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January 25, 2021

OC Public Works, Development Services/Planning Attn: Kevin Canning 301 North Ross Street Santa Ana, CA 92701

Subject: Comments on Notice of Preparation for Draft Environmental Impact Report for Legacy at Coto California Grand Villages, OCPW Planning Application No. PA-20-0022

Mr. Canning:

As the purveyor of water and sewer service for the proposed project the Santa Margarita Water District (District) has reviewed the information on the Notice of Preparation for the above mentioned project and provides the following comments in preparation of the Draft Environmental Impact Report (EIR) and development of the project.

- 1. Development of the site for water and sewer service shall adhere to the requirements in the District's most recent Board adopted *Design Criteria and Standard Drawings for Water and Sewer Facilities*.
- 2. The process of obtaining approval for improvement plans for the construction of public water and sewer facilities necessary to serve the proposed site is discussed in Part D of the District's Design Criteria and Standard Drawings document.
- 3. The requirements for design and construction are described in Parts A through C and standard drawings for construction are included in Part E.

An overview of the process is provided below as guidance for the developer and the design team to obtain water and sewer service:

- Prepare a Water and Sewer Master Plan for the proposed development.
- Include a review of the following planning documents that encompass the project site to justify service can be provided as shown in the Water and Sewer Master Plan.

The following planning documents must be reviewed to ensure the proposed design is consistent with these documents:

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- ID 2 & 2A Preliminary Master Plan of Water Supply & Wastewater Disposal Facilities, Dated December 1983
- Coto de Caza North Golf Course Trunk Sewer Master Plan, Dated November 2, 1984
- Coto de Caza Trunk Sewer System Preliminary Engineering Design Report, Dated May 1985
- o Coto de Caza Specific Plan General Plan Amendment One, Dated September 1984
- Analyze the proposed water demands and sewer flows of the project site in comparison to the existing water demands and sewer flows from the current designated land use on the site utilizing the District's current duty factors.
- Provide a review of the fire flows for the current land use versus the proposed land use. The hydraulics of the system required to deliver the fire flows as well as the daily demands should be analyzed to ensure the flows can be met without negative impact.
- A hydraulic analysis of the sewer conveyance system should be completed based on the addition of the proposed project to the current design flows in the system.
- The existing public facilities that could potentially be impacted and should be studied include at a minimum the following:
 - Domestic and recycled water supply
 - Domestic and recycled water seasonal and operational storage
 - Domestic and Recycled water conveyance system, including all pipelines, pump stations, and pressure reducing facilities
 - Sewer conveyance system which will include all gravity pipeline and force mains, and sewer lift stations
 - Capacity at downstream sewage treatment plants
- Summarize the impacts to these facilities. In areas where the project results in a negative impact to any facility the design team will make recommendations for improvements to mitigate the negative impact. The developer and the design team will be responsible for the planning, design and construction of improvements required to reduce the impacts on the facilities to pre-project conditions.
- Planning, design and construction of all facilities required to reduce the impacts of the project on District facilities will take place under the guidance and approval of District staff and will be completed prior to the project site development.

Any impacts should be approximated in the Initial Study/Draft EIR with more in depth analysis provided directly to the District for review as described above. Mitigation required could also be discussed and added to the Initial Study/Draft EIR for documentation.

The District looks forward to reviewing the Draft EIR once it has been prepared. A review of the sections pertinent to water and sewer service will be done and comments provided. We appreciate the opportunity

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to provide written comments on the NOP. Should clarification on any of the above comments be needed, please call me or Karla Houlihan at (949) 459-6581.

Sincerely,

Patricia Butler

Patricia Butler Chief Engineer

cc: Don Bunts, SMWD Dan Ferons, SMWD Karla Houlihan, SMWD Jim Leach, SMWD