

## TECHNICAL MEMORANDUM

To: Mr. Dean Mills  
VP of Land Acquisition and Forward Planning  
Century Communities, Bay Area Division

Date: December 2, 2022

**Subject: East Garrison – Entitlement and Technical Support Services**

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### Introduction

We understand that Century Communities is seeking to modify or amend the East Garrison Specific Plan (EGSP) with the intent of changing the configuration of uses within “Town Center” area. This type of modification would require environmental review, using the previously certified Subsequent EIR (SEIR) as the basis for initiating environmental analysis. The proposed changes to the EGSP includes:

- Relocation of the Phase 3 Affordable/Artspace project (66 units) to the south of the Town Center Park. The 3-4 story vertically integrated mixed-use Artspace affordable building will include approximately 30,000 gsf. of ground floor commercial uses along with 66 residential live/work uses above.
- Design of the relocated Affordable/Artspace project as a mixed-use building.
- Integration of commercial uses (retail and artist’s studio spaces) into the new affordable mixed-use building.
- The balance of the Final Phase area will be developed with 254 two and three story residences, with townhomes bordering the Town Square Park and small lot single family detached homes replacing the previously planned 4-story condominium project and live/work units. The remaining workforce and moderate units will be provided within the Final Phase residential areas.

Our approach, as outlined below, identifies the tasks necessary to provide Monterey County staff with the supporting environmental analysis to make their CEQA determination. Based on preliminary review of the proposed Specific Plan modifications, we believe that the analysis will demonstrate that further comprehensive environmental review is not necessary. Our approach is based on the understanding that the reconfiguration of uses will result in the overall unit count at East Garrison will remain below the approved 1,470 units (including ADU’s) that were analyzed by the original SEIR. There is no reduction of commercial space; the only difference between the two plans is the number of units. Items to be addressed are traffic, water, etc. with the assumption is that less units would equate to similar or less impacts as compared to that previously analyzed.

### Project Approach & Scope of Work

Kimley-Horn and Associates (Kimley-Horn) will perform the following Scope of Work for Century Communities (Client), to provide Entitlement and Technical Support Services associated with proposed changes to the East Garrison Specific Plan (EGSP) (the project).

The EGSP Subsequent EIR (SEIR) was certified by Monterey County in 2005 and will be used as the basis for comparison to the proposed Specific Plan changes. For the reasons noted above, we have assumed preparation of an Addendum to the EGSP SEIR, consistent with Section 15164 of the CEQA Guidelines.

We anticipate that preparation of the CEQA Checklist will conclude that the project will not result in any substantial changes with respect to the circumstances under which the project would require major revisions of the previous environmental analysis. Furthermore, the project will be subject to the adopted mitigation measures from the EGSP SEIR.

We have assumed that preparation of staff reports, findings, and other related documentation will be prepared by the County and thus are not addressed herein. Kimley-Horn's role will be limited to entitlement support (i.e. planning, coordination, meetings, etc.) and CEQA analysis. Additionally, based on our preliminary review of the proposed Specific Plan modifications, we do not anticipate the need for new technical studies will be required including but not limited to air quality, GHG emissions, noise, water supply, wastewater, or transportation. However, we will utilize the EGSP SEIR and their relevant technical studies for reference and for purposes of preparing supplemental technical memorandum.

For each environmental resource, the CEQA Checklist will provide a brief analysis describing why the project is consistent with previous CEQA analysis and a justification as to why no further impact analysis nor mitigation is required. It will provide construction and operational level environmental analysis for the project, where appropriate.

The CEQA Checklist will use Monterey County's template and contain the following sections:

### **Introduction & Background**

This section will identify the purpose of the CEQA Checklist and statutory authority under CEQA, summarize the content of the CEQA Checklist, and identify any documentation incorporated by reference.

### **Project Description**

Kimley-Horn will prepare a description of the characteristics and details of the project (i.e. the proposed changes to the EGSP). The project description will include specific text and graphic changes to the EGSP which will be shown with track changes.

The draft project description will be submitted to the Client for one round of review and comment. Kimley-Horn will incorporate the Client's modifications into the Administrative Draft CEQA Checklist.

### **Environmental Analysis**

Kimley-Horn will use the environmental checklist in Appendix G of the CEQA Guidelines to address the environmental topics of CEQA, as listed below. For each environmental resource, we will evaluate whether there are any new impacts or further mitigation beyond what has been previously

identified. Supporting technical analysis, described below, will be referenced where applicable. The following environmental resources will be analyzed:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services and Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

Some environmental resources, namely, Energy, Greenhouse Gas Emissions, Transportation – Vehicle Miles Traveled, Tribal Cultural Resources, and Wildfires; were not analyzed in the EGSP SEIR. For these resources, because the EGSP SEIR has been certified, the determination of whether these resources need to be analyzed for this project is governed by the law on supplemental or subsequent EIRs (Public Resources Code section 21166 and CEQA Guidelines, Sections 15162 and 15163). Accordingly, we have assumed that no further analysis is required under those standards as they do not constitute "new information of substantial importance, which was not known and could not have been known at the time the previous EIRs were certified as complete" (CEQA Guidelines Sec. 15162 (a) (3)). Therefore, for each of these resources, the CEQA Checklist will document this conclusion.

#### **Supporting Technical Memorandums Air Quality**

Kimley-Horn will prepare a technical air quality memorandum that describes the change in land uses (the project) and their potential impact on both construction and operational air quality conditions. These conditions will be compared to the previous technical analysis as described in the Air Quality section of the EGSP SEIR and associated Appendix F – Air Quality. This scope of work assumes that the analysis will be qualitative, and will not require additional air quality modelling.

### **Water Supply and Wastewater**

Kimley-Horn will prepare a technical water supply memorandum that compares water use consumption rates associated with the proposed land use changes to those previously analyzed in the EGSP SEIR and associated Appendix J – Water Supply Assessment.

This memorandum will also document project wastewater generation rates and compare it to those analyzed in the EGSP SEIR.

### **Transportation**

Kimley-Horn will prepare a technical transportation memorandum that compares the project to the previous EGSP SEIR transportation analysis, including Appendix E – Traffic Report. This analysis will include a trip generation comparison of the proposed land use designations to those analyzed in the EGSP SEIR. This scope of work assumes that the trip generation rate will be the same or less than previously analyzed and conclude that further traffic analysis for each traffic scenario (Existing, Existing + Project, Cumulative, and Cumulative + Project) will not be necessary.

Kimley-Horn will document the methodology, assumptions, analysis, and results in a draft traffic memorandum which will be use for reference in the CEQA Checklist.

### **Figures/Graphics**

Kimley-Horn will prepare figures to support the written text and clarify the project. These figures will include the existing and proposed EGSP land use designations.

### **Draft CEQA Checklist**

Kimley-Horn will prepare the Draft CEQA Checklist by incorporating one complete set of comments on the Administrative Draft CEQA Checklist from the Client.

The Draft CEQA Checklist will be prepared for submittal to the County for their review and use in expediting preparation of an Addendum to the EGSP SEIR, consistent with Section 15164 of the CEQA Guidelines.

### **Summary**

Based on the project assessment described above, it is anticipated that the proposed project will have the same or less impacts as compared to the existing approved plan.