

Memorandum

TO	Anna Quenga	DATE	6 November 2023
COMPANY	Monterey county	COPIES TO	Dean Mills Keith McCoy
FROM	Barry Long		
PROJECT	East Garrison Minor Amendments		
PURPOSE	Response to comments		
REMARKS			

Anna,

We have largely reflected your comments in the attached draft of the East Garrison Specific Plan and Pattern Book. However, there are a few of your notes/questions that require a separate explanation. Below please find our responses:

SPECIFIC PLAN

- Table of Contents (TOC) -- The TOC in the original Specific Plan and Pattern Book were done manually. They have now both been linked to the section headers to allow for automatic updates and avoid inconsistencies.
- Section 1, p. 6, 7, and 8 – Suggestions were not incorporated on the advice of legal counsel.
- Section 3, 3.3 Development Program – We added a reference to the DDA versus having the program detailed in two places. The intent is to avoid the risk of inconsistencies.
- Section 3, Table 3.3 – Yes, one less unit was built in Phase 1 than originally anticipated.
- Section 3, Table 3.4 – Yes, one less unit was built in Phase 2 than originally anticipated.
- Section 3, p. 33 – We do not plan to have a monument sign as a suitable location doesn't exist. Also, office and professional signs will be limited to a maximum of 35 square feet.
- Section 4, 4.1.10 Town Center Street – Meade Way must remain one-way.
- Section 4, 4.1.16 Neighborhood Street – Shown on a different neighborhood street key plan (4.1.17)

- Section 4, Figure 4.52 – Parking diagram was deleted because it is too detailed for a Specific Plan. This information belongs in the improvement plans.
- Section 4, 4.6.4 Town Square – Uses listed in the description are included in the park improvement plans already approved by Monterey County.
- Section 4, Table 4.10 – This table was updated in our September submission.
- Section 4, p.55 – Yes
- Section 4, Table 4.11 – This table was updated in our September submission.

PATTERN BOOK

- B16 – No, we are not carrying over the open space requirement.

November 22, 2023

East Garrison Final Phase Executive Summary



Century Communities
6700 Koll Center Parkway, Suite 200
Pleasanton, CA 94566

EXECUTIVE SUMMARY

Century Communities is pleased to provide this summary for the Final Phase of the East Garrison community. This narrative describes the modifications needed to enable East Garrison to be completed in a timely manner while respecting the goals and intent of the original vision.

A summary of the key requested modifications includes:

1. Relocation of the required 66 affordable housing units from the Arts Park to the upper floors of a proposed mixed-use building in the Town Center. The ground floor of this building will house the required 30,000 square feet of commercial space.
2. Infill with compact 2-story single-family homes flanking the Arts Park.
3. Development of the parcel north of the Town Square Park with live/work rowhouses. Units facing the park will have storefronts.
4. Buildout of the Residential High 2 site with compact 3-story single family homes.
5. Reduction of the overall maximum permitted unit count from 1400 to 1384. Note that the Final Phase was reduced by 15 units and 1 unit was removed from a previous phase.
6. Adjustments to the Residential Medium, Residential High 2, Town Center, and Live/Work land uses to be consistent with the modifications described above.
7. Adjustments to the Pattern Book to be consistent with the modifications described above.

East Garrison residents were engaged in the discussion of the proposed updates. A list of these meetings is included in Section 1 of the revised East Garrison Specific Plan.

Table 1 below compared planned and proposed Final Phase uses.

RESIDENTIAL LAND USE	FINAL PHASE AREA AS PLANNED 2004	FINAL PHASE AREA AS PROPOSED 2023
Single Family	0	140
Townhouses	35	0
Condos/Apartments/Lofts	190	0
Live/Work Units	49	119
Affordable Units	66	66
Total	340	325
NON-RESIDENTIAL LAND USE		
Commercial	30,000 SF	30,000 SF
Library/Sheriff	4,000 SF	4,000 SF
Total	34,000 SF	34,000 SF



- KEY
- 30'x70' LOTS
 - 30'x55' LOTS
 - LIVE/WORK ROWHOUSE
 - ARTSPACE/COMMERCIAL
 - PHASE 4: FINAL PHASE BOUNDARY

Proposed 2023 Final Phase Plan

2004 Approved



2023 Proposed



FIGURE 3.6 LAND USE PLAN

EAST GARRISON SPECIFIC PLAN / EAST GARRISON, CALIFORNIA / JUNE 2023



URBAN DESIGN ASSOCIATES



MEMORANDUM

To: Dean Mills
Century Communities

From: Bill Wiseman, Frederik Venter, P. E., and Achilles Malisos
Kimley-Horn and Associates

Date: August 17, 2023 / Revised 10-25-23

Subject: **East Garrison Specific Plan Amendment – Response to Incomplete Letter (8/9/23)**

This memo is in response to the incomplete letter from Anna Ginette Quenga, Principal Planner at Monterey County, dated August 9, 2023, in regard to the Water Demand Analysis and Technical Reports related to transportation, air quality, and noise. County comments are shown in red for reference.

Water Demand Analysis. Please address the comments below:

- Revise Table 1 to be consistent with other materials to ensure the total of residential units is accurate.

Table 1 has been corrected, as shown on the following page and the revised Water Demand Analysis, attached.

Table 1: East Garrison Final Phase Proposed Land Uses

Land Use	Approved	Built	Final Phase	Total
Residential (dwelling units)				
Single-Family	780	779	140	919
Townhouse	227	150	--	150
Live / Work Rowhouse	197	--	119	119
Affordable Apts.	196	130	66	196
Accessory Dwelling Units (optional)	70	--	70	70
Total	1,470	1,059	395	1,454
Non-Residential (square feet)				
Commercial (incl. Community Courtyard)	75,000	--	30,000	30,000
Library/Sheriff	4,000	--	4,000	4,000
Fire Station	7,000	11,200	--	11,200
Arts / Cultural / Education (incl. Chapel)	100,000	--	100,000	100,000
Total	186,000	11,200	134,000	145,200

Source: Urban Design Associates, 2023.

- Provide a brief justification describing why the new demand factors are appropriate as well as any other deviations for previous methodology use.

The new water demand factors were derived from Table 4.4 of the 2020 Urban Water Management Plan (UWMP) prepared for the Marina Coast Water District. These are the most current water demand factors that incorporate current water conservation practices and appliances. This is noted on page 24 of the UWMP, which states:

MCWD modified its District Code in August 2005, to require additional conservation measures in the construction of new development and remodeling. These new requirements include incorporation of hot water recirculation systems and high efficiency clothes washers for residential units, and zero-use urinals for non-residential construction. These residential requirements are expected to achieve the State water conservation goal of an average indoor per capita consumption rate of 55 gallons per person per day.

These regulations were implemented after certification of the East Garrison Specific Plan Final SEIR and will be required for the Final Phase construction at East Garrison. As such,

the water demand factors used in the Water Demand Analysis are fully justified and appropriate.

Technical Reports. Below is a list of technical information needed to support the conclusions in the environmental document:

- Provide a letter from a qualified professional demonstrating why the previous Traffic Impact Study prepared by TJKM Transportation Consultants, dated September 7, 2004, is sufficient. The information should provide quantifiable evidence reflecting if there would be a change in traffic trips. This information would demonstrate whether or not a Vehicle Miles Traveled analysis is necessary. Also see the attached memo from HCD-Engineering Services for comments on traffic and parking.
- Provide a letter from a qualified professional demonstrating why the previous Air Quality Analysis prepared by Michael Brandman Associates, dated September 3, 2004, is adequate. Ensure that if there is a change in operational traffic trips, resulting air quality emissions are addressed.
- Provide a letter from a qualified professional demonstrating why the previous Noise Impact Analysis prepared by Michael Brandman Associates, dated September 3, 2004, is sufficient.

Introduction

The East Garrison Specific Plan Subsequent EIR (SEIR) was certified by the Monterey County Board of Supervisors in 2005. The SEIR identified potentially significant environmental impacts and related mitigation measures. The County also adopted a Mitigation Measures and Monitoring Program that continues to apply to all future development at East Garrison, including Final Phase development of the Town Center (i.e., the EGSP Amendment).

The approved East Garrison Specific Plan (July 2004) allowed 1,470 residential units and 186K square feet of non-residential uses. The EGSP Amendment would reduce the number of residential units by 16 and reduce the amount of non-residential uses by 40,800 square feet. Logically, this reduction in the intensity of development will result in a reduction of operational impacts, particularly related to traffic trips. As described below, this would result in a reduction of traffic level of service (LOS) impacts, and correspondingly operational impacts associate with air quality, GHG emissions, and noise, all of which use traffic trips as the basis for their operational impact analysis. This is a professionally based “common sense” conclusion, as confirmed by Kimley-Horn technical experts, described below.

Traffic Impact Study

The basis of the Traffic Impact Study prepared by TJKM (September 2004) uses projected trip generation rates to determine the level of impact on intersections, as described starting on page 15 and shown in **Table II: Project Trip Generation from the Model**. The model assumed that the “development with 1,470 homes is expected to generate a total of approximately 13,692 daily trips with 1,290 trips occurring during the a.m. peak hour and 1,379 trips occurring during the p.m. peak hour.”

Assuming a reduction in the total number of residential by 16 units (1,470 to 1,454, per Table 1, above), this results in a reduction of 1,152 daily trips, and 8 and 9 peak hour a.m. and p.m. trips, respectively. ¹

With respect to the commercial uses, the approved EGSP (2004) allows up to 75,000 square feet of commercial space in the Town Center (EGSP, page 9). With the proposed amendments, only 30,000 square feet (per Table 1, above), will be constructed, resulting in a reduction of 45,000 square feet. This results in a decrease of 3,038 daily trips, and 78 and 234 peak hour a.m. and p.m. trips, respectively. ²

In total, the proposed amendments would result in a reduction of 4,190 daily trips, and 86 and 243 peak hour a.m. and p.m. trips, respectively. This results in a 31 percent (31%) reduction in vehicular trips as compared to the previously approved EGSP project (2004).

Both the EGSP Amendment and TJKM Traffic Impact Study were reviewed by Frederik Venter, P.E, a senior traffic engineer with Kimley-Horn & Associates. ³ Frederik is very familiar with the East Garrison project having reviewed traffic improvement plans for East

¹ Institute of Traffic Engineers (ITE) Trip Generation Handbook, 3rd Edition, Land Use Code 215 – Single Family Attached.

² Institute of Traffic Engineers (ITE) Trip Generation Handbook, 3rd Edition, Land Use Code 821 – Shopping Plaza (mixed commercial between 40,000 and 150,000 sf.).

³ Frederik Venter has 33 years of experience as a transportation planner, civil engineer, and traffic engineer. He is currently registered as a Professional Civil Engineer in California and has been involved in numerous major transportation and traffic engineering studies throughout the United States. Frederik also has extensive experience in the development of transportation infrastructure needs for the long-term based on future development of the cities and counties, as well as development impact studies. Frederik has managed transportation planning survey studies, including comprehensive origin/destination surveys and parking survey demand, mitigation proposal, pedestrian and bike facility planning, and concept designs. He has performed strategic planning of roads-related infrastructure, while remaining cognizant of applicable Caltrans standards, fiscal and socioeconomic constraints, and community needs.

Garrison Phases 2 and 3 on behalf of Monterey County when employed with RBF Consulting.

Frederik confirmed that reduction in the total development (described above) would result in fewer trips and therefore the TJKM Traffic Impact Analysis represents a worst-case scenario and is sufficient for the EGSP Amendment, and no further traffic impact analysis is warranted or necessary, per CEQA Guidelines Section 15162 (described below [No Subsequent Environmental Review Required]).

Vehicle Miles Travelled

Since certification of the EGSP SEIR, the issue of vehicle miles traveled (VMT) has become a more prominent issue of concern as evidenced by passage of SB 743 in 2013. The previous CEQA analysis prepared by TJKM (2004) was conducted using a level of service (LOS) measurement to evaluate traffic delay.

As specified under SB 743 and implemented under Section 15064.3 of the State CEQA Guidelines (effective December 28, 2018), VMT is the required metric to be used for identifying CEQA impacts and mitigation. In December 2018, the CA Governor's Office of Planning and Research (OPR) published a Technical Advisory on Evaluating Transportation Impacts, including guidance for VMT analysis. The Office of Administrative Law approved the updated CEQA Guidelines and lead agencies were given until July 1, 2020, to implement the updated guidelines for VMT analysis.

Because EGSP SEIR has been certified, the determination of whether VMT needs to be analyzed for this project is governed by the law on supplemental or subsequent EIRs per Public Resources Code section 21166 and CEQA Guidelines, Sections 15162 and 15163. VMT is not required to be analyzed under those standards unless it constitutes "new information of substantial importance, which was not known and could not have been known at the time the previous SEIR was certified as complete" (CEQA Guidelines Section 15162 (a) (3)).

VMT impacts were not analyzed in the EGSP SEIR; however, these impacts are not new information that was not known or could not have been known at the time the EGSP SEIR was certified. The issue of VMT as a metric for analyzing traffic was widely known prior to the certification of the EGSP SEIR.

Therefore, the impact of VMT was known at the time of the certification of the EGSP SEIR. Under CEQA standards, it is not new information that requires analysis in a subsequent EIR or Negative Declaration. No supplemental environmental analysis of the project's impacts on this issue is required per CEQA Guidelines, Sections 15162 and 15163.

Air Quality & Noise Analysis

Achilles (Ace) Malisos, a senior environmental analyst with Kimley-Horn reviewed Section 4.5 Air Quality and Section 4.6 Noise of the EGSP Draft SEIR. He also reviewed Appendix F Air Quality and Appendix G Noise Assessment, both prepared by Michal Brandman Associates and dated September 3, 2004.

Ace has more than 20 years' experience preparing air quality, greenhouse gas emissions, and noise studies throughout California. ⁴

Because the EGSP Amendment represents a one percent (1%) reduction in the amount of development as compared to that analyzed in the certified EGSP EIR, both the air quality and noise analysis are considered adequate and represents a worst-case condition. The basis for his conclusion is that both studies utilize traffic trip generation rates (described above) as the basis for determining operation impacts associated with air quality and noise.

He confirmed that the mitigation measures identified in the Draft SEIR will reduce project impacts associated with the EGSP Amendment to less than significant, with the exception of long-term vehicle emission air quality impacts, which will remain significant and unavoidable.

As such, Ace has confirmed that no further Air Quality nor Noise impact analysis is warranted or necessary per CEQA Guidelines Section 15162 (described below [No Subsequent Environmental Review Required]).

Project Referral Sheet from HCD – Engineering Services

Responses to the following comments from the HCD – Engineering Services “Project Referral Sheet” are addressed below.

⁴ Achilles Malisos serves as an environmental analyst, with a specialty in Acoustics, Air Quality, and Climate Change. He has experience in the research, preparation, and analysis consistent with the CEQA and NEPA for a variety of environmental planning projects involving redevelopment, infrastructure, residential, mixed use, institutional, and commercial uses. Achilles has the ability to implement a full analysis methodology per Environmental Protection Agency (EPA), CARB, Air Pollution Control District/Air Quality Management District, and Caltrans/FHWA guidelines. His expertise in Air Quality/Greenhouse Gas Assessments includes technical modeling experience using various state and federally approved programs including the California Emissions Estimator Model (CalEEMod), AERMOD, CALINE4, and EMFAC.

- Submit an updated Traffic Impact Analysis reflecting the updated project scope. In order to reduce potential delays, we recommend submitting the traffic scope of work for review and approval by Public Works prior to commencing the analysis.

As described above, an updated traffic impact analysis is not warranted or necessary per CEQA.

- Provide verification the project trip generation does not exceed the anticipated trip generation from the East Garrison Specific Plan.

As described above, the project trip generation will be less than the trip generation previously identified in the TJKM Traffic Impact Analysis prepared for the EGSP in 2004.

- Provide updated analysis with verification/clarification of mitigations for direct and cumulative traffic impacts, and implementation of said mitigations.

As described above, an updated traffic impact analysis is not warranted or necessary.

- The attached East Garrison Final Phase Shared Parking Analysis by Kimley Horn, dated May 2023 is incomplete. Submit a copy of the completed shared parking analysis for review.

Please provide comments on what specifically is considered “incomplete” so that we can provide an informed response.

- Provide VMT analysis as required per CEQA requirements and Office of the Planning & Research (OPR).

See discussion above as to why a VMT analysis is not required for CEQA.

No Subsequent Environmental Review Required

Monterey County will need to prepare Findings that no subsequent environmental review is required. CEQA Guidelines Section 15162 identifies the conditions requiring subsequent environmental review. After a review of these conditions, the County will be able to conclude that no subsequent EIR or Negative Declaration is required for the EGSP Amendment project. This is based on the following:

a) Are there substantial changes to the project involving new or more severe significant impacts?

There are no substantial changes to the project as analyzed in the EGSP SEIR. The proposed project would reduce the level of development intensity and thereby reduce operational impacts associated with air quality, GHG emissions, energy, noise, transportation, public

services, utilities, and service systems. All other impacts, as identified Appendix G of the CEQA Guidelines would remain the same.

b) Are there substantial changes in the conditions which the project is undertaken involving new or more severe significant impacts?

There are no substantial changes in the conditions assumed in the EGSP SEIR. The project would reduce the level of development intensity and thereby reduce operation impacts, as described above.

c) Is there new information of substantial importance, which was not known and could not have been known at the time of the previous EIR that shows the project will have a significant effect not addressed in the previous EIR; or previous effects are more severe; or, previously infeasible mitigation measures are now feasible but the applicant declined to adopt them; or mitigation measures considerably different from those in the previous EIR would substantially reduce significant effects but the applicant declines to adopt them?

There is no new information showing a new or more severe significant effect beyond those identified in the EGSP SEIR. Similarly, there are no new or different mitigation measures required for the project. All previously adopted mitigations continue to apply to the project. The EGSP SEIR adequately describes the impacts and mitigations associated with the proposed project development within the EGSP area.

d) If no subsequent EIR-level review is required, should a subsequent negative declaration be prepared?

No subsequent EIR or Negative Declaration is required because there are no significant impacts of the project beyond those identified in the EGSP SEIR and no other standards for supplemental review under CEQA are met.