

# Exhibit A

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## EXHIBIT A – DISCUSSION

### I. INTRODUCTION

This document provides an overview of the East Garrison Specific Plan (“Approved Project” or “Previously Approved Project”) (PLN030204), history of subsequent approvals related to the Approved Project, and describes the Proposed Project (PLN030204-AMD2). Section II provides an overview of the Approved Project, location details, previous California Environmental Quality Act (“CEQA”) documentation prepared for the Approved Project, and includes a procedural overview of prior approvals. Section III provides an overview of the Proposed Project, also referred as the Proposed Modification, including a description of the site location (specific to the Proposed Project area), proposed changes to the East Garrison Specific Plan (“EGSP”), Pattern Book, and changes to the Successor Agency Agreements (including the Disposition and Development Agreement or “DDA”). Section IV evaluates the Proposed Project’s consistency with the 1982 Monterey County General Plan, adequacy of available water supply, transportation related effects, and other relevant land use considerations. Section IV also includes a discussion of CEQA compliance completed for the Proposed Project .

### II. PROJECT BACKGROUND/APPROVED PROJECT

#### *a. Project Location*

The Approved Project is located approximately two miles east of the City of Marina and 5.5 miles southwest of the City of Salinas along Reservation Road. The Approved Project is located on an approximately 244-acre site on the Former Fort Ord referred to as “Track Zero at East Garrison”. The U.S. Army previously used the site for military activities including housing troops and training grounds for infantry. The site was extensively disturbed in connection with previous use by the U.S. Army.<sup>1</sup> The Approved Project is accessed via Reservation Road, Inter-Garrison Road, and the eastern portion of Watkins Gate Road. The site has been extensively developed in connection with previous phases of the Approved Project. The Proposed Modification would amend the Final Phase of development (now consisting of portions of Phase 3 and the Town Center) to facilitate build-out of the remainder of the site.

#### *b. Approved Project Overview*

The Approved Project (PLN030204) consisted of the adoption of the EGSP and Pattern Book (Resolution No. 05-266) to facilitate the development of a new community featuring a mix of residential, commercial, cultural, and open space land uses on a 244-acre site located on the former Fort Ord. The Approved Project also included the approval of General Plan Amendments to adopt the EGSP (Resolution No. 05-265), an amendment to the Zoning Ordinance (Ordinance #05000), approval of a Combined Development Permit (“CDP”) (Resolution No. 05-

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<sup>1</sup> The U.S. Army transferred Track Zero at East Garrison to the Fort Ord Reuse Authority (“FORA”) in 1994. FORA subsequently transferred Track Zero to the County of Monterey Redevelopment Agency (Resolution #05-269) on October 4, 2005.

267)<sup>2</sup>, and allocation of 470 acre-feet per year (“afy”) of potable water<sup>3</sup> from the Fort Ord Reuse Authority’s (“FORA’s”) allocation to serve the Approved Project. Other approvals associated with the Approved Project included the approval of the DDA between the Redevelopment Agency and East Garrison Partners I, LLC (Resolution No. 05-271).<sup>4</sup> The Board of Supervisors unanimously approved all resolutions and ordinances related to the Approved Project (5 to 0 vote). UCP East Garrison, LLC purchased the development rights for the Approved Project on August 7, 2009.

The Approved Project consisted of three phases consisting of residential neighborhoods and a centrally located mixed-use town center, with development intended to occur simultaneously with development of these phases. The Approved Project consisted of up to 1,400 residential units (consisting of 780 single-family detached units, 227 townhouses, 280 condominium/loft/apartment units, and 113 live/work units) plus up to 70 accessory dwellings (dependent on water availability), up to 75,000 square feet (“sf”) of commercial space, and 11,000 sf of institutional uses. The Approved Project also included up to 100,000 sf of artist studio space in 25 renovated historical buildings and approximately 50 acres of open space, parks, and natural areas.

#### Phase 1

Phase 1 included the development of 70 acres and included a mix of detached, single-family attached, and multi-family attached residential units. Phase 1, as approved, consisted of 398 residential units, though only 397 units were constructed. Phase 1 also included 3.8-acres of parks, 3.7-acres of open space, 21-acres of roadways, pathways, and bicycle systems, and two (2) main entrances to East Garrison from Inter-Garrison Road and Reservation Road.

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<sup>2</sup> The CDP consisted of a Vesting Tentative Subdivision Map (“VTM”), Use Permit for tree removal, General Development Plan, Use Permit for development on slopes greater than 30 percent, and a Design Approval.

<sup>3</sup> Provided by Marina Coast Water District (“MCWD”).

<sup>4</sup> Additional approvals associated with the Approved Project included land transfers and related approvals.



**Figure 1. Existing Phase 1**

Phase 2

Phase 2 included the development of 73 acres. This phase also included a mix of detached, single-family attached, and multi-family attached residential units. Phase 2, as approved, included the development of 471 residential units, though only 470 units were constructed. Phase 2 also included 9.2-acres of open space, 23.1-acres of roadways, pathways, and bicycle systems and 4.1-acres of parks.



**Figure 2. Existing Phase 2**

### Phase 3<sup>5</sup>

Phase 3 included the development of 82 acres and included the Arts District. Phase 3 included residential uses, including 65 deed-restricted residences, adjacent to the Arts Park. Phase 3, as approved, included the development of 442 residential units, though only 192 units have been constructed. Phase 3 also included the rehabilitation and reuse of 25 historic structures, 11.1-acres of open space, 3.8-acres of parks, and 18.5-acres of roadways, pathways, and bicycle systems.



**Figure 3. Existing Phase 3**

### Town Center<sup>6</sup>

The Town Center included the development of 16 acres and was intended to be the hub of the East Garrison community and included the development of up to 75,000 sf of commercial space. Built-out was intended to occur concurrently with the other phases of development. The Town Center also included 89 residential units, including lofts, condominiums, and apartments above retail spaces. The Town Square was also intended to serve as a venue for hosting community events, including festivals and concerts. The Town Center included 0.2-acres of open space, a one-acre park, and 5.1-acres of roadways, pathways, and bicycle systems.

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<sup>5</sup> The Proposed Modification includes 16-acres of Phase 3 (see Section III for a discussion of changes to Phase 3 under the Proposed Modification).

<sup>6</sup> The Proposed Modification includes the entirety of the Town Center Phase (see Section III for discussion of changes to the Town Center Phase under the Proposed Modification).



**Figure 4. Existing Town Center Area**

*c. California Environmental Quality Act (CEQA)*

The County evaluated the environmental effects associated with implementation of the Previously Approved Project. The County prepared a Notice of Preparation (“NOP”), EGSP Draft Subsequent Environmental Impact Report (“EIR”), and EGSP Final Subsequent EIR to analyze environmental impacts associated with the build out of the Previously Approved Project, which anticipated future development of the area of development as part of the Project. The County also adopted a Mitigation Monitoring and Reporting Plan (“MMRP”) that included 66 mitigation measures. The CEQA process for the Previously Approved Project is described below.

Notice of Preparation

The County distributed an NOP to agencies and other interested parties on August 12, 2003 and subsequently held a public scoping meeting on September 4, 2003. The County prepared and circulated the NOP in accordance with CEQA guidelines to provide the public an opportunity to inform the scope and content of the environmental analysis. The County received 11 comments on the NOP from public agencies and organizations. The comments primarily related to traffic, air quality emissions, schools, and cumulative impacts.

EGSP Draft Subsequent Environmental Impact Report

The County circulated the EGSP Draft Subsequent EIR for public review from September 15, 2004 to November 1, 2004. The EGSP Draft Subsequent EIR identified potentially significant impacts requiring mitigation in the following areas: Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Noise, Public Services/Utilities, and Transportation. The County identified mitigation to reduce the

majority of impacts to less than significant. However, the EGSP Draft Subsequent EIR found that significant and unavoidable impacts would occur due to construction and operational air quality emissions, substantial adverse changes to historic resources, incremental worsening of level of service (“LOS”) at project area intersections and roadways, and significant impacts associated with increases in water demand and construction of new water supply, storage, and distribution facilities.

#### EGSP Final Subsequent Environmental Impact Report

The County received 18 comment letters during the public review period for the EGSP Draft Subsequent EIR. The County responded to comments in the Response to Comments on the Draft Subsequent Environmental Impact Report (“Response to Comments”) (June 5, 2005). Comments primarily focused on cumulative environmental impacts from traffic, air quality, and noise, adequacy of the alternatives analysis, tiering of the EGSP Draft Subsequent EIR from the *Fort Ord Disposal and Reuse Final Environmental Impact Statement*, traffic modeling and regional forecasts, impacts to schools and biological resources, consistency with land use policies (including the 1982 General Plan), and inclusionary housing. The County made several changes to the text of the EGSP Draft Subsequent EIR as a result of these comments in the Response to Comments. The EGSP Final Subsequent EIR consisted of the EGSP Draft Subsequent EIR as amended by the Response to Comments.

#### Certification of the EGSP Final Subsequent Environmental Impact Report

The Board of Supervisors certified the EGSP Final Subsequent EIR, adopted a Mitigation Monitoring and Reporting Program (“MMRP”), and also adopted a Statement of Overriding Considerations for the Previously Approved Project on October 4, 2005. The County subsequently filed a Notice of Determination (“NOD”) for the Approved Project on October 7, 2005. The County applied 265 Conditions to the Previously Approved Project (see **Exhibit H**).

#### Addendum No. 1 to the EGSP Final Subsequent Environmental Impact Report

The County approved an Addendum to the EGSP Final Subsequent EIR (“Addendum No. 1”) on February 11, 2020. Addendum No. 1 modified mitigation measure MM 4.5-C-1, adopted as Condition 184 of the Previously Approved Project, related to project Reactive Organic Gas and Nitrogen Oxide air quality impacts. Condition 184 dictated that the Previously Approved Project would pay fees to the Carl Moyer Memorial Air Quality Standards Air Quality program (“Carl Moyer Program”) to fund agricultural pump retrofits and the purchase of school buses. The specificity in funding allocation in the condition language prevented the Monterey Bay Air Resources District (“MBARD”) from using funds collected under Condition 184 to other efforts that would more substantially reduce Reactive Organic Gas and Nitrogen Oxide emissions. Addendum No. 1 modified the language of Condition 184 to remove the specificity of funding allocation and allow collected fees to be put to other emission reduction grant programs, including, but not limited to, installation of electric vehicle charging infrastructure and incentive programs promoting the purchase of school vehicles. Addendum No. 1 concluded that the change to Condition 184 of the Previously Approved Project to remove specificity of funding allocation did not present a substantial change to any previously identified environmental impacts described in the EGSP Final Subsequent EIR.

#### Addendum No. 2 to the EGSP Final Subsequent Environmental Impact Report



The County approved an Addendum to the EGSP Final Subsequent EIR (“Addendum No. 2”) on June 16, 2020. Addendum No. 2 analyzed an extension to the timeline for implementation of the Approved Project and associated establishment of a fee to replace the Fort Ord Reuse Authority’s (FORA) Community Facilities District fees related to habitat management and traffic. This amendment was needed to allow additional time to implement the Approved Project due to economic conditions circa 2007-2010 resulting in the bankruptcy of the original developer and acquisition of the loan and property by the Developer, the COVID19 pandemic circa 2020 resulting in market stressors and uncertainty, and the dissolution of the FOR A on June 30, 2020. Addendum No. 2 concluded that the change to amend the Development Agreement did not present a substantial change to any previously identified environmental impacts described in the EGSP Final Subsequent EIR.

*d. Procedural Overview – Prior Approvals*

Prior approvals related to the Previously Approved Project are identified below (partial listing) and allowed development of the site:

1. Certification of a Final Subsequent Environmental Impact Report ("FSEIR"), including project-specific mitigation measures and a Statement of Overriding Considerations, adopted by the County Board of Supervisors (Resolution No. 05-264, adopted on October 4, 2005).
2. Mitigation Monitoring and Reporting Plan (“MMRP”) adopted by the County Board of Supervisors (Resolution No. 05-264, adopted on October 4, 2005).
3. The East Garrison Specific Plan ("Specific Plan") approved by the County Board of Supervisors (Resolution No. 05-266, adopted on October 4, 2005).
4. General Plan text amendments approved by the County Board of Supervisors (Resolution No. 05-265 adopted on October 4, 2005).
5. Zoning Ordinance text and map amendments adopted by the County Board of Supervisors (Ordinance No. 05000 adopted on October 4, 2005).
6. Combined Development Permit, including Conditions of Approval, comprising a standard subdivision (Vesting Tentative Map) to create parcels for up to 1400 dwelling units (plus up to 70 secondary (“Carriage”) units, each on the same lot as a residential unit), commercial uses, and public uses, use permit for tree removal, general development plan, use permit to allow development on slopes over thirty percent (30%), and Design Approval, approved by County Board of Supervisors (Resolution No. 05-267, adopted on October 4, 2005).
7. Allocation by the County Board of Supervisors of 470 acre-feet annually of potable water (from the FORA allocation of water to the County) to serve the Project (Resolution No. 05-268, adopted on October 4, 2005).
8. The Development Agreement (the "Development Agreement"), approved by the County Board of Supervisors (Ordinance No. 05001, adopted on October 4, 2005, (the "Enacting Ordinance")).
9. Adopted Resolution No. 20-037 (February 11, 2020) to consider an Addendum (Addendum No. 1) to the EGSP Final Subsequent EIR and amending Condition of Approval 184 to better allocate funds for the benefit of air quality in the region and local area.

10. Adopted Ordinance No. 5333 (June 16, 2020) to consider an Addendum to the EGSP Final Subsequent EIR and the First Amendment to the Development Agreement to extend agreement for 15 years and establish fees on remaining building permits for the Approved Project to replace the Fort Ord Reuse Authority’s (FORA) Community Facilities District fees.

### III. PROPOSED PROJECT

#### a. Overview

The Proposed Project (PLN030204-AMD2) revises the adopted EGSP, Combined Development Permit, and DDA, and includes a Vesting Tentative Map to facilitate construction of up to 325 total residential units. The Proposed Project would consist of up to 259 residential for-sale units (of which 140 market rate single-family units and 119 rental live/work artist “rowhouses” of which 33 will be affordable to moderate-income households, 70 affordable to Workforce II households, and 16 will be sold at market rate) and 66 affordable apartments, as well as up to 30,000 sf of commercial/institutional/retail uses (including a community courtyard), a one-acre Town Center Park, and a 4,000 sf library/sheriff’s office. Century Communities (“Project Applicant”) revised the Town Center development phase to be the Final Phase for the EGSP. The Proposed Project also includes some portions of Phases 2 and 3 that were not developed as part of the Approved Project. As a result, the Proposed Project would result in the development of approximately 20.25 acres.

Overall, implementation of the Proposed Project would decrease the amount of development associated with buildout of the EGSP by reducing the residential development by 16 total units and the maximum allowable commercial square footage would be reduced from 75,000 sf to 30,000 sf. **Table 1** shows the comparison of total development between the Previously Approved Project and the Proposed Project.

Proposed Use	Approved Project*	Proposed Modification**	Difference
<b>Residential (dwelling units)</b>			
Single-Family	780	919	Increase of 139 units
Townhouse	227	150	Decrease of 77 units
Live/Work Rowhouse	197	119	Decrease of 78 units
Affordable Apartments	196	196	N/A
<b>Total</b>	<b>1,400</b>	<b>1,384</b>	<b>Decrease of 16 units</b>
Carriage Units (dependent on water availability)	70	70	N/A
<b>Total (including Carriage Units)</b>	<b>1,470</b>	<b>1,454</b>	<b>Decrease of 16 units</b>

<b>Table 1 Comparison of Total Development under the Approved Project and Proposed Modification</b>			
<b>Proposed Use</b>	<b>Approved Project*</b>	<b>Proposed Modification**</b>	<b>Difference</b>
<b>Non-Residential (square feet)</b>			
Commercial (incl. Community Courtyard)	75,000	30,000	Decrease of 45,000 sf
Library/Sheriff	4,000	4,000	N/A
Fire Station	7,000	11,200	Increase of 4,200 sf***
Arts/ Cultural/ Education (incl. Chapel)	100,000	100,000	N/A
<b>Total</b>	<b>186,000</b>	<b>145,200</b>	<b>Decrease of 40,800 sf</b>
Notes: * As described in the Adopted EGSP ** As described in the application materials provided by the Applicant *** Already constructed – not included in the Proposed Modification (Source: Century Communities, November 2023)			

The Proposed Project would revise the type of units developed as part of the Final Phase. However, the Proposed Modification would reduce the overall residential development compared to the Previously Approved Project. The Approved Project included 442 total residential units for Phase 3 – however, only 192 residential units were actually developed as part of this phase. **Table 2** shows the comparison of unit types for the Final Phase.

<b>Table 2 Comparison of Final Phase under the Previously Approved Project and Proposed Project</b>			
<b>Proposed Use</b>	<b>Previously Approved Project*</b>	<b>Proposed Project**</b>	<b>Difference</b>
Residential Units – Market Rate	40 Single-family units	140 Single-family units	Increase of 100 units <sup>^</sup>
Residential Units - Market Rate/Moderate/Workforce II	49 Live/Work Rowhouses	119 Live/Work Rowhouse***	Increase of 70 units <sup>^</sup>
Affordable Apartments	N/A	66 units	Increase of 66 units <sup>^</sup>
Commercial	Up to 75,000 sf Minimum of 34,000 sf	Maximum of 30,000 sf****	Maximum reduction of 45,000 sf
Public/Institutional	4,000 sf	4,000 sf	
Town Center/Parks	1 acre	1 acre	N/A
Adaptive Historic Reuse	100,000 sf	100,000 sf	N/A
Notes: * As described in the Adopted EGSP ** As described in the application materials provided by the Applicant *** Consists of 16 market-rate units, 33 Moderate-Income units, and 70 Workforce II units **** Includes community courtyard <sup>^</sup> Includes units carried over from Phases 3 and 2 of development (442 total units were approved as part of Phase 3 but 250 of the approved units were not constructed, and one (1) unit was carried over from Phase 2)			

Table 2 Comparison of Final Phase under the Previously Approved Project and Proposed Project			
Proposed Use	Previously Approved Project*	Proposed Project**	Difference
(Source: Century Communities, January 2024)			

As identified above in **Tables 1** and **2**, the Proposed Project includes 119 Live/Work Rowhouses located around East Garrison Drive, Sherman Boulevard, Ord Avenue, and Meade Way, 66 Town Center Apartments (below market-rate units) on the upper floors of a mixed-use building (consisting of 32 one-bedroom 700 sf units, 17 two-bedroom 950 sf units, and 17 three-bedroom 1,100 sf units), and 140 single-family units with attached parking garages (in a mix of attached and detached unit types). The single-family units would consist of 61 units on 30 by 70-foot lots, located around the Arts Park, Sherman Boulevard and Ord Avenue, and 79 units on 30 by 55 foot lots located north of the former Battle Simulation Building on Ord Avenue, Sherman Boulevard, and Sloat Avenue. These areas were previously approved for commercial and residential uses as part of the Previously Approved Project. The Proposed Project would increase the number of single-family residences by 139 units, but would decrease the number of Townhomes and Live/Work Rowhouses by 77 units and 78 units compared to the Previously Approved Project. Overall, the Proposed Project would reduce the total number of residential units by 16, with a total of 1,386 residential units under the Proposed Project compared to 1,400 residential units under the Previously Approved Project. The Proposed Project would also carry over the 70 Carriage Units from the Previously Approved Project, with construction dependent on water availability.

The Proposed Project would also reduce the extent of commercial development as compared to the Previously Approved Project. The Previously Approved Project allowed a total development (inclusive of all originally defined development phases) of up to 186,000 sf of non-residential development, including a maximum of 75,000 sf of commercial, a 4,000 sf library/sheriff's office (located at the intersection of East Garrison Drive and Sherman Boulevard), a 7,000 sf fire station, and 100,000 sf of adaptive reuse of historical for arts and education (including the existing 3,400 sf chapel located south of the Town Center at the intersection of East Garrison Drive and Chapel Hill Road). The Proposed Project, however, would reduce the maximum extent of non-residential development under the Final Phase by 45,000 sf, for a net decrease of 40,800 sf across all phases of development (accounting for the 11,200 sf as-built fire station). Implementation of the Proposed Project would result in approximately 34,000 sf of non-residential development (including the 4,000 sf library/sheriff's station) under the Final Phase (see **Table 1**). The remaining 30,000 sf of non-residential space is anticipated to consist of 14,800 sf of cultural art use (art galleries, studio workspaces, etc.) and 15,200 sf of commercial use (food and beverage stores, clothing stores, general stores, restaurants, etc.).

The Proposed Project includes a one-acre Town Center park bounded by Meade Way, Sherman Boulevard, Ord Avenue, and East Garrison Drive, consistent with the Previously Approved Project. The Proposed Project also includes the development of new internal streets and sidewalks and would abandon some of the existing utility easements that were previously recorded as part of the Previously Approved Project and would dedicate new utility easements.



**Figure 5. Proposed Project Area**

*b. Project Location*

The site is entirely within the boundaries of the EGSP in an area previously planned for residential and non-residential development under the Previously Approved Project. More specifically, the Proposed Project is located on Assessor Parcel Numbers (“APNs”) 031-164-028-000 through 031-164-076-000, 031-164-116-000 through 031-164-121-000, 031-164-123-000, 031-164-126-000, 031-164-128-000, 031-169-036-000, 031-169-053-000, 031-169-054-000, 031-301-014-000, 031-301-015-000, and 031-302-057-000 through 031-302-059-000. The site has been previously disturbed, including site preparation, grading, and completion of roadway infrastructure, during previous phases of development associated with the Previously Approved Project.

The surrounding land uses consist of existing residential, commercial, and community uses associated with the East Garrison community to the east, west, and south. Other surrounding land uses include agricultural cultivation and the Salinas River to the north and east, former Fort Ord to the south and west, and residential uses to the north and west. In addition, the California State University Monterey Bay (“CSUMB”) campus is located approximately one mile west of the site. Marina Municipal Airport is located approximately 2.3 miles to the northwest.

c. *East Garrison Specific Plan Amendment*

The Proposed Project would amend the EGSP to: 1) update descriptions of development phases, 2) revise residential unit counts and maximum non-residential development, 3) update permitted land uses, 4) modify the parking network, and, 5) other changes as described below. The Proposed Project would amend Section 1 – Introduction, Section 3 - Land Use, Section 4 – Infrastructure, Section 5 – Phasing, and Section 6 – Plan Review. The following discussion briefly describes the proposed amendments to the EGSP. For a complete description of the modifications, please refer to **Exhibit C**.

Section 1– Introduction Modifications

The changes to Section 1 – Introduction, include a brief summary of the changes in units and square footages of non-residential development consistent with Section 3 – Land Use, and an update to Section 1.9 – Planning Process, to reflect additional public outreach efforts conducted by the Applicant.

Section 3 – Land Use Modifications

The changes to Section 3 – Land Use, include revised unit counts and descriptions, changes to the total acreage of residential and non-residential development land use categories, changes to the land use plan, and changes to the development phases of the Approved Project. **Table 3** provides a summary of Final Phase land use categories.

<b>Table 3 Summary of Final Phase Land Uses</b>				
<b>Land Use</b>	<b>Description</b>	<b>Acreage</b>	<b>Units/SF</b>	<b>Density (residential)</b>
<b>Residential Land Uses</b>				
Residential Medium (RM)	Mix of single-family detached and attached units. One- and two-story houses and two- and three-story townhouses.	3.6	61	17 DU/AC
Residential High (RH-2)	Mix of single- and multi-family attached units.	3.7	79	21 DU/AC
<b>Mixed-Use Land Uses</b>				
Town Center (TC)	Mix of commercial/retail, existing chapel, and inclusionary housing units.	4	Up to 30,000 sf of commercial space*	17 DU/AC
			66 inclusionary units	
			3,400 sf chapel	
Live/Work (LW)	Live/Work Rowhouse units designed to accommodate residential space above ground floor home office or residential uses.	4.3	119 units	28 DU/AC

<b>Table 3 Summary of Final Phase Land Uses</b>				
<b>Land Use</b>	<b>Description</b>	<b>Acreeage</b>	<b>Units/SF</b>	<b>Density (residential)</b>
<b>Institutional/Community Land Uses</b>				
Public Uses (PU)	Library/sheriff's office within the Town Center	0.1	4,000 sf library/sheriff's office	N/A
Parks (P) and Open Space (OS)	Green area to serve as multi-use space for Town Center (space for community gatherings and festivals).	4.6	N/A	N/A
Notes: * Includes community courtyard (Source: Century Communities, January 2024)				

Changes to the land use plan include changed unit counts as described above, increasing the Residential Medium acreage from 80 to 82 acres, decreasing the minimum density of Residential High units from 18 to 10 dwelling units per acre, and updated tables and figures reflecting the Proposed Modification. Other changes include revisions to the permitted land uses, building height limits, signage restrictions, and changes to the parking network. **Table 4** provides a summary of height limits by Land Use category. **Table 5** provides a comparison of changes to the parking network.

<b>Table 4 Summary of Height Limits by Land Use</b>						
<b>Land Use Category</b>	<b>Description</b>	<b>Permitted # of Stories</b>	<b>Maximum Height Between Floors 1 &amp; 2</b>	<b>Maximum Height Between Floors 2 &amp; 3</b>	<b>Maximum Height Between Floors 3 &amp; 4</b>	<b>Maximum Height</b>
<b>RM</b> (detached single-family)	Residential Medium	2 stories plus a 3 <sup>rd</sup> floor tower <sup>1</sup>	12 ft	11 ft	N/A	35 ft
<b>RM</b> (attached townhouse)	Residential Medium	3 stories	12 ft	11 ft	N/A	45 ft
<b>RH-1</b>	Residential High 1	3 stories	12 ft	11 ft	N/A	45 ft
<b>RH-2</b>	Residential High 2	3 stories	12 ft	11 ft	11 ft	45 ft
<b>TC</b>	Town Center	4 stories <sup>2</sup>	16 ft	11 ft	11 ft	50 ft <sup>3</sup>
<b>LW</b>	Live/Work	3 stories	12 ft	11 ft	N/A	45 ft
<b>CL</b>	Cultural Land Use	2 stories	12 ft	N/A	N/A	35 ft
<b>PU</b>	Public Uses	2 stories	16 ft	N/A	N/A	45 ft
<b>P</b>	Parks	1 story	N/A	N/A	N/A	25 ft
<b>OS</b>	Open Space	1 story	N/A	N/A	N/A	25 ft
Notes: <sup>1</sup> 3 <sup>rd</sup> floor tower may not exceed 350 sf. <sup>2</sup> 4 <sup>th</sup> floor limited to southeastern half of the mixed-use building. <sup>3</sup> Towers, special features, and parapet walls may extend up to 55 ft. (Source: Century Communities, January 2024)						

<b>Land Use Categories</b>	<b>Land Use Description</b>	<b>Minimum Off-Street Parking Requirements for the Previously Approved Project</b>	<b>Minimum Off-Street Parking Requirements for the Proposed Project</b>	<b>Changes</b>
RM	Residential Medium	2 per unit <sup>1</sup>	2 per unit <sup>1</sup>	N/A
RH-1	Residential High 1	2 per unit	2 per unit	N/A
RH-2	Residential High 2	2.25 per unit	2 per unit <sup>4</sup>	<b>Decrease of 0.25 spaces per unit</b>
TC (non-residential, including Chapel)	Town Center	1 per 250 sf of building space	1 per 250 sf of building space <sup>3</sup>	Now excludes truck bays
TC (residential)	Town Center	1.25 per unit	1.5 per unit <sup>3</sup>	<b>Increase of 0.25 spaces per unit</b>
TC (Fast Casual Restaurant)	Town Center	N/A	1 per 80 sf of building space <sup>3</sup>	<b>1 new space per 80 sf of building space</b>
LW	Live/Work	2 per unit	2 per unit	N/A
CL (concrete buildings)	Cultural Land Use	1 per 1,000 sf of building space	1 per 1,000 sf of building space	N/A
CL (Theater and Battle Simulation Building, or their replacements)	Cultural Land Use	2 per 250 sf of building space <sup>2</sup>	2 per 250 sf of building space <sup>2</sup>	N/A
PU	Public Use	1 per 250 sf of building space <sup>3</sup>	1 per 250 sf of building space <sup>3</sup>	N/A
P	Parks	None	None	N/A
OS	Open Space	None	None	N/A
Notes: <sup>1</sup> Carriage units require a minimum of 1 additional parking space. <sup>2</sup> On-street parking along Ord Avenue and Sloat Street may be counted towards the parking requirement. <sup>3</sup> Excluding truck bays. <sup>4</sup> Most RH-2 units to have a third off-street surface space. (Sources: Urban Design Associates, July 2004, Kimley-Horn, December 2023)				

**Section 4 - Infrastructure Modifications**

The changes to Section 4 – Infrastructure, include modifications to the proposed network of streets, bicycle systems plan, and parking network. Changes to the proposed network of streets consist of updated diagrams of primary and internal street networks. Changes to the bicycle systems plan consist of updated diagrams of bicycle lane details and lane networks. Changes to the parking network included removal of two designated off-street parking lots for the



community park, increasing the minimum parking spaces in the Town Center from 1.25 to 1.5 designated off-street spaces per unit, replacing dedicated lots or event parking and adaptive building reuse with angled parking along Ord Avenue, and updated diagrams of parking networks. Other changes include updated utility information (including increasing the diameter of water pipelines and noting that not all residential units would require natural gas service) and revisions to the proposed open space component of the Town Center.

#### Section 5 – Implementation Modifications

The changes to Section 5 – Implementation consist of revised descriptions and graphics on as-built, current, and future development phases. The changes also include modification to the illustrative phasing diagram and text to reflect the revised development phases under the Proposed Project.

#### Section 6 – Plan Review

The changes to Section 6 – Plan Review include noting that the East Garrison Design Review Committee is governed by the East Garrison Homeowners Association, as well as revised unit counts and descriptions under the as-built development phase and the Proposed Modification.

#### *d. Combined Development Permit Amendment*

The Proposed Project includes the amendment of Combined Development Permit PLN030204 to modify the development types defined under the Previously Approved Project. More specifically, the Proposed Project consists of the following revisions to PLN030204: 1) relocate 66 affordable housing units from the Arts Park to the upper floors of a mixed-use building in the Town Center; 2) develop new compact two-story single-family homes on the former Arts Park parcels, and 3) develop 254 two- to three-story compact homes and rowhouses within the Town Center. These amendments to the Combined Development Permit are necessary to implement modifications described above.

#### *e. Vesting Tentative Map*

The Proposed Project includes the re-subdivision of existing lots of record to facilitate individual sale and/or lease of each of the proposed residential and live/work units and the remaining non-residential development under the final phase of development. The affected lots are Lots 740-788, Lots M2.10, M2.11, M3.1 - M3.5, T1.1 - T1.6, T1.8, Z1.6, and Z1.8 as shown on the Final Maps for the Approved Project. The Proposed Project would result in the creation of 61 Residential-Medium Lots (Lots 1135-1151 and 1231-1274) and 79 Residential-High-2 Lots (Lots 1152-1230), for a total of 140 single-family lots on 7.29 acres. The Proposed Modification would also result in the creation of 119 live/work lots (Lots 1016-1134 over 4.26 total acres), two Town Center Parcels (Parcels T4.1 and T4.2 over 2.5 total acres), 15 Open Space Parcels (Parcels Z4.1-Z4.15 over 2.85 total acres), one Street Right-of-Way (Parcel S4.1 over 0.64 total acres), and 11 Lane Right-of-Ways (Parcels A4.1-A4.11 over 2.71 total acres). The subdivision of existing lots and parcels is provided below in **Table 6**.

<b>Table 6</b>	
<b>Summary of Subdivision of Existing and Proposed Lots</b>	
<b>Existing Lot/Parcel</b>	<b>Proposed Lot/Parcel</b>
Lots 740-748, Parcel Z1.6	Lots 1016-1025
Lots 756-762	Lots 1026-1033
Lots 749-755, 763-772, Parcels T1.1-T1.3, Z1.8	Lots 1034-1111, Parcels Z4.1-Z4.9, A4.1-A4.4
Parcels T1.4-T1.6	Parcels T4.1-T4.2
Lots 773-782, Parcel T1.8	Lots 1112-1128, 1231-1234
Parcel M3.1	Lots 1235-1239
Parcel M3.2	Lots 1240-1244
Parcel M3.3	Lots 1245-1259, Parcels A4.10, Z4.14
Parcel M3.4	Lots 1260-1274, Parcels A4.11, Z4.15
Lots 783-788, Parcels M2.10-M2.11, M3.5, A2.21	Lots 1129-1230, Parcels S4.1, A4.5-A4.6, A4.8, Z.10-Z.12
Source: Whitson Engineers, August 2023.	

The Proposed Project would also abandon some of the existing utility easements that were previously recorded as part of the Previously Approved Project and would dedicate new utility easements as part of the Proposed Project to serve the new lots.

*f. Pattern Book Amendment*

The Proposed Project includes changes to the EGSP Pattern Book. Changes to the EGSP Pattern Book include the removal of the “Artist Lofts” unit type, addition of new “Live/Work Rowhouses” unit type, replacement of “Live/Work Townhouse” lot type with “Live/Work Rowhouse” lot type, and addition of new “Hamlet” lot type. Other changes to the EGSP Pattern Book include modifications to previously defined lot types (including “Townhouse lots” and “Town Center”), changes to materials, revised setback requirements, introduction of new “modern” architectural styles for town center structures, and modifications to building designs.

**IV. DISCUSSION**

*a. General Plan Consistency*

The County previously evaluated the Previously Approved Project’s consistency with the 1982 General Plan, as amended (Resolution No. 05-267). The County determined that the Previously Approved Project, which included amendments to the 1982 General Plan, would ensure that implementation of the EGSP would be consistent with the 1982 General. Specifically, the County concluded that “[t]he amendments to the Monterey County General Plan ...ensure the Specific Plan and the Combined Development Permit are consistent with the General Plan” (Resolution #05-267”). Similarly, the County also previously determined that development at the residential densities proposed in connection with the Previously Approved Project would be consistent with applicable zoning of the site and would be consistent with the densities contemplated in the EGSP.

The Final EGSP Subsequent EIR evaluated the Previously Approved Project for consistency with the 1982 General Plan. The County found that the Previously Approved Project was consistent with the 1982 General Plan. The Approved Project included two amendments to the

1982 General Plan. The first amendment provides for the policies and regulations of an adopted specific plan to supersede the policies of the 1982 General Plan on development of slopes of 30 percent or greater. The second amendment provides for the policies and regulations of an adopted specific plan to supersede the policies of the 1982 General Plan related to limitations on square footage for convenience/specialty retail. These amendments ensured that the EGSP and the Combined Development Permit would be consistent with the 1982 General Plan.

As noted above, the Previously Approved Project anticipated future development of the Proposed Project site with commercial, residential, and other related uses. The County previously determined that the Previously Approved Project was consistent with the 1982 General Plan, as amended. The Proposed Project would reduce the amount of development associated with implementation of the EGSP, as modified. In fact, the Proposed Project would reduce the number of overall residential units by 16 units and would also reduce the maximum amount of commercial space by 45,000 sf. The reduction of anticipated development at buildout of the EGSP would not result in any potential conflicts with the 1982 General Plan. In addition, the Proposed Project includes amendments to the EGSP to ensure that the modifications are consistent with the EGSP. The proposed commercial, residential, and community uses included in the Proposed Project are consistent with those previously considered as part of the Previously Approved Project, although the specific unit type and configuration has been revised to account for a more refined site design and layout. These modifications would ensure that the EGSP includes a cohesive town center with surrounding commercial, residential, and open spaces uses consistent with the intent of the Previously Approved Project. For these reasons, the Proposed Project would be consistent with the 1982 General Plan.

*b. Analysis of EGSP Amendments*

Government Code Section 65450 authorizes California jurisdictions to “prepare specific plans for the systematic implementation of the general plan for all or part of the area covered by the general plan”. The EGSP identifies the following specific findings that must be made prior to approval of any major amendments:

1. The Specific Plan amendment is consistent with the goals, objectives, policies and programs of the General Plan, and is necessary and desirable to implement the provisions of the General Plan.
2. The uses proposed in the Specific Plan amendment are compatible with adjacent uses and properties.
3. The Specific Plan amendment will not adversely affect the public health, safety or welfare.
4. The proposed Specific Plan amendment will not create internal inconsistencies in the Specific Plan.

Consistency with the Goals, Objectives, and Policies of the General Plan

The EGSP identified minimum and maximum square footage thresholds for development of commercial space and total unit count based on economic projections at the time of approval. The Town Center component of the Previously Approved Project was designed with a flexible zoning overlay in order to respond to changes in market demand over the course of build-out

under the EGSP. The Proposed Project would reduce the required commercial space compared to the Previously Approved Project due to changes in consumer spending away from in-person retail since the time the EGSP was approved.

The changes under the Proposed Project ensure that the major goals and objectives of the Previously Approved Project would be met while accounting for changes in economic circumstances since the time the EGSP was adopted. The County determined that the Previously Approved Project was consistent with the 1982 General Plan, as amended. The Proposed Project would not result in any new land uses or increases in development that would be inconsistent with the 1982 General Plan or the EGSP. The proposed amendment to the EGSP would be consistent with the goals, objectives, and policies of the 1982 General Plan. See also discussion above regarding consistency with the 1982 General Plan.

#### Compatibility with Adjacent Uses and Properties

The Proposed Project site is adjacent to previous development phases under the EGSP, consisting mainly of residential uses. The Proposed Project consists of residential, commercial, and recreational/open space uses. The Proposed Project does not introduce new land uses (such as industrial, manufacturing, hazardous materials processing, etc.) that would be incompatible with existing adjacent uses. The proposed amendment to the EGSP would be consistent with would be compatible with adjacent land uses and residential properties. Moreover, the Proposed Project includes commercial, residential, and other related uses consistent with the uses contemplated under the Previously Approved Project, although the extent of development would be reduced as part of the Proposed Project .

#### Adverse Impacts to Public Health, Safety, or Welfare

The Proposed Project would result in new development on a site previously approved for development under the Approved Project. The Previously Approved Project analyzed development of these areas with respect to potential adverse impacts to public health, safety, or welfare. The Proposed Project would reduce the maximum residential units and non-residential space compared to the Previously Approved Project. The Proposed Project does not introduce new land uses (such as industrial, manufacturing, hazardous materials processing, etc.) that would result in adverse impacts to public health, safety, or welfare. The proposed amendment to the EGSP would not result in any new or increased adverse impacts to public health, safety, or welfare. Moreover, the final phase of construction also includes public facilities (i.e., sheriff substation) and other public safety facilities (i.e., fire station) were developed in prior phases of development.

#### Internal Consistency with the Adopted Specific Plan

The Proposed Project would reduce the minimum and maximum amounts of commercial space to be developed under the EGSP compared to the Previously Approved Project, as described above. The changes under the Proposed Project ensure that the major goals and objectives of the Approved Project would be met while accounting for changes in economic circumstances since the time the EGSP was adopted. The Proposed Project would be consistent with the stated goals of the adopted EGSP, including, but not limited to, creating a compact pedestrian-friendly planned development, designing efficient, self-funded infrastructure systems, and minimizing effects on the environment. The Proposed Project does not introduce new land use types that

would be inconsistent with the adopted EGSP. Moreover, the Proposed Project includes amendments to the EGSP to ensure that there would not be any internal inconsistencies with the adopted EGSP.

*c. Successor Agency Agreements*

East Garrison Partners, LLC (“EGP”) and the Redevelopment Agency of the County of Monterey with the approval and agreement of the County of Monterey (“County”) entered into a DDA dated as of October 4, 2005. The DDA provides, among other things, for the construction and rental of affordable housing, in three phases, on a portion of the real property located on the former Fort Ord Army Base within the East Garrison area. On September 8, 2009, the Developer acquired fee title to the East Garrison project that was subject to the DDA, and consequently, as successor-in-interest to EGP, assumed certain rights, interests and requirements under the DDA. The Redevelopment Agency of the County of Monterey has been succeeded by the Successor Agency to the Redevelopment Agency of the County of Monterey (Agency). On August 30, 2016, the Developer and Agency entered into an Amended and Restated First Implementation Agreement to the Disposition and Development Agreement (First Implementation Agreement) assigning the obligations of the DDA to the Developer and amending certain DDA terms.

*d. Long-term Reliable Water Supply*

The County previously considered adequacy of water supply for the Previously Approved Project as part of the EGSP Final Subsequent EIR. The County requested that the Marina Coast Water District (“MCWD”) prepare a Water Supply Assessment and Written Verification of Supply (“WSA”) for normal, single dry, and multiple dry water years, in compliance with Water Code Sections 10910 and 10912 and Government Code Sections 65867.5 and 66473.7, to evaluate and determine whether sufficient potable water will be available to serve water demand for the Previously Approved Project. MCWD concluded that they had available capacity to serve the Previously Approved Project and the County of Monterey subsequently allocated 470 acre-feet per year (“afy”) to the Previously Approved Project. The Proposed Project would lower the total water demand to 453.38 afy due to the reduction of 45,000 sf of commercial space; this represents a total reduction in water demand of 16.62 afy compared to the Previously Approved Project (see Addendum #2, page A1-56). **Table 7** presents the revised water demand projections under the Proposed Project .

<b>Table 7 Revised Projected East Garrison Water Demand at Full Buildout</b>					
<b>Land Use</b>	<b>Dwelling Units</b>	<b>Building Area (sf)</b>	<b>Acreage</b>	<b>Demand Factor<sup>1</sup> (afy)</b>	<b>Annual Demand (afy)</b>
<b>Residential</b>					
Single-Family Detached	919	N/A	N/A	0.25	229.75
Townhouse	150			0.25	37.50
Live/Work Rowhouse	119			0.25	29.75
Affordable Apartments	196			0.25	49.00
Carriage Units	70			0.25	17.50
<b>Commercial (Town Center)</b>					
Retail	N/A	20,100	N/A	0.00021	4.22
Market/Grocery		3,000		0.00021	0.63
Restaurant & Community Courtyard		6,900		0.00145	10.01
<b>Institutional/Cultural/Parks/Open Space</b>					
Cultural/Educational	N/A	100,000	N/A	0.0003	30.0
Library/Sheriff		4,000		0.0003	1.20
Fire Station		11,200		0.0003	3.36
Parks		N/A	13.27	2.5	33.18
Special Landscape Features			4.00	2.1	8.40
<b>Total</b>	<b>1,454</b>	<b>145,200</b>	<b>17.27</b>		<b>454.5</b>
<sup>1</sup> From Table 4.4 in MCWD 2020 Urban Water Management Plan SF = square feet AFY = acre feet per year (Source: Kimley-Horn, August 2023)					

The Proposed Project would not exceed the existing water allocation for the Previously Approved Project and there would be adequate available water supplies to serve the Proposed Project. The Proposed Project has an adequate source of water as identified in the WSA prepared by MCWD. The Proposed Project would be consistent with previous County determinations on the adequacy of available water supplies for the Previously Approved Project.

*e. Transportation/Traffic/Parking*

The County previously considered impacts to transportation and traffic as a result of the Previously Approved Project as part of the EGSP Final Subsequent EIR. The Project Applicant retained Kimley-Horn to prepare a Final Phase Shared Parking Analysis (December 2023) to ensure that the existing available parking supply would be sufficient for the Proposed Project . The Proposed Project would change the parking ratios based on the ratios identified in the EGSP for each land use type as described in **Table 6**, above. Kimley-Horn’s analysis was based on the results of a virtual town hall meeting with residents of the East Garrison community on March 14, 2023 and the revised land uses under the Proposed Project .

Kimley-Horn determined that the Town Center would have an available parking supply of 333 shared spaces (consisting of 171 on-street spaces and 162 off-street spaces). Kimley-Horn

identified a peak parking demand of 232 spaces using the methodology discussed in the EGSP for each land use type (see **Table 6**). As a result, the Proposed Project would not result in insufficient parking for the Town Center uses.

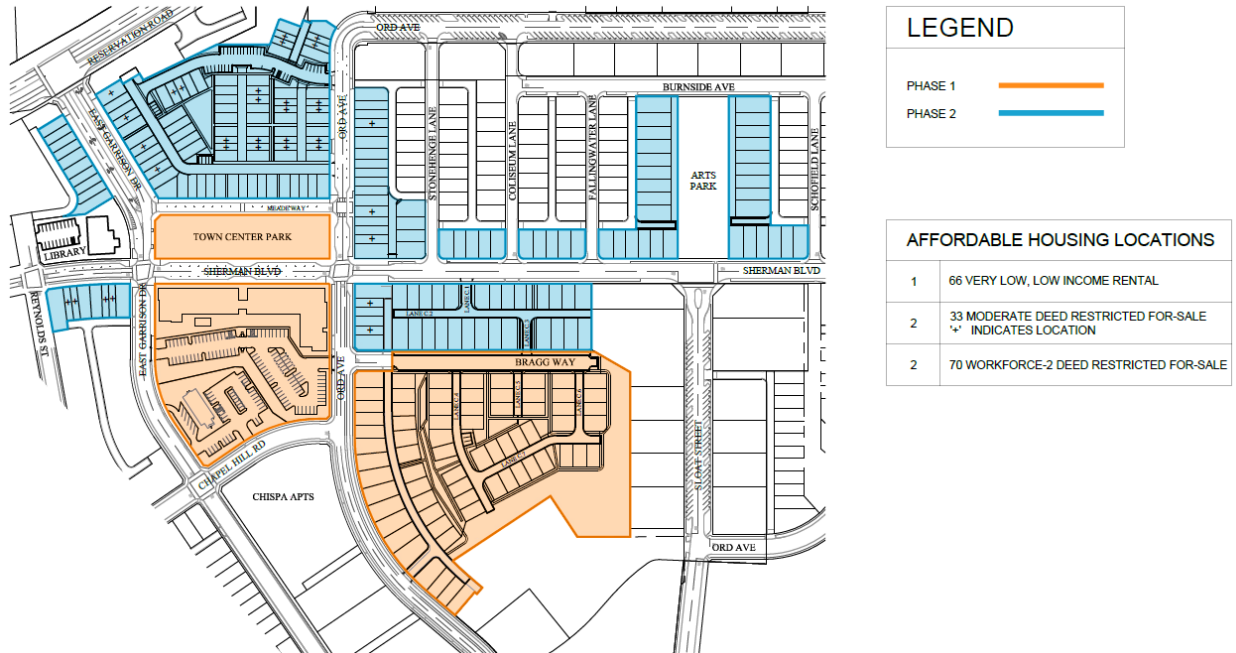
The residential portion of the Final Phase would have an available parking supply of 776 spaces, inclusive of garage parking (518 spaces), driveway parking (214 spaces), and dedicated off-street parking spaces (44 spaces). Kimley-Horn identified a peak parking demand of 232 spaces (see **Table 6**). As a result, Kimley-Horn determined that the Proposed Project would not result in insufficient parking for the residential uses.

The Proposed Project would implement recommendations for parking demand management identified in Final Phase Shared Parking Analysis. These recommendations include parking of oversized vehicles at the vacant Battle Simulation Building site, preparing an Events Management Plan to address parking, security, and other related issues during future events, and future consideration of improving the small arms range west of Barloy Canyon Road to provide dedicated parking for users of the Fort Ord National Monument.

*f. Affordable Housing*

The DDA provides, in part, that the Previously Approved Project must include at least: a) 6% of the total of the 1,400 permitted residential units (exclusive of accessory or carriage units) developed under the EGSP must be affordable to and occupied by Very Low Income Households ("Very Low Income Units"); b) 8% must be affordable to and occupied by Low Income Households ("Low Income Units"); and c) 6% must be affordable to and occupied by Moderate Income Households ("Moderate Income Units"). The EGSP and the DDA provide that the Very Low Income and Low-Income Units in each phase shall be affordable rental units developed by one or more qualified tax credit entities (each a "Rental Affordable Housing Developer") selected by the Developer, subject to the reasonable approval of the Agency.

A total of 33 Moderate income units and 66 affordable units (Very Low and Low income) required by the Previously Approved Project remains to be built. An additional 70 Workforce II units of the Previously Approved Project remains to be built. The Project includes 66 very low and low income rental units, 33 for sale deed restricted moderate units and 70 for sale deed restricted Workforce II units. An amendment to the DDA, and as conditioned, commitments are in place to ensure the Project meets the EGSP inclusionary housing obligations prior to build out. See **Figure 6** below for the draft Affordable Housing Plan.



**Figure 6. Affordable Housing Plan**

*g. Design – Revised Pattern Book*

The adopted EGSP Appendix A – Pattern Book includes development standards for residential and commercial development. The EGSP amendment modifies the Pattern Book to add a new “modern” architectural style for the Town Center; replace “Live/Work Townhouse” lot type with “Live/Work Rowhouse” lot type; add a new “Hamlet” lot type; remove the “Artist Lofts” unit type; and add a new “Live/Work Rowhouse” unit type.

Future development would be subject to the design review process identified in the EGSP. Specifically, development would be subject to review and approval by the East Garrison Design Review Committee prior to issuance of an approval, permit, and/or conformance determination.

*h. California Environmental Quality Act Compliance – Proposed Project*

The County prepared Addendum No. 3 to the EGSP Final Subsequent EIR for the Proposed Modification. CEQA Guidelines Section 15164 states that “[a] lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.” CEQA Guidelines Section 15162 establishes the following criteria for the preparation of a subsequent EIR:

- 1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;



- 2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- 3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
  - a) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
  - b) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
  - 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 would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Addendum No. 3 evaluated the potential environmental effects associated with implementation of the Proposed Project and concluded that it would not result in new significant impacts or increase the severity of a previously identified impact. The Proposed Project would reduce the number of residential units by 16 residential units. Similarly, the Proposed Project would reduce the amount of non-residential development by 45,000 sf as compared to the Approved Project. As a result, the Proposed Project would reduce the magnitude of potential impacts as compared to the Approved Project. However, the Proposed Project would not reduce the overall level of significance (i.e., less than significant, less than significant with mitigation, or significant and unavoidable) of any of the impacts identified in the EGSP Final Subsequent EIR. The development of the EGSP, as modified by the Proposed Project, would still result in significant and unavoidable impacts related to construction and operational air quality emissions, substantial adverse changes to historic resources, incremental worsening of level of service (“LOS”) at project area intersection and roadways, and increases in water demand and construction of new water supply, storage, and distribution facilities as identified for the Previously Approved Project. Implementation of the Proposed Project would not, however, increase the severity of any of these impacts. In fact, the Proposed Project would slightly reduce the magnitude of these effects due to the reduction in proposed development. The Proposed Project would not result in any additional environmental effects beyond those previously identified in the EGSP Final Subsequent EIR.

Pursuant to Section 15162 of the CEQA Guidelines, there are no substantial changes proposed in the Proposed Modification, no changes to circumstances under which the Previously Approved Project was undertaken, and there is no new information of substantial importance not known at time that would require major revisions to the EGSP Final Subsequent EIR due to the introduction of new environmental effects or substantial increase in the severity of previously identified environmental effects as a result of the Proposed Project . The Proposed Project would not result in any new significant environmental effects that cannot be mitigated with existing, previously identified mitigation measures in the EGSP Final Subsequent EIR. In addition, the Proposed Project would not substantially increase the severity of environmental effects identified in the EGSP Final Subsequent EIR. As described above, CEQA Guidelines Section 15164 states that a lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary, but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred. The Proposed Project does not present a substantial change to identified environmental impacts previously discussed and addressed in the EGSP Final Subsequent EIR (SCH#2003081086). Therefore, a subsequent or supplemental EIR, pursuant to CEQA Guidelines Section 15162, is not required in connection with approvals for the Proposed Project.

*i. Conditions of Approval/Mitigation Monitoring & Reporting Program*

The Board of Supervisors previously certified the EGSP Final Subsequent EIR (SCH#2003081086), adopted a Mitigation Monitoring and Reporting Plan (“MMRP”), and adopted a Statement of Overriding Considerations for the Previously Approved Project (Resolution No. 05-264) on October 4, 2005. 17 mitigation measures would be applicable to the Proposed Modification as identified in Appendix F of Addendum No. 3 (**Exhibit G**). The County previously adopted 265 conditions of approval for the Approved Project. Condition compliance for the Previously Approved Project is considered ongoing as buildout of the EGSP is ongoing. All applicable conditions from the Previously Approved Project would be carried over to the Proposed Project, with the exception of Condition No 184, which was modified as part of Addendum No. 1. The Proposed Project would not require additional mitigation measures beyond those identified for the Previously Approved Project. The County has identified that 5 additional conditions of approval would be applicable. See **Exhibit F**.

*j. Public Outreach*

The Applicant has conducted extensive public outreach to solicit community feedback from residents. Century communities organized a presentation at an HOA Board meeting, an East Garrison CSD meeting (conducted virtually via Zoom), and an in-person discussion with residents about the commercial town center (including presentations by a commercial broker). Century Communities also conducted an in-person discussion with residents at the East Garrison Fire Station about the art space and arts habitat mixed-use building, an Open House Question and Answer Session at the East Garrison Fire Station on January 21, 2023, and a Board of Supervisors presentation. Community concerns at these events included parking availability, open space, and traffic.