

4.2 AGRICULTURE AND FORESTRY

This section examines the potential for the proposed Project to significantly impact agricultural resources. This section is based on information obtained from the California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP), the United States Department of Agriculture, the Natural Resources Conservation Service, the Orange County Agricultural Commissioner/Sealer of Weights and Measures Office, the Orange County General Plan (2018), the City of Lake Forest General Plan Update Existing Conditions Report (2018c), and the 2008 City of Lake Forest *Opportunities Study Area Program Environmental Impact Report* (OSA PEIR). This section does not analyze impacts to forest resources because the Initial Study concluded that no forestland resources are within, adjacent to, or near the Project site.

4.2.1 Scoping Process

The City of Lake Forest (City) received 28 comment letters during the public review period of the Initial Study/Notice of Preparation (IS/NOP). For copies of the IS/NOP comment letters, refer to Appendix A of this Environmental Impact Report (EIR). No comments related to agriculture or forestry were received during the public scoping period.

4.2.2 Existing Environmental Setting

The proposed Project is located in Lake Forest, Orange County (County), California. This section discusses the status of agricultural resources in Orange County, Lake Forest, and on the Project site.

4.2.2.1 Orange County

Orange County was once a rural area supported primarily by an agricultural economy. During the 1930s and 1940s, the economy began to change, landowners began to convert agricultural land to urban development, and agricultural uses in Orange County began to decline (County of Orange 2005). Urban areas continue to encroach on agricultural lands in the County and there is continued pressure to convert agricultural land to urban uses. Additionally, the cost of irrigation water, agricultural land tax rates, labor costs, and damage from vandalism have increased production costs, making it more difficult to maintain a successful agricultural operation in the County.

The most recent agricultural land conversion data available for Orange County is for the 2014–2016 period and was obtained through the DOC FMMP (California DOC 2016a). Land converted in this period is shown in Table 4.2.A, Orange County Agricultural Land Conversion 2014–2016.

In summary, for the 2-year period from 2014 to 2016, the total amount of Important Farmland inventoried decreased by 356 acres (ac), and the total amount of agricultural land that was inventoried in the County decreased by 348 ac. The reason there was a larger decrease in Important Farmland than in agricultural land as a whole is because 8 ac of grazing land were added to the inventory of agricultural land in the County, thereby offsetting the loss of agricultural land by 8 ac. However, grazing land is not considered to be Important Farmland; therefore, it did not affect the net loss of acres of Important Farmland.

Table 4.2.A: Orange County Agricultural Land Conversion 2014–2016

Land Use Category	Total Acreage Inventoried		2014–2016 Acreage Changes		
	2014	2016	Acres Lost (-)	Acres Gained (+)	Net Acreage Changed
Prime Farmland	2,851	2,391	373	213	-160
Farmland of Statewide Importance	305	411	8	114	106
Unique Farmland	3,215	2,913	375	73	-302
Farmland of Local Importance	0	0	0	0	0
Important Farmland Subtotal	6,071	5,715	756	400	-356
Grazing Land	37,106	37,114	331	339	8
Agricultural Land Subtotal	43,177	42,829	1,087	739	-348
Urban and Built-Up Land	291,246	292,689	399	1,842	1,443
Other Land	174,279	172,173	1,352	246	-1,106
Water Areas	1,015	1,026	7	18	11
Total Area Inventoried	509,717	509,717	2,845	2,845	0

Source: California Department of Conservation, Division of Land Resources Protection, Farmland Mapping and Monitoring Program, Table A-23 Orange County 2014-2016 Land Use Conversion.

Table 4.2.B, Orange County Agricultural Production Value 2012 vs. 2017,¹ shows the value of agricultural production in 2012 versus 2017 and provides a percent change between these years.

Table 4.2.B: Orange County Agricultural Production Value 2012 vs. 2017

Agricultural Category	2012 Value	2017 Value	Percent Change
Livestock	\$375,953	\$2,094,000	457.5%
Field	\$696,850	\$1,187,000	70.3%
Nursery	\$70,630,679	\$61,670,000	-12.7%
Tree and Berry	\$44,120,251	\$33,935,000	-23.1%
Vegetable	\$20,486,704	\$14,351,000	-29.9%
Total	\$136,310,437	\$113,237,000	-16.9%

Source: Orange County Agricultural Commissioner’s Office, *Orange County Annual Crop Report 2017* and *Orange County Crop Report 2012*, <http://www.ocagcomm.com/services/report> (accessed December 10, 2018).

While the value of livestock and field crops experienced an overall increase of 457.5 percent and 70.3 percent, respectively, the agricultural production value in Orange County decreased by 16.9 percent between 2012 and 2017.

4.2.2.2 City of Lake Forest

Lake Forest has had a development history similar to that of the County. In the early 20th century, Lake Forest, known at the time as El Toro, was an unincorporated agricultural community. After World War II, the area began to urbanize, and agricultural uses were eventually replaced with

¹ The 2017 Orange County Agricultural Production Value data is the most current year available from the Orange County Agricultural Commissioner’s Office.

residential, commercial, and industrial uses (City of Lake Forest 2018c). Today Lake Forest is primarily urban with limited areas of land under agricultural production. The City of Lake Forest 2040 General Plan Update Existing Conditions Report presents existing “on the ground” land uses on individual parcels in the City from data that has been gathered by the Orange County Assessor’s Office. According to the data, the City currently contains 18 parcels that are occupied by agricultural uses (general agricultural uses, horse ranches, nurseries, and other agriculture), totaling 192 ac. According to the most current 2016 FMMP data, the City contains 140.3 ac of Important Farmland. This acreage includes 0.2 ac of Prime Farmland, and 140.1 ac of Unique Farmland. Although there are 192 ac of land within the City currently in agricultural use, none of the land is designated for agricultural use because the existing Lake Forest General Plan does not include any agricultural land use designations. Chapter 9.72 of the Lake Forest Municipal Code discusses non-residential zoning districts in the City of Lake Forest, including zone designation A1 – Agricultural District. According to 2012 data from the Southern California Association of Governments (SCAG)¹, there are approximately 476 ac (which includes the proposed 122 ac Project site) of A1 – Agricultural District zoned parcels in the City of Lake Forest.

Given that agricultural uses in Lake Forest are limited to a total of 192 ac of land, the agricultural production value is not readily available; therefore, the agricultural production value of Lake Forest is not included as part of this existing conditions discussion.

4.2.2.3 Project Site

The Project site is located within Lake Forest and is approximately 122 ac in size (Assessor’s Parcel Number [APN] 612-221-01). Historically, the Project site was used primarily for agriculture. Prior to the late 1920s, the Project site was used for cattle grazing. From the late 1920s through the late 1960s, the parcel was developed with orchards. In the late 1960s, the northwestern portion of the Project site continued operating as an orchard while the remainder of the Project site was converted to a retail nursery. In 1988, the citrus orchards were removed from the remainder of the Project site, and the parcel was fully converted to a retail nursery. The Project site is currently operating as a retail nursery with all products grown and/or sold in pots; in-ground cultivation is not occurring on site. The main source of water used on the Project site is an on-site well; however, the Irvine Ranch Water District (IRWD) does provide water to the site but is used only as backup and to supplement during hot weather.

According to the DOC FMMP, a majority of the Project site (119.2 ac of the 122 ac Project site) is considered Unique Farmland (DOC 2016). The Project site is not under a Williamson Act contract or a Farmland Security Zone (FSZ) contract. The City’s General Plan Land Use Map designates the Project site as Business Park and Business Development Overlay (BDO). The Project site is classified as A1 – Agricultural District per the City’s Zoning Code.

¹ Zoning information for the City of Lake Forest was acquired by using SCAG’s 2012 general plan land use and zoning data, developed for the 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The dataset is parcel-based and reviewed by local jurisdiction staff during the SCAG’s Local Input Process (V 2.0). These data were deemed newer and more accurate than the City’s hosted zoning information, which was from 2008.

Based on the United States Department of Agriculture (USDA) Soil Survey for Orange County, soil types on the proposed Project site are shown in Table 4.2.C, Soil Types of the Project Site. The dominant soil type on the Project site is Unit 207 Sorrento loam, 2 to 9 percent slopes covering approximately 48.9 ac or 40 percent of the Project site.

The DOC uses two systems to determine a soil's agricultural productive capability: the USDA Soil Capability Classification System and the Storie Index rating system.

The USDA Soil Capability Classification System indicates the suitability of soils for most kinds of crops. Soils are rated from Class I to Class VIII, with soils having the fewest limitations receiving the highest rating (Class I), and soils that are unsuitable for agriculture receiving the lowest rating (Class VIII). Specific subclasses are also used to further characterize soils.

Generally, as the range of the Capability Class increases, yields and profits from these lands are more difficult to obtain. Varying Capability Class ratings of soils are found on the Project site and are defined as follows (it should be noted that Class I and Class V soil types are not located on the Project site):

- **Class II:** These soils have some limitations that restrict the choice of plants or that require moderate conservation practices. These soils require careful soil management, including conservation practices, to prevent deterioration or to improve air and water relations when the soils are cultivated. The limitations are few and the practices easy to apply. The soils may be used for cultivated crops, pasture, range, woodland, or wildlife food and cover.
- **Class III:** These soils have severe limitations that reduce the choice of plants or require special conservation practices or both. These soils have more restrictions than those in Class II, and when used for cultivated crops, the conservation practices are usually more difficult to apply and maintain. They may be used for cultivated crops, pasture, woodland, range, or wildlife food and cover.
- **Class IV:** These soils have very severe limitations that restrict the choice of plants, require very careful management, or both. The restrictions in this class of soils are greater than those in Class III. When these soils are cultivated, more careful management is required and conservation practices are more difficult to apply and maintain. Soils in this class may be used for crops, pasture, woodland, range, or wildlife food and cover.
- **Class VI:** These soils have severe limitations that make them generally unsuitable to cultivation and limit their use largely to pasture or range, woodland, or wildlife food and cover. Some soils in this class can be safely used for common crops provided unusually intensive management is used. Some of the soils in this class are also adapted to special crops such as sodded orchards, blueberries, or the like, requiring soil conditions unlike those demanded by common crops. Depending upon soil features and local climate, the soils may be well or poorly suited to woodlands.

Table 4.2.C: Soil Types of the Project Site

Soil Unit Number	Soil Name	Acres	Proportion of Project Area	Soil Capability Classification	Storie Index Rating	Soil Description
135	Capistrano sandy loam, 2% to 9% slopes	5.6	5%	IIIe	90	This soil is gently sloping to moderately sloping and occurs mostly as long, narrow areas in small valleys. If the soil is bare, runoff is slow to medium and the erosion hazard is moderate. Present land uses for this soil include citrus, barley, pasture, range, wildlife, and recreation.
136	Capistrano sandy loam, 9% to 15% slopes	4.0	3%	IVe	81	This soil is strongly sloping and generally occurs on small toe slope fans and in small, narrow foothill valleys. If has the profile described as typical of the Capistrano services. If the soil is bare, runoff is medium and the erosion hazard is moderate. Present land uses for this soil include irrigated citrus, dryland barley, pasture, and range.
142	Cieneba sandy loam, 30% to 75% slopes, eroded	20.2	17%	VIIe	7	This soil is steep to very steep and eroded. It is only 5 to 15 inches deep over bedrock and is cut by gullies and intermittent drainage channels in many places. Geologic erosion is active, and small landslips are common. If the soil is bare, runoff is rapid and the erosion hazard is high. Present land uses for this soil are limited to range, watershed, and wildlife habitat.
149	Cropley clay, 2% to 9% slopes	27.8	23%	IIe	47	This soil is gently sloping to moderately sloping and occurs as irregular, oblong areas. If the soil is bare, runoff is medium and the erosion hazard is slight. Present land uses for this soil include citrus, barley, pasture, range, and urban development.
176	Myford sandy loam, 15% to 30% slopes	1.5	1%	VIe	27	This moderately steep soil generally occurs on side slopes of terraces. If the soil is bare, runoff is rapid and the erosion hazard is high. Available water capacity is 2 to 4 inches. The effective rooting depth is 12 to 19 inches for root-sensitive crops. For other crops, it is 60 inches or more. Present land uses for this soil include range, barley, and urban development.
174	Myford sandy loam, 2% to 9% slopes	11.6	10%	VIe	35	This gently sloping to moderately sloping soil generally occurs on broad terraces. If the soil is bare, runoff is medium and the erosion hazard is moderate. Available water capacity is 1.5 to 3.5 inches. The effective rooting depth is 5 to 12 inches for root-sensitive crops. For other crops, it is 60 inches or more. Present land uses for this soil include range, barley, and urban development.

Table 4.2.C: Soil Types of the Project Site

Soil Unit Number	Soil Name	Acres	Proportion of Project Area	Soil Capability Classification	Storie Index Rating	Soil Description
191	Riverwash	1.4	1%	VIIIw	40	This soil consists of areas of unconsolidated alluvium that is generally stratified, varies widely in texture, recently deposited by intermittent streams, and subject to frequent changes through stream overflow. Runoff is generally rapid, and the erosion hazard is high. Deposition and removal of fresh alluvium are common. Riverwash has little or no agricultural value. Present uses for this soil include watercourses, groundwater recharge, sand and gravel pits, and wildlife habitat.
207	Sorrento loam, 2% to 9% slopes	48.9	40%	Ile	90	This gently sloping to moderately sloping soil generally occurs on upper valley fans and along stream channels. If the soil is bare, runoff is slow to medium and the erosion hazard is slight to moderate. Available water capacity is 10 to 13 inches. Present land uses for this soil include irrigated crops, citrus, range, and urban development.
Total		121.1	100%			

Source: United States Department of Agriculture, Soil Conservation Service and Forest Service. 2016. *Soil Survey of Orange County and Western Part of Riverside County, California*.

Ile = Soil Capability Class II, Subclass (e), Erosion

IIIe = Soil Capability Class III, Subclass (e), Erosion

IVe = Soil Capability Class IV, Subclass (e), Erosion

VIe = Soil Capability Class VI, Subclass (e), Erosion

VIIe = Soil Capability Class VII, Subclass (e), Erosion

VIIIw = Soil Capability Class VIII, Subclass (w), Excess Water

- **Class VII:** Soils in this class have very severe limitations that make them unsuited to cultivation and that restrict their use largely to grazing, woodland, or wildlife. Physical conditions of soils in this class are such that it is impractical to apply such pasture or range improvements as seeding, liming, fertilizing, and water control with contour furrows, ditches, diversions, or water spreaders. Depending upon the soil characteristics and local climate, soils in this class may be well or poorly suited to woodland. They are not suited to any of the common cultivated crops; in unusual instances, some soils in this class may be used for special crops under unusual management practices.
- **Class VIII:** Soils and landforms in this class have limitations that preclude their use for commercial plant production and restrict their use to recreation, wildlife, or water supply, or to aesthetic purposes. Soils and landforms in this class cannot be expected to return significant on-site benefits from management for crops, grasses, or trees, although benefits from wildlife use, watershed protection, or recreation may be possible. Badlands, rock outcrop, sandy beaches, riverwash, mine tailings, and other nearly barren lands are included in this class. It may be necessary to protect and manage plant growth in soils and landforms in this class in order to protect other more valuable soils, to control water, or for wildlife or aesthetic reasons.

As noted above, subclasses are used to further define specific limitations for soils classified in the USDA Soil Capability Classification System. The four kinds of limitations recognized at the subclass level include: risks of erosion, designated by symbol (e); wetness, drainage, or overflow (w); rooting-zone limitations (s); and climatic limitations (c). Subclasses that are identified for the soils located on the Project site are defined as follows:

- **Subclass (e), Erosion:** This subclass is made up of soils where the susceptibility to erosion is the dominant problem or hazard in their use. Erosion susceptibility and past erosion damage are the major soil factors for placing soils in this subclass.
- **Subclass (w), Excess Water:** This subclass is made up of soils where excess water is the dominant hazard or limitation in their use. Poor soil drainage, wetness, high water table, and overflow are the criteria for determining which soils belong in this subclass.

The Storie Index is another method used to rate soils and is also based on the soil characteristics and the land's potential utilization and productive capacity. The Storie index rating system ranks soils on a 100-point scale that is divided into six grade classes as follows:

- **Grade 1, Excellent:** 81 to 100 points
- **Grade 2, Good:** 61 to 80 points
- **Grade 3, Fair:** 41 to 60 points
- **Grade 4, Poor:** 21 to 40 points
- **Grade 5, Very Poor:** 11 to 20 points
- **Grade 6, Nonagricultural:** 10 points or less

Four factors that represent the inherent characteristics and qualities of the soil are considered in the Storie Index rating system: profile characteristics, texture of the surface layer, slope, and other

factors (i.e., drainage, salinity). The majority of the soils (62.6 ac) on the Project site have a Storie Index rating below 80 points.

4.2.3 Regulatory Setting

The following section describes the regulations applicable to analyzing the potential impacts to agricultural resources from development of the proposed Project.

4.2.3.1 Federal Regulations

Federal regulations regarding agricultural resources do not apply to the proposed Project.

4.2.3.2 State Regulations

California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP). In 1982, the DOC began coordinating with the USDA Soil Conservation Service in the preparation and completion of Important Farmland mapping for California through the establishment of the FMMP. The FMMP created a greater level of mapping compared to the USDA Soil Conservation Service by modifying the federal criteria for use in California and incorporating irrigation criteria for farmland significance. The primary purpose of the FMMP is to monitor the conversion of California's agricultural lands. The DOC Division of Land Resource Protection works with landowners, local governments, and researchers to conserve California's farmland and open space resources based on information provided in the FMMP.

The DOC FMMP produces maps and statistical data used for analyzing impacts on agricultural resources. Agricultural land is categorized according to soil quality and irrigation status. The maps are updated every 2 years through review of aerial photographs, a computer mapping system, public review, and field reconnaissance. The latest statewide data available are for the period from 2014 to 2016. The FMMP categories are defined as follows:

- **Prime Farmland:** This land category has the best combination of physical and chemical features for sustaining long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce crops with sustained high yields. The land must have been used for irrigated agricultural production at some time during the 4 years prior to the mapping date.
- **Farmland of Statewide Importance:** This category is similar to Prime Farmland but with minor shortcomings (e.g., greater slopes or less ability to store soil moisture). The land must have been used for irrigated agricultural production at some time during the 4 years prior to the mapping date.
- **Unique Farmland:** This category consists of lesser quality soils used for the production of the State's leading agricultural crops. This land is usually irrigated, but may include non-irrigated orchards or vineyards. The land must have been cropped at some time during the 4 years prior to the mapping date.

- **Farmland of Local Importance:** This land category is important to the local agricultural economy as determined by each county's Board of Supervisors and a local advisory committee.
- **Grazing Land:** This type of land is occupied with vegetation suited to grazing livestock. This category was developed in cooperation with the California Cattleman's Association, University of California Cooperative Extension, and other groups interested in the extent of grazing activities. The minimum mapping unit is 40 ac.
- **Urban and Built-Up Land:** This type of land is occupied by structures with a building density of at least one unit to 1.5 ac, or approximately six structures to a 10 ac parcel. Common examples include residential, industrial, commercial, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, and water control structures.
- **Other Land:** This type of land is not included in any other mapping category. Common examples include low-density rural developments, brush, timber wetland, riparian area not suitable for livestock grazing, and water bodies smaller than 40 ac. Vacant and nonagricultural land surrounded on all sides by urban development that are greater than 40 ac are mapped as Other Land.

The DOC FMMP considers Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance collectively as Important Farmland (a term that will be used throughout this EIR section).

Williamson Act and Farm Land Security Act. The California Land Conservation Act, better known as the Williamson Act, has been the State's most important agricultural land protection program since its enactment in 1965. Fundamentally, the Williamson Act is a State policy administered by local governments. Local governments are not mandated to administer the Act, but those that do have some latitude to tailor the program to suit local goals and objectives.

Williamson Act contracts have a minimum term of 10 years, with renewal occurring automatically each year (local governments can establish initial contract terms for longer periods of time). The contracts run with the land and are binding on all successors in interest of the landowner. Only land located within an agricultural preserve is eligible for Williamson Act contracts. An agricultural preserve defines the boundary of an area within which a city or county would enter into contracts with landowners. The boundary is designated by resolution of the board of supervisors or city council having jurisdiction. The rules of each agricultural preserve specify the uses allowed. Generally, any commercial agricultural uses would be permitted within any agricultural preserve. In addition, local governments may identify compatible uses allowed with a use permit.

In August 1998, Senate Bill (SB) 1182 established the FSZ provisions of the Williamson Act. An FSZ is created within an agricultural preserve by County Board of Supervisors' approval and at the request of a landowner or group of landowners. FSZ contracts offer landowners greater property tax reductions in return for an initial contract term of 20 years, with renewal occurring automatically each year. Land restricted by an FSZ contract is valued for property assessment purposes at 65 percent of its Williamson Act valuation, or 65 percent of its Proposition 13 valuation, whichever is

lower. New special taxes for urban-related services must be levied at an unspecified reduced rate unless the tax directly benefits the land or living improvements. Cities and special districts that provide non-agricultural services are generally prohibited from annexing land enrolled under an FSZ contract. Similarly, school districts are prohibited from taking FSZ lands for school facilities.

4.2.3.3 Regional Regulations

Regional regulations regarding agricultural resources do not apply to the proposed Project.

4.2.3.4 Local Regulations

Orange County Resources and Development Management Department. The Orange County Resources and Development Management Department (RDMD) has instated the Pesticide Regulation Program to enforce State pesticide laws and regulations and to protect the agricultural and urban development throughout Orange County. This program also protects people working with and around pesticides from exposure to hazardous pesticide levels through an ongoing inspection program focused on commercial pesticide use. The California Department of Pesticide Regulation oversees the Orange County Pesticide Regulation Program.

City of Lake Forest General Plan. The City of Lake Forest General Plan contains goals, policies, and plans intended to guide growth and development of the City. The City is currently preparing General Plan Update 2040, which is anticipated to be approved in 2019. The current General Plan consists of the following elements:

- Land Use Element (revised September 2016)
- Housing Element (January 2014)
- Circulation Element (revised July 1, 2008)
- Recreation and Resources Element (revised September 2016)
- Safety and Noise Element
- Public Facilities and Growth Management Element

The current General Plan does not contain goals, policies, or plans related to the conservation of agricultural resources. The General Plan Land Use Element does not identify any agricultural land uses within the City's jurisdiction.

City of Lake Forest Municipal Code. The City's Municipal Code does not have any codes that pertain to agricultural conservation or right-to-farm policies. However, guidelines and provisions related to agricultural development are addressed in Chapter 9.72, A1 – Agricultural District:

- **A1 – Agricultural District** allows for agriculture, outdoor recreational uses, and low-intensity uses that predominantly have open space characteristics. This designation is also intended to be used as an interim zone in those areas the General Plan may designate for more intensive urban uses in the future. The Project site is currently zoned as A1 – Agricultural District.

4.2.4 Methodology

The potential Project impacts to agricultural resources were evaluated on a qualitative and quantitative basis. Quantitative impacts were assessed by completing the Land Evaluation and Site Assessment (LESA) model as well as using geographic information system (GIS) tools to calculate the exact acreage of Important Farmlands that would be impacted by development of the proposed Project. Qualitative impacts were assessed by evaluating the Project's potential for impacting agricultural activities within the City and County. The agricultural resources analysis is based on information from a number of sources, including the DOC, the Orange County Agricultural Commissioner's office, and the City of Lake Forest. The DOC LESA model was also used (refer to Appendix B).

4.2.4.1 California Agricultural Land Evaluation and Site Assessment Model

LESA is a term used to define an approach for rating the relative quality of land resources based on specific measurable features. The formulation of a California LESA Model is the result of SB 850 (Chapter 812/1993), which charges the Resource Agency (in consultation with the Governor's Office of Planning and Research) with developing an amendment to Appendix G of the California Environmental Quality Act (CEQA) Guidelines concerning agricultural lands. Such an amendment is intended "to provide lead agencies with an optional methodology to ensure that significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process" (Public Resources Code [PRC] Section 21095). A LESA analysis is based on the definition of agricultural land contained in CEQA, PRC Section 21060.1:

21060.1 (a) "Agricultural land" means prime farmland, farmland of statewide importance, or unique farmlands, as defined by the United States Department of Agriculture land inventory and monitoring criteria as modified for California.

21060.1 (b) In those areas of the state where lands have not been surveyed for the classifications specific in subdivision (a), "agricultural land" means land that meets the requirement of "prime agricultural land" as defined in paragraph (1), (2), (3), or (4) of subdivision (c) of Section 51201 of the Government Code [the Williamson Act].

4.2.5 Thresholds of Significance

The thresholds for agriculture and forestry impacts used in this analysis are consistent with Appendix G of the State CEQA Guidelines. Agricultural impacts associated with implementation of the proposed Project may be considered significant if the agricultural impacts exceed the Thresholds of Significance identified below:

Threshold 4.2.1: Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use

- Threshold 4.2.2:** Conflict with existing zoning for agricultural use, or a Williamson Act contract
- Threshold 4.2.3:** Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?
- Threshold 4.2.4:** Result in the loss of forest land or conversion of forest land to non-forest use.
- Threshold 4.2.5:** Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use

The Initial Study, included as Appendix A, substantiates that there would be no impacts associated with Thresholds 4.2.3 and 4.2.4. These thresholds will not be addressed in the following analysis.

4.2.6 Project Impacts

A portion of the Project site (approximately 45 ac [Site 7]) was analyzed for conversion to urbanized uses in an EIR prepared by the City in 2008 (i.e., the OSA PEIR). The Project impact analysis takes into account the impact conclusions on the 45 ac of land that were previously analyzed as part of the OSA PEIR.

- Threshold 4.2.1:** Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Significant Impact. The Project site is currently occupied by a retail nursery with above-ground potted plant stock for sale. There is no in-ground agricultural production currently occurring on the Project site. Implementation of the proposed Project would result in the permanent conversion of 119.2 ac of Important Farmland (Unique Farmland as designated by the DOC FMMP) on the 122 ac Project site to non-agricultural uses.

In order to determine the significance of this conversion of Important Farmland to non-agricultural uses, the LESA model was prepared for the Project. The LESA model is composed of a Land Evaluation (LE) portion, which measures soil quality, and the Site Assessment (SA) portion, which evaluates other factors that contribute to the site's agricultural importance (e.g., parcel size and on-farm investments). A Final LESA Score of 0 to 39 points is not considered significant. A final score between 40 to 59 points is considered significant only if the LE and SA subscores are each greater than or equal to 20 points. A final score between 60 to 79 points is considered significant unless either the LE or SA subscore is less than 20 points. A final score between 80 to 100 points, however, is considered significant. The Project site achieved a Final LESA score of 56.7. According to the LESA model instructions described above, a final LESA score of 40 to 59 points is considered to be significant only if the LE and SA subscores are each greater than or equal to 20 points. The LE score

for the Project site was 31.2 and the SA score for the Project site was 25.5. Therefore, converting approximately 119 ac of Unique Farmland to a non-agricultural use would be considered a significant impact. The LESA model worksheets are provided in Appendix B.

The loss of Unique Farmland on the Project site would result in the decrease of Important Farmland inventory in both Orange County and the City of Lake Forest. In 2016, Orange County had an Important Farmland inventory of 5,715 ac, 2,913 ac of which were categorized as Unique Farmland. Implementation of the Project would convert 119.2 ac of Unique Farmland, which would result in a 2.1 percent decrease in the Important Farmland inventory of Orange County and a 4.1 percent decrease in the County's Unique Farmland inventory. In 2016, the City of Lake Forest had an Important Farmland inventory of 140.3 ac, 140.1 ac of which were categorized as Unique Farmland. Implementation of the Project would convert 119.2 ac of Unique Farmland, which would result in an 84.9 percent decrease in the Important Farmland inventory of the City and an 85 percent decrease in the City's Unique Farmland inventory. Once the land is converted to urban uses, the ability to use the land designated as Unique Farmland for future agricultural production would be lost. As noted above, the City's General Plan does not include agricultural land use designations nor do the four Citywide Theme proposed land use maps as identified in the recently prepared City of Lake Forest *Land Use Themes Report* (February 2019). As such, it can be assumed that the City recognizes and supports the notion that agricultural land within the City will be converted to non-agricultural land as the City builds out. Nevertheless, significance conclusions for this EIR are based on existing uses and conditions at the Project site. Therefore, given that a large percentage of the City's remaining agricultural land would be converted to a non-agricultural use with implementation of the proposed Project, and that this conversion would contribute to a depletion of Important Farmland inventory in both the County and the City, implementation of the proposed Project would result in a significant impact.

Mitigation measures were considered for the proposed Project in order to reduce the significant impact of converting the nursery on the Project site to non-agricultural uses; however, none of the mitigation measures were feasible. A discussion of the mitigation measures that were considered are discussed below in Section 4.2.9.

Threshold 4.2.2: Would the Project conflict with existing zoning or agricultural use, or a Williamson Act contract?

Less than Significant Impact. The City classifies the Project site as A1 – Agricultural District zoning. The A1 zoning classification was established in the City to provide for agriculture, outdoor recreational uses, and those low-intensity uses that have a predominantly open space character. This zone is also intended to be used as an interim zone in those areas the General Plan may designate for more intensive urban uses in the future. The existing City General Plan Land Use Element designates the Project site as BDO. The current use (retail nursery) occupying the Project site is consistent with the A1 zoning designation; however, the future use of the Project is not consistent with the A1 zoning classification. Given that the City's General Plan Land Use Element designates the future use of the Project site for a non-agricultural use, the Project site's zoning designation is an interim designation.

As part of the Project application process, the Project proponent is seeking a zoning classification amendment to change the zoning on the Project site from A1 to Planned Community District (PC). The zone change would require approval of the Project Area Plan, as well as the Nakase Property Supplemental Text and Development Plan.¹ Once the zone change is approved, the proposed use of the Project site would be consistent with the City's zoning classification as set forth in the City's Municipal Code, and impacts pertaining to conflicts with existing zoning would be less than significant.

The Project site is currently not under a Williamson Act contract. As such, implementation of the proposed Project would not conflict with a Williamson Act contract.

Threshold 4.2.5: Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

Less Than Significant Impact. No changes to the existing environment other than those analyzed as part of the proposed Project (e.g., planned community with a variety of uses and associated infrastructure) would result in the conversion of agricultural uses to non-agricultural uses. There are various parcels within the City that are currently under the A1– Agricultural District zoning classification. The A1 zoning classification allows for agricultural uses and recognizes such uses on these parcels as an interim zone in which the General Plan may designate more intensive urban uses in the future. The City also designates these specific A1 zone classified parcels as urban land uses under the General Plan Land Use Element. As such, the City anticipates that these parcels will eventually be developed with urban uses. Implementation of the proposed Project would not influence the conversion of agricultural uses to non-agricultural uses because these parcels have already been designated for conversion to urban uses through the City's General Plan. Impacts involving other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural uses would be less than significant.

4.2.7 Cumulative Impacts

The cumulative geographic study area for agricultural impacts is the City. Development of the proposed Project in combination with the related projects in the City (please refer to Chapter 4, Table 4.A of this EIR) has the potential to deplete the inventory of Important Farmland (Prime Farmland, Unique Farmland, and Farmland of Statewide Importance) in the City through the conversion of agricultural land to non-agriculture land.

According to the most current DOC FMMP data, in 2016, the City had 140.3 ac of Important Farmland. This acreage includes 0.2 acres of Prime Farmland, and 140.1 acres of Unique Farmland. The City of Lake Forest Opportunities Study Program EIR indicates that Important Farmland within the City will eventually be developed based on future approved land use designations. The loss of Important Farmland within the City is considered to be a significant cumulative impact.

¹ The Nakase Property Supplemental Text and Development Plan would be considered equivalent to the planned community text, specified in Section 9.111.050 of the City's Municipal Code

Table 4.A of this EIR provides a list of related Projects to be analyzed as part of the cumulative impact analysis. None of the related Projects provided in Table 4.A contain Important Farmland. Therefore, none of the related projects will convert Important Farmland to a non-agricultural use and thereby contribute to the reduction of Important Farmland inventory in the City. Implementation of the proposed Project would result in the conversion of 0.2 acre of Prime Farmland and 119.2 acres of Unique Farmland, which would reduce the total acreage of Important Farmland within the City. Because implementation of the Project would result in the conversion, and elimination, of a significant amount of Unique Farmland remaining in the City, the contribution of the proposed Project to the loss of Important Farmland would be cumulatively considerable. Consequently, the cumulative impact of the proposed Project on Unique Farmland would be significant and unavoidable.

There are no Williamson Act contracted lands in the City. Therefore, there are no Williamson Act contract lands associated with the related Projects. Furthermore, the proposed Project is not under a Williamson Act contract. Therefore, impacts on Williamson Act contract lands would be less than cumulatively considerable.

There are approximately 476 acres of land zoned for agricultural use in the City. The Project site is zoned for agricultural use; however, none of the related Projects are zoned for agricultural uses. Implementation of the proposed Project would reduce the amount of land zoned for agricultural use in the City (by 119.2 acres) through a rezone of the Project site to a non-agricultural zoning designation. Given that the existing zoning of the Project site is an interim zoning designation and project-related impacts associated with conflicts with agricultural zoning would be less than significant, and that the related Projects in the City are not zoned for agricultural use, impacts on agricultural zoning would be less than cumulatively considerable. Cumulative impacts of the proposed Project on agricultural zoned land would be less than significant.

The proposed Project would result in the conversion of agricultural land to non-agricultural land within the City. Once this land is converted, only 21 acres of agricultural land would remain in the City. The remaining 21 acres of land are not adjacent to or near the proposed Project site; as such, implementation of the proposed Project would not directly or indirectly influence the conversion of the remaining 21 acres of agricultural land to a non-agricultural use or involve other changes in the existing environment, which due to their location and nature, could result in the conversion of farmland to non-agricultural uses. The contribution of the proposed Project to the conversion of agricultural land to non-agricultural land would not be cumulatively considerable. As such, cumulative impacts of the proposed Project would be less than significant.

4.2.8 Level of Significance Prior to Mitigation

The conversion of 119.2 ac of Unique Farmland would be potentially significant. The proposed Project would conflict with the existing A1 – Agricultural District zoning but would not conflict with a Williamson Act contract. As noted above, as part of the Project application process, the Project proponent is seeking a zoning classification amendment to change the zoning on the Project site from A1 to PC. Likewise, impacts involving other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural uses would be

less than significant. A discussion of potential measures to mitigate for the loss of this agricultural resource is provided below.

4.2.9 Mitigation Measures

Implementation of the proposed Project would result in a significant impact from the conversion of 119.2 ac of Unique Farmland to a non-agricultural use. Mitigation measures such as paying in-lieu fees for agricultural conversion impacts were considered for this Project; however, this was determined infeasible as the City and County do not have programs where developers can pay in-lieu fees that apply towards agricultural conservation. The preservation of equivalent quality agricultural land on a 1:1 ratio within the City and County was also considered; however, this mitigation was considered infeasible due to the lack of land designated as Important Farmland within the City and County.

According to the FMMP, the City has a current inventory of 140.3 ac of Important Farmland (0.2 ac of Prime Farmland and 140.1 ac of Unique Farmland) within its jurisdiction. The 140.1 ac of Unique Farmland includes the 119.2 acres of Unique Farmland designated on the Project site; therefore, without the Project site accounted for in the City's Unique Farmland inventory, the City would only have 21 ac of Unique Farmland left within its jurisdiction. In order to mitigate at a 1:1 ratio, 119.2 ac of Unique Farmland would need to be set aside and preserved in perpetuity. The remaining 21 ac of Unique Farmland within the City would not be enough to provide adequate mitigation for the loss of Unique Farmland caused by implementation of the proposed Project. Preserving Unique Farmland at a 1:1 ratio within the City could not be used as a mitigation measure to reduce agricultural conversion impacts due to a lack of available appropriate land.

Areas outside the City's jurisdiction were also considered for conserving agricultural uses to reduce the impacts associated with the proposed Project. According to the FMMP, the County (in 2016) had a 5,715 ac inventory of Important Farmland, of which 2,931 ac were designated as Prime Farmland, 411 ac were designated as Farmland of Statewide Importance, and 2,913 ac were designated as Unique Farmland. Land use patterns in the County were reviewed using GIS applications and compared to the FMMP's Important Farmland categories, which shows that the majority of the land designated as Prime Farmland, Unique Farmland, and Farmland of Statewide Importance in the County is entitled for urban development, is slated for future urban development, or is sparse and fragmented. Replacing the 119.2 ac of Unique Farmland on one contiguous similar size parcel would not be feasible. Replacing the 119.2 ac of Unique Farmland on one contiguous similar size parcel would not be feasible. Replacing agricultural uses within Orange County could not be used as a mitigation measure to reduce agricultural conversion impacts.

4.2.10 Level of Significance after Mitigation

As described above in Section 4.2.9, mitigation was considered to reduce the impact of the conversion of 119.2 ac of Unique Farmland to non-agricultural uses. The mitigation measures were not considered feasible; therefore, impacts pertaining to the conversion of Important Farmland to a non-agricultural use from implementation of the proposed project would be significant and unavoidable.