

CEQA ADDENDUM

Initial Study/Mitigated Negative Declaration

SCH No. 2023090132

The Oak at Ardmore Townhouses

Assessor Parcel Number: 025-362-050

Location: 2930 Union Road

Paso Robles, CA

Planned Development (PD25-14)

Rezone (RZN 25-03)

Vesting Tentative Tract Map (VTTM 3255)

Conditional Use Permit (CUP25-05)

Oak Tree Removal (OTR25-09)

Applicant:

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I. INTRODUCTION

A. Determination

The City of Paso Robles is processing an application for the Oak at Ardmore Townhouses, a 154-unit residential project (“ Project”) located at 2930 Union Road (APN: 025-362-050). The Project will replace the previously approved Covelop development at this same location, which was originally entitled with a mixed-use commercial and light industrial project consisting of approximately 240,000 square feet of commercial/light-industrial space spanning six buildings.

This document constitutes an Addendum to the February 2024 Mitigated Negative Declaration (MND or 2024 MND) prepared for the Covelop development (Planned Development 22-20, Conditional Use Permit 22-20, Vesting Tentative Parcel Map 22-0054, Oak Tree Removal 23-11). This Addendum evaluates whether the Project would result in any new or substantially more adverse significant effects or require any new or modified mitigation measures as compared to the 2024 MND which required minimal mitigation measures specific to biological and cultural resources.

As lead agency, and as part of the City’s due diligence, the City required a supplemental Noise Analysis, supplemental Arborist Report, and supplemental Air Quality and Greenhouse Gas Emissions Analysis to determine if the Project would result in any new or more severe significant effects not identified in the original MND. Based on these studies, and a full analysis of the scope of the Project, and the previously adopted 2024 MND, none of the criteria specified in CEQA Guidelines section 15162 requiring a subsequent or supplemental environmental document to be prepared is triggered. In particular, there have been no: (1) substantial changes in the project that will require major revisions to the previous MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effect; (2) substantial changes with respect to the circumstances under which the Project is undertaken that will require major revisions to the previous MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effect; and (3) new information of substantial importance that was not known and could not have been known at the time the previous MND was adopted that shows: (a) the Project would have significant effects not discussed in the previous MND; (b) the Project would have more severe environmental effects; or (4) mitigation measures previously found to be infeasible or new mitigation measures now exist and would be feasible and would reduce significant effects. Therefore, an addendum is the appropriate document under CEQA to analyze the consistency of the Project with the type and intensity of development previously analyzed for the site in the MND as provided for in CEQA Guidelines section 15162 and 15164.

This Addendum incorporates the mitigation measures detailed in the MND. The incorporation of these measures ensures that previously adopted mitigation will be implemented for the Project and that no significant impacts will result from the Project and no new or increased significant impacts will result from the Project. No new or modified mitigation is available, and all impacts will be reduced to a less-than-significant level with the existing mitigation measures.

B. Background

Exhibit A

On February 20, 2024, the City of Paso Robles City Council approved a mixed-use commercial and light industrial project consisting of a Vesting Tentative Parcel Map (PR22-0054) to subdivide Lot 6 into two parcels; a Conditional Use Permit/Development Permit (PD22-20) for the construction of six commercial/light industrial buildings; and an Oak Tree Removal Permit (OTR23-11) for the removal of six oak trees. The entitlement was supported by a Mitigated Negative Declaration with specific conditions of approval and accompanying mitigation measures.

Since the time of approval, the applicant has reevaluated the site's development potential considering evolving market demands, the City's housing objectives, and the City's 5-year Economic Development Strategic Plan. The applicant is proposing a new project on the site that reflects a balanced approach to providing housing that is affordable by design, supports homeownership opportunities, and leverages the site's urban location to offer residents convenient access to jobs, transit, services, and community amenities.

The proposed Project now includes a Mixed-Use and Special Planned Development overlay zoning district, a Phased Vesting Tentative Tract Map (TR 3225), Conditional Use Permit/Planned Development, Development Plan Modification, and Oak Tree Removal Permit to facilitate the development of a 154-unit residential multi-family housing development. Therefore, the Project applicant is now seeking the following entitlements to allow for construction of a residential project consistent with the 2024 MND, related CEQA documents, and the City's General Plan:

- Rezone to include a Mixed-Use Overlay
- Special Planned Development Overlay
- Planned Development
- Conditional Use Permit
- Phased Vesting Tentative Tract Map
- Oak Tree Removal

C. Addendum Purpose

The purpose of this Addendum is to analyze the consistency of the Project with the type and intensity of uses previously analyzed for the site in the 2024 MND and related environmental documents. As documented in this Addendum, none of the conditions stated in CEQA Guidelines section 15162 have been met and therefore there is no need for a subsequent environmental impact report. This Addendum, together with the MND, and those previous environmental documents incorporated by reference, will be relied on by the City when considering approval of the Project.

This Addendum has been prepared to comply with CEQA Guidelines section 15164 and Public Resources Code sections 21083 and 21166.¹ The Addendum uses an environmental checklist to evaluate each environmental topic area within Appendix G of the CEQA Guidelines. This

¹ / See *Save Our Heritage Organisation v. City of San Diego* (2018) 28 Cal.App.5th 656, 668.

Addendum applies to the current action only; any future development proposals that are not part of the proposed Project will be subject to their own consistency determinations and potential subsequent CEQA review.

D. CEQA Framework for Addendum

CEQA Guidelines sections 15162 and 15164 provide that an addendum to an adopted MND may be prepared when the conditions for subsequent or supplemental review are not present. (CEQA Guidelines, § 15164.)² Subsequent or supplemental review is only required when substantial changes to a project require major revisions of a previous environmental document due to new or increased substantial environmental impacts, or where new information of substantial importance has been uncovered that indicates the project would create new impacts or increase the severity of existing impacts. (CEQA Guidelines, §§ 15162, subd. (a), 15164, subd. (b).)

Subsequent environmental review is only necessary if one or more of the following has occurred:

- Substantial changes are proposed for the project that will require major revision of a previous Negative Declaration due to the involvement of new, significant environmental effects or a substantial increase in the severity of previously identified effects;
- Substantial changes with respect to the circumstances under which the project is undertaken, requiring major revision to a previous Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified ones;
- New information of substantial importance that was not known or could not have been known without the exercise of reasonable diligence at the time the previous Negative Declaration was adopted shows any of the following:
 - The project will have one or more significant effects not discussed in the previous Negative Declaration.
 - Significant effects previously examined will be substantially more severe than disclosed in the previous Negative Declaration.
 - Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt them.
 - Mitigation measures or alternatives that are considerably different from those analyzed in the previous document would substantially reduce one or more

² / When project changes “[do] not raise any new effects which the [MND] had not already reviewed and analyzed” then preparation of a subsequent environmental document is not warranted. (*River Valley Preservation Project v. Metropolitan Transit Development Bd.* (1995) 37 Cal.App.4th 154, 177; see also *Santa Teresa Citizen Action Group v. City of San Jose* (2003) 114 Cal.App.4th 689, 704.)

significant effects, but the project proponents decline to adopt the measures or alternative.

II. PROJECT DESCRIPTION

The project site is a +/- 12.98-acre property located at 2930 Union Road, Lots 6 & 13 of APN 025-362-050, in the City of Paso Robles and is situated 0.25 miles south of Highway 46 East and 2.3 miles east of downtown Paso Robles. The site has existing access from Ardmore Road. The parcel is zoned Commercial/Light Industrial (C3) and has Planned Development (PD) overlay and Special Planned Overlay “F” (C3-PD, District “F” Overlay).

The Project is a 154-unit residential subdivision, including ten common lots, a private clubhouse, right-of-way dedication for the Ardmore Road extension, subdivision improvements including private access roads, pedestrian walkways, drainage conveyance systems, retention basins, waste enclosures, street lighting, and utility connections. The project includes the following entitlement requests:

- **Rezone 25-03 (“RZN25-03”):**
 - To establish a Mixed-Use Overlay to allow residential uses by-right, in addition to a request for an allocation of 154 surplus density units;
 - To establish a Special Planned Development Overlay (“SPD Zoning Overlay K”) to allow:
 - Reduced setbacks including zero lot line development as part of the associated development plan;
 - Exceptions to the Special Planned Development Overlay “F” designation as outlined by PRMC Section 21.04.070, to eliminate the requirement for a solid wall adjacent to residentially zoned land;
- **Planned Development 25-14 (“PD25-14”) and Conditional Use Permit 25-05 (“CUP25-05”):**
 - To establish a 154-unit residential development;
- **Modification 26-04 (“MOD26-04”)**
 - To allow deviations from specific Zoning Code development standards, including:
 - *Objective Design Standard Tier 1* – A portion of the project’s frontage along Ardmore Road (facing west) will not have pedestrian-oriented entries along the street frontage;
 - *Objective Design Standard Tier 4* – The project incorporates only one (1) out of the two (2) required design strategies for roofs;
 - *Objective Design Standard Eave Projections* – The project will have eaves that project between 0 and 12 inches beyond the roofline, instead of the required 18 inches;
 - *Hillside Development Standards* – The project will include retaining walls in five locations throughout the project site in which the heights exceed the six-foot maximum height by more than two feet; and

Exhibit A

- **Vesting Tentative Tract Map 3255 (“VTTM 3255”):**
 - To subdivide the site into 154 individual fee-simple residential lots, ten common lots, and the proposed right-of-way for the Ardmore Road extension; and
- **Oak Tree Removal 25-09 (“OTR25-09”)**
 - To allow the removal of six (6) Valley Oak trees totaling 265-inches, and the replanting of thirty-four (34) 2-inch diameter mitigation Oak trees.



The Project consists of 34 residential buildings containing a total of 154 townhome units, resulting in an overall density of 11.86 dwelling units per acre. All units will include a private entry, an attached one- or two-car garage, and a private outdoor area. All townhomes will share a consistent architectural language characterized by similar massing, complementary rooflines, and cohesive color and material palettes to create a unified yet visually interesting streetscape. Subtle variations in unit design, façade articulation, and roof pitch help break up massing and enhance neighborhood character.

The proposed Clubhouse is a single-story facility centrally located within the project site, designed to offer shared indoor and outdoor amenities that promote social interaction and recreation. The building includes approximately 3,019 sq. ft. of interior space, plus an adjacent covered patio and pool deck. Outdoor amenities include a 1,177 sq. ft. covered patio for dining and seating, a 711 sq. ft. pool, and a 2,455 sq. ft. pool deck with lounge furniture. Together, the clubhouse and outdoor spaces serve as the neighborhood’s primary gathering hub.

The proposed landscape plan covers approximately 199,841 sq. ft. and emphasizes adaptive, drought-tolerant planting throughout the site. The diverse plant palette includes over 254 trees, featuring native species such as Valley Oak and California Sycamore, as well as accent and shade trees like Red Maple, Ginkgo, Marina Arbutus, Crape Myrtle, and Tulip Tree.

Landscaped areas are organized into distinct zones, including shaded pedestrian walkways, bocce ball courts, picnic spaces, passive recreation lawns, and a woodland-themed natural play

Exhibit A

area. Flexible recreational spaces, such as synthetic turf mounds and temporary soccer nets, support informal activities without requiring permanent hardscape courts. Bioretention areas and stormwater basins are planted with species such as Berkeley Sedge, Muhlenbergia, and native rushes to manage runoff and promote infiltration.

Existing Zoning

The property is zoned Commercial/Light Industrial (C3) with a Planned Development (PD) overlay. It is also subject to Special Planned Development Overlay “F,” which includes various stipulations intended to ensure compatibility with adjacent residentially zoned properties. Because the C3 zoning designation does not allow residential uses by right, the project requires a Mixed-Use Overlay be applied to the site, which is described further below. The PD Overlay is applied to properties where a formal Development Plan is required, regardless of whether the project otherwise meets the standard thresholds and would trigger discretionary review.

Mixed-Use (MU) Overlay

The Project will redesignate the site with a Mixed-Use (MU) overlay to allow a phased subdivision of the property into 154 residential multi-family lots. The purpose of the MU Overlay zoning is to provide for locations appropriate for development of multi-family residential in nonresidential zoning districts, either in combination with commercial uses or as stand-alone residential development projects.

Special Planned Development (SPD) Overlay

A Special Planned Development (SPD) Overlay District “K” is also requested to allow zero-lot line development and eliminate a requirement for a solid wall adjacent to residentially zoned land. The purpose of the SPD overlay is to provide for innovation and flexibility in the design of residential, mixed-use commercial and industrial developments, with findings to be made by the City Council in order to be approved.

The Project is intended to deliver housing that is affordable by design, featuring smaller lots and attached townhomes, while also providing neighborhood amenities and streetscape enhancements. The SPD overlay is necessary for this project since it allows the project to be designed specifically with zero-lot line setbacks, enabling the townhome configuration which is not otherwise achieved under the base C3 zoning development standards.

Also as part of the SPD Overlay, the site is seeking to be relieved from a stipulation created by Overlay “F” and to eliminate the requirement for a solid wall adjacent to residentially zoned land, which is no longer necessary since it was originally required only for commercial development.

Modifications to Objective Design Standards

The Project includes a request to modify several standards of the Paso Robles Municipal Code. The first modification is from the Building Orientation Tier 1 Design Strategy outlined in PRMC Section 21.50.050.B.1, to waive the requirement that townhomes along Ardmore Road include pedestrian-oriented entries facing the street. To address the intent of the standard and maintain a strong streetscape presence, the rear elevations have been enhanced with upgraded frontage treatments, including 3-foot-tall wood fencing dual-sided landscaping, and courtyard-oriented

Exhibit A

designs featuring covered porches designed to appear as front entries. These elements create the visual impression of pedestrian entryways, strengthening the streetscape and enhancing the overall appearance along Ardmore Road. All mechanical equipment will be fully screened, and a mix of shrubs and trees will further soften and enrich the pedestrian environment. Gates are not proposed. Fence maintenance will be managed by the HOA to ensure routine upkeep and timely repairs, preventing deterioration.

A modification to the Tier 4 Design Strategies (Roofs) outlined in PRMC Section 21.50.050.E is requested to allow implementation of one complete strategy, supplemented by portions of other strategies, rather than requiring two complete strategies. The project fully complies with Strategy 6.c, incorporating gables along at least 40% of all façade lengths. In addition, the design integrates key elements from several other strategies, collectively achieving the intent of promoting architectural variety and visual interest. These elements include:

- Roof height variations exceeding 18 inches on most elevations.
- Dormers provided along certain right-of-way-facing facades in accordance with Sub-Standard 1, though covering less than 50% of those elevations.
- Substantial eave and rake projections consistent with Sub-Standard 2, though slightly less than 2 feet in depth.
- Accent standing seam metal roofing consistent with Sub-Standards 5 and 7, applied to less than 25% of some roof lines and under 50% of the total roof area.

A modification to the eave projection standards in PRMC Section 21.50.060.C.2.c is requested to allow eaves to project between 0 and 12 inches beyond the roofline, instead of the required 18 inches. Due to the project's affordable design, featuring smaller lot sizes and reduced or zero-lot-line setbacks, eaves extending more than 12 inches would encroach over the exterior property lines. Additionally, in certain instances where interior lot lines terminate at the roof edge, zero-inch eaves are proposed. Because the project provides one complete roof objective design standard along with key elements from five additional objective design standards, the reduction in eave projection would not diminish architectural variety or the overall visual interest of the roof.

A modification to PRMC Section 21.81.040.D.1.a is requested to allow rear-yard retaining walls to exceed the six-foot maximum height by two feet or more in limited instances, consistent with PRMC Section 21.81.050. Due to both onsite and offsite topographical and drainage constraints, this modification is necessary to facilitate development and support required drainage basins. In five locations, retaining walls exceed six feet in height; however, in only two of these instances does the visible height exceed six feet.

- Section A: An eight-foot retaining wall with a concrete bypass channel is proposed along the southern property line behind Lots 88–92. When standing at the adjacent property line, on the opposite side of the four-foot-wide bypass channel, the exterior visible height of the wall is approximately five feet. Tall annual grasses grow on the adjacent property to provide natural screening from off-site minimizing offsite visual impacts. Further, there are no public vantage views from this portion of the project site, and the nearest residence is over 1,000 feet away. The retaining wall is not visible from within the site.

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- Section B: A six-foot nine-inch retaining wall is proposed along the eastern property line behind Lot 79 and is visible from the interior of the lot. This condition occurs entirely within the private rear yard, does not result in offsite visual impacts, and is driven by site-grading constraints necessary to accommodate development. The wall configuration will be apparent to future property owners at the time of purchase but does not create an unreasonable visual condition.
- Section C: An eight-foot retaining wall is proposed along the east side of Basin C. The wall is only visible from within the site. When standing at the edge of Basin C, which will be fenced, the visible height is less than six feet. In addition, when the basin contains water, the visible height of the wall is further reduced. Drainage basin landscaping will further help soften the massing of the wall.
- Section F: An eight-foot six-inch retaining wall is proposed along the north side of Basin C and Lot 17. This wall borders an agricultural field and will be visible from offsite. However, tall annual grasses grow on the adjacent property and will provide natural screening to minimize offsite visual impacts. The nearest residence is over 600 feet away, with variations in topography, therefore the wall will not be highly visible. Due to onsite and offsite drainage patterns and site-grading constraints, Basin C must be located in this position, and the associated retaining wall is necessary to support the basin and ensure compliance with stormwater performance standards.
- Section G: An eight-foot nine-inch retaining wall is proposed along the west side of Lots 106–109. Due to the sloping topography to the west, the visible height of the wall is less than six feet at a distance of approximately ten feet from the wall. This property line is shared with Spurr Construction and is bordered by an existing six-foot-tall chain-link fence with privacy slats, which effectively reduces the visible height to less than six feet. Tall annual grasses grow on the adjacent property to provide natural screening from off-site minimizing offsite visual impacts.
- Section H: Similar to Section G, an eight-foot one-inch retaining wall is proposed along the west side of Lots 110–113. While the topography slopes more gently in this area, the wall is adjacent to Spurr Construction and screened by an existing six-foot-tall chain-link fence with privacy slats, which effectively reduces the visible height to less than six feet. Tall annual grasses grow on the adjacent property to provide natural screening from off-site minimizing offsite visual impacts.

Oak Tree Assessment

An Oak Tree Assessment Report was prepared by Heritage Tree Arboricultural Consulting (“Heritage”) in October 2022 for the previously approved Planned Development/Conditional Use Permit (PD22-20). The assessment concluded that six trees proposed for removal (Tree # 1, 2, 3, 4, 9, and 11) were in poor or very poor condition, with imminent catastrophic failure due to internal fungal root and butt rot. Two additional trees (Tree # 11 and 13) were proposed for protection and were assessed as being in poor and good condition, respectively. An Oak Tree Removal Permit (OTR23-11) was subsequently approved for the removal of the six trees.

Exhibit A

Since that assessment, Tree #3 has since fallen. In light of this and the project’s change from an industrial to a residential use, Heritage prepared an updated assessment in July 2025 to reevaluate Tree #13, which was previously identified as being in good condition but at high risk of trunk failure due to advanced internal decay. A July 2025 reassessment was conducted by HTAC that reconfirmed that Tree #13, a 42-inch native oak, remains at high risk of structural failure. Resistograph testing showed significant internal decay, with up to 77% radial wood loss in some areas. While the tree was previously proposed for retention under the industrial use scenario with protective fencing, the transition to residential use introduces more frequent and prolonged public access, including by children. Due to the increased potential for injury, the consulting arborist now recommends removal of Tree #13. Oak tree removals approved as part of this Project would be mitigated in accordance with the City Zoning Code, requiring replacement plantings on an inch for inch basis of 25% of the inches of diameter at breast height of the oak trees removed. Additionally, the project has been designed in a manner to protect the Tree No. 10 and protection measures such as protection fencing will be required as conditions of approval. As a result of the trees being removed being in poor condition and mitigation oak trees will be planted on site as outlined in the City’s Oak Preservation Ordinance, this Project’s impacts on oak trees will remain as being less than significant.

Water and Sewer

A Water Use Evaluation was prepared by Wallace Group in July 2025 to estimate projected domestic water demand and sewer flows associated with the project and was updated in November 2025 to include peak day and peak hour flow data. Landscaping water demand estimates were completed separately by RRM in August 2025.

As demonstrated by those studies, the Project is anticipated to generate approximately 7.71 AFY of irrigation demand (Table 6), 33.57 AFY of domestic water demand (Table 7), and an estimated sewer flow of 20,696 gallons per day (Table 8). The project will connect to the City’s water and sewer systems.

Table 6: Landscaping Water Demand Calculations

Reference Evapotranspiration (Eto)			49.0				
Hydrozone # /Planting Description*	Plant Factor (PF)	Irrigation Method	Irrigation Efficiency (IE)	ETAF (PF/IE)	Landscape Area (Sq, ft)	ETAF x Area	Estimated Total Water Use (ETWU)
Regular Landscape Areas							
Low Use Shrubs	0.25	Drip	0.81	0.31	164,123	50655.25	1,538,906
Low Use Trees	0.25	Bubbler	0.81	0.31	800	246.91	7,501
Mod Use Trees	0.5	Bubbler	0.81	0.62	700	432.10	13,127
Basins	0.25	Spray	0.75	0.33	15,901	5300.33	161,024
				Totals	181524	56634.59	1,720,559
Special Landscape Areas							
Play Field				1	0		0
Edibles				1	0		0
SLA Basin				1	19817		602,040
				Totals	19817		602,040
						ETWU Total	2,322,599
						Maximum Allowed Water Allowance (MAWA)	3,635,125

Table 7: Domestic Water Demand Calculations

Average Daily Flow (gpd)	AREA	UNIT	No. of Units	Irrigation Demand Factor	Occupancy ² persons/unit	Demand Factor	Water Demand (afy)
WATER DEMAND							
Multifamily							
Indoor Water Demand			154		2.66	50 gpcd	22.94
Outdoor Water Demand	4.59	AC		2.25	n/a	n/a	10.32
Clubhouse with Pool							
Indoor Water Demand	3,000	SF	3			0.08 afy/ksf	0.24
Outdoor Water Demand (Pool Evap)	650	SF	1			54 gal/day	0.06
Total							33.57

Table 8: Sewer Flow Rates

			No. of Units		Occupancy ² persons/unit	Per Capita Sewage Flow (gpcd)	Sewage Flow
SEWER FLOW							
Multifamily							
Average Daily Flow (gpd)			154		2.66	50	20,482
Design Flow Rate (gpm) ¹							28
Clubhouse with Pool							
Average Daily Flow (gpd)						214	214
Design Flow Rate (gpm) ¹							0.30
Total							20,696

Noise

An Acoustic Study was completed by 45 dB in March 2023 for the previously approved commercial and light industrial project (P22-20), concluding that noise impacts would be less than significant and consistent with both daytime and nighttime standards in the Municipal Code. In January 2025, 45 dB prepared a supplemental memo evaluating the conversion of the site to a residential housing development. The memo reconfirmed the ambient noise levels identified in the 2023 study and determined that the proposed residential use would remain compatible with surrounding conditions, with outdoor noise levels below the 65 dBA threshold and interior levels projected at DNL 36 dBA, well under the 45 dBA interior limit for Residential receiving land uses.

Air Quality and Greenhouse Gas Emissions

An Air Quality and Greenhouse Gas Emissions Analysis was completed by LSA in April 2023 for the previously approved Covelop project (P22-20). The study found no conflicts with the 2001 Air Plan and determined that construction and operation would not generate air pollutants or GHG emissions exceeding SLO County APCD thresholds, impact sensitive receptors, or create objectionable odors.

In September 2024, LSA prepared a supplemental memo evaluating a residential project and confirmed it would also remain below all significance thresholds, concluding that no significant impacts would occur for a project with fewer than 330 multi-family units; therefore, this Project remains consistent with the prior analysis given it is 154-units.

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Biological Resources

A Biological Resources Assessment was completed by David Wolff Environmental in July 2023 for the previously approved Covelop project (P22-20), concluding that with implementation of recommended mitigation measures for nesting birds and San Joaquin Kit Fox, impacts would be less than significant. The proposed Project involves an equal amount of site disturbance as the approved project, and with the same mitigation measures, it will result in no significant biological impacts.

Cultural Resources

A Phase 1 Archaeological Study was completed by Padre Associates in July 2022 for the previously approved Covelop project (P22-20) and found no cultural resources within the project area, concluding that no further archaeological work is required. Since the proposed Project is within the same study area, no impacts to cultural resources are anticipated.

Transportation

A Transportation Analysis was completed by CCTC in December 2022 for the previously approved Covelop project (P22-0020), concluding the project would generate 1,194 average daily trips, with 117 AM peak hour trips and 158 PM peak hour trips, and that no VMT or intersection impacts would occur.

In September 2025, CCTC compared the approved trips to the proposed trips and found that the new project would generate fewer daily and peak hour trips. Therefore, the proposed Project would result in lower traffic impacts than the approved project and would not cause significant impacts on intersection operations or VMTs.

Ardmore Trip Generation (2025)								
Land Use	Size Unit	Daily	AM Peak Hour			PM Peak Hour		
		Total	In	Out	Total	In	Out	Total
<i>Total Project Trips from December 2022 TIS</i>		-1,194	-86	-31	-117	-59	-99	-158
Townhomes (August 2025 Submittal) ¹	154 DU	1,009	19	57	76	46	34	80
Net New Project Trips		-185	-67	26	-41	-13	-65	-78

DU=Dwelling Unit; ITE = Institute of Transportation Engineers.

1. ITE Land Use Code #215, Single Family Attached Housing. Fitted curve equations used.

Source: ITE Trip Generation Manual, 12th Edition and Trip Generation Handbook, 3rd Edition.

Project would produce less trips than the previously approved project and would therefore not significantly impact intersection operations or VMT consistent with the 2022 TIS.

III. CONSISTENCY DETERMINATION

The project site has been previously analyzed under CEQA and approved for the development of a mixed-use commercial and light industrial complex. The environmental determinations for the Covelop project included environmental review in accordance with CEQA resulting in the 2024 MND that addressed potentially significant environmental impacts for Biological Resources and Cultural Resources. Mitigation measures for the 2024 MND addressed the potentially significant impacts specific to nesting birds, San Joaquin Kit Fox, and potential for encountering human remains during ground disturbance activities.

The proposed Project is requesting a zone change to include a Mixed-Use Overlay which would allow the development to include residential uses in addition to the underlying commercial/industrial zoning. With the Project's specific request, there would no longer be a commercial/industrial complex component. The Project involves an equal amount of site disturbance as the previously approved Covelop project, and demonstrates it will have more landscaped areas and less hardscaped areas than the previous Covelop project. Additionally, the proposed Project aligns with General Plan and Economic Strategy objectives by providing new housing opportunities within an urbanized area, increasing the City's housing supply, and promoting community development in a compact and potentially walkable form. General Plan Land Use Policy 1A is to "provide an appropriate mix and diversity of land uses" and Policy 2I is to "Encourage infill development as a means of accommodating growth while preserving open spaces areas, reducing vehicle miles travelled and enhancing livability/quality of live."

Because development of similar scope and impact on the site has been fully evaluated through the previous MND and related CEQA documents, the Project would have no new significant effects and, with adoption of the conditions of approval and mitigation measures previously identified in conjunction with the previous 2024 MND, any significant effects previously identified would be mitigated to a less-than-significant level.

IV. ENVIRONMENTAL ANALYSIS

A. Description of Environmental Checklist

The checklist includes the full range of environmental issues presented in the most recent version of Appendix G of the CEQA Guidelines. Pursuant to CEQA Guidelines section 15162, this checklist evaluates environmental topics in terms of any "changed condition" (i.e., changed circumstances, project changes, or new information of substantial importance) that may result in a different environmental impact significance conclusion than that reached in the MND. If the situations described in CEQA Guidelines section 15162 are not present, then no subsequent EIR or initial study/negative declaration is required, and an addendum is the appropriate CEQA document.

The column headings in the checklist have been modified from the Appendix G version to assess whether the conditions described in CEQA Guidelines section 15162 are present. The checklist offers the following: (1) identification of the earlier analyses and where they are available in prior document(s) for review; (2) discusses whether proposed deviations from the previously analyzed program would involve new or substantially more severe significant impacts; (3) discusses whether new circumstances surrounding the previously-analyzed program would involve new or substantially more severe significant impacts; (4) discusses any substantially important new information requiring new analysis; and (5) describes the mitigation measures that were incorporated from the prior document(s) and the extent to which they address any site specific conditions for the Project. (CEQA Guidelines, § 15162, subdivision (a).) Each column is described in more detail below. The issue-area checklists are followed by a discussion that explains the results and provides site-specific analysis as warranted.

1. Where Was Impact Analyzed?

This column references the pages of the previous MND where information and analysis relative to the environmental issue at hand can be found.

2. Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Pursuant to CEQA Guidelines section 15162, subdivision (a)(1), this column indicates whether proposed changes (if any) represented by the Project will result in new significant impacts not disclosed in the 2024 MND or that the Project will result in substantial increases in the severity of previously identified significant impact. A “yes” answer is only required if such new or worsened significant impact will require “major revisions of the previous EIR or negative declaration.” If a “yes” answer is given, additional mitigation measures or alternatives may be needed. Conversely, a “no” answer does not mean that there are no potential impacts relative to the environmental issues, but only that there is no change in the condition or status of the impact since it was analyzed and addressed with mitigation measures in the prior approved environmental documents.

3. Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?

Pursuant to CEQA Guidelines section 15162, subdivision (a)(2), this column indicates whether changed circumstances affecting the Project will result in new significant impacts not disclosed in the 2024 MND or will result in substantial increases in the severity of previously identified significant impacts. A “yes” answer is only required if such new or worsened significant impacts will require “major revisions of the previous EIR or negative declaration.” A “yes” answer is only required if such new or worsened significant impacts will require “major revisions of the previous EIR or negative declaration.” If a “yes” answer is given, additional mitigation measures or alternatives may be needed. Conversely, a “no” answer does not mean that there are no potential impacts relative to the environmental issue, but only that there is no change in the condition or status of the impact since it was analyzed and addressed with mitigation measures in the prior approved environmental documents.

4. Any New Information of Substantial Importance Requiring New Analysis or Verification?

Pursuant to CEQA Guidelines section 15162, subdivision (a)(3), this column indicates whether new information “of substantial importance” is available requiring an update to the analysis of the 2024 MND to verify that the environmental conclusions and mitigations remain valid. Any such information is only relevant if it “was not known and could not have been known with reasonable diligence at the time of the previous EIR.” To be relevant in this context, such new information must show one or more of the following:

- (A) The project will have one or more significant effects not discussed in the previous

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- EIR or negative declaration;
- (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR or negative declaration;
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR or negative declaration would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measures or alternative.

This category of new information may apply to any new regulations enacted after certification of the prior EIR or adoption of the prior negative declaration, which might change the nature of analysis of impacts or the specifications of a mitigation measure. If the new information shows the existence of new significant effects or significant effects that are substantially more severe than were previously disclosed, then new mitigation measures should be considered. If the new information shows that previously rejected mitigation measures or alternatives are now feasible, such measures or alternatives should be considered anew. If the new information shows the existence of mitigation measures or alternatives that are (i) considerably different from those included in the prior EIR or negative declaration, (ii) able to substantially reduce one or more significant effects, and (iii) unacceptable to the project proponents, then such mitigation measures or alternatives should also be considered.

5. What Prior Environmental Document's Mitigation Measures Address Impacts

Pursuant to Public Resources Code section 21083.3, this column indicates whether the 2024 MND and/or the findings adopted by the lead agency provides mitigation measures to address effects in the related impact category. In some cases, the mitigation measures have already been implemented. A "yes" response will be provided in either instance. If "n/a" is indicated, this environmental review concludes that the impact does not occur with this Project and therefore no mitigation is needed.

B. Checklist and Discussion

1. AESTHETICS.					
<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Have a substantial adverse effect on a scenic vista?	MND, p. 5	No	No	No	None required.
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	MND, p. 5	No	No	No	None required.
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	MND, p. 5	No	No	No <i>(Refer to Project Plans and Project Description)</i>	None required.
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	MND, p. 5	No	No	No	None required.

Discussion: The project site is adjacent to an urbanized area of the City with existing commercial and industrial development to the west and residential uses to the east. The site has some visibility from local roadways, but is mostly surrounded by open fields. Existing uses on the project site consist of abandoned agricultural structures and a +/- 12 acres of horse pasture. The visual quality of the site is moderately high since it is mostly undeveloped. The site is not within or adjacent to a scenic vista, gateway, or scenic highway as designated by the City’s General Plan or other adopted plans or policies. Therefore, the Project could not result in a substantial impact on scenic resources.

The Project does not involve any element that might result in a new significant or substantially more severe impacts to aesthetics. The Project is subject to both the Special Planned Development (SPD) and Planned Development (PD) process and requires the Planning Commission and City Council to make specific findings, including that the Project would not have an adverse effect on public views from nearby roadways and other public vantage points and that the design and intensity of the Project would not be a disharmonious or disruptive element of the neighborhood, that the project is sensitive to the natural topography of the site. Consistent with the MND, the SPD and PD process would ensure that the Project is developed in a manner that does not degrade existing visual character and quality. The SPD Overlay “K” is necessary for the project since, due to the nature of the townhomes being attached, zero lot line development can only be established with the special overlay. Zero-lot line development does not diminish the aesthetics of the project though but instead offers an opportunity for more visual variation to be contemplated as part of the project’s PD process. Also, as part of the SPD Overlay, the site is seeking to be relieved from a stipulation created by Overlay “F” and to eliminate the requirement for a solid wall adjacent to residentially zoned land, which is no longer necessary since it was originally required only for commercial development. A residential fence in place of a masonry wall will be more compatible with future residential uses along the southern boundary, creating a more harmonious transition between the two properties. Further, the modifications to the retaining wall heights as described in the project

description are sensitive to the natural topography of the site, minimizes alterations to the land, and maintains and enhances significant natural resources, since there is an associated development plan that includes a well-thought grading plan which has been designed to work with existing landforms where feasible, and retaining walls are located in specific, functionally necessary locations to accommodate slope conditions and support required drainage features and development. The adjustment to SPD Overlay “F” to eliminate the requirement for a solid wall adjacent to residentially zoned land will not change the aesthetics of this areas, since the original requirement was only for commercial development. As a residential project, traditional wood fencing and/or non-masonry fencing is a more compatible building material. The adjustments being made to the objective design standards are minor in scope, with architectural requirements for residential uses being more stringent than the requirements for the prior Covelop project. Overall, the massing and architecture of the residential buildings are vast improvements for this area, and will not result in more severe impacts.

The Project proposes a coordinated site lighting plan that balances visibility, safety, and design aesthetics throughout the residential community. Lighting will be installed along pedestrian walkways, drive aisles, parking areas, and shared community spaces. In the time since the MND was approved, the City has adopted newer and more stringent lighting standards that this Project will be required to adhere to, including reduced heights for parking lot pole lights, reduced Kelvin rating, and more pronounced shielding of the light source. With these new standards, the Project will not result in significant new light or glare onto the surrounding properties. Therefore, the proposed Project will result in less than significant impacts from light or glare.

In summary, the Project does not involve any element that might result in a new significant or substantially more severe impact to aesthetic resources. Any unanticipated impacts to aesthetic resources that might occur as a result of the Project would be within the scope of those discussed in the 2024 MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe impacts to aesthetic resources in relation to the Project.

Mitigation Measures: None required.

Conclusion: The Project would not have any new significant or substantially more severe impacts to aesthetic resources (CEQA Guidelines § 15162(a)).

2. AGRICULTURE AND FOREST RESOURCES.					
<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	MND, p. 6	No	No	No	None required.
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	MND, p. 6	No	No	No	None required.
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland	MND, p. 6	No	No	No	None required.

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Production (as defined by Government Code section 51104(g))?					
d. Result in the loss of forest land or conversion of forest land to non-forest use?	MND, p. 6	No	No	No	None required.
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	MND, p. 6	No	No	No	None required.

Discussion: The project site is designated in the General Plan and is zoned on the City’s Zoning Map for commercial development. The property is not identified in the City General Plan, Conservation Element (Figure OS-1, Important Farmland) as having either prime or unique farmland of statewide importance. Therefore, the Project would not result in impacts on converting prime or other significant soils to urban land uses.

The Project would not conflict with zoning for agricultural use. The project site is not zoned for agriculture and is not under a Williamson Act Contract. Therefore, the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract and would result in no impact.

As for forest resources, the project site does not include any forest or timberland since these resources do not exist within the City of Paso Robles and would not cause any changes to forest resources.

In summary, the Project does not involve any element that might result in a new significant or substantially more severe impact to agricultural or forest resources. Any unanticipated impacts to agricultural or forest resources that might occur as a result of the Project would be within the scope of those discussed in the 2024 MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe impacts to agricultural or forest resources in relation to the Project.

Mitigation Measures: None required.

Conclusion: The Project would not have any new significant or substantially more severe impacts to agricultural or forest resources (CEQA Guidelines § 15162(a)).

3. AIR QUALITY.					
<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Conflict with or obstruct implementation of the applicable air quality plan?	MND, p. 7-8	No	No	No <i>(Refer to 2024 LSA Supplemental Memo)</i>	None required.
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	MND, p. 7-8	No	No	No <i>(Refer to 2024 LSA Supplemental Memo)</i>	None required.

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c. Expose sensitive receptors to substantial pollutant concentrations?	MND, p. 7-8	No	No	No <i>(Refer to 2024 LSA Supplemental Memo)</i>	None required.
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	MND, p. 7-8	No	No	No <i>(Refer to 2024 LSA Supplemental Memo)</i>	None required.

Discussion: An Air Quality and Greenhouse Gas Emissions Analysis was originally completed by LSA in April 2023 for the previously approved Covelop project. The study found no conflicts with the 2001 Air Plan and determined that construction and operation would not generate air pollutants or GHG emissions exceeding SLO County APCD thresholds, impact sensitive receptors, or create objectionable odors.

In September 2024, LSA prepared a supplemental memo evaluating the proposed residential Project and confirmed it would also remain below all significance thresholds. The memo concluded that no significant impacts would occur for a project with fewer than 330 multi-family units. Because this Project proposed 154-units, well below the 330-unit threshold, this project remains consistent with the prior analysis.

In summary, the Project does not involve any element that might result in a new significant or substantially more severe impact to air quality. Any unanticipated impacts to air quality that might occur as a result of the Project would be within the scope of those discussed in the 2024 MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe impacts to air quality in relation to the Project.

Mitigation Measures: None required.

Conclusion: The Project would not have any new significant or substantially more severe impacts to air quality (CEQA Guidelines § 15162(a)).

4. BIOLOGICAL RESOURCES.

<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	MND, p. 9-11	No	No	No	MM BIO 1 through 2
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish	MND, p. 9-11	No	No	No	None required.

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and Game or US Fish and Wildlife Service?					
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	MND, p. 9-11	No	No	No	None required.
d. Interfere substantially with the movement of any native resident or migratory fish and wildlife Species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	MND, p. 9-11	No	No	No	None required.
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	MND, p. 9-11	No	No	No <i>(Refer to 2025 HTAC Supplemental Memo)</i>	None required.
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	MND, p. 9-11	No	No	No	None required.

Discussion: A Biological Resource Assessment (BRA) was originally prepared by David Wolff Environmental, LLC, dated July 24, 2023 for the previously approved Covelop project. The BRA studied the 14-acre study area for biological resources, and concluded that there are no special status plant species within the project site. Additionally, no special status wildlife species or evidence of nesting birds was identified. The BRA did indicate that the project site may provide suitable habitat to support some special-status wildlife species, based on suitable habitat and regional (less than five miles) documented occurrences. These species include the San Joaquin Kit Fox (SJKF) and migratory nesting birds. Based on the potential impacts for special status biological resources, mitigation measures were included in the original project as MMs BIO-1 and BIO-2, which would ensure the projects impacts on Biological Resources would remain less than significant. More specifically, MM BIO-1 is intended to require preconstruction surveys for nesting birds for any vegetation removal or site disturbance done during nesting season, with avoidance of non-disturbance buffer zones established for any nests. MM BIO-2 avoids direct take of SJKF by implementation of a variety of measures such as worker education training prior to issuance of grading permits, maximum speed limits during construction, covering all excavations deeper than 2 feet at the end of a work day or installing wildlife escape ramps, as well as various other measures. The proposed Project involves an equal amount of site disturbance as the original Covelop project, and with implementation of the above MMs, the project would not have any new significant or substantially more severe impacts to biological resources.

The BRA also indicated that field surveys were conducted and concluded that no wetlands, water of the U.S./State or riparian habitat occur on the project site. Additionally, there were not any other sensitive natural communities located on the site. Therefore, this project’s impacts on riparian and sensitive habitats were determined to be less than significant and remain less than significant with the proposed Project.

The BRA also indicated that there are two swale features observed onsite and were determined to not be subject to the Clean Water Act or California Fish and Game Code jurisdiction due to a lack of defined bed and bank structure. In addition, consultation with the RWQCB confirmed that similar to the Case Pacific project and Spurr project sites to the west, they would not regulate the swales as waters of the state pursuant to the Porter Cologne Act due to lack of wetland habitat and low beneficial uses. Therefore, the project’s impact on protected wetlands were determined to be less than significant and remain less than significant with the proposed Project.

The proposed Project will not substantially interfere with the movement of any native resident or migratory fish or wildlife species, nor will it substantially interfere with established native resident or migratory wildlife corridors. Furthermore, the Project will not impede the use of native wildlife nursery sites. According to Figure 4.3-2 San Joaquin Kit Fox Mitigation Area of the City of Paso Robles General Plan EIR, the project site is

not located within the Kit Fox Mitigation Area and considered part of the developed portion of the City, therefore, compensatory mitigation is not required.

An Oak Tree Assessment Report was prepared by Heritage Tree Arboricultural Consulting (“Heritage”) in October 2022 for the previously approved Covelop project. The assessment concluded that six trees proposed for removal (Tree # 1, 2, 3, 4, 9, and 11) were in poor or very poor condition, with imminent catastrophic failure due to internal fungal root and butt rot. Two additional trees (Tree # 11 and 13) were proposed for protection and were assessed as being in poor and good condition, respectively. In October 2025, Heritage Tree Arboricultural Consulting prepared a supplemental memo evaluating the proposed residential Project with the existing oak trees. Since that assessment, Tree #3 has since fallen. In light of this and the project’s change from an industrial to a residential use, Heritage prepared an updated assessment in July 2025 to reevaluate Tree #13, which was previously identified as being in good condition but at high risk of trunk failure due to advanced internal decay. The July 2025 reassessment reconfirmed that Tree #13, a 42-inch native oak, remains at high risk of structural failure. Resistograph testing showed significant internal decay, with up to 77% radial wood loss in some areas. While the tree was previously proposed for retention under the industrial use scenario with protective fencing, the transition to residential use introduces more frequent and prolonged public access, including by children. Due to the increased potential for injury, the consulting arborist now recommends removal of Tree #13. Oak tree removals approved as part of this Project would be mitigated in accordance with the City Zoning Code, requiring replacement plantings on an inch for inch basis of 25% of the inches of diameter at breast height of the oak trees removed. Additionally, the project has been designed in a manner to protect the Tree No. 10 and protection measures such as protection fencing will be required as conditions of approval. As a result of the trees being removed being in poor condition and mitigation oak trees will be planted on site as outlined in the City’s Oak Preservation Ordinance, this Project’s impacts on oak trees will remain as being less than significant.

There are no Habitat Conservation Plans or other related plans in the City of Paso Robles; therefore, no impact will occur.

Mitigation Measures: MMs BIO-1 through BIO-2.

Conclusion: With implementation of the above MMs, the Project would not have any new significant or substantially more severe impacts to biological resources (CEQA Guidelines § 15162(a)).

5. CULTURAL RESOURCES.

<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?	MND, p. 12	No	No	No	None required.
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	MND, p. 12	No	No	No	None required.
c. Disturb any human remains, including those interred outside the formal cemeteries?	MND, p. 12	No	No	No	MM CUL-1

Discussion: A Phase I archeological survey was conducted by Padre Associates, Inc. of the project site on July 1, 2022. The field investigation identified no prehistoric materials or historic cultural resources within the project site. Although the study did not identify any cultural resources, mitigation measure CUL-1 was included in the original Covelop project to require work to stop in the event that cultural materials are encountered during future ground disturbance. With the implementation of this mitigation measure, the previous project’s impacts related to archeological resources were found to be less than significant with mitigation incorporated.

Since the proposed Project is within the same study/disturbance area, no impacts to cultural resources are anticipated consistent with the previous project. In the unlikely event that buried cultural materials are encountered during construction, CUL-1 will maintain the new Project’s impacts related to archeological resources to be less than significant with mitigation incorporated.

Mitigation Measures: CUL-1.

Conclusion: With implementation of the above MM, the Project would not have any new significant or substantially more severe impacts to biological resources (CEQA Guidelines § 15162(a)).

6. ENERGY.

<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	MND, p. 13	No	No	No	None required.
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	MND, p. 13	No	No	No <i>(Refer to 2024 LSA Supplemental Memo)</i>	None required.

Discussion: Under the original Covelop project scope, construction activities were anticipated to be temporary and consist of site preparation, grading, construction of buildings, paving, and installation of landscaping. The same is true for the proposed Project. According to the 2024 LSA Supplemental Memo, the construction schedule for the proposed Project is not yet known, therefore, default assumptions from CalEEMod were used, which was also the case for the prior Covelop project. It is anticipated construction sequencing will be designed to be efficient in order to avoid excess monetary costs. The proposed Project is also subject to air quality and energy efficiency requirements which are often referred to as Green Building Standards or the Building Energy Efficiency Standards, all of which are applicable standards to reduce inefficient, wasteful, or unnecessary consumption of energy. Furthermore, the City’s General Plan and Conservation Element ensures the conservation and preservation of energy resources by increasing the energy efficiency of buildings, appliances, and buildings to the use of alternative forms of energy. Additionally, based on the 2024 LSA Supplemental Memo, the project would not exceed the Efficiency Threshold for operational emissions, the Project would not conflict with the CAP, Updated Strategic Action Plan Update, or the City of Paso Robles Climate Action Plan (PRCAP). Therefore, impacts to energy resources will remain as less than significant.

In summary, the Project does not involve any element that might result in a new significant or substantially more severe impact to energy consumption. Any unanticipated impacts to energy consumption that might occur as a result of the Project would be within the scope of those discussed in the 2024 MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe impacts to energy consumption in relation to the Project.

Mitigation Measures: None required.

Conclusion: The Project would not have any new significant or substantially more severe impacts to energy consumption (CEQA Guidelines § 15162(a)).

7. GEOLOGY AND SOILS.

<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or</i>	<i>Any new circumstances involving new significant impacts or</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
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Exhibit A

		<i>substantially more severe impacts?</i>	<i>substantially more severe impacts?</i>		
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. ii. Strong seismic ground shaking? iii. Seismic-related ground failure, including liquefaction? iv. Landslides?	MND, p. 13-14	No	No	No	None required.
b. Result in substantial soil erosion or the loss of topsoil?	MND, p. 13-14	No	No	No	None required.
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	MND, p. 13-14	No	No	No	None required.
d. Be located on expansive soil, as defined in Table 18- 1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	MND, p. 13-14	No	No	No	None required.
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	MND, p. 13-14	No	No	No	None required.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	MND, p. 13-14	No	No	No	None required.
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Discussion: There are two known fault zones on either side of the Salinas Rivers valley. The Rinconada Fault system runs on the west side of the valley and grazes the City on its western boundary. The San Andreas Fault is on the east side of the valley and is situated about 30 miles east of Paso Robles. The City of Paso Robles recognizes these geologic influences in the application of the California Building Code (CBC) to all new development within the City. Review of available information and examinations indicate that neither of these faults is active with respect to ground rupture in Paso Robles. Soils and geotechnical reports and structural engineering in accordance with local seismic influences are typical requirements applied in conjunction with any new application type. Based on standard conditions of approval, the potential for fault rupture and exposure of persons or property to seismic hazards is not considered significant. There are no Alquist-Priolo Earthquake Fault Zones within City limits.

Per the General Plan EIR, the project site is located in an area with soil conditions that have a low potential for liquefaction or other type of ground failure due to seismic events and soil conditions. To implement the EIR’s mitigation measures to reduce this potential impact, the City has a standard condition to require submittal of soils and geotechnical reports, which include site-specific analysis of liquefaction potential for all building permits for new construction, and incorporation of the recommendations of said reports into the design of the project. The 2024 MND relied on a Geotechnical analysis which indicated the project assumed one and two story wood or metal framed construction. Geotechnical investigations were performed to evaluate soil conditions of the site. Groundwater was not encountered to a depth of twenty feet. The new Project has been designed to not exceed two-story construction and grading has a maximum cut height of approximately 10-feet, which is nearly identical to the original Covelop project and intended to balance the site where areas need to be cut versus receive fill. Additionally, the project site is in an area that is designated a low-risk area for landslides. Therefore, potential impacts due to landslides is less than significant since the project is not substantially more severe than what was originally proposed.

Per the General Plan EIR the soil condition is not erosive, expansive, or otherwise unstable. As such, no significant impacts are anticipated. A geotechnical/soils analysis has been conducted to evaluate the site specific soil stability and suitability of grading and retaining walls proposed. This study outlines the necessary grading techniques and erosion control plan to ensure that potential impacts due to soil stability will not occur.

The development will be connected to the City’s municipal wastewater system, therefore there would not be impacts related use of septic tanks.

There are no known paleontological or unique geologic features identified on-site. If resources are found during grading activities, appropriate recommendations will be made regarding their treatment and/or disposition; therefore, this project will result in less than significant impacts on paleontological resources and/or unique geologic features.

In summary, the Project does not involve any element that might result in a new significant or substantially more severe impact to geology and soils since it does not involve substantially more severe grading. Any unanticipated impacts to geology and soils that might occur as a result of the Project would be within the scope of those discussed in the 2024 MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe impacts to geology and soils in relation to the Project.

Mitigation Measures: None required.

Conclusion: The Project would not have any new significant or substantially more severe impacts to geology and soils (CEQA Guidelines § 15162(a)).

8. GREENHOUSE GAS EMISSIONS.					
<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	MND, p. 15-16	No	No	No <i>(Refer to 2024 LSA Supplemental Memo)</i>	None required.

b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	MND, p. 15-16	No	No	No	None required.
<p>Discussion: An Air Quality and Greenhouse Gas Emissions Analysis was originally completed by LSA in April 2023 for the previously approved project. The study found no conflicts with the 2001 Air Plan and determined that construction and operation would not generate air pollutants or GHG emissions exceeding SLO County APCD thresholds, impact sensitive receptors, or create objectionable odors.</p> <p>In September 2024, LSA prepared a supplemental memo evaluating the proposed residential Project and confirmed it would also remain below all significance thresholds. The memo concluded that no significant impacts would occur for a project with fewer than 330 multi-family units. Because this Project proposed 154-units, well below the 330-unit threshold, this project remains consistent with the prior analysis.</p> <p>In summary, the Project does not involve any element that might result in a new significant or substantially more severe impact to GHG emissions. Any unanticipated impacts to GHG emissions that might occur as a result of the Project would be within the scope of those discussed in the 2024 MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe impacts to GHG emissions in relation to the Project.</p> <p>Mitigation Measures: None</p> <p>Conclusion: The Project would not have any new significant or substantially more severe impacts related to GHG emissions (CEQA Guidelines § 15162(a)).</p>					

9. HAZARDS AND HAZARDOUS MATERIALS.					
<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	MND, p. 16-17	No	No	No	None required.
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	MND, p. 16-17	No	No	No	None required.
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one- quarter mile of an existing or proposed school?	MND, p. 16-17	No	No	No	None required.
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant	MND, p. 16-17	No	No	No	None required.

Exhibit A

to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?					
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	MND, p. 16-17	No	No	No	None required.
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working on the project area?	MND, p. 16-17	No	No	No	None required.
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	MND, p. 16-17	No	No	No	None required.
h. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	MND, p. 16-17	No	No	No	None required.

Discussion: Construction of the Project would involve the temporary transport, use, and disposal of potentially hazardous materials. These materials may include paints, adhesives, surface coatings, cleaning agents, fuels, and oils that are typically associated with any urban development project. These materials would be used temporarily during construction. All potentially hazardous materials associated with construction activities would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, which further minimizes the potential risk associated with construction-related hazardous materials. The project does not include use of, transport, storage or disposal of hazardous materials that would create a significant hazard to the public or environment. Once construction has finished, the project would use industry-standard landscape and building maintenance products which would be stored in compliance with all applicable safety requirements to mitigate hazardous emissions. However, the project would not emit any hazardous materials and apply the appropriate precautionary storage and handling methods to ensure that hazardous materials on-site would not affect the environment or general public.

The Project is not identified as a hazardous site per Government Code section 65962.5, and the site is not situated near an airport safety zone. There are no schools within ¼ mile of the project site. Therefore, the project does not pose any potential threat related to hazardous materials.

The Project does not involve any element that might result in a new significant or substantially more severe hazards or hazardous materials impacts. Any hazards or hazardous materials impacts that may occur as a result of the project would be within the scope of those discussed in the 2024 MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe hazards or hazardous materials in relation to the Project.

Mitigation Measures: None required.

Conclusion: The Project would not have any new significant or substantially more severe impacts related to hazards and hazardous materials (CEQA Guidelines § 15162(a)).

10. HYDROLOGY AND WATER QUALITY.					
<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	MND, p. 17-18	No	No	No	None required.
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	MND, p. 17-18	No	No	No	None required.
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: <ul style="list-style-type: none"> i. would result in substantial erosion or siltation on- or off-site ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff iv. impede or redirect flood flows 	MND, p. 17-18	No	No	No	None required.
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	MND, p. 17-18	No	No	No	None required.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	MND, p. 17-18	No	No	No	None required.
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Discussion: Water use during construction would be limited to dust control measures for grading activities. The Project will not result in releasing water or wastewater from the site. The Project is subject to several existing regulations and programs, including the City’s Storm Water Management Program and State Water Resources Control Board (SWRCB) Regulations. BMPs and PPMs are required to be incorporated into grading and construction plans for the short and long-term management and protection of water quality. The proposed Project’s Stormwater Control plans include the use of drainage management areas (DMAs) and the use of low impact designs (LIDs). Therefore, considering these factors, the impacts as a result of the development of this Project on storm water will be less than significant.

The proposed project would be on the City’s municipal water supply system, therefore it could not individually impact nearby well production. The City’s municipal water supply is composed of groundwater from the Paso Robles Groundwater Basin, an allocation of the Salinas River underflow, and a surface water allocation from the Nacimiento Lake pipeline project. According to the 2020 Urban Water Management Plan (UWMP), Citywide, the City of Paso Robles anticipates a water demand of 9,451 acre-feet/year at full buildout, with supply availability projected to be 15,088 acre-feet/year to serve development during normal, dry, and multiple dry years. Based on UWMP indicating that City water resources exceeds the projected demand city wide, this Project’s water use will have less than significant impact on the City’s overall water system. Further, standard conditions applied to all new developments require the payment of development fees for water service expansion to mitigate its proportionate share of related impacts.

The proposed new/replaced impervious surface area is approximately 9.56-acres, nearly 2-acres less than the previously approved Covelop project. Post-Construction Stormwater Requirements (PCRs) will be satisfied through a variety of methods. Several different Stormwater Control Measures (SCMs) have been designed for implementation across the site, depending on proposed surface drainage conditions and subsurface retention requirements. In conclusion, the project’s drainage system was designed to meet minimum drainage requirements outlined in the City of Paso Robles Standard Specifications and the Regional Water Quality Control Board’s PCRs. Based on the stormwater retention plan, the impact will be less than significant.

The proposed project site is generally flat, and therefore will not result in substantial erosion on or off-site. Additionally, in compliance with State and local regulations, during construction erosion and/or stormwater control measures will be implemented during site disturbance; therefore, the Project is not expected to result in substantial erosion or siltation and impacts will be less than significant.

In accordance with the Paso Robles General Plan, there is no mudflow hazards located on or near the project site. Therefore, the project could not result in mudflow inundation impacts.

The project will incorporate all feasible means to manage water runoff on the project site. There is no wetland or riparian areas in the near vicinity, and the project could not result in impacts to aquatic habitat. Therefore, the project will not result in significant impacts to these resources.

Mitigation Measures: None required.

Conclusion: The project would not have any new significant or substantially more severe impacts to hydrology and water quality (CEQA Guidelines § 15162(a)).

11. LAND USE AND PLANNING.					
<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Physically divide an established community?	MND, p. 18-19	No	No	No	None required.
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for	MND, p. 18-19	No	No	No	None required.

the purpose of avoiding or mitigating an environmental effect?					
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	MND, p. 18-19	No	No	No	None required.

Discussion: The project site is adjacent to an urbanized area of the City with existing commercial and industrial development to the west and a few residential uses to the east. There is not an established community in this part of the City, therefore, the existing residences would not be physically divided as a result of the Project, which was also the case for the Covelop development. The integration of the proposed residential Project would create a more natural transition from the commercial uses to the existing residential uses.

The General Plan Land Use Element Policy LU-2I encourages infill residential development, including mixed-use development, in areas within walking distance to transit and other commercial services where the environmental impacts of the development would be minimized. By applying the Mixed-Use Overlay to this site, the Project would meet the policy to encourage opportunities for infill residential/mixed-use development, especially given the project site’s proximity to adjacent commercial uses. Therefore, the Project is found to be consistent adopted General Plan Land Use Element.

As discussed in the Biological Resources section above, there are no sensitive natural habitats or species located on the site; further, no habitat conservation plans or natural community conservation plans established in this area of the City. Therefore, there would be no conflicts.

In summary, the Project does not involve any element that might result in a new significant or substantially more severe impact to land use and planning. Any unanticipated impacts to land use and planning that might occur as a result of the Project would be within the scope of those discussed in the 2024 MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe impacts to land use and planning in relation to the Project.

Mitigation Measures: None required.

Conclusion: The Project would not have any new significant or substantially more severe impacts to land use and planning (CEQA Guidelines § 15162(a)).

12. MINERAL RESOURCES.					
<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	MND, p. 19	No	No	No	None required.
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	MND, p. 19	No	No	No	None required.

Discussion: There are no known mineral resources at this project site. The Project does not involve any element that might result in a new significant or substantially more severe impacts to mineral resources than the previously approved Covelop project. Any impacts to mineral resources that might occur as a result of the Project would be within the scope of those discussed in the 2024 MND. Furthermore, the City is not aware of any

new circumstances or new information that might result in new significant or substantially more severe impacts to mineral resources in relation to the Project.

Mitigation Measures: None required.

Conclusion: The Project would not have any new significant or substantially more severe impacts to mineral resources (CEQA Guidelines § 15162(a)).

13. NOISE.					
<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	MND, p. 19-20	No	No	No <i>(Refer to 2025 45dB Acoustics Supplemental Memo)</i>	None required.
b. Generation of excessive groundborne vibration or groundborne noise levels?	MND, p. 19-20	No	No	No	None required.
c. For a project located within the vicinity of a private airstrip or an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	MND, p. 19-20	No	No	No	None required.
<p>Discussion: An Acoustic Study was completed by 45 dB in March 2023 for the previously approved Covelop project (P22-20), concluding that noise impacts would be less than significant and consistent with both daytime and nighttime standards in the Municipal Code.</p> <p>In January 2025, 45 dB prepared a supplemental memo evaluating the conversion of the site to a residential housing development. The memo reconfirmed the ambient noise levels identified in the 2023 study and determined that the proposed residential use would remain compatible with surrounding conditions, with outdoor noise levels below the 65 dBA threshold and interior levels projected at DNL 36 dBA, well under the 45 dBA interior limit for Residential receiving land uses.</p> <p>The Project may result in short-term construction noise and vibration from machinery. However, the construction noise is not anticipated to be excessive, and construction will only take place during daytime hours, 7 a.m. and 7 p.m. excluding Sundays and federal holidays. Therefore, impacts from groundborne vibration noise would be considered less than significant.</p> <p>The Project is not located within an airport area subject to an airport land use plan and will thus not be impacted by airport-related noise.</p>					

In summary, the Project does not involve any element that might result in a new significant or substantially more severe impact to noise. Any unanticipated impacts to noise that might occur as a result of the Project would be within the scope of those discussed in the 2024 MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe impacts to noise in relation to the Project.

Mitigation Measures: None required.

Conclusion: The Project would not have any new significant or substantially more severe impacts to noise (CEQA Guidelines § 15162(a)).

14. POPULATION AND HOUSING.

<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	MND, p. 20-21	No	No	No	None required.
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	MND, p. 20-21	No	No	No	None required.

Discussion: The proposed Project does not result in unplanned population growth. There is a large demand to house people who currently reside in the region who may be restricted to overcrowded or other unsatisfactory housing conditions.

The proposed development will be responsible for paying the required fees as part of the City’s entitlement process, therefore impacts to City infrastructure are less than significant.

There are no residences located on the project site, therefore, there are no impacts related to the displacement of people.

In summary, the Project does not involve any element that might result in a new significant or substantially more severe impact to population and housing. Any unanticipated impacts to population and housing that might occur as a result of the Project would be within the scope of those discussed in the 2024 MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe impacts to population and housing in relation to the Project.

Mitigation Measures: None required.

Conclusion: The Project would not have any new significant or substantially more severe impacts to population and housing (CEQA Guidelines § 15162(a)).

15. PUBLIC SERVICES.					
<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any the public services:	MND, p. 21	No	No	No	None required.
Fire protection?	MND, p. 21	No	No	No	None required.
Police protection?	MND, p. 21	No	No	No	None required.
Schools?	MND, p. 21	No	No	No	None required.
Parks?	MND, p. 21	No	No	No	None required.
Other public facilities?	MND, p. 21	No	No	No	None required.
<p>Discussion: The proposed Project would not result in a significant impact to fire or police protection, as the project site is located in the current service area by the City of Paso Robles Police and Fire Department. The project site is within the Paso Robles Joint Unified School District. Solid waste is managed by the San Luis Obispo Regional Integrated Waste Management Authority. Parks and public recreational facilities are located within proximity to the project site, including the regional Barney Schwartz Park located east of the site.</p> <p>Regarding cumulative effects, the applicant is required to pay fees, which would go towards provision of municipal services. Therefore, potential impacts would be less than significant.</p> <p>In summary, the Project does not involve any element that might result in a new significant or substantially more severe impact to public services. Any unanticipated impacts to public services that might occur as a result of the Project would be within the scope of those discussed in the 2024 MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe impacts to public services in relation to the Project.</p> <p>Mitigation Measures: None required.</p> <p>Conclusion: The Project would not have any new significant or substantially more severe impacts to public services (CEQA Guidelines § 15162(a)). All required impact fees supporting public services will be paid at the appropriate time in the construction process and ongoing as part of local property taxes.</p>					

16. RECREATION.

Exhibit A

<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	MND, p. 21	No	No	No	None required.
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	MND, p. 21	No	No	No	None required.

Discussion: The proposed Project would not result in a significant population increase, since the number of residential units being applied to the site in conjunction with the Mixed-Use Overlay is within the General Plan buildout of 44,000 population. Further, the Project is not anticipated to affect projected demand for parks and recreational facilities in the immediate area as the development plan demonstrates there will be on-site recreational facilities, including a central tot lot, clubhouse, and pool. The City’s Parks and Recreation Element of the General Plan dictates improvements of existing parks as well as periodically assessing usage of park facilities, and identifying physical changes needed to accommodate anticipated land use patterns. As a result, several renovation upgrades to existing parks have been made in the last several years. Based on these ongoing actions, impacts to recreational facilities is anticipated to be less than significant.

In summary, the Project does not involve any element that might result in a new significant or substantially more severe impact to recreation. Any unanticipated impacts to recreation that might occur as a result of the Project would be within the scope of those discussed in the 2024 MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe impacts to recreation in relation to the Project.

Mitigation Measures: None required.

Conclusion: The Project would not have any new significant or substantially more severe impacts to recreation (CEQA Guidelines § 15162(a)).

17. TRANSPORTATION.

<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Conflict with a program plan, ordinance or policy establishing addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	MND, p. 22	No	No	No	None required.

b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	MND, p. 22	No	No	No	None required.
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	MND, p. 22	No	No	No	None required.
d. Result in inadequate emergency access?	MND, p. 22	No	No	No	None required.

Discussion: A Transportation Analysis was completed by CCTC in December 2022 for the previously approved Covelop project (P22-0020), concluding the project would generate 1,194 average daily trips, with 117 AM peak hour trips and 158 PM peak hour trips, and that no VMT or intersection impacts would occur.

In September 2025, CCTC completed a review of the new Project and compared the approved trips to the proposed trips. Using the ITE Trip Generation Manual, CCTC determined that the new Project would generate fewer daily and peak hour trips. Therefore, the proposed Project would result in lower traffic impacts than the previously approved Covelop project and would not cause significant impacts on intersection operations or VMTs.

The proposed circulation system, including roadways, transit, and bicycle and pedestrian facilities all comply with existing plans, ordinances, and policies. The Project will improve bike lane and pedestrian path connectivity along the existing Ardmore Road and will provide new connections to the east that are consistent with the City’s Circulation Plan.

No hazardous geometric design features are included within or adjacent to the site’s circulation.

The new Project has been reviewed by the City’s Department of Emergency Services. The Project will not impede emergency access, and is designed in compliance with all emergency access safety features and to City emergency access standards.

In summary, the Project does not involve any element that might result in a new significant or substantially more severe impact to transportation. Any unanticipated impacts to transportation that might occur as a result of the Project would be within the scope of those discussed in the 2024 MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe impacts to transportation in relation to the Project.

Mitigation Measures: None required.

Conclusion: The Project would not have any new significant or substantially more severe impacts to transportation (CEQA Guidelines § 15162(a)).

18. TRIBAL CULTURAL RESOURCES.					
<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section	MND, p. 22-23	No	No	No	None required.

<p>21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p> <ul style="list-style-type: none"> i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. 					
<p>Discussion: A Phase I archeological survey was conducted by Padre Associates, Inc. of the project site on July 1, 2022. The field investigation identified no prehistoric materials or historic cultural resources within the project site. The site is located within an area characterized as low to moderate archaeological sensitivity, the existing landform has slightly been altered by an agricultural accessory structure and mainly used as pastureland for horses. The project area has excellent ground surface visibility, ranging from 60 to 95 percent, with discarded construction materials and oak detritus accounting for areas of reduced visibility. No tribal cultural resources were identified within the project area. Further, the original Covelop project initiated tribal notification in accordance with AB 52, with no further consultation requested as part of the project’s review period. Based on the location and characteristics of the site, it is unlikely that there are tribal cultural resources.</p> <p>The project does not involve any element that might result in a new significant or substantially more severe impact to tribal cultural resources. Any unanticipated impacts to tribal cultural resources that might occur as a result of the project would be within the scope of those discussed in the MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe impacts to tribal cultural resources in relation to the project.</p> <p>Mitigation Measures: None required.</p> <p>Conclusion: The project would not have any new significant or substantially more severe impacts to tribal cultural resources (CEQA Guidelines § 15162(a)).</p>					

19. UTILITIES AND SERVICE SYSTEMS.					
<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	MND, p. 23-24	No	No	No	None required.
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	MND, p. 23-24	No	No	No	None required.
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	MND, p. 23-24	No	No	No	None required.
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	MND, p. 23-24	No	No	No	None required.
e. Comply with federal, state, and local statutes and regulations related to solid waste?	MND, p. 23-24	No	No	No	None required.
<p>Discussion: Per the City's General Plan EIR, Urban Water Management Plan, and Sewer System Management Plan, the City's water and wastewater treatment facilities are adequately sized, including planned facility upgrades, to provide water needed for the project and treat effluent resulting from this project. All new storm water resulting from this project will be managed on the project site and will not enter existing storm water drainage facilities or require expansion of new drainage facilities.</p> <p>No new water or wastewater facilities, electric power, natural gas, or telecommunications will need to be constructed or expanded for this project.</p> <p>During construction, most debris would consist of recyclable materials such as wood pallets, plastic and paper packaging and scrap metal that can be taken to the nearby waste recycling center and all other non-recyclable construction debris being taken to the nearby landfill. The landfill has a maximum permitted capacity of 6,495,000 cubic yards and a maximum permitted throughput of 450 tons of solid waste per day and 75,000 tons per</p>					

year, through October 1, 2051. As of December 31, 2017, the landfill had a remaining capacity of 4,216,402 cubic yards or approximately 65% of the maximum permitted. Operationally, large residential projects are anticipated to generate approximately 0.3021 yd³/unit, which equates to approximately 46 yd³. Further, the size/density of the project is within the City’s General Plan buildout for population and due to consistency with the General Plan and the the City’s Landfill Master Plan, the City’s landfill has been determined to be adequate capacity to accommodate construction related and operational solid waste disposal for this project; therefore, there is no impact to solid waste infrastructure from this Project.

The Project will comply with all federal, state, and local solid waste regulations and will not generate solid waste in excess beyond state of local standards or capacity.

In summary, the Project does not involve any element that might result in a new significant or substantially more severe impact to utilities and services systems. Any unanticipated impacts to utilities and service systems that might occur as a result of the Project would be within the scope of those discussed in the 2024 MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe impacts to utilities and service systems in relation to the Project.

Mitigation Measures: None required.

Conclusion: The project would not have any new significant or substantially more severe impacts to utilities and service systems (CEQA Guidelines § 15162(a)).

20. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	MND, p. 24	No	No	No	None required.
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	MND, p. 24	No	No	No	None required.
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	MND, p. 24	No	No	No	None required.
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result	MND, p. 24	No	No	No	None required.

of runoff, post-fire slope instability, or drainage changes?					
<p>Discussion: The City of Paso Robles does not have an adopted emergency response plan or evacuation plan. Therefore, the Project would not impact an emergency response plan.</p> <p>As previously identified, the site is not considered as being located within the wildland urban interface (WUI) and therefore would not need specific measures for fire-fighting purposes, beyond emergency vehicle access, clearance around structures, and connection to water. The Project has been reviewed by the City of Paso Robles Fire Department and designed with Fire Codes in mind. Given these considerations the impacts will be less than significant.</p> <p>The Project site is relatively flat and not subject to landslide potential or significant drainage changes, therefore there would be no impact.</p> <p>In summary, the Project does not involve any element that might result in a new significant or substantially more severe wildfire risk. Any impacts related to wildfire risk would be within the scope of those discussed in the 2024 MND. Furthermore, the City is not aware of any new circumstances or new information that might result in new significant or substantially more severe wildfire risk in relation to the Project.</p> <p>Mitigation Measures: None required.</p> <p>Conclusion: The project would not have any new significant or substantially more severe impacts to wildfire risk (CEQA Guidelines § 15162(a)).</p>					

21. MANDATORY FINDINGS OF SIGNIFICANCE.					
<i>Would the project:</i>	<i>Where was the impact analyzed?</i>	<i>Do proposed changes involve new significant impacts or substantially more severe impacts?</i>	<i>Any new circumstances involving new significant impacts or substantially more severe impacts?</i>	<i>Any new information of substantial importance requiring new analysis or verification?</i>	<i>What MND MMs address impacts?</i>
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare or threatened species, or eliminate important examples of the major periods of California history or prehistory?	MND, p. 25	No	No	No	None required.
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when	MND, p. 25	No	No	No	None required.

Exhibit A

view in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?					
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	MND, p. 25	No	No	No	None required.
<p>Discussion: As noted within the Biological Resources section of this environmental document, there are two mitigation measures related to habitat for nesting birds and SJKF that will reduce impacts on biological resources to less than significant. There will be no impact to fish habitat as well as no impact to fish and wildlife populations.</p> <p>The Project will not have impacts that are individually limited, but cumulatively considerable.</p> <p>The Project will not cause substantial adverse effects on human beings, either directly or indirectly.</p> <p>Mitigation Measures: None required.</p> <p>Conclusion: The project would not have any new significant or substantially more severe impacts to the environment.</p>					

C. ANALYSIS AND BACKGROUND MATERIALS. Earlier analyses and new supplemental analyses may be used where, pursuant to tiering, program EIR, or other CEQA process, one or more effects have been adequately analyzed in an earlier EIR or negative declaration. Section 15063 (c)(3)(D). All documents are available for review at the City of Paso Robles Community Development Department - 1000 Spring Street, Paso Robles, CA 93446.

DOCUMENT TITLE
1. Mitigated Negative Declaration for Covelop, 2024
2. 45dB Acoustics Supplemental Memo for Ardmore Townhouses Project, 2025
3. Air Quality and Greenhouse Gas Supplemental Memo for Ardmore Townhouses Project, 2024
4. Heritage Tree Arboricultural Consulting Supplemental Memo for Ardmore Townhouses Project, 2025
5. Proposed Project - Plan Set, 2026
6. Proposed Project - Project Description, 2025