

June 13, 2025

Emily Thomas, Chair
Los Gatos Planning Commission
Town of Los Gatos
110 E. Main Street
Los Gatos, CA 95030

**RE: Letter of Justification
Rebuild of Los Gatos Meadows**

Dear Ms. Thomas,

Included in this letter is the justification for the efforts of Covia Communities to rebuild Los Gatos Meadows, the 10.84-acre site located at 110 Wood Road (APN 510-47-038) at the intersection of Wood Road and S. Santa Cruz Avenue in Los Gatos. Our Justification Letter includes responses to prior comments we received at the Conceptual Development Advisory Committee (“CDAC”) review, as well as the Town Staff comments received during the Town Review meetings held in 2008. In addition, we have spent the last 18 months participating in community outreach efforts with our former residents, neighbors, stakeholders, local business community members, and community residents to understand the concerns and needs specific to senior housing on this site. Covia Communities has carefully considered and integrated this input as we have developed our site plan to rebuild Los Gatos Meadows. Furthermore, we have focused on how our project complies with the Town’s 2020 General Plan, the Sustainability Plan (2012), and the direction of the current General Plan Update process (2040).

The proposed rebuild project (the “project”) involves the redevelopment of the 10.84-acre site with a senior living community that would replace the existing Los Gatos Meadows senior living community. The project would include a total of 174 independent residential apartments plus 17 care support units. The project, a Continuing Care Retirement Community (CCRC), will be licensed as a Residential Care Facility for the Elderly (RCFE) under the California Department of Social Services. The project would be restricted to persons age 62 and older and would provide 24/7

assisted living services to the residents. The project would provide coordinated health care services, including 17 care support units. These proposed services would be similar to the use offered in the previous community. An estimated 120 full time equivalent (FTE) employees would be anticipated with the project; this is commensurate with the number of employees onsite prior to the closure of the facility in late 2019.

Site improvements would include on-site amenity areas, parking, new landscaping, and a variety of energy efficient and sustainable interior and exterior building elements.

Parking for residents, staff, and visitors would be provided within a new structure which would include between 240-278 parking spaces of which approximately 30 would be near the garage entrance and the balance on the main parking level.

Under the project, approximately 81 percent of the site would remain as open space, which is greater than the 79 percent under the existing permit condition. The project site layout, building orientation and articulation, use of open space and building materials have been designed to focus on being visually compatible with the surrounding area and to inspire a natural biophilic environment.

Site improvements would require demolition of all existing site improvements. The project is anticipated to be built over a period of approximately 26 to 30 months. Demolition of the existing improvements is expected to require approximately four (4) months.

As described in the paragraphs that follow, the project would fully comply with all applicable Town General Plan Goals and Policies, as well as applicable standards and guidelines established by the Municipal Code.

In March 1968, the Town of Los Gatos adopted Ordinance NO. 938, which rezoned the 10.84 project site to Residential Planned Development (R:PD). The Town Code 29.80.120 provides that if a R:PD ordinance was in effect prior to the adoption of the Town's PD regulations in 1976, that prior ordinance will continue to apply. However, as part of our request to rebuild of the existing Los Gatos Meadows facility, Covia Communities seeks a new Planned Development permit. While our current PD Permit remains valid, per Section 29.80.075 of the Town Municipal Code¹, we recognize the need to update the permit to reflect our desire to rebuild on the current site. The site's proposed density of 16 dwelling units per acre is below the General Plan's maximum density limit of 24

¹ Section 29.80.075 of the Town Municipal Code states that any change in the activities conducted on, or any new construction in such PD or RPD zone is subject to the regulations of this division.

dwelling units per acre allowed for the site². The term “dwelling units” relates to independent residential apartments, not to the care support units, consistent with the interpretation of dwelling units under the original PD Permit. A comparison of the proposed rebuild project to the existing PD permit conditions is provided in Table 1 below.

Table 1: Comparison of Planned Development (PD) Permit Conditions		
Permit Condition	Original 1968 PD Conditions	Proposed Rebuild Project
Site Coverage	21%	19%
Maximum Dwelling Unit Density	18 units per acre	16 units per acre
Total Number of Livable Units ¹	184	174
Total Number of Support Care Units	38	17
Total Units Permitted	222 ²	191
Open Space	79%	81%
Building Setbacks from property line ⁴	Front: 20'-0" Side: 15'-0", 27'-0" Rear: 15'-0"	Front: 34'-10" Side: 40'-10", 60'-0" Rear: 32'-11"
Parking	111 parking spaces ³	240-278
Height ⁴	Predominantly two-story with some basement or below grade space for infirmary, parking, storage and mechanical. Heights vary between 30'-9" and 55'-2" ±.	3-5 stories with below grade space for parking, storage and mechanical. Heights vary between 59'-0" and 85'-6" feet.
Architecture	Residential	Residential
¹ 184 units is the number of livable units allowed; total unit count including skilled nursing beds permitted is 222 total units. ² Total applicable unit count prior to consolidation/ combination of units is 205. ³ The current number of spaces onsite is 130. ⁴ Neither minimum building height nor maximum setbacks are specified under the 1968 entitlement. Table 1 includes setback and heights under the current and proposed conditions. Source: Covia, January 2020		

Background

Los Gatos Meadows, a CCRC owned and operated by Covia Communities, was originally developed as a CCRC and opened in 1971. The objective then, and now, is to provide seniors a place to age in place, living independently in the Los Gatos Community.

² The General Plan land use designation of Medium Density Residential allows for a maximum density of 12 dwelling units per acre. However, consistent with density bonus laws in the State of California, General Plan Action HOU-1.3 provides up to a 100 percent density bonus for developments that include housing for elderly households. Further, according to the existing entitlement (adopted by Ordinance No.938 on March 4, 1968), the project site has an allowed maximum density of 24 dwelling units per acre. As such, the 10.84-acre site would allow for up to 240 dwelling units.

The site is currently developed with 10 residential buildings, which include a total of 205 independent residential apartments and support care units³. The facility includes a dining and commons building, an infirmary, garage and services building, a multi-purpose building, and two cottages. There are 130 existing parking spaces onsite (85 within the existing structure and 45 surface parking spaces) and staff and visitors also use nearby neighborhood street parking, leased commercial space parking, and a public parking lot due to lack of parking availability on-site.

Recent Site Closure

In February 2019, after undertaking a rigorous facilities assessment by a third-party firm on the condition and physical status of its buildings, Covia concluded that continuing operations of the 48-year+ old facility in its present form presented too great a risk to its residents. Of the numerous conditions reviewed during the assessment, compromised accessibility for fire response services and other fire safety issues, inadequate building systems, aging infrastructure, and the accumulated risk of all other operational and structural factors led to this decision. Thus, Covia initiated a months-long closure and transition process to ensure that these risks would not cause harm to the residents of Los Gatos Meadows. As of September 30, 2019, all residents of Los Gatos Meadows had found new homes, with a vast majority of life care residents either moving to another community owned and operated by Covia Communities or moving to a non-Covia community but retaining their life care contract with Covia. Covia initiated wind down procedures and provided relocation and transition assistance in compliance with all applicable laws and regulations, and in a manner consistent with its philosophy of care and sensitivity to all residents.

Though Covia has completed the closure process, Los Gatos Meadows continues to be staffed to provide on-going maintenance and security of the property. The Planned Development Permit for the site remains in effect, and the existing facilities legally could be re-occupied after completion of seismic and fire safety retrofit work. Covia prefers, however, to rebuild on the site to provide modern facilities that will include the types of amenities that benefit seniors and better serve the Los Gatos community.

To further mitigate the existing fire safety issues, Covia submitted a Tree Management Plan and request for Tree Removal Permit to the Town of Los Gatos on September 26, 2019. The tree management recommendations are based on fire safety, sudden oak death (SOD), species invasiveness and tree risk. Phase 1 of the Tree Management Plan

³ Total applicable unit count prior to consolidation/combination of units; the 205 count excludes two original independent residential units that were converted to a fitness center and marketing office, respectively.

identifies recommendations for removal of 44 trees based on the following criteria: (1) they disproportionately contribute to fire risk or are invasive and (2) based on their health, structure and condition, they do not contribute to site screening between properties. Fire risk and invasive trees are the most imminent risk for the site. Los Gatos Meadows has been closed, in part, due to fire risk. Limiting the spread of invasive species to other portions of the site and neighboring sites is time sensitive as well. The permit, which is independent from the proposed rebuild project, was approved on December 05, 2019.

Responses to Feedback on Prior Site Proposals

In 2008, when rebuild efforts were initiated, Covia met with the Town Planning Staff and CDAC Committee Members. This allowed for introduction, exploration and feedback of the proposed rebuild project, creating an open discussion for comments and concerns. During the CDAC meeting, the committee members provided valuable feedback regarding project compatibility with the General Plan, building height and massing, architectural design, impacts on trees, and construction impacts. The feedback on these items was taken with great seriousness and the project has since been redesigned in accordance with the committee's concerns.

Specifically, the CDAC recognized the need to modernize the Los Gatos Meadows complex and supported the senior residential use of the facility. The CDAC hoped to improve the walkability of the Farwell Lane connection, since the current connection is overly steep for seniors. As part of the project, Covia has included an autonomous vehicle, alternative transportation solution as the means by which to address the steep slope at Farwell Lane, while enhancing connectivity and mobility between Los Gatos Meadows and Broadway, thus enabling both safe and convenient access for residents to connect to downtown Los Gatos. The project would also incorporate a below grade parking level, a reflection of the CDAC comments regarding potential parking garages. The CDAC also expressed concerns with traffic. Covia has studied the site circulation and access accordingly, and as a result has made some substantial modifications to site circulation and parking and has included alternative modes of transportation, thereby minimizing impacts on neighboring properties. The proposed site plan provides for an efficient on-site circulation pattern and increases the availability of parking to minimize the likelihood of spillover parking onto neighboring streets.

While the property is not located in the area subject to the hillside ordinance, the CDAC suggested that the spirit and intent of the hillside guidelines should be applied within the design of the project. To that end, the project would result in the reduction of the development pad and the increase in overall open space, which would generally be consistent with the hillside design guidelines. In addition to this, the proposed buildings

would not be visible from any viewing platforms and would be stepped with the hillside slope, limiting overall visual impacts throughout the Town of Los Gatos. The project would align building roof lines with the contour of the hill and incorporate smaller roof components, minimizing the contrast between buildings and the existing environment. The project would also conserve the natural features of the topography. To that end, the project would have generous replacement of mature trees and vegetation and would use natural materials for drainage and retaining walls.

Additional Outreach

Since re-initiating our rebuilding efforts in 2018, there have been several meetings with various Planning and Public Works staff, in order to clarify and confirm the proposed architectural concepts and treatment of off- and on-site conditions, and to address specific technical challenges.

In March of 2018, the project team hosted the first of six neighborhood open house meetings at Los Gatos Meadows to inform neighbors about the rebuilding process and to solicit their input and feedback. During 2018 and early 2019, the project team met with each council member. Furthermore, in the spirit of community engagement and to commence the development of a “Town Integration” project, over the last year and half, the project team has conducted twenty in-person meetings with local businesses, associations, and interest groups. Feedback from neighbors, council members, and other community leaders included concerns and comments on building/site design, parking and circulation, visual impacts, and safety, which were accounted for during the formation of the site plan and project. The project design reflects the concerns of not only the Town, but also the broader Los Gatos community, to ensure seamless integration into this closely-knit community.

Benefits to Community

We believe the benefits of the project to the Los Gatos community to be substantial, and critical in meeting the needs of the broader senior community.

The project would further the Town’s Human Services Element by revitalizing Los Gatos Meadows and continuing its role as a healthy, contemporary independent senior living community that connects seniors with existing resources in the community, encourages social interaction, improves mobility, and ensures a safe environment for Los Gatos seniors. The project would provide a mix of different unit sizes and varying levels of care that respond to the needs of an active, aging community. The project would incorporate outstanding health care services, recycled and sustainable building materials, and energy efficient operational systems.

The proximity to nearby stores and services, such as the US Postal Service, Old Town Los Gatos Shopping Center, and Los Gatos Theatre, provides residents with opportunities to participate in social, recreational, educational, and shopping activities all within a close distance. The dining area would include a demonstration kitchen for local restaurants to showcase their offerings on a rotating basis, allowing for Town integration into the CCRC.

The project would result in no increase in the number of total units currently entitled or occupied up through September 2019. As a result, the project would not generate substantial new vehicle trips. There would be a modest redistribution of trips from Farwell Lane to Wood Road and Santa Cruz Avenue, though even with this redistribution, level of service would remain at an acceptable level of service (LOS B). Furthermore, the project would improve on-site circulation and alleviate spillover parking experienced under the prior site plan by creating additional parking spaces and decreasing the need for on-street parking in nearby neighborhoods.

The project would also improve the integration of the site with the broader Los Gatos community by closing Farwell Lane to through traffic and transitioning this pathway connecting Los Gatos Meadows and Broadway into a naturally landscaped, pedestrian-friendly connection to downtown Los Gatos. The conversion of Farewell Lane into a pedestrian and bicycle lane would improve safety for vehicle and pedestrian interaction at the intersection of Farwell Lane and Broadway. The project would continue to use the existing driveway on Wood Road for access to the parking entrance, main entrance, and loading entrance, providing safe and efficient access to the site. The project would result in the construction of a parking structure that would include 240-278 parking spaces, which would help address spillover parking by increasing the parking ratio to at least 1.38 spaces per independent residential apartment. Furthermore, the project would incorporate a dedicated area for fire access, which would be located on the western side of the property.

One of the extraordinary elements of the project is the integration of one or more autonomous vehicles and control systems deployed along Farwell Lane to enable a safe, convenient and alternative means of transporting residents between the Meadows and Town retail, entertainment, and civil services. This element of the project will enable both safe and convenient access for residents to connect to Downtown Los Gatos. The project would consider Aurigo, a vendor of autonomous vehicles, to provide this alternative transportation solution.

While difficult to gauge precisely, the combined effect of facilitating pedestrian, bicycle and self-driving vehicles on Farwell Lane is expected to materially reduce the number of total vehicle trips to and from the community.

From an environmental perspective, the building design would provide a more energy efficient and healthy environment for prospective residents. Upgraded and energy efficient buildings would assist in further reducing the current carbon footprint by minimizing energy load, enhancing the number of large shade trees, modernizing energy operations/systems, increasing the amount of landscaped space, and improving irrigation efficiency.

Project Compatibility with the Los Gatos 2020 General Plan

The proposed project has a General Plan land use designation of Medium Density Residential. The Medium Density Residential designation allows for multi-family residential, duplex, and/or small single-family homes and a maximum density of 12 dwelling units per acre. The proposed project would result in 16 dwelling units per acre, which is above the 12 dwelling units permitted for the Medium Density Residential land use designation. However, consistent with density bonus laws in the State of California, General Plan Action HOU-1.3 provides up to a 100 percent density bonus for developments that include housing for elderly households. Since the proposed project's residential uses would be restricted to seniors 62 years and older, it qualifies for the density bonus up to 100 percent. Therefore, the proposed 16 dwelling units per acre would be well within the 24 dwelling units per acre allowed for by the land use designation.

In accordance with the Town's General Plan 2020 Land Use recommendations, the project would also promote the appropriate use of local, native plants in its landscaping. The rebuild would promote the efficient use of water and would minimize the amount of storm water runoff. Energy systems would be new, and thus offer the benefit of far more efficient systems than those currently in place. The project would result in a slight reduction in the overall development pad and would include tree replacement and retention/preservation of mature onsite trees, a Village Green area, and passive gardens to ensure aesthetic consistency with the surrounding hillside area.

Among other benefits noted above, the project would further the Town's General Plan by revitalizing the existing site into a healthy, contemporary independent senior living community that connects seniors with existing resources in the community, encourages social interaction, improves mobility, and ensures a safe environment for Los Gatos seniors. In addition, the project would provide seniors with an alternative mode of transportation by incorporating autonomous vehicle technology into the project to assist in enhanced connectivity between Los Gatos Meadows and proximate Town services such as the Library, Civic Center, and entertainment and retail establishments.

Specific applicable goals/policies in the 2020 General Plan are included in “Letter of Justification Appendix A”. A more detailed description of how these goals/policies are incorporated into the project is included in the Request for *Planned Development (PD) Entitlement* section of this letter.

Project Consistency with Zoning Code

The proposed project site is zoned as Residential Planned Development (R:PD) which is typically applied to areas where residential development is planned in the future. However as noted earlier, this project site secured its Planned Development permit entitlements in 1968 and has operated under this permit until late September 2019. The project has been designed in conformance with the Town of Los Gatos zoning requirements for Planned Development (PD) overlay zones as described further below. As per the Municipal Code, Development in a PD zone must be in accordance with the approved “development plan”. The Town of Los Gatos Municipal Code provides that the development plan must contain:

- a land use plan locating all proposed uses, a tentative site plan,
- schematic architectural elevations of all buildings and structures in relationship to each other,
- a schedule for any phasing of development,
- a tabulation of land area including the entire planned development,
- the floor area of each occupancy,
- the proposed number of off-street parking, and grading, soils and geologic information⁴.

Our project application includes each of these “development plan” requirements.

As per the intent of the PD Ordinance, the PD zoning allows uses not ordinarily possible, only if the use and development are in compliance with the complete development plan. Further, all uses in the PD zone are permitted to the extent specified in the development plan⁵. All uses identified in the rebuild project, are in compliance with the current PD zoning permit approved by Ordinance NO. 938 in 1968.

As per the Municipal Code, any ordinance that would rezone land to a PD zone must incorporate the development plan⁶. In addition, changes in the approved development plan must be made by ordinance⁷. Planned Development overlay zones also include projects that provide a public benefit to the citizens of the Town, projects that are

⁴ Section 29.80.080 of the Town Municipal Code

⁵ Section 29.80.110 of the Town Municipal Code

⁶ Section 29.80.125 of the Town Municipal Code

⁷ Section 29.80.145 of the Town Municipal Code

designed to preserve and enhance conservation and enrichment of hillsides and ridgelines, the production of affordable housing and projects that maximize open space. The proposed project would also increase the amount of onsite open space from 79% to 81%, consistent with the prevailing Planned Development zoning overlay requirement, of maximizing open space⁸. The open space would be controlled by topography, use of underground parking, and specific building location, in order to preserve and enhance the hillsides and ridgeline. The proposed project will also include a development plan that includes all the requirements provided.

The project would provide seniors with care housing that is subject to comprehensive statewide regulatory controls and oversight. The California Community Care Facilities Act and associated regulations establish a robust regulatory system relating to matters such as rates and refunds, personnel and administration, financing, admission agreements, and eviction proceedings. The project would not be subject to the Town's inclusionary housing requirements because state law prohibits local agencies from imposing rent controls on licensed residential care facilities for the elderly. (Health & Safety Code § 1569.147(b).) As a practical matter, it is not possible to operate a facility such as this under two different regulatory systems affecting rent and pricing. (*See Ocean House Corp. v. Permanent Rent Control Board of the City of Santa Monica*, 147 Cal. App. 3d 395 (1983).) However, the project would provide intrinsic housing benefits and it would not result in any housing impacts. Onsite employment and indirect demand for professional and other services is expected to be consistent with that of the existing care facilities. Thus, the project would not contribute to any increased need for affordable housing in the community.

Justification

In 2018, a third-party firm conducted a rigorous facilities assessment of the current Los Gatos Meadows buildings at 110 Wood Road. Of the numerous conditions reviewed during the assessment, the firm discovered compromised accessibility for fire response services and other fire safety issues, inadequate building systems, aging infrastructure, and other operational and structural issues. As a result, it was deemed that it was too great a risk to its current residents to continue operations of the 48-year+ old facility in its present form and Los Gatos Meadows residents began the process of closure in February 2019. The final resident was outplaced in a new home as of September 30, 2019. As described herein, Covia is now proceeding with processing a development review application to rebuild the Los Gatos Meadows site.

⁸ Section 29.80.075 of the Town Municipal Code

The rebuild project would further the Town's General Plan by revitalizing the existing site and continuing provision of a healthy, contemporary independent senior living community that connects seniors with existing resources in the community, encourages social interaction, improves mobility and ensures a safe environment for Los Gatos seniors. The proposed uses of the project would be essential and desirable to the community. The project would result in the construction and/or provision of many service facilities including, but not limited to, a health center, dining venues, fitness services, and supplemental transportation services that would be located throughout the property. These services and amenities would help provide social interaction for the residents. The project would provide a wide variety of senior services and programs, including daily opportunity for health care, physical activity and recreation, and mental stimulation. In addition, the project would provide coordinated health care services, including 17 care support units with sections specializing in assisted living care, memory care and respite care, meeting the wide range of needs for seniors as they age.

In addition, there has been positive feedback on the proposed uses of the project from not only local prospects and neighbors, but also local leadership. The 174 independent residential apartments would assist in the implementation of the Town's 2015-2035 Goals for providing housing opportunities, lifestyle living, and assisted living facilities for seniors. The project would provide a mix of different size apartments and varying levels of care and amenities that respond to the needs of the active, aging community found in the Town of Los Gatos. The functional site layout, floor plans, and site architecture have been specifically designed to align with the local market, providing larger apartments and on-site amenities desired by seniors.

The project furthers many of the Housing and Health Services elements. The project would be consistent with Goal HS-8, by providing a wide variety of senior services and programs, including daily opportunities for seniors to have physical activity, social interaction, and mental stimulation. The project would further Policy HOU-5.3, to work with existing senior lifestyle living and assisted living facilities in Los Gatos and support the building of Los Gatos Meadows in a manner that includes a continuum of care facilities within the Town. The project would bring a new state-of-the-art CCRC, incorporating outstanding health care services, recycled and sustainable building materials, and energy efficient operational systems. The project would further Health Services Goal HS – 9, providing seniors with an alternative mode of transportation by incorporating autonomous vehicle technology into the project to assist in enhanced connectivity between Los Gatos Meadows and proximate Town services such as the Library, Civic Center, and retail and entertainment establishments.

The current architecture, with its substantial concrete façades, is not harmonious with its surroundings, nor does it provide an inviting or healthy environment sought by the senior community. The site plan of the project incorporates environmentally appropriate design attributes, utilizing the site's topography and natural setting to create a synergy between the design and the hillside that does not exist today. The project will result in a slight reduction in the overall development pad, increasing the amount of common open space available for all to enjoy. The proposed residential buildings would be arranged around shared courtyards. They would be oriented to blend into the hillside and natural landscape to minimize the impact of views to the site while also maximizing views from the site to surrounding hillsides and across the valley. In addition, the project will include generous tree replacement and use of mature trees and a Village Green area, to ensure consistency with the surrounding hillside area.

The project would improve bicycle and pedestrian access for seniors to downtown Los Gatos and would improve vehicular traffic circulation at the project site. As a part of the project, Farwell Lane at Broadway, the exit-only driveway, would be closed to through traffic. Farwell Lane would be constructed into an improved pedestrian and bicycle connection, as well as serve as the fixed route for an autonomous vehicle connection from the main entrance to the Broadway frontage. This reconfiguration of Farwell Lane will further Transportation Policy TRA-5 by ensuring that project streets are safe for all uses, including drivers, cyclists, and pedestrians. The project is consistent with General Plan Policy TRA-13 and would provide adequate parking for the proposed uses, thereby minimizing impacts on surrounding residential neighborhoods. Previously, many staff members were forced to park on nearby residential streets due to the lack of on-site parking, which is a less than ideal situation for the neighborhood residents. Further, the project would provide seniors with an alternative mode of transportation by incorporating autonomous vehicle technology that will facilitate safe and reliable connections to Downtown Los Gatos. As such, the project would further the Transportation goal to provide transit services in the Town for seniors by incorporating autonomous vehicle technology for residents.

The project will result in a slight reduction in the overall development pad, increasing the amount of common open space available for all to enjoy, consistent with the Community Design Goal - 7. The project would further the Community Design Goal CD-1, CD-4 and CD - 15, by preserving and enhancing Los Gatos' character through exceptional community design features including, but not limited to: buildings that shall follow the natural contour of the surrounding hillside; promoting visual continuity through tree planting; and designing new structures to harmonize and blend with the natural features of the area. In addition, the proposed residential buildings would be arranged around shared courtyards. They would be oriented to blend into the hillside

and natural landscape to minimize the impact of views to the site, while also maximizing views from the site to surrounding hillsides and across the valley, furthering the Town's Land Use Element. In addition, the project would be consistent with Policy LU – 1.3, and would incorporate high quality, well-designed, environmentally sensitive, and diverse landscaping.

Request for Planned Development (PD) Entitlement

This project request is for approval of a new Planned Development Overlay permit. The project complies with the Town's existing PD zoning for the property, as shown in Table 1. The project does not require any variance or exception to any rule, code, or regulation and meets the basic requirements under the existing zoning permit related to site coverage, density, open space, and parking.

The project would not impair the integrity or character of the zoning district. The project would not result in any additional independent residential apartments, additional supporting health care units or additional staff. It would have hours and staffing consistent with the most recent prior use and would result in an estimated 120 full time equivalent (FTE) employees. As noted above, proposed site coverage, unit count, open space and parking are all consistent with the current PD permit in place today (refer to Table 1). Project building heights have been articulated to protect views from adjacent properties ensuring compatibility with the neighborhood (refer to Visual Simulations, Section "C" of the project development application submittal).

The project would not be detrimental to the public health, safety, or general welfare. The project would provide state-of-the-art health care services for residents who would have access to health care facilities, open 24/7, to ensure consistent and reliable care. The project would have a dedicated fire access road, located on the western side of the property, improving fire access to the entire site, which would improve safety on-site. Because the project is a rebuild of the prior use, it will also include an updated Emergency Preparedness Plan (EPP) and evacuation plan to address the new facilities and ensure a safe environment for all residents and staff. commensurate with Covia's Risk Assessment Policy. In compliance with Covia's Risk Assessment Policy, these two plans already exist for the prior facility, but would be updated in accordance with the applicable federal, state and local requirements in effect at the time of building occupancy.

The project would result in the reconfiguration of the existing "exit only" driveway, located on Broadway, and would convert the driveway into a pedestrian and bicycle lane, thereby creating safer conditions for pedestrians and bicyclists, as well as serve as

the fixed route for an autonomous vehicle connection from the main entrance to the Broadway frontage. This would provide for safer modes of transportation between the project site and downtown Los Gatos. The project would ensure that seniors have convenient access to social and medical services, commercial areas, and transportation by coordinating with senior shuttle service providers, which in turn encourages Town integration and benefits the community.

The proposed uses of the project would be in harmony with the various elements and objectives of the General Plan and the purposes of the zoning ordinance. As discussed above, the project is consistent with several of the aspects of the Los Gatos 2020 General Plan (refer to "Letter of Justification Appendix A"). The project is consistent with the Town's Sustainability element and would implement best practices both in design and operations through the adoption of biophilic design principles and sustainable design measures to best fit into the unique site while minimizing initial and ongoing environmental impacts. In addition to this, the site plan of the project incorporates environmentally appropriate design attributes, utilizing the site's topography and natural setting to create a synergy between the design and the hillside that does not exist today.

Finally, the project would allow seniors in the Town of Los Gatos to age in place with state-of-the-art health and living facilities. In addition, the proposed CCRC would continue to make a significant contribution to the Town, both as a major employer, as well as a vital resource for residents who want to remain a part of the community. We believe that the project will be a tremendous asset to the Town of Los Gatos, extending a historical legacy of quality residence and care to the broader senior community. In consideration of all the points outlined above, we welcome your review and appreciate your timely consideration of our request.

Respectfully,



Francesco J. Rockwood
Rockwood Pacific Inc.
Applicant

Letter of Justification Appendix A

Los Gatos 2020 General Plan

Housing Element:

- HOU-5.3 Work with existing senior lifestyle living and assisted living facilities in Los Gatos, and support the development of new senior housing that includes continuum of care facilities within the Town.

Land Use Element:

- LU-1.3 To preserve existing trees, natural vegetation, natural topography, riparian corridors and wildlife habitats, and promote high quality, well-designed, environmentally sensitive, and diverse landscaping in new and existing developments
- LU-1.4 Infill projects shall be designed in context with the neighborhood and surrounding zoning with respect to the existing scale and character of surrounding structures, and should blend rather than compete with the established character of the area.
- LU-6.7 Continue to encourage a variety of housing types and sizes that is balanced throughout the Town and within neighborhoods, and that is also compatible with the character of the surrounding neighborhood.

Community Design Element:

- CD-1 Preserve and enhance Los Gatos' character through exceptional community design.
- CD-1.1 Building elements shall be in conformance with those traditionally in the neighborhood.
- CD-1.2 New structures, remodels, landscapes and hardscapes shall be designed to harmonize and blend with the scale and rhythm of the neighborhood and natural features in the area.
- CD-1.3 Buildings, landscapes, and hardscapes shall follow the natural contours of the property.
- CD-1.4 Development on all elevations shall be of high equality design and construction, a positive addition to and compatible with the Town's ambiance. Development shall enhance the character and unique identity of existing commercial and/or residential neighborhoods.
- CD-2 To limit the intensity of new development to a level that is consistent with surrounding development and with the Town at large.
- CD-3.2 Street and structural lighting shall be required to minimize its visual impacts by preventing glare, limiting the amount of light that falls on neighboring properties, and avoiding light pollution of the night sky.

- CD-3.5 All landscaping shall be carefully reviewed to ensure that it is aesthetically pleasing, compatible with its neighborhood and natural environment, and water conserving.
- CD-4 To preserve existing trees, natural vegetation, natural topography, riparian corridors and wildlife habitats, and promote high quality, well designed, environmentally sensitive, and diverse landscaping in new and existing developments.
- CD-4.5 New development shall promote visual continuity through tree planting, consistent use of low shrubs and ground cover.
- CD-4.7 Landscaping plans should maximize the use of trees for energy efficiency, climate control, screening, shading (especially of parking lots), and aesthetics.
- CD-7 To preserve the quality of the private open space throughout Los Gatos.
- CD-7.1 Maximize quality usable open space in all new developments.
- CD-7.3 All residential developments shall include private open space in proportion to the building size.
- CD-15 To preserve the natural topography and ecosystems within the hillside area by regulating grading, landscaping, and lighting.
- CD-15.4 Hillside landscaping shall be designed with the following goals in mind: a. Minimizing formal landscaping and hardscape. b. Siting formal landscaping and hardscape close to the house. c. Following the natural topography. d. Preserving native trees, native plant and wildlife habitats, and migration corridors.
- CD-16 Promote and protect view sheds and scenic resources.

Human Services Element:

- HS-8 To ensure programs and facilities for social interaction for senior citizens.
- HS-8.3 Encourage the Los Gatos-Saratoga Recreation District and other service providers to provide a wide variety of senior services and programs, including daily opportunities for seniors to have physical activity, social interaction, and mental stimulation.
- HS-8.5 Encourage new development to include intergenerational spaces, such as cafés or family-oriented outdoor spaces.
- HS-8.6 Encourage the establishment and operation of a dedicated space for seniors.
- HS-8.5 Connect seniors with existing resources in the community.

- HS-9 To improve mobility and access to care and services for seniors.
- HS-9.1 Ensure that seniors have convenient access to social and medical services, commercial areas, and transportation by coordinating with senior shuttle service providers.
- HS-9.2 Encourage all new senior housing developments to provide transportation services.
- HS-10 To encourage a wide variety of types of senior housing, including independent living, residential care facilities, and affordable housing within the Town.
- HS-10.1 Encourage new development or substantial remodels to incorporate barrier-free design principles to ensure access for people of all ages and abilities.
- HS-10.1 Identify incentives for the development of a variety of types of senior housing, including independent living and residential care facilities.
- HS-11 To ensure safe environments for Los Gatos seniors.

Transportation Element:

- TRA-2.6 Street improvements such as curb cuts, sidewalks, bus stop turnouts, bus shelters, light poles, traffic signals, benches, and trash container shall be planned as an integral part of development projects to ensure safe movement of people and vehicles and minimize disruption to the streetscape.
- TRA-3 To prevent and mitigate traffic impacts from new development (all policies under Goal TRA-3).
- TRA-5 To ensure that Los Gatos streets are safe for all users, including drivers, cyclists and pedestrians.
- TRA-8.4 Coordinate with appropriate agencies to provide transit service in the Town for seniors, school children, low income people, the physically disabled, and other groups with special needs.
- TRA-9.6 Require development proposals to include amenities that encourage alternate forms of transportation that reduce pollution or traffic congestion as a benefit to the community (e.g. bicycle lockers/racks, showers, dedicated vanpool or car-pool parking areas, dedicated shuttle services, innovative bus shelter designs.)
- TRA-13 To provide adequate parking for existing and proposed uses, and to minimize impacts on surrounding residential neighborhoods.

Environmental and Sustainability Element:

- ENV-1 To preserve and protect native plants and plant communities in the Town, and promote the appropriate use of local, native plants in habitat restoration and

landscaping.

- ENV-9 To minimize the amount of storm water runoff, as well as to protect and improve the water quality of runoff.
- ENV-10 To promote recycling and reuse as well as reduction in demand.
- ENV-12 To conserve the air resources of the Town and maintain and improve acceptable air quality in Los Gatos.
- ENV-13 To promote a sustainable community that protects environmental resources and the climate to prevent negative impacts to future generations.
- ENV-14 To reduce overall greenhouse gas (GHG) emissions to 1990 levels by 2020.
- ENV-17 To promote green buildings that minimize consumption of energy and natural resources

Los Gatos Sustainability Plan (2012):

- TR-1 Support for Pedestrians, Bicyclists and Transit. Promote walking, bicycling, and transit through the following:
- a. Require all new buildings, excluding single-family homes, to include a principal functional entry that faces a public space such as a street, square, park, paseo or plaza, in addition to any entrance from a parking lot, to encourage pedestrian foot traffic.
 - b. Require new projects, excluding single-family homes, to include pedestrian or bicycle through-connections to existing sidewalks and existing or future bicycle facilities, unless prohibited by topographical conditions.
 - c. Seek grant funding to establish a Safe Routes to School (SR2S) Program to increase more student walking and biking trips.
 - d. Design and implement affordable traffic-calming measures on specific streets to dissuade Highway 17 cut-through traffic and attract pedestrian and bicycle traffic.
 - e. Implement transit access improvements through sidewalk/crosswalk safety enhancement and bus shelter improvements.
- GB-4 Solar Orientation. Require measures that reduce energy use through solar orientation by taking advantage of shade, prevailing winds, landscaping and sunscreens.
- RE-5 Solar Ready Features. Where feasible, require that all new buildings be constructed to allow for the easy, cost-effective installation of future solar energy systems. "Solar ready" features should include: proper solar orientation (i.e. South facing roof area sloped at 20 to 55 degrees from the horizontal); clear access on the south sloped roof (i.e. No chimneys, heating vents, or plumbing vents); electrical conduit installed for

solar electric system wiring; plumbing installed for solar hot water system; and space provided for a solar hot water storage tank.

- EC-1 Energy-Efficient Appliances and Lighting. Require new development to use energy-efficient appliances that meet Energy-Star standards and energy-efficient lighting technologies that exceed Title 24 standards by 30 percent.
- EC-3 Energy-Efficient Outdoor Lighting. Require outdoor lighting fixtures to be energy-efficient. Require parking lot light fixtures and light fixtures on buildings to be on full cut-off- fixtures, except emergency exit or safety lighting, and all permanently installed exterior lighting shall be controlled by either a photocell or an astronomical time switch. Prohibit continuous all night outdoor lighting in construction sites unless required for security reasons. Revise the Town Code to include these requirements.
- EC-10 Heat Gain Reduction. Require all new development and major rehabilitation (i.e. additions or remodels of 20,000 square feet of office/retail commercial or 100,000 square feet of industrial floor area) projects to incorporate any combination of the following strategies to reduce heat gain for 50 percent of the non-roof impervious site landscape, which includes roads, sidewalks, courtyards, parking lots, and driveways: shade within five years of occupancy; paving materials with a Solar Reflectance Index (SRI) of at least 29, open grid pavement system; and parking spaces underground, under deck, under roof , or under a building. Any roof used to shade or cover parking must have an SRI of at least 29.
- WW-1 Water Use and Efficiency Requirements. For new development, require all water use and efficiency measures identified as voluntary in the California Green Building Standards Code, and consider more stringent targets. California Green Building Standards Code requirements include: 1) reduce indoor potable water use by 20 percent after meeting the Energy Policy Act of 1992 fixture performance requirements, and 2) reduce outdoor potable water use by 50 percent from a calibrated mid-summer baseline case, for example, through irrigation efficiency, plant species, recycled wastewater, and captured rainwater.
- WW-3 Bay Friendly Landscaping. Require new development to use native plants or other appropriate non-invasive plants that are drought-tolerant, as described in the Bay Friendly Landscaping Guidelines, available at StopWaste.Org and BayFriendlyCoalition.Org.
- SW-3 Salvage, Recycled-Content and Local Construction Materials. Encourage the use of salvaged and recycled-content materials and other materials that have low production energy costs for building materials, hard surfaces, and non-plant landscaping. Require sourcing of construction materials locally, as feasible.