



September 13, 2019

**VIA EMAIL: [MLUNA@LAKEFORESTCA.GOV](mailto:MLUNA@LAKEFORESTCA.GOV)**

Marie Luna, Senior Planner  
City of Lake Forest  
Community Development Department  
Lake Forest, CA 92630

Governor's Office of Planning & Research

**SEP 12 2019**

**STATE CLEARINGHOUSE**

Dear Ms. Luna:

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR  
THE PROPOSED NAKASE PROPERTY AREA PLAN, SCH# 2018071035

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Nakase Property Area Plan. The Division monitors farmland conversion on a statewide basis and administers the Williamson Act and other agricultural land conservation programs. We offer the following comments and recommendations with respect to the proposed project's potential impacts on agricultural land and resources.

#### Project Description

The Nakase Property Area Plan would facilitate the development of the 122-acre proposed project site as a master-planned community. Implementation of the Area Plan would include development of residential uses, an elementary school site, and over 28 acres of parks, open space, and habitat restoration area. The Area Plan would establish guidelines for the future development of the planned community, which would consist of single-family residential units (contained in five distinct neighborhoods), affordable apartment units for senior citizens, an elementary school site, parks and open space, an internal circulation system, and a multipurpose water quality basin. The proposed project would entitle development of up to 675 two- and three-story, single-family residential units on approximately 61.4 acres of the site.

The 122-acre proposed project site is located at 20261 Lake Forest Drive, Lake Forest, CA 92630 (Assessor's Parcel Number [APN] 612-221-01) and is currently operating as Nakase Brothers Wholesale Nursery, an agricultural wholesale plant nursery. The project site is designated as Unique Farmland as defined by the Department of Conservation's Farmland Mapping and Monitoring Program.<sup>1</sup>

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<sup>1</sup> Department of Conservation, Farmland Mapping and Monitoring Program, California Important Farmland Finder, 2019, <https://maps.conservation.ca.gov/DLRP/CIFF/>

## Department Comments

The conversion of agricultural land represents a permanent reduction and significant impact to California's agricultural land resources. Under CEQA, a lead agency should not approve a project if there are feasible alternatives or feasible mitigation measures available that would lessen the significant effects of the project.<sup>2</sup> All mitigation measures that are potentially feasible should be included in the Draft Environmental Impact Report (DEIR). A measure brought to the attention of the lead agency should not be left out unless it is infeasible based on its elements.

Agricultural conservation easements on land of at least equal quality and size can mitigate the project impacts in accordance with CEQA Guideline § 15370. The Department highlights agricultural conservation easements because of their acceptance and use by lead agencies as an appropriate mitigation measure under CEQA. Agricultural conservation easements are an available mitigation tool and should always be considered; however, any other feasible mitigation measures should also be considered.

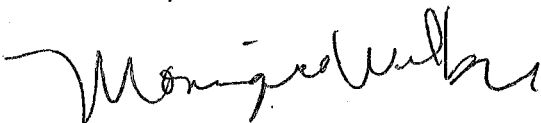
## Conclusion

The Department recommends the following discussion under the Agricultural Resources section of the DEIR:

- Type, amount, and location of farmland conversion resulting directly and indirectly from implementation of the proposed project.
- Impacts on any current and future agricultural operations in the vicinity; e.g., land-use conflicts, increases in land values and taxes, loss of agricultural support infrastructure such as processing facilities, etc.
- Incremental impacts leading to cumulative impacts on agricultural land.
- Proposed mitigation measures for all potentially impacted agricultural lands.

Thank you for giving us the opportunity to comment on the Notice of Preparation of a Draft Environmental Impact Report for the Nakase Property Area Plan. Please provide this Department with notices of any future hearing dates as well as any staff reports pertaining to this project. If you have any questions regarding our comments, please contact Farl Grundy, Environmental Planner at (916) 324-7347 or via email at [Farl.Grundy@conservation.ca.gov](mailto:Farl.Grundy@conservation.ca.gov).

Sincerely,



Monique Wilber  
Conservation Program Support Supervisor

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<sup>2</sup> Public Resources Code section 21002.