

May 1, 2020

Mr. Kevin Canning
County of Orange
OC Public Works | Planning and Development
300 N. Flower Street
Santa Ana, CA 92703

**Subject: Letter of Project Proposal and Scope of Work
Legacy at Coto 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/Applicant 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 California Grand Villages Coto Partners, LLC, Drew Purvis

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 Legacy at Coto Project involves the development of a 101-unit active senior living residential project with a subterranean parking facility. The project would be developed on the former Vic Braden Tennis College site. 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 tennis college has not been in operation for over twenty years and the tennis facilities are in a degraded condition. A small portion of the offices in the building are currently used by the property owner as administrative offices. The construction of the project would require the reuse of the entire Vic Braden Tennis College site. All existing buildings and tennis facilities on the site would be removed and the entire site would be regraded to create the subterranean parking area and building areas.

The proposed senior living project will consist of one building. The building would have an L-shaped configuration and consist of two stories with a maximum height of 40 feet. The total building area for the project including the subterranean parking facility would be 154,131 square feet; refer to Figure 1, Site Plan, Figure 2a, Garage Plan (Sub Grade), Figure 2b, First Floor Plan (At Grade), and Figure 2c, Second Floor Plan. A total of 48 residential units would be located on the first floor and 53 residential units would be on the second floor, ranging in size from 441 square feet to 1,567 square feet; refer to Table 1, Residential Unit Mix, Figure 3, Cross Sections and Figures 4a thru 4c, Unit Plans.

Table 1: Residential Unit Mix

Residential Unit Type	Quantity	Square Feet
Studio	8	479
Studio	15	441
Studio	2	470
Studio	6	485
1 Bedroom	2	724
1 Bedroom	20	650
1 Bedroom	14	680
1 Bedroom	22	765
2 Bedroom	4	1,057
2 Bedroom	2	1,002
3 Bedroom	2	1,330
3 Bedroom	1	1,421
3 Bedroom	2	1,368
3 Bedroom	1	1,567
Total	101	12,439

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. The residents will be provided with both gourmet restaurant food and basic bistro food, room service and housekeeping services weekly as part of the rent. Through concierge services, residents can arrange for the chauffeur-driven Legacy at Coto cars to take them to appointments, shopping and events and other personal needs. Descriptions of other special amenities are provided below, and the size of the amenities are shown in Table 2, *List of Amenities*.

- **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 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.
- **Bar** – Small seating area serving drinks to Legacy at Coto residents and their guests. It is planned to be a place for small gatherings to socialize.
- **Dog Spa** – For Legacy at Coto 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.
- **Fitness Center** – Small room for Legacy at Coto residents to exercise and have fitness classes to maintain their physical well-being. An area that can be used for massage.
- **Restaurant** – Will provide dining and meals for Legacy at Coto residents. It will also be open to Legacy at Coto guests and provide a formal meal setting. This will be a full-service dining experience with gourmet meals.
- **Movie Cinema** – Small room for Legacy at Coto residents to watch movies on a large screen.
- **Lounge** – Small gathering space for Legacy at Coto residents to meet, relax and play games.

- Wine and Sports Club – A place for Legacy at Coto 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.
- Swimming Pool and Spa – Pool and sun deck with food service and beverages from the Bistro and bar, respectively.
- Onsite Trails – 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 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.
- 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 passive recreation area for senior residents of the Legacy at Coto community to relax and reflect on the grand life they have created.

Table 2: List of Amenities

Amenity	Square Feet
Bistro	113
Bistro Outdoor Seating Area	270
Bar	123
Dog Spa	168
Fitness Center (First Floor)	704
Great Room	1,037
Lounge (First Floor)	1,638
Restaurant	1,847
Boutique Movie Cinema	615
Fitness Center (Second Floor)	704
Lounge (Second Floor)	540
Wine and Sports Club	1,378
Amenity Services	
- Housekeeping	
- Concierge	
- 24-Hour Security	
- Secure and Safe Parking Structure	
- Chauffeur-Driven Transportation	

CIRCULATION AND PARKING

All of the required parking for the project would be self-contained and provided in a secure subterranean parking garage. The primary access to the site would be a fire safety compliant driveway accessed from Avenida La Caza. The driveway would provide direct access to the subterranean parking structure as well as access to surface parking areas. Secondary emergency access to the project would be provided from the north end of Via Alondra. The access drive would be gated and would only be available for emergencies.

No resident drop-off or passenger staging would be permitted. Additionally, as part of the project, a restricted access vehicle connection from Via Alondra to Via Venado would be provided only for fire safety purposes. A total of 120 onsite parking spaces and 25 offsite parking spaces would be provided for residents and visitors; refer to [Table 3, *Parking Provisions*](#). This includes five ADA spaces, one ADA Van space, seven compact spaces, 12 EV Ready spaces and 95 subterranean parking structure spaces.

Table 3: Parking Provisions

Parking Types	Quantity
Parking Based on Type of Users	
Resident	101
Employee/Staff	19
Total	120
Parking Based on Type of Parking Stalls	
American with Disabilities Act (ADA)	2
American with Disabilities Act (ADA) Electric Vehicle (EV)	3
American with Disabilities Act (ADA) Van	1
Compact (C)	7
Electric Vehicle (EV)	12
Standard Parking (P)	95
Total	120
Note: An additional 25 parking spaces are provided at the adjacent Coto Valley Country Club site, for a total for 145 parking spaces available for the project's use.	

ARCHITECTURAL TREATMENT

The Legacy design has been envisioned as an equestrian manor to reflect the Coto de Caza heritage. The proposed architectural style of the Legacy building is French Country. As shown in [Figures 5a thru 5c, *Exterior Elevations*](#), the building has several elements that reflect French Country 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 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.

LANDSCAPE TREATMENT

A comprehensive landscape program has been proposed for the project. 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.

Current landscaping, which includes undesirable 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 drainage corridor located on the project site would be preserved, refer to [Figure 6, *Conceptual Landscape Plan*](#). A decomposed granite pedestrian trail would weave through the open space area providing an additional open space amenity for residents.

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 Figure 7, Conceptual Grading Plan, 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; refer to Figure 8, Preliminary Drainage Plan. 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)
- ***Emergency Response and Evacuation.*** Emergency responses and evacuation procedures would be the responsibility of the Orange County Fire Authority and the Orange County Sheriff's Department. Under the California Standardized Incident Command System (ICS), evacuation is a law enforcement function. The Orange County Sheriff's Department would be in charge of evacuating neighborhoods in the event of a fire that threatens homes. These evacuations would be decided within the Incident Command structure in consultation with the fire department, law enforcement, public works, and local government liaisons in order to establish when and where they would occur. Under the Ready Set Go program instituted in Orange County, citizens are encouraged to evacuate prior to an evacuation recommendation, advisory or order. Prior to issuance of occupancy permits, the applicant would work with the Orange County Sheriff's Department and the Orange County Fire Authority to confirm the standard for triggering voluntary evacuations and would establish a predecessor trigger for the Legacy at Coto project that would be approved by the County of Orange. A special monetary fund would be established to charter buses from a charter bus company for those who prefer not to drive themselves. The use of the bus would be funded by the project and available on request. Additionally, the funds would be used to house residents at local hotels until any danger passes. Additional safety qualified staff would also be provided during red flag warning days to assist residents. Fire drills would be practiced twice a year to ensure all residents and staff are well trained on the procedure.

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; refer to Figure 9, Regional Location Map. 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; refer to Figure 10, Project Area Map.

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. The existing conditions on the project site are shown in Figure 11a, Site Photograph Locations, and Figure 11b, Existing Site Photographs.

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; refer to Figure 12, Existing Land Uses.

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; refer to Figure 13, Development Map, 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: A traffic analysis has been prepared for the project. The project would generate approximately 382 daily trips with 22 AM peak hour trips and 28 PM peak hour trips. 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.

Under the County General Plan, Neighborhood/Commercial uses are assumed to be consistent with Suburban Residential areas, subject to compliance to the Neighborhood Commercial Guidelines provided in the General Plan. The proposed bistro component of the proposed project would be considered Neighborhood Commercial use. Table 4, *Neighborhood Commercial Guidelines Consistency*, provides a consistency analysis of the proposed bistro with Neighborhood Commercial Guidelines.

Table 4: Neighborhood Commercial Guidelines Consistency

Neighborhood Commercial Guideline	Consistency Analysis
1. To encourage the development of commercial activities in centers with unified planning, design, and facilities (such as parking, ingress and egress).	Consistent: The proposed bistro has been aesthetically integrated into the design of the senior living residential building. Dedicated parking for the bistro would be provided at the Coto Valley Country Club.
2. To locate commercial development at intersections of primary and secondary streets wherever possible. When local commercial development must be located adjacent to major intersections, access should be from the lesser of the two arterials.	Consistent: The proposed bistro would be accessed by Avenida La Caza which is the primary roadway for residents within the Village community of Coto de Caza. The access to the site has been designed to accommodate both pedestrian and vehicle access.
3. To locate commercial development so that wherever possible, it is centrally located within its service area.	Consistent: The proposed bistro would be centrally located in the Village community of Coto de Caza and could be easily accessed by either walk up traffic or vehicular traffic.
4. To locate commercial sites at an optimal distance from regional and community commercial centers.	Consistent: There are no existing regional or community commercial centers in Coto de Caza. The closest community commercial center is located in Santa Margarita, located approximately 1.7 miles from the project site.
5. To locate, generally, neighborhood commercial centers one mile apart.	Consistent: There are no existing neighborhood commercial centers within one mile of the project.
6. To encourage adequate pedestrian and bicycle connections to neighborhoods and adjacent retail and service uses.	Consistent: The proposed bistro would be located 0.10 miles from existing residential uses and could easily be accessed by walking or biking.
7. To accommodate all modes of transportation by incorporating appropriate design features and supporting development of a comprehensive trails and bike system.	Consistent: The proposed bistro would be located 0.10 miles from existing residential uses and could easily be accessed by walking, biking and by automobile for residents outside of the Village community within Coto de Caza.

Neighborhood Commercial Guideline	Consistency Analysis
8. To manage parking efficiently and provide easily accessible and well-designed bicycle parking.	Consistent: The project would provide dedicated bicycle parking near the proposed bistro. A total of 25 dedicated parking spaces would be available at the Coto Valley Country Club for the bistro. The proposed site plan has been designed to allow for adequate pedestrian and vehicle access to the project site.
9. To set a general standard of one acre of commercial development per 1,000 people in the service area. Because there are no absolute criteria for neighborhood commercial acreage needed to adequately service a given number of people, this standard should be tempered by the character of each particular area.	Consistent: Because of the limited amount of commercial areas located in Coto de Caza, it is anticipated the bistro would serve nearby residents in the Village as well as residents in Coto de Caza.
10. To set a general standard of three to ten acres for neighborhood commercial developments.	Consistent: The proposed bistro has been integrated into the planning and design of a larger development that encompasses a 4.2-acre building site.
11. To require the developer of a commercial center to provide a statistical demand analysis of the market service area at the time of the zoning request in order to assist in determining its adequacy and appropriateness.	Consistent: The proposed bistro is not a free-standing commercial center. It has been integrated into a larger structure that provides supporting commercial services for project residents as well as nearby residents. Therefore, a statistical demand analysis of the market service area is not required.
12. To review regularly and evaluate excessive undeveloped commercial zoning for its appropriateness and its ability to serve the County.	Consistent: Implementation of the proposed project would require the build out of the project site. There would not be any undeveloped area for future development.

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 5, 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 5: 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. Additionally, the project incorporates the following design features to ensure the operation of the project would be compatible with adjacent existing land uses in the project area:

- A self-contained underground parking facility would be provided, which would help avoid nuisance noises typically associated with large open surface parking areas. Additionally, the closest surface parking areas on the southern and eastern side of the project site is approximately 100 feet away.
- All rooftop mounted HVAC equipment will be fully shielded or enclosed from the line of sight of adjacent residential uses. The shielding/parapet wall should be at least as high as the equipment and not less than six feet tall.

- All pool/spa equipment and mechanical pumps will be fully shielded from the line of sight of any adjacent residential property or onsite residential unit or enclosed within an equipment room.
- No outdoor music, audio equipment, sound amplifying equipment, or performance of live music will be permitted at the outdoor patio areas and pool deck on the project site.
- The drive aisle at the southwest corner of the project site with access to Via Alondra would be gated and shall be restricted to emergency evacuation only. All vehicles accessing the site, including trucks associated with deliveries and trash pick-up, will access the project site via Avenida La Caza under normal operation.
- No truck loading/unloading activities or idling shall be allowed on the Via Alondra emergency evacuation access drive aisle.
- Delivery, loading/unloading activity, and trash pick-up hours will be limited to daytime (7:00 AM – 10:00 PM) hours only.
- Engine idling time for all delivery vehicles and moving trucks will be limited to five minutes or less. Signage will be posted in the designated loading areas to enforce the idling restrictions.

Parking Study: The proposed project would provide 120 parking spaces for residents 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. As shown in [Table 6, Project Parking Demand](#), 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 120 parking spaces which exceeds the parking demand by 52 parking spaces, a surplus of 76 percent.

Table 6: Project Parking Demand

Category	Units	Parking Rate	Parking Demand
Senior Adult Housing Attached	101 DU	0.66	67
Shopping Center	0.188 TSF	4.1	1
Total Parking			68
Abbreviations: DU = Dwelling Unit, TSF = Thousand Square Feet Source: Stantec Consulting Services Inc., <i>Parking Analysis Memorandum</i> , April 13, 2020.			

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 7, *Community Center/Commercial Requirements*, the proposed project would be consistent with the Community Center/Commercial site requirements.

Table 7: 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	20 Feet
Side Yard Setback	20 Feet	20 Feet
Rear Yard Setback	20 Feet	20 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.**

To illustrate visual presence of the proposed project, computer generated visual simulations have been created which depict before and after project conditions. As shown in Figure 14a, *Visual Simulation – Entry from Avenida La Caza and Via Pavo Real*, and Figure 14b, *Visual Simulation – Via Alondra*, the proposed project has been designed at scale, mass and height that does not conflict with the existing aesthetic environment. Additionally, Figure 14c, *Visual Simulation – Village Bistro*, shows a visual simulation of the proposed bistro.

- **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 insure 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

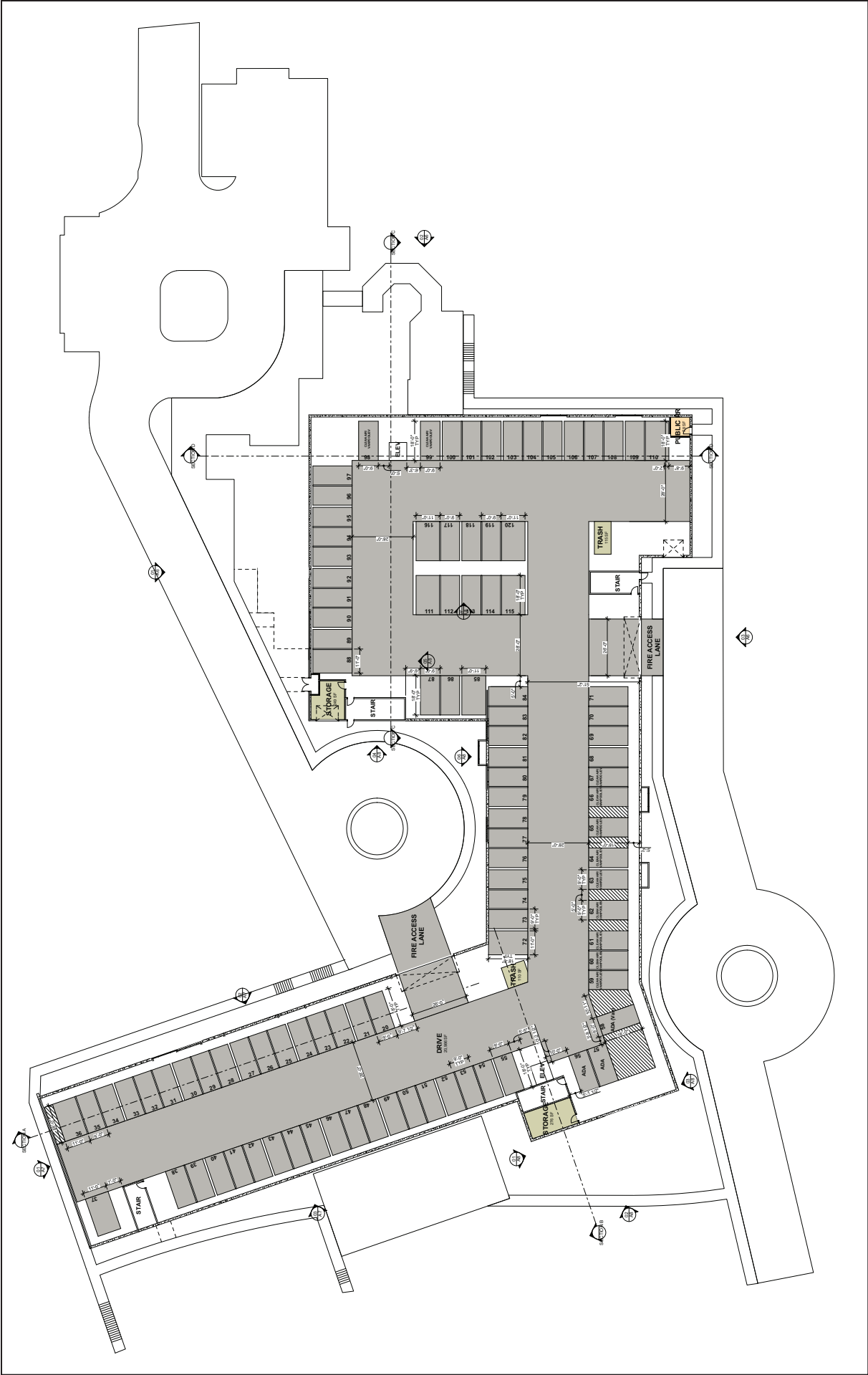
- To merge the two existing legal parcels into one legal parcel.

We are pleased to submit the Legacy at Coto 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



Source: Irwin Partners Architects; April 27, 2020.

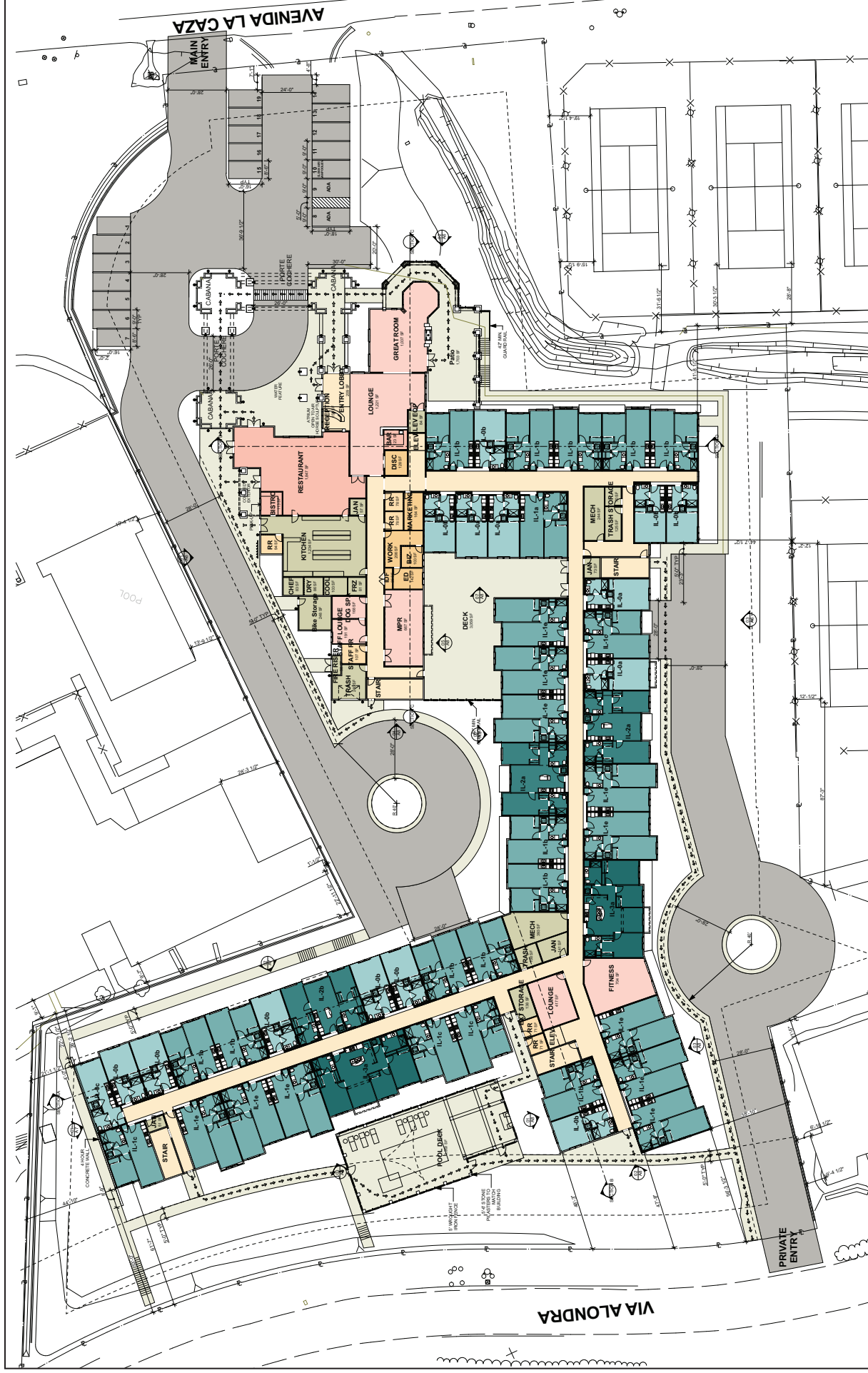
LEGACY AT COTO
Letter of Project Proposal and Scope of Work
Garage Plan (Sub Grade)

Figure 2a



VCS Environmental



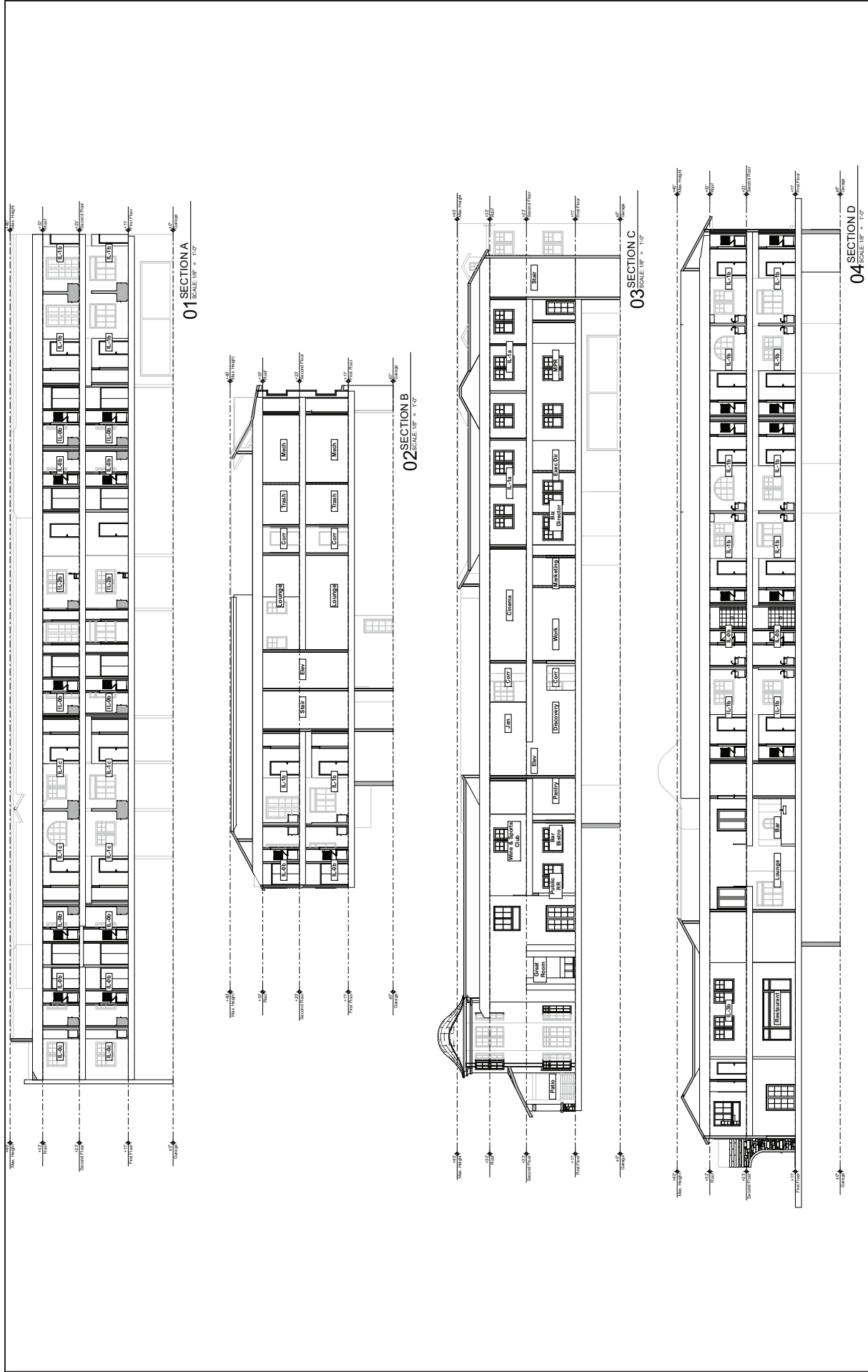


Source: Irwin Partners Architects; April 27, 2020.

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First Floor Plan (At Grade)

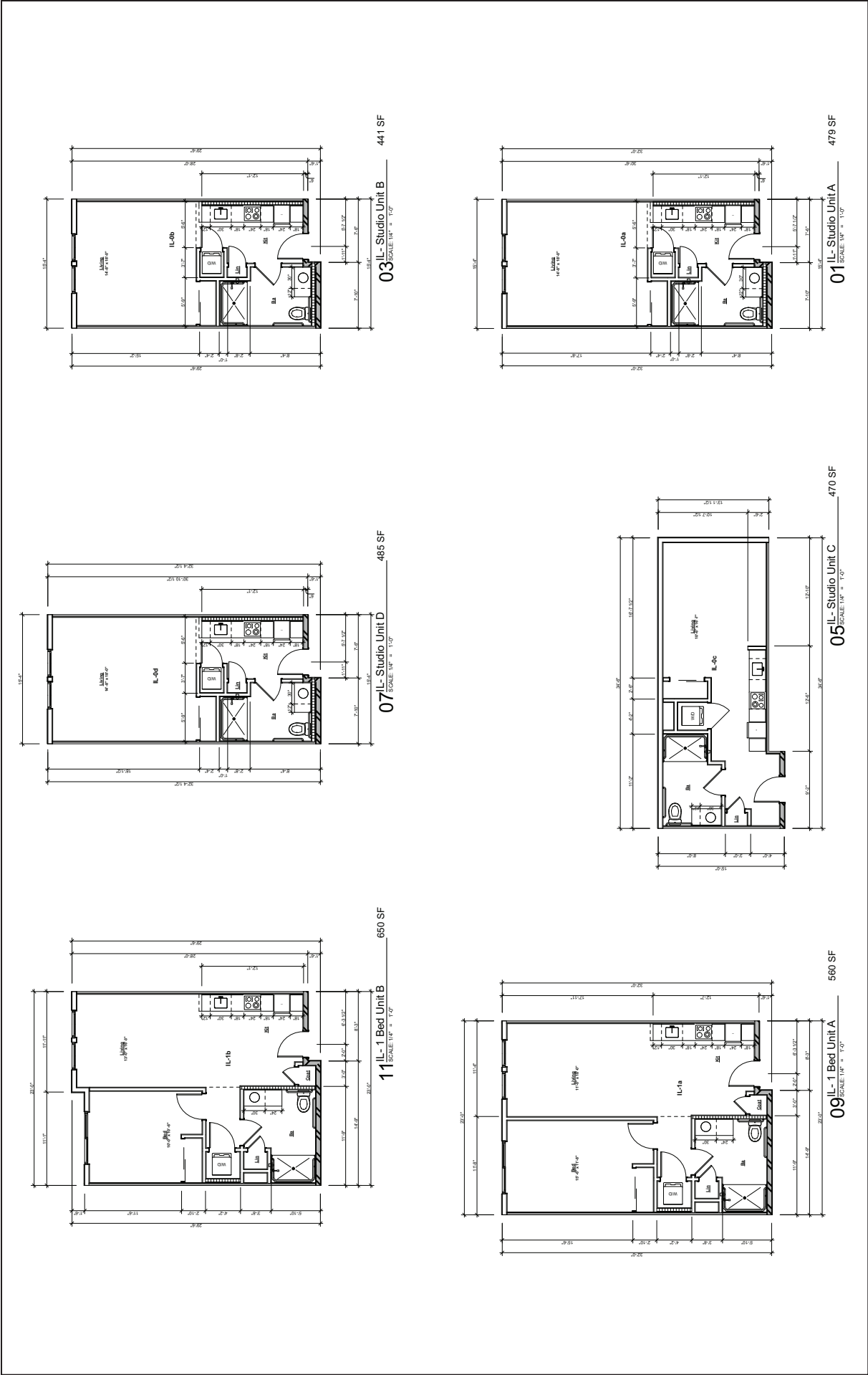
Figure 2b





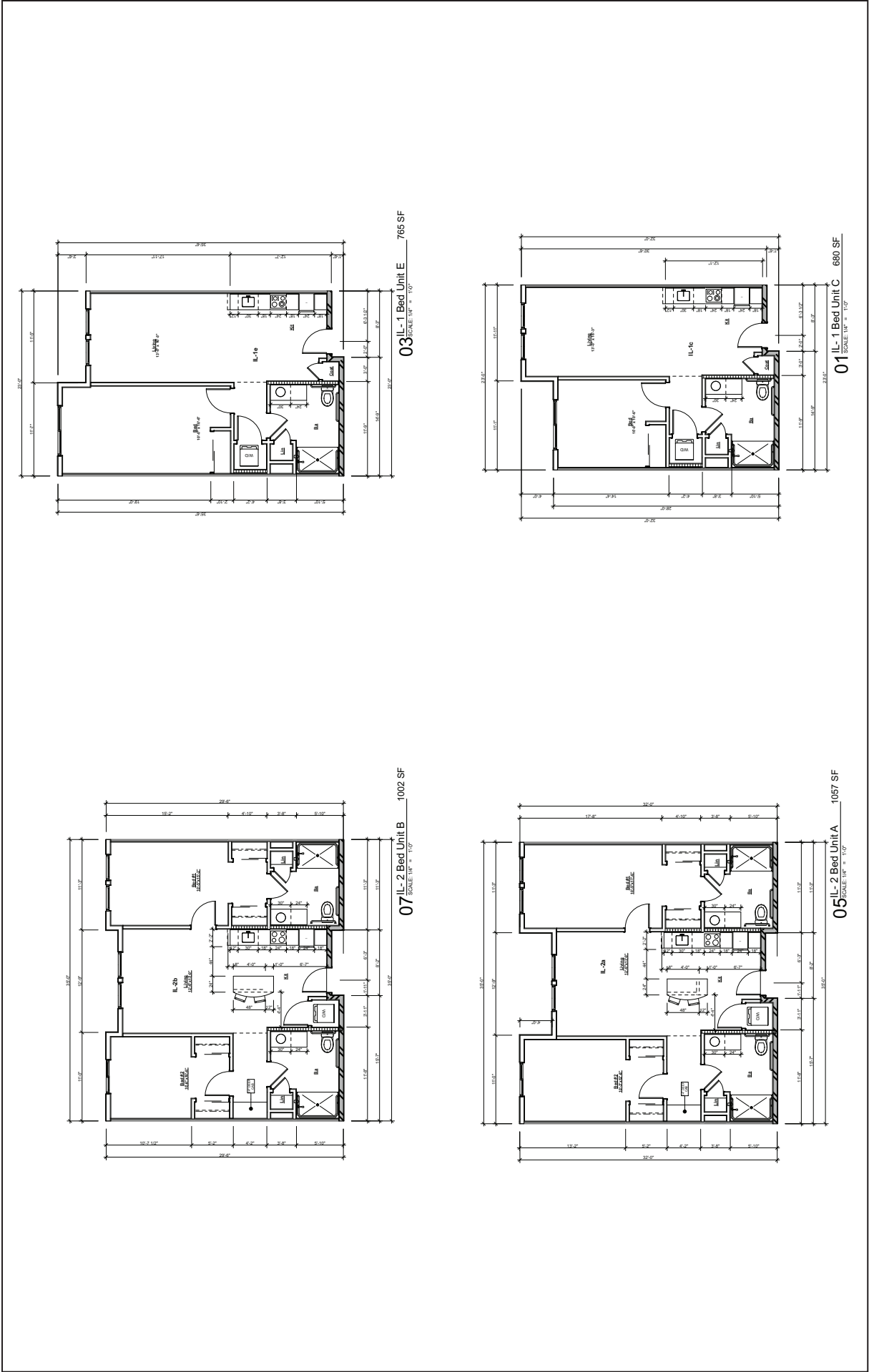
Source: Irwin Partners Architects; April 27, 2020.

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Cross Sections

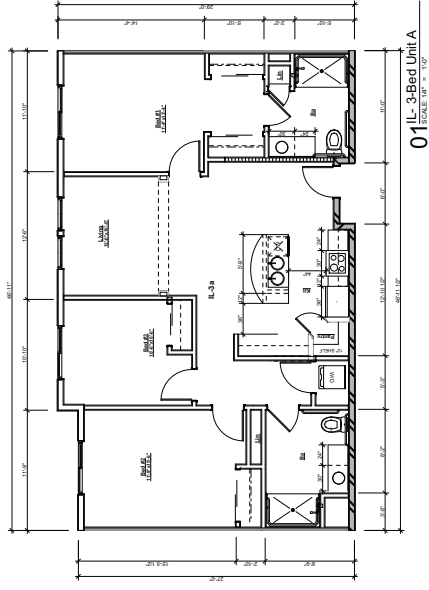
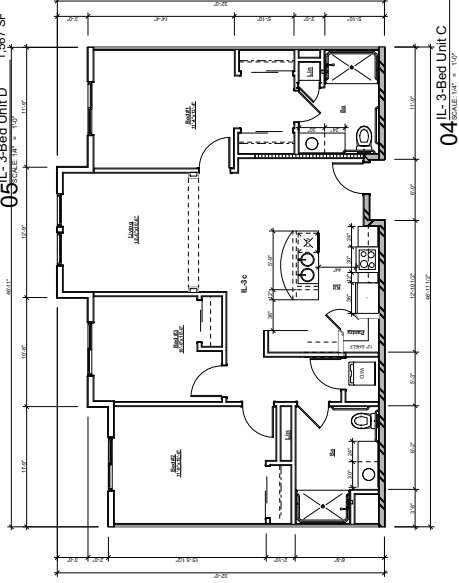
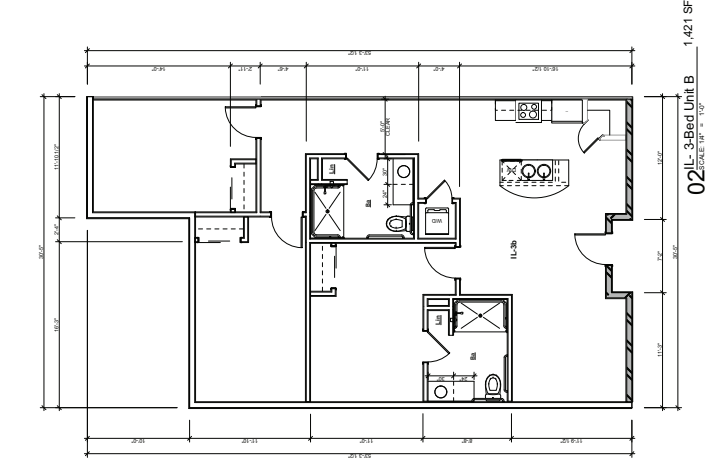
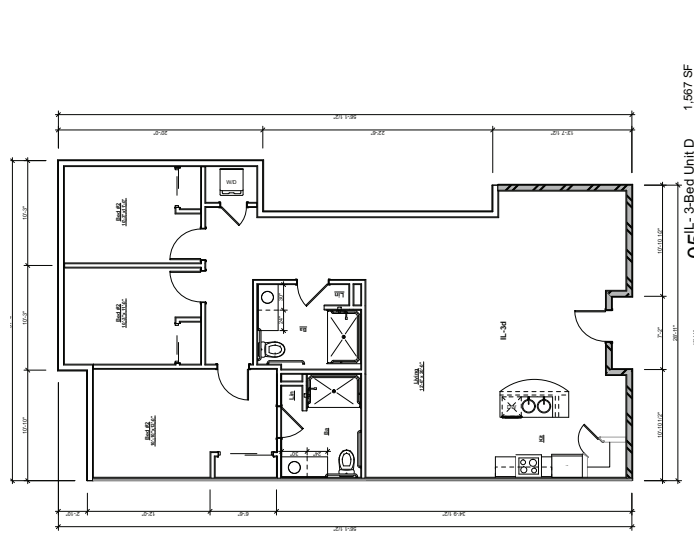


Source: Irwin Partners Architects; April 27, 2020.

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Letter of Project Proposal and Scope of Work
Unit Plans



Source: Irwin Partners Architects; April 27, 2020.

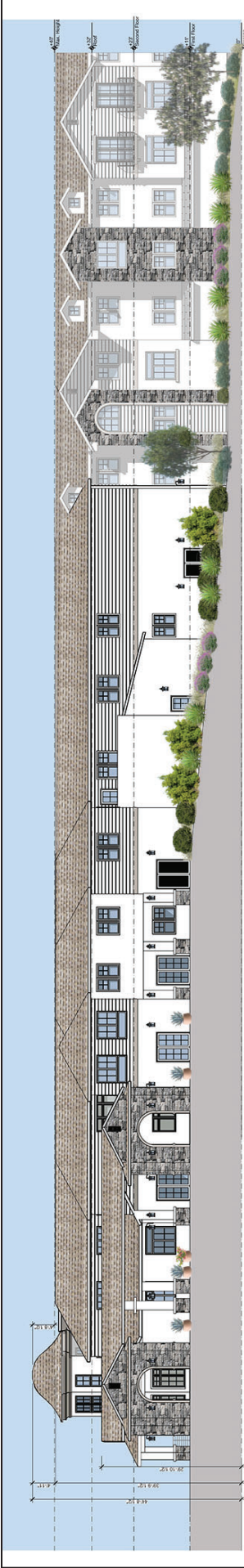


Source: Irwin Partners Architects; April 27, 2020.

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Letter of Project Proposal and Scope of Work

Unit Plans



01 EXT A
SCALE 1/8" = 1'-0"



02 EXT B
SCALE 1/8" = 1'-0"



03 EXT C
SCALE 1/8" = 1'-0"

Source: Irwin Partners Architects; April 27, 2020.

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Exterior Elevations

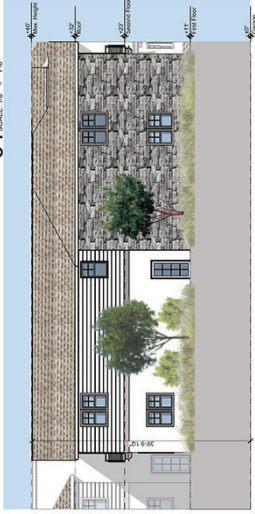


Source: Irwin Partners Architects; April 27, 2020.

LEGACY AT COTO
Letter of Project Proposal and Scope of Work
Exterior Elevations



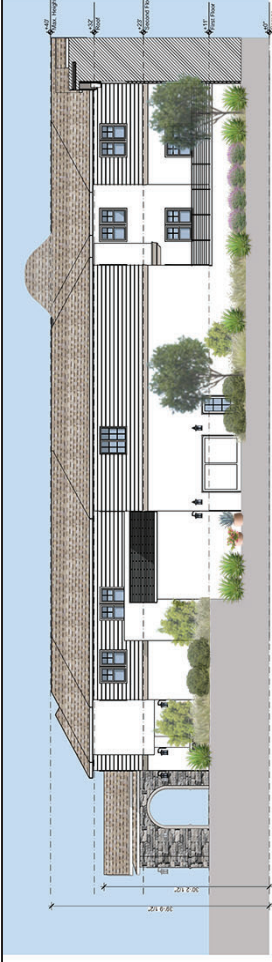
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SCALE 1/8" = 1'-0"



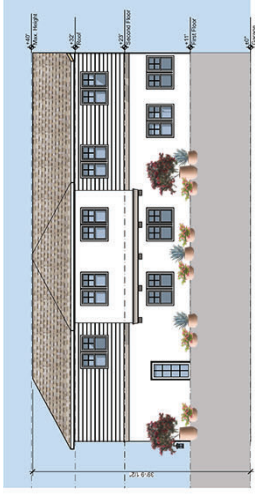
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SCALE 1/8" = 1'-0"



03 EXT C
SCALE 1/8" = 1'-0"



04 EXT A
SCALE 1/8" = 1'-0"



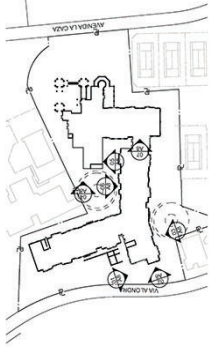
05 EXT B
SCALE 1/8" = 1'-0"



06 EXT C
SCALE 1/8" = 1'-0"



07 DECK ELEVATION
SCALE 1/8" = 1'-0"

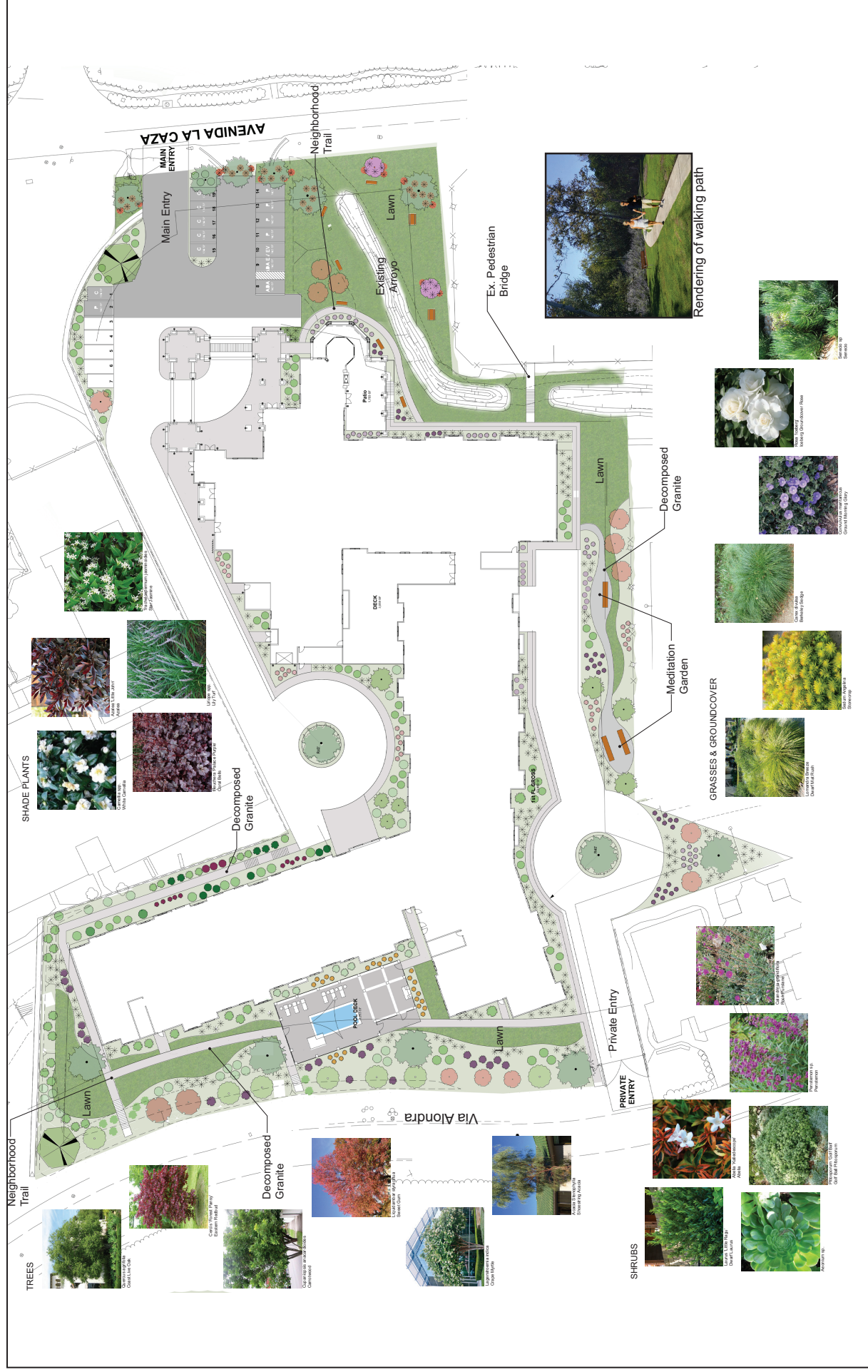


Source: Irwin Partners Architects; April 27, 2020.

LEGACY AT COTO

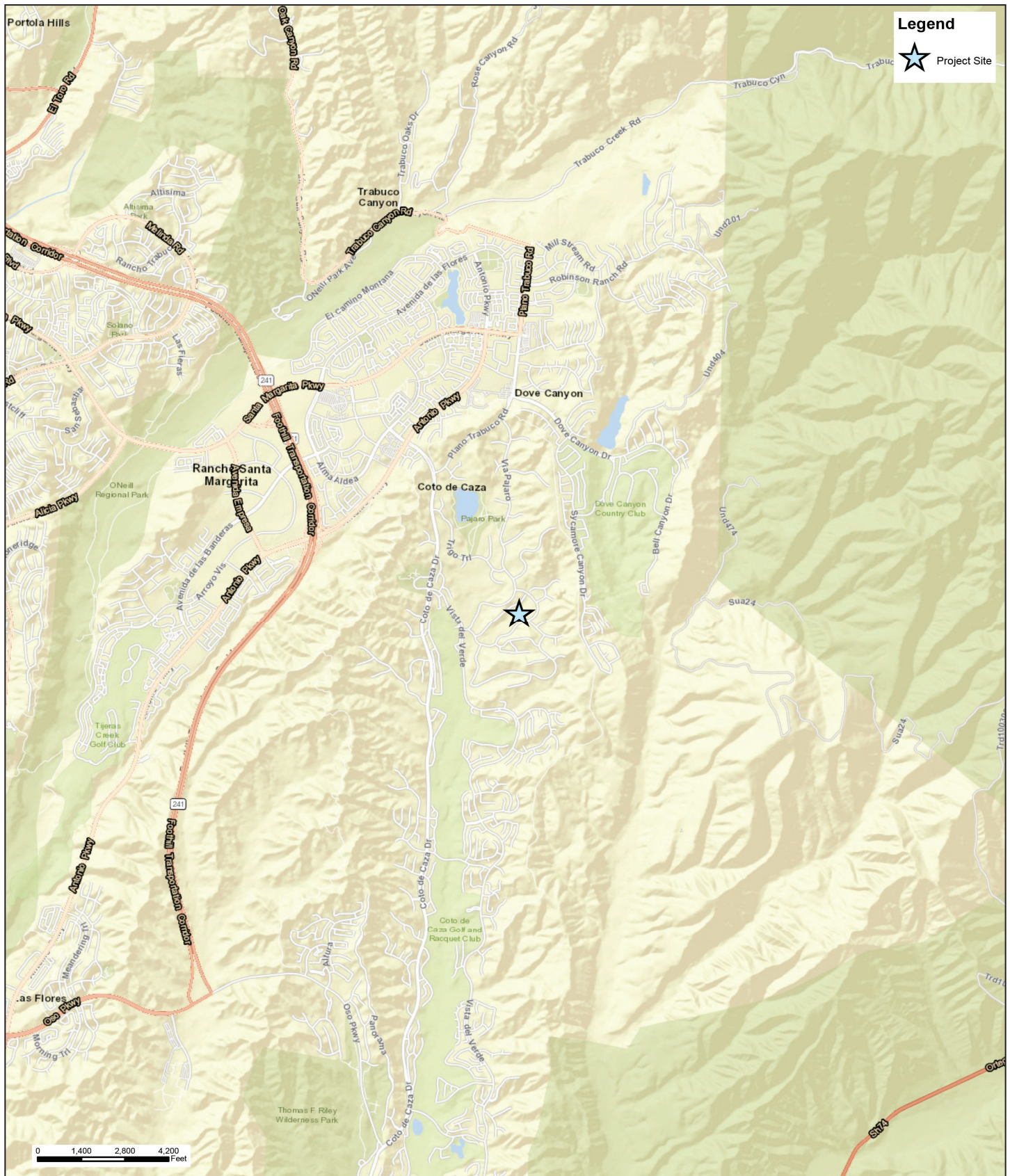
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Exterior Elevations



Source: Julie Friedrichsen Design; April 28, 2020.





Source: Huitt-Zollars and ESRI; December 2019.

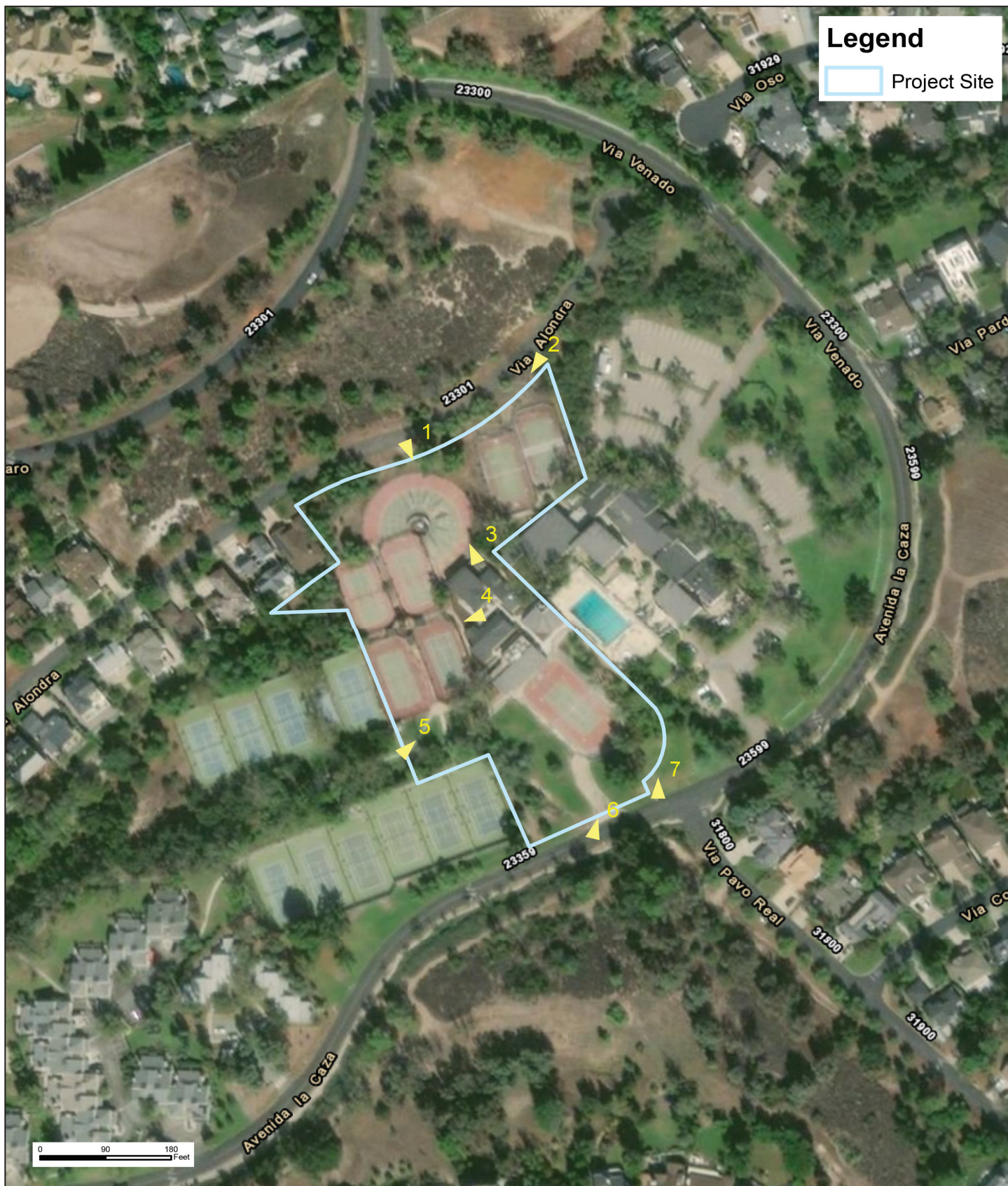
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Letter of Project Proposal and Scope of Work
Regional Location Map





Source: Google Earth Pro; January 2020.
- approximate Project Site Boundary





Source: ESRI and CNDDDB; December 2019.

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Letter of Project Proposal and Scope of Work
Site Photograph Locations





1. View looking southeast on the north end of the property.



4. View looking west from the center of the property.



2. View looking southwest of the northeastern end of the property.



5. View looking northeast from the western boundary of the property.

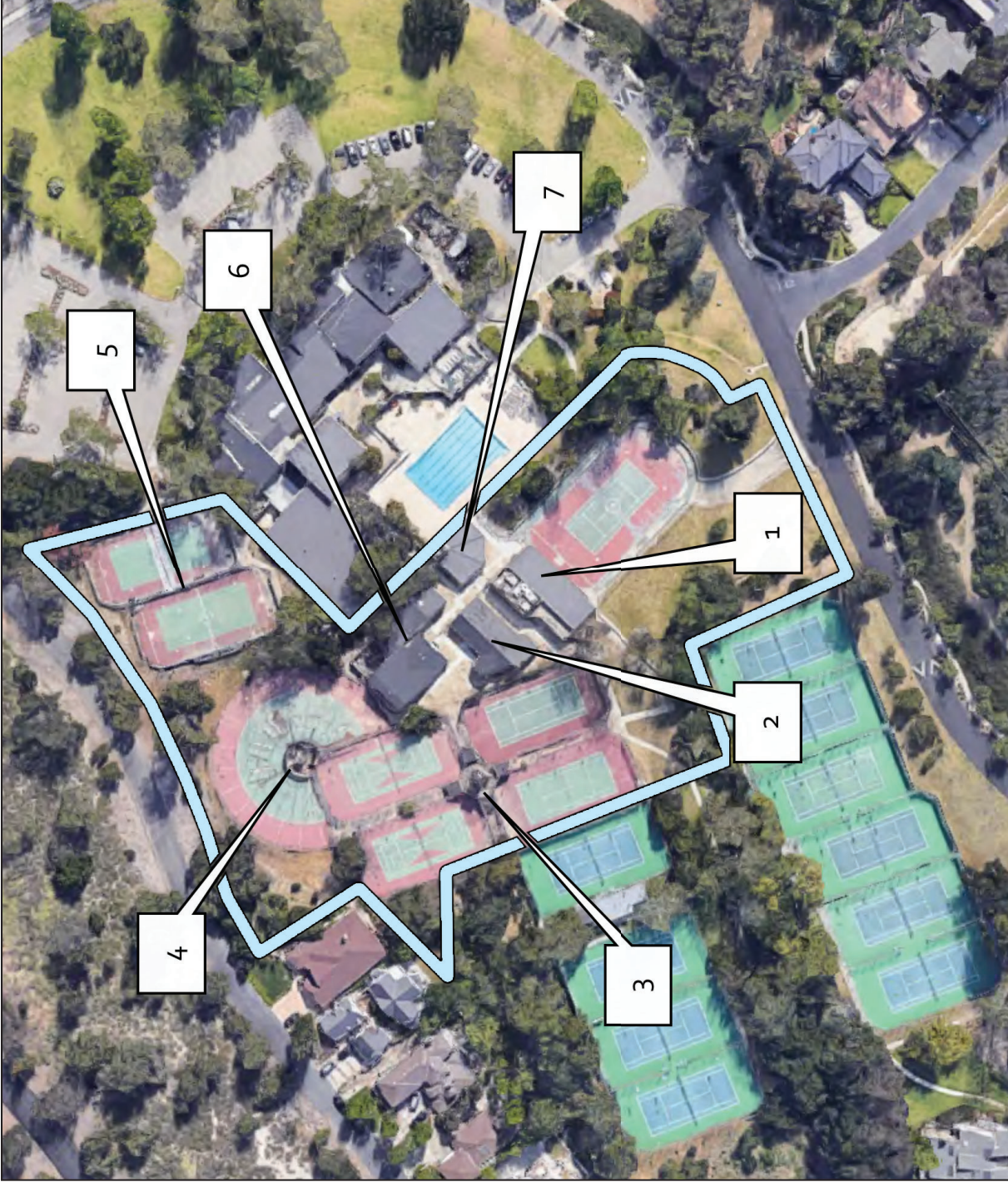


3. View looking northwest from the center of the property.




6. View looking north from the southern end of the property.

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Existing Site Photographs

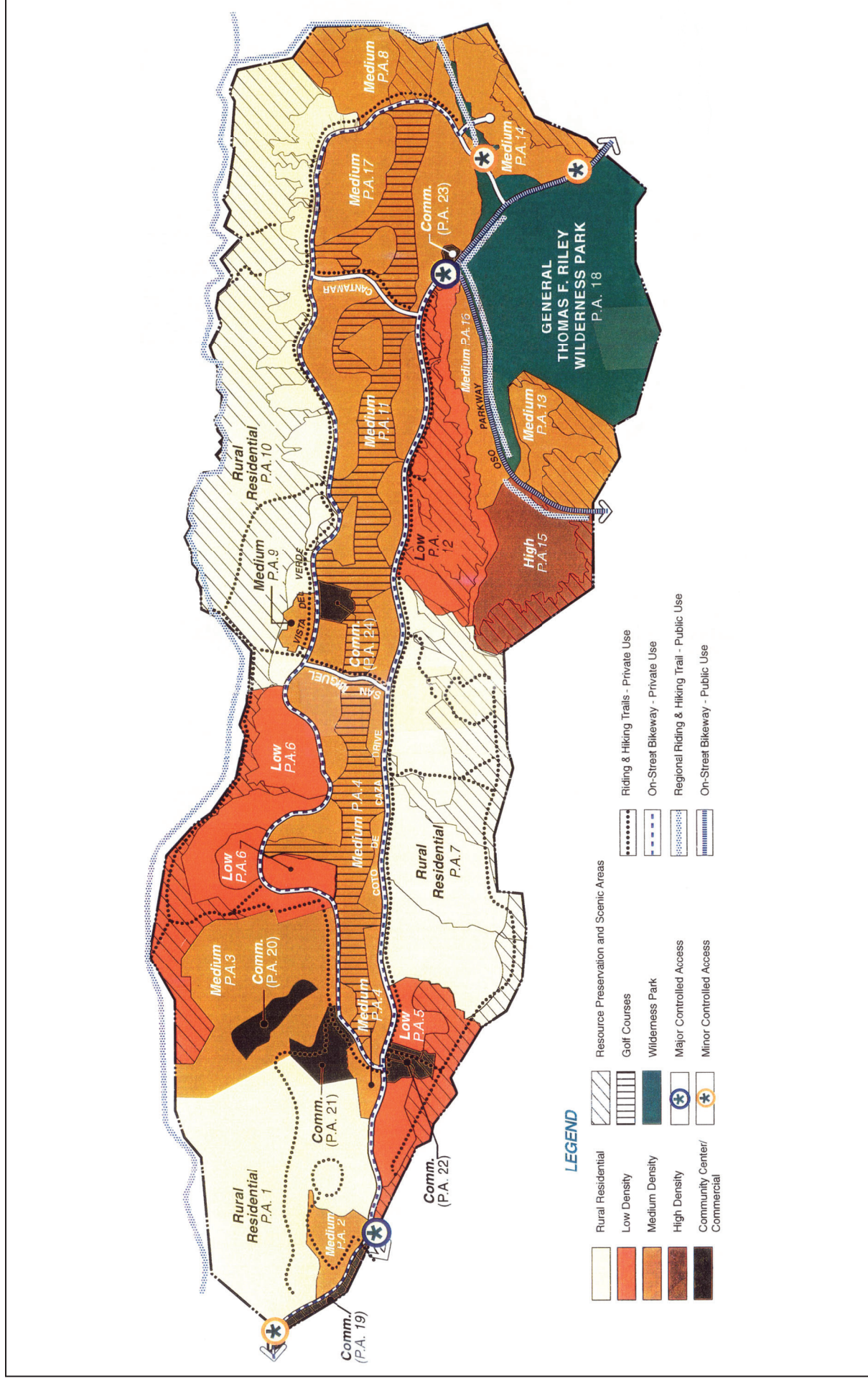


LEGEND

-  - approximate Project Site Boundary
- 1. Coto Research Center
- 2. Ancillary Building No. 1
- 3. Tennis Court Quad and Observation Tower
- 4. Teaching Lanes
- 5. Tennis Court Duo
- 6. Ancillary Building No. 2
- 7. Ancillary Building No. 3

Source: Urbana Preservation & Planning, LLC; October 2019.

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Existing Land Uses



Source: Coto de Caza Specific Plan (Amendment 3), Exhibit 7, prepared by Planner's Annex; adopted August 8, 1995.





Existing Condition



Proposed Improvements

Source: Visual Impact Group, March 2020.

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Letter of Project Proposal and Scope of Work
Visual Simulation – Entry from Avenida La Caza and Via Pavo Real



Existing Condition



Proposed Improvements

Source: Visual Impact Group, March 2020.

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Letter of Project Proposal and Scope of Work
Visual Simulation – Via Alondra



Source: Visual Impact Group, March 2020.

LEGACY AT COTO
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Visual Simulation – Village Bistro