

December 15, 2020

Mr. Kevin Canning
County of Orange
OC Development Services / Planning
601 North Ross Street
Santa Ana, CA 92701

**Subject: Letter of Project Proposal and Scope of Work
Legacy at Coto California Grand Villages Project**

Dear Mr. Canning:

This letter transmits the Discretionary Permit Application for the Legacy at Coto California Grand Villages Project within Planning Area 20 of the Coto de Caza Planned Community.

Owner Coto Valley Tennis Club, LLC (Stonefield Development as Manager), Robert C. Pack, President Coto Valley Office Complex, LLC (Robert C. Pack 1998 Revocable Trust, Manager), Robert C. Pack, Trustee

Applicant CGV Coto Partners, LLC

PROJECT PROPOSAL/SCOPE OF WORK

Project Name: Legacy at Coto California Grand Villages
Project Location: 23333 and 23335 Avenida La Caza, Coto de Caza, California
APNs: 804-231-04 and 804-231-02

The proposed Project involves the development of a 95-unit active senior living residential project with a secure subterranean parking garage and related amenities. The construction of the Project would require the reuse of the area where the existing tennis facilities and administrative offices are located. All existing buildings and tennis facilities on the site would be removed and the site would be regraded to level out its mixed elevation to thereby create the subterranean parking area and building areas. Approximately 3.38 acres of the site would be graded.

A total of 3.09 acres of the site would be developed, with the building taking up approximately one acre (51,000 square feet) of the property surface area, and hardscaping and landscaping taking up the remainder of the developed portion. The proposed senior living Project will consist of one building. The building would have an L-shaped configuration and consist of two stories on top of the subterranean parking area with a maximum combined total height of 40 feet (some portions of the building will only be as high as 29 feet above ground level due to slope of the property). The total building area for the Project including the subterranean parking facility would be 154,131 square feet, refer to [Figure 1, Site Plan](#). The Roof Plan for the Project will reflect how the roof top mechanical equipment would be shielded from view. The residential units would be located on both floors, ranging in size from 441 square feet to 1,567 square feet.

To meet the day-to-day household and recreation needs of residents, several general amenities and services will be provided. The building will have staffing and 24-hour onsite security year-round. The residents will be provided with both gourmet restaurant food and basic bistro food, room service and housekeeping services weekly as part of the year- to-year leases. Through concierge services, residents can arrange for the chauffeur-driven Legacy at Coto Grand Villages cars to take them to appointments, shopping and events and other personal needs. Descriptions of other special amenities are shown in [Table 1, Amenity Descriptions](#).

Table 1: Amenity Descriptions

Amenity	Square Feet
Bistro – Small dining venue with a light food menu, primarily serving breakfast and lunch. It has indoor/outdoor seating and is open to both Legacy at Coto Grand Villages and Coto de Caza residents. Because of its central location to existing residential uses, it is anticipated that the majority of people would walk to the bistro, minimizing vehicular traffic in the area. This Bistro will also have a provisions wall, selling staples like milk, butter, eggs, etc. to Coto residents.	113
Bistro Outdoor Seating Area	270
Bar – Small seating area serving drinks to Legacy at Coto Grand Villages residents. It is planned to be a place for small gatherings to socialize.	123
Dog Spa – For Legacy at Coto Grand Villages residents as a place to self-bathe their pets. It is adjacent to the Bistro for convenience and for residents to enjoy a meal or snack while their dog dries.	168
Fitness Center First Floor – Small room for Legacy at Coto Grand Villages residents to exercise and have fitness classes to maintain their physical well-being. An area that can be used for massage is also included.	704
Restaurant – Will provide dining and meals for Legacy at Coto Grand Villages residents. This will be a full-service dining experience with gourmet meals.	1,847
Movie Cinema – Small room for Legacy at Coto Grand Villages residents to watch movies on a large screen.	615
Lounge First Floor – Small gathering space for Legacy at Coto Grand Villages residents to meet, relax and play games.	1,638
Wine and Sports Club – A place for Legacy at Coto Grand Villages residents to go for a glass of beer or wine tasting. Indoor seating overlooking the Great Room. A place to watch specials and sporting events.	1,378
Swimming Pool and Spa – Pool and sun deck with food service and beverages from the Bistro and bar, respectively.	3,040
Meditation Garden – This is a private landscaped area on the south side of the property providing a nice quiet buffer from the Via Alondra residential area. This is a passive recreation area for senior residents of the Legacy at Coto Grand Villages community to relax and reflect.	2,300
Onsite Walking Paths – There are two walking paths that extend across the entire property from east to west and from west to east on both the north and south sides of the property, respectively. These paths provide a connection for the Coto Village neighborhood residents from Via Alondra to Avenida La Caza to the onsite Village Bistro. There are additional walking paths from north to south from the privately owned Coto Clubhouse property to the privately owned tennis courts on the Coto Valley Country Club adjacent to the property and to the onsite landscape meditation garden. These trails will be constructed of natural decomposed granite surface and occur within the newly landscaped yard areas of the property.	N/A
Amenity Services – A wide of variety of amenity services would be available to residents, including housekeeping, concierge, 24-hour security, secure and safe parking and chauffeur driven transportation.	N/A

CIRCULATION/PARKING

The primary access to the site would be from a private driveway constructed to meet fire code requirements that would be accessed from Avenida La Caza on the southern site boundary. The private driveway would provide direct access to the subterranean parking structure as well as access to surface parking areas. The entrance to the subterranean garage would be through gated access. Secondary emergency only access to the Project would be provided from Via Alondra on the north site boundary. This secondary emergency only access drive would be gated and would only be available for emergency vehicular access for fire evacuation safety purposes. No ambulance service or resident drop-off or passenger staging would be permitted on the emergency vehicle access drive. Presently, there is not a vehicular connection between Via Alondra and Via Venado. As an offsite improvement for the Project, a restricted access emergency vehicle connection from Via Alondra to Via Venado would be provided only for fire safety evacuation purposes. The access would be restricted and controlled by a post and a chain with a sub-keyed knock pad lock that would be removed during an emergency. No parking signs would be posted on both sides of the chain.

All of the required parking for the Project would be self-contained and would be provided by a combination of surface parking and a secure subterranean parking garage. A total of 115 onsite parking spaces would be provided for residents, employees and visitors; refer to Table 2, *Parking Provisions*. This includes four Americans with Disability Act (ADA) spaces, one ADA Van space, two compact spaces, 10 EV Ready surface parking spaces near the entrance of the building and 96 standard size parking spaces provided in the subterranean parking structure. Additionally, 25 offsite parking spaces would also be available at the Coto Valley Country Club, per easement agreement with Coto Valley Country Club, recorded in September 1989.

Table 2: Parking Provisions

Parking Types	Quantity
Parking Based on Type of Users	
Resident	96
Employee/Staff Onsite	19
Total	115
Parking Based on Type of Parking Stalls	
American with Disabilities Act (ADA)	4
American with Disabilities Act (ADA) Electric Vehicle (EV)	3
American with Disabilities Act (ADA) Van	1
Compact (C)	2
Electric Vehicle (EV)	10
Standard Parking (P)	95
Total	115
Note: An additional 25 parking spaces are permitted at the adjacent Coto Valley Country Club site, per easement agreement between property owner and Coto Valley Country Club for a total for 140 parking spaces available for the Project's use.	

ARCHITECTURE TREATMENT

The Legacy at Coto Grand Villages design has been envisioned as an equestrian manor to reflect the Coto de Caza ranch heritage as a private hunting and equestrian social club. The proposed architectural style of the Legacy at Coto Grand Villages building is French Country which is consistent with surrounding buildings. The building would have several elements that reflect French Country Estate design, including an entry porte-cochère embellished with lattice trim and cut openings, octagon tower, bell shaped roof with cast eaves reflecting a high-quality architecture design. The building elevations would have natural materials, stone, wood and stucco in varying patterns to create interest on all sides. Landscape planter beds and vines are proposed to enhance the building with flora color. The roof color has low reflectivity.

LANDSCAPE TREATMENT

The Project proposes a landscape setback around the perimeter of the site to create a buffer to adjacent land uses. The setback area would incorporate a combination of trees, shrubs along the existing arroyo, which would soften views and reduce the visual presence of the building along Avenida La Caza by creating a park-like setting around the Project site. Along Via Alondra, a heavy landscaped setback with trees, shrubs and a decomposed granite trail would be provided to complement existing open space and landscaping provided in the Project area. Based on approved Conceptual Landscape Plan, a detailed planting plan would be prepared that would identify locations and quantities where specific plant materials would be installed. The planting plan would comply with Water Use Classifications of Landscape Species (WUCOLS) and the County's Landscape Ordinance.

Current landscaping, which includes high flammable vegetation according to the Orange County Fire Authority (OCFA) guidelines, will be replaced with fire resistive vegetation including the use of succulent plants, thereby minimizing the possibility of fire on the property. An existing riparian corridor located on the Project site would be preserved and incorporated into the landscape plan. A decomposed granite pedestrian trail would weave through the open space area providing an additional open space amenity for residents.

PHASING AND CONSTRUCTION

The proposed Project would be constructed in one phase. The initial construction activities would involve the removal of existing vegetation, buildings and infrastructure and clearing of the site, followed by rough grading to create a building area. The grading would be balanced onsite with no importing or exporting of earth materials. The Project is anticipated to be under construction from November 2021, when clearing and grading would be initiated, until Second Quarter 2023, approximately 18 to 20 months as estimated by construction management experts. The sequence of construction activities that typically occur would be clearing and site grading, drainage improvements and utilities, horizontal building foundation and vertical building construction, then site concrete work and paving, landscape installation and final inspections.

INFRASTRUCTURE

Grading Plan: The proposed project would be constructed in one construction phase. The initial construction activities would involve the removal of existing vegetation, buildings and infrastructure and clearing of the site, followed by rough grading to create a building area. Approximately 93 trees would be removed from the project site, of which two-thirds are non-native trees and over 50 percent of the trees have minor to major to extreme health problems. The landscape plan proposes to plant approximately 50 trees of varying species. As shown on the grading would be balanced onsite with no importing or exporting

of earth materials. After grading operations are completed, horizontal infrastructure including roadways, retaining walls and utilities would be constructed. Once infrastructure is in place, the vertical construction of the building would begin. It is anticipated that the overall construction of the proposed project would be approximately twenty months.

Drainage Plan: The project site currently drains southerly and westerly to existing drainage channels. A new onsite underground storm drain would be constructed to better manage existing offsite flows through the project site. There would be no change to the offsite conditions. The proposed storm drain outfall location would be approximately in the same location as the existing storm drain outfall. Onsite drainage would be collected and treated and mitigated per current County of Orange requirements and would include onsite treatment of low flows and an underground storage gallery to detain and mitigate larger stormwater runoff volumes and flow rates.

Water Service: Water service to the project site would be provided by the Santa Margarita Water District. New lateral pipelines would be constructed on the project site that would tie into existing eight-inch pipelines located along Avenida La Caza and Via Alondra.

Sewer Service: Sewer service would be provided by the Santa Margarita Water District. New lateral pipelines would be constructed on the project site that would tie into existing eight-inch sewer lines located along Avenida La Caza.

Utilities: The current utility providers for the project are:

- San Diego Gas Electric – Electricity Service
- Southern California Gas Company – Natural Gas Service
- Cox Cable – Internet, HDTV, Telephone

PUBLIC SERVICES

Fire Protection Services: Orange County Fire Authority (OCFA) would provide fire protection, emergency medical services and rescue services for the proposed project. The closest fire station to the project site would be Fire Station 40 located at 25082 Vista Del Verde, Coto de Caza, CA 92679. The project has been designed to comply with OCFA fire safety requirements. As part of the design for the proposed project the following fire safety plans have been prepared and submitted to Orange County Fire Authority for approval.

- ***Fuel Modification Plan.*** The Fuel Modification Plan is a vegetation management code that requires landscaped areas adjacent to new buildings be dedicated for permanent vegetation management activities. The Fuel Modification Plan program brings fire-safe landscaping and construction features together to improve community safety and reduce property loss during wildfire emergencies. The Fuel Modification Plan for the proposed project proposes a 20-foot Zone A Non-Combustible Zone that is only allowed for non-combustible construction and a 0 to 153-foot Zone B Wet Zone extending from Zone A, that would consist of permanently irrigated fully landscaped drought tolerant, deep rooted high moisture plant material. Additionally, a Restricted Plant Zone is proposed for the portion of the project adjoining Via Alondra. Within this area, groupings of trees would be prohibited, and only individual trees spaced 30 feet apart would be allowed. Understory of existing Oak Trees are required to be cleared and maintained.

- **Fire Master Plan.** Fire Master Plans are general guidelines pertaining to the creation and maintenance of fire department access roadways, access walkways to and around buildings, and hydrant quantity and placement as required by the 2019 California Fire and Building Codes (CFC and CBC) and as amended by local ordinance. Fire Master Plans demonstrate the effectiveness of emergency response and firefighting operations are directly related to the proper installation and maintenance of fire access roadways, the proper sitting of hydrants, adequate water supply, and access to structures. The information contained within the Fire Master Plan is intended to assist the applicant in attaining compliance and to ensure that privately owned roadways that are necessary for emergency response purposes would be available for use at all times. Issues addressed in the Fire Master Plan include:
 - Fire access roadway design
 - Fire lane identification
 - Premises identification
 - Fire lane obstructions
 - Access for residential development
 - Alternative engineered fire access systems
 - Access requirements in wildfire risk areas
 - Hydrant quantity, spacing, placement, and identification
 - Water availability and fire flow
 - Access to structures
 - Access during construction
 - Fire Safe Regulations for State Responsibility Areas (SRA) and Very High Fire Hazard Severity Zones in Local Responsibility Areas (LRA)

Police Services: Police services for the proposed project would be provided by the Orange County Sheriff's Department. Coto de Caza is located within the Sheriff's Department Southeast Operation Division. The Southeast Operations Division deploys 65 patrol cars during each 24-hour period, with 168 sworn peace officers. The Southeast Operation Division is stationed at 20202 Windrow Drive, Lake Forest, California 92630, approximately 5.5 miles from the project site. The closest substation is located at 22112 El Paseo, Rancho Santa Margarita, California 92688, approximately 1.6 miles from the project site.

Solid Waste Disposal: Coto de Caza currently contracts with CR&R Incorporated Environmental Services for solid waste and recycling collection services for residential and commercial waste. Prima Deshecha Sanitary Landfill is primarily responsible for waste generated from Coto de Caza along with a small amount that is sent to the Frank R. Bowerman Sanitary Landfill.

EXISTING SITE CONDITIONS AND EXISTING USES

The project site is located within the Coto de Caza Planned Community within unincorporated, Orange County. The site is located at 23333 and 23335 Avenida La Caza. The project site consists of 4.2 acres and is currently developed and situated within a suburban setting. The site is bordered to the northwest by Via Alondra, to the southeast by Avenida La Caza, to the east by the existing Coto Valley Country Club, and to the west by existing residential homes and tennis courts.

Topographically, the site consists of flatter areas with rolling slopes that descend into three existing drainages located west, east and south of the project site. The site is heavily landscaped with groundcover and ornamental trees. A small portion of the western end of the project site is within the 100-year flood zone.

Regional access to the project site is provided by Interstate State 5 (I-5) and State Route 241 (SR-241). Local access is provided from Oso Parkway, Coto de Caza Drive and Avenida La Caza. The site was previously the Vic Braden Tennis College and the site still contains several tennis courts, office space structures, walls, fences, and associated improvements.

The County of Orange General Plan Land Use Element designates the project site Suburban Residential (1B). In accordance with the General Plan, areas designated Residential (1B) are allowed to a wide range of housing types, from estates on large lots to attached dwelling units, including townhomes, condominiums and clustered arrangements. The proposed project would be consistent with the type of housing allowed under the General Plan Land Use Element Residential (1B) land use category.

The zoning for the project site is provided within the Coto de Caza Specific Plan. The project site is located within Planning Area 20 and is zoned for Community Center/Commercial land uses.

EXISTING ENVIRONMENTAL CONDITIONS

Earth: The project site consists of flatter areas with rolling slopes that descend into three existing drainages located west, east and south of the project site. The project site is not located in a landslide and liquefaction hazard area and there is low potential for expansive soils. The project site is in a seismically active region, although no Alquist-Priolo Earthquake Fault Zones are on the project site or in the nearby area. A preliminary geotechnical report has been prepared and has determined that the project is geotechnically feasible. The proposed grading operations for the project would include a combination of cut and fill that would be balanced onsite with no importing or exporting of fill material.

Water: The project site is in the San Juan Creek Watershed. The project site currently drains southerly and westerly to existing drainage channels. A small portion of the western end of the project site is within a 100-year flood zone. A Water Quality Management Plan, as enclosed, has been prepared to manage surface water runoff from the site. Additionally, the project would have to meet FEMA requirements to maintain a minimum of one foot of freeboard between the floodplain and proposed building finished floor. In addition, if proposed grading modifies a location within the floodplain, a Conditional Letter of Map Revision (CLOMR) and Letter of Map Revision (LOMR) will be required to be submitted to FEMA to show the proposed change in the mapped floodplain.

Biological Resources: Three special status animal species were determined to have moderate potential to occur within the project site including the pallid bat, western mastiff bat, and western red bat. Additionally, two special status animal species, the Coastal Range newt and the coastal whiptail, were determined to have a low to moderate potential to occur within the project site. There is one major surface drainage onsite and a small portion of a second surface drainage to the west that are classified as Waters of United States and Waters of the State that would be avoided. The project site would remove 93 trees, of which two-thirds are non-native trees and over 50 percent of the trees have minor to major to extreme health problems. The landscape plan proposes to plant approximately 50 trees of varying species.

Land Use: The County of Orange General Plan designates the project site 1B Suburban Residential. The zoning for the project site is provided within the Coto de Caza Specific Plan. The project site is located within Planning Area 20 and is zoned for Community Center/Commercial land uses. The project consists of 4.2 acres and is located within the Coto de Caza Village, which includes residential, recreational and commercial land uses. The site was previously the Vic Braden Tennis College and the site still contains several tennis courts, office space structures, walls, fences, and associated improvements. Presently located on the project site is 10,780 square feet of office area, 3,500 square foot Design Center, 3,822 square foot research

center, seven tennis courts and one large mechanical tennis ball pitching machine with 16 hitting lanes. The project site is surrounded by the Coto de Caza Valley Country Club to the east, tennis courts and residential uses to the west, open space to the north, and open space and residential uses to the south.

Hazards: The project site contains no known hazardous waste sites.

Cultural Resources: There are no known historic, archaeological or paleontological resources on the project site and the project site is not located within or near a general area of sensitivity. The Vic Braden Center is ineligible to be listed on the California Register of Historical Resources.

Traffic: All project area intersections and roadway segments would continue to operate at an existing level of service. Additionally, with other development project volumes added to the project traffic analysis, all project area roadway segments and intersections would operate at acceptable levels of service.

JUSTIFICATIONS

Zoning

The County of Orange General Plan Land Use Element designates the project site Suburban Residential (1B). In accordance with the General Plan, areas designated Residential (1B) are characterized by a wide range of housing types, from estates on large lots to attached dwelling units, including townhomes, condominiums and clustered arrangements. The proposed project would involve the development attached residential uses which be consistent with the type of housing allowed under the General Plan Land Use Element Residential (1B) land use category.

Coto de Caza Specific Plan, Orange County Zoning Code

In accordance with Section 7-9-38 of the Orange County Zoning Code, senior living facilities are defined as providing care and services on a monthly basis or longer to residents aged sixty (60) years of age or older and may include: Independent living (IL) facilities that are intended for individuals who are presently able to manage an independent lifestyle but foresee a future where more support will be necessary. IL residents are provided with assistance in the instrumental activities of daily living, such as: dining, housekeeping, security, transportation and recreation. IL dwelling units may have separate kitchens and garages.

The zoning for the project site is provided within the Coto de Caza Specific Plan. In accordance with the County Zoning Code Section 7-9-142, a senior living facility may be permitted in any district, planned community, or in any specific plan area zoned for multi-family residential or commercial uses subject to the approval of a use permit by the planning commission unless otherwise authorized by an administrative site development permit in accordance with the base district regulations. Development standards shall be per the base district unless the approving authority makes the appropriate findings to approve a modified development standard. Each senior living facility use permit or site development permit application shall be reviewed on a case-by-case basis and shall:

- 1) Demonstrate compatibility with adjacent development.
- 2) Provide a parking study that will be used to determine if a modification to the base district parking standards will be necessary.

- 3) Provide the location of all services and how they are accessed by residents and non-residents, including deliveries and including universal design features in compliance with the Americans with Disabilities Act (ADA).

Project Consistency

Senior Living Facility Definition: The proposed project would meet the intent of the County’s Zoning Code definition of senior living facility, in that the project would be restricted to persons that are 60 years of age or older and would provide assistance to meet day-to-day household and recreation needs with a wide range of services and amenities.

Demonstrate Compatibility with Adjacent Development: The County of Orange General Plan designates the project site 1B Suburban Residential, which allows a wide range of housing types, from estates on large lots to attached dwelling units (townhomes, condominiums, and clustered arrangements). The proposed project is an attached housing project that would be an allowable housing type under the 1B Suburban Residential land use designation.

The project site is currently developed and in a deteriorated condition. As shown in Table 3, Surrounding Zoning Uses, the project site is surrounded by areas that are zoned for medium density residential land uses. Existing land uses within the vicinity of the site include recreation, open space, single-family residential, and multiple-family residential land uses.

Table 3: Surrounding Land Uses

Direction	General Plan Designation	Zoning	Existing Land Use
North	1B Suburban Residential	Medium Density Residential	Open Space
East	1B Suburban Residential	Medium Density Residential	Coto Valley Country Club
South	1B Suburban Residential	Medium Density Residential	Open Space and Single-Family Residential Uses
West	1B Suburban Residential	Medium Density Residential	Tennis courts and Single-Family Residential Uses

The project has incorporated project design features to ensure compatibility with existing land uses. The project proposes a landscape setback around the perimeter of the site to create a buffer to adjacent land uses. The setback area would incorporate a combination of trees, shrubs along an existing arroyo, which would soften views and reduce the visual presence of the project along Avenida La Caza, creating a park-like setting around the project site. The project would be situated below grade along Via Alondra which would reduce the visual height at street level and would be comparable with heights of other existing residential structures in the project area. A heavy landscaped setback with trees, shrubs and a decomposed granite trail would be provided between Via Alondra and the project to complement existing open space and landscaping provided in the project area.

Parking Study: The proposed project would provide 115 parking spaces for residents, employees and guests. An additional 25 parking spaces would also be provided at the Coto Valley Country Club. A parking study was prepared for the proposed project based on the project’s former residential unit count of 101 residential units. The parking study utilized the Institute of Traffic Engineering (ITE) parking rate for Senior Adult Housing – Attached (Land Use: 252) of 0.66 spaces per unit. This rate includes all parking demand comprised of resident, staff, and guest vehicles. Similarly, the ITE parking rate for the Shopping Center (Land Use: 820) of 4.1 spaces per 1,000 square feet of gross leasable area (GLA) was also used. Based on the ITE parking rates discussed above, the proposed project requires a total of 68 parking spaces—67 spaces for the residential use, and an additional one space for the specialty retail use. The project proposes to provide 115 parking spaces.

Americans with Disabilities Act (ADA): The proposed project has been designed to be compliant with the American Disabilities Act to facilitate ADA access within the building. As shown on the site plan, ADA parking spaces have been incorporated into the project to facilitate access from the parking area to the residential building. As part of the County of Orange building review of the project, the project would be required to demonstrate that it would be compliant with the Americans with Disabilities Act (ADA).

Base Zoning District Site Requirements: The zoning for the project site is established in the Coto de Caza Specific Plan. The project site is located within Planning 20 and zoned for Community Center/Commercial uses. In accordance with Section 7-9-142, the project site development standards must be in accordance with the base district regulations. As shown in Table 4, *Community Center/Commercial Requirements*, the proposed project would be consistent with the Community Center/Commercial site requirements.

Table 4: Community Center/Commercial Requirements

Site Development Standard	Coto de Caza Specific Plan Community Center/ Commercial Requirement	Proposed Project
Building Height	40 Feet	40 Feet
Site Coverage	50 Percent	29 Percent
Front Yard Setback	20 Feet	111 Feet
Side Yard Setback	20 Feet	35 Feet, 38 Feet
Rear Yard Setback	20 Feet	42-Feet

Additionally, the proposed project has been designed to meet the following design guidelines established for Community Center/Commercial land uses.

- **The arrangement of structures and facilities should encourage enough mass and scale to identify their presence as major elements within the community. Architectural of smaller commercials facilities should stress intimate settings with a rural character.**

The proposed project has been designed at scale, mass and height that does not conflict with the existing aesthetic environment.

- **Architectural accents such as cupolas, windvanes, windmills and towers which relate to the existing architectural and environmental character of Coto de Caza are encouraged in these areas.**

The proposed project has been designed to complement existing country-like architectural character reflected throughout Coto de Caza. Architectural accents incorporated into the design of the project include porte-cochère embellished with lattice trim and cut openings, octagon tower, bell shaped roof with cast eaves and building elevations with natural materials. Additionally, landscape planter beds and vines are proposed to enhance the building with flora color. Softscape elements such as decomposed granite trails provided along pedestrian paths further accent the country-like design.

- **Onsite circulation systems and public spaces such as arcades, courtyards, patios and porches should be designed to encourage interaction and pedestrian travel.**

The design of the proposed project incorporates both indoor and outdoor gathering areas to encourage social interaction. Within the residential building, there are activity rooms, cinema, fitness center, restaurant, lounge sports bar and a wine club. The building also includes an outdoor patio and deck areas.

A landscaped pedestrian trail extends around the perimeter of the building allowing for outdoor social interactions. A private landscape meditation garden is provided for relaxation.

- **Community Center/Commercial planning areas should be connected with community-wide circulation routes and open space/recreation systems.**

The proposed project retains the existing circulation system currently provided within the planning area. The proposed project includes both indoor and outdoor recreation amenities and is within walking distance to existing recreation facilities and community pedestrian walking paths.

General Welfare

Potential impacts that could cause substantial adverse effects on human beings were analyzed in this Initial Study include, but are not limited to; air quality, greenhouse gas emissions, geology hazards, hazardous materials, seismic hazards, hydrology/water quality, noise and wildfire. Each issue area found that there would be either no impacts, impacts would be less than significant, or impacts would be less than significant with mitigation incorporated. The proposed project would comply with local and regional planning programs, applicable codes, and ordinances, State and Federal laws and regulations, standard conditions of approval and mitigation measures to ensure that long-term operation activities and short-term construction activities associated with the proposed project would not result in direct, or indirect adverse impacts to human beings.

REQUESTED APPROVALS

The following is a listing of approvals requested for the project:

Conditional Use Permit

- Approval of senior living facility.
- To allow an increase of 4 feet 8½ inches over the maximum height of 40 feet for an architecture feature.
- Request to allow 7 compact parking spaces.

Site Development Permit

- To allow ancillary uses in conjunction with the proposed senior living facility.

Lot Merger

- To merge the two existing legal parcels into one legal parcel.

We are pleased to submit the Legacy at Coto California Grand Villages Project to the County of Orange for consideration and review. We look forward to working with County staff on the processing of the project. Please do not hesitate to contact me at (949) 234-6072 or dbott@vcsenvironmental.com with any questions or informational needs you may have.

Sincerely,

Dan Bott

Dan Bott
CEQA Director