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Subject: Comments Related to the Notice of Preparation of A Draft Environmental Impact Report -- Planning Application No. PA-20-0022

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Kevin Canning, thank you for the opportunity to comment on the Notice of Preparation for the noted Project: Legacy at Coto California Grand Villages. I applaud the decision to make an Environmental Impact Report (EIR) a requirement for this proposed Project. I am a resident in the Dove Canyon community within the City of Rancho Santa Margarita and within the County of Orange. I will be very focused in my concern relative to the content and scope of the EIR.

The typical EIR as outlined in Appendix G of the State CEQA Guidelines will cover many boilerplate environmental factors which consultants can amass the required data and perform supporting studies, however, there are special circumstances where there should be a more complex analysis included in the EIR. In the OCPW cover letter to this notice, I saw that the environmental factor of Wildfire is noted but the parameters of this environmental factor need further deliniation as it is not one of the typical boilerplate environmental factors:

1. Project properties which reside in high risk fire zones need to have a different analysis than what one would find in typical EIRs. There are many issues around wildfires such as materials of construction, setbacks, proximity and access for first responders, water supply, site emergency evacuation, and air access which one would find in the typical EIRs. The issue of community or residential emergency evacuation is a relatively newer issue that has not been addressed in typical EIRs. Interestingly, the key word is community evacuation and not specifically the Project site emergency evacuation, although this is still important. On this latter issue for the proposed Legacy property, one can easily measure traffic flow and conclude that with the entire Coto de Caza residential base, the impact will be very small as the project population will be so small compared to the population of the 5000 residential homes in the entire community of Coto de Caza. That is understandable and the conclusion reached would likely be understandable. But this type of analysis misses the point of **community evacuation**.

2. As evidenced by recent CA wildfires, the issue of community emergency evacuation is very real. As recently as the past months, residents of Irvine and Foothill were under mandatory evacuation orders for a large portion of the community due to wildfires. In 2018, it was the community of Paradise, CA where there was a mandatory evacuation of the community which had 2 community exits. In the case of Paradise, CA, there were 85 residents who died largely due to the inability to properly evacuate from the community when wildfire consumed the community. There is a short documentary on the Paradise fire called "Fire in Paradise" that can be found on Netflix. It should also be noted that community evacuations are not limited to wildfires as our communities experienced "evacuation-like" conditions around September 2020 when two distinct incidents occurred where the main Coto gate was closed forcing Coto residents to exit and enter via other community gates. The traffic congestions during both incidents were very significant at the gate that controlled at Plano Trabuco Road near Dove Canyon Drive.

3. So here are the parameters of a community evacuation analysis as I see it:

a. Coto de Caza as a community of 5000 homes and is a gated community; access and egress are from 3 points -- the main Coto gate leading onto Antonio Parkway and into the City Rancho Santa Margarita ; there is another gate leading into Ladera Ranch; and there is another gate leading on to Plano Trabuco Road and into the City of Rancho Santa Margarita. Coto de Caza is in a high risk fire zone.

b. An evacuation from Coto could occur from any of the 3 gates but as evidenced by recent incidents, there were closures of one of these gates and the impacts were felt at the other two gates. Vehicles were backed up attempting to exit/enter on to the Plano Trabuco Road gate which is the closest gate to the proposed Project site. The congestion was quite immense.

c. The wildfires tend to know very few boundaries so it is highly likely to have a Coto de Caza fire condition also impacting the communities around Coto de Caza such as Dove Canyon, Rancho Cielo, Walden, Trabuco Highlands, Robinson Ranch, and Villas de La Paz. You also have the Santa Margarita Catholic High School and the Santa Margarita Catholic Church. The situation could be mutual, where any fire condition impacting the surrounding communities will impact Coto de Caza.

d. As one can see, the issues are many: the Project occupants will likely evacuate into the City of RSM; these occupants will contribute to the emergency traffic flow and will impact emergency traffic flow of neighboring communities in case of a community-wide mandatory evacuation order; the project occupants are seniors likely with more specific needs where time may be of an essence; as evidenced in the Paradise fire, due to traffic congestions, the Paradise residents were ordered to evacuate on foot since vehicles were at a standstill; this would be highly difficult with senior residents; and bear in mind that while there may be an evacuation taking place, first responders will be entering the community so traffic flow in both directions is important.

e. A related measuring point which can be used at any of the surrounding communities is what is the impact of evacuation at these other communities. Dove Canyon is an example of a 1252 home community with one central gate and only one route of exit---Dove Canyon Drive. Dove Canyon Drive runs into Plano Trabuco Road which is the same road likely to be used by the Coto de Caza residents and the Project occupants. This same Plano Trabuco Road is the same road used by residents of Rancho Cielo, Walden, Trabuco Highlands, Robinson Ranch, and Villas de La Paz. The students/parents associated with the Santa Margarita Catholic High School who park on the rear of the school would use Plano Trabuco Road. We all share the same City of Rancho Santa Margarita road network.

As you can see, the EIR needs to address the issues of wildfires, community emergency evacuations relative to the Project and Project occupant profile, as well as the impact on community-wide emergency evacuation of neighboring communities. Lastly, 2 of the 3 Coto de Caza routes of exit "dump" into the City of Rancho Santa Margarita so it is important that the impacts and also the required support by the City of Rancho Santa Margarita are clearly understood and documented.

This is much more than a traffic study.

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