



LAFCO - San Luis Obispo - Local Agency Formation Commission
SLO LAFCO - Serving the Area of San Luis Obispo County

June 12, 2020

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Darren Nash, City Planner
Community Development Department
City of Paso Robles
1000 Spring Street
Paso Robles, CA 93446

Subject: Follow-up Comments on Final Environmental Impact Report (FEIR) Gateway Annexation (Annexation Permit No. ANX 16-001 and Planned Development Permit No. PD 17-0090)

Dear Mr. Nash:

Thank you for considering LAFCO's comments regarding the draft Environmental Impact Report for the Gateway Annexation project. The Final EIR provides some clarification outlined in our April 10, 2020 letter. In some cases, the revisions to the FEIR adequately address LAFCO's policies. Other responses deferred the concerns to City Council, identified the matter as not related to environmental issues, or were uncertain regarding timing and implementation. Please consider the following comments that would assist LAFCO in evaluating the annexation:

Affordable Housing comments. The response that "economic or social effects of a project shall not be treated as significant effects on the environment" does not help address the factors LAFCO must consider when reviewing an annexation. We appreciate forwarding the affordable housing issues to the City decision-makers for review and consideration. We understand the City of Paso Robles is currently in the process of updating its Housing Element to incorporate the latest RHNA, but this response may not assist LAFCO in making a decision. The updates to the Housing Element to include the analysis of the Gateway Project's housing needs and housing production would likely be completed after the annexation is filed with LAFCO. LAFCO would like to use the FEIR as a Responsible Agency to assist in the annexation decision. Having the FEIR address this issue could provide that assistance.

Water Resource comments. The response that the Paso Robles Groundwater Basin's legal challenges could be considered speculative to assume decreased water pumping rights for the City may not address LAFCO policies. The future use of recycled water enhancements to the City's resilience during drought conditions could also be speculative at this time. LAFCO has a strong water policy along with the City's SOI conditions for an annexation to document an adequate, reliable, and sustainable water supply that would be available and deliverable to serve the areas proposed for annexation at the time of annexation for the buildout of the City into the future. Should the rights to pump be decreased, documentation should identify if the water supply is adequate for City buildout including the Gateway annexation.

Traffic and Circulation comments. The response that Caltrans and County coordination and approval would result in uncertainty regarding timing and implementation lacks the clarity LAFCO must rely on when determining the annexation. Additionally, the U.S. 101/Main Street interchange response that these improvements are in the beginning planning phases and funding and feasibility cannot be guaranteed or determined at this time. Therefore, LAFCO would be required to make overriding consideration for this impact when considering the annexation. LAFCO would like a clear outline of what improvements to these interchanges will be completed and when as it relates to the buildout of the Gateway project. This would assist LAFCO when considering this factor.

We appreciate your responses to our comments and request further information regarding this project to assist LAFCO when evaluating the annexation. These issues are critically analyzed by the Commission and LAFCO recommends further analysis be conducted. If you have any questions regarding these comments please call me at 805-781-5795.

Sincerely,



Mike Prater
LAFCO Deputy Executive Officer

cc. Brian Pierik, LAFCO Counsel
Commissioners