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## 3.2 AGRICULTURAL RESOURCES

### 3.2.1 Introduction

This section describes agricultural resources within the Project Area. Information was obtained from the California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP), EIP staff site surveys, the City's 1994 General Plan Final Master EIR, and previous environmental documentation prepared for the Project Area.

No comment letters associated with agricultural resources were received during the NOP comment period.

### 3.2.2 Environmental Setting

This section describes the farmland present within the County, City, and more specifically, within the Project Area, as shown in Figure 3.2-1. As defined by the DOC, farmland is generally grouped into five categories:

- *Prime Farmland*—Farmland with the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date. The mapping date in this case was 2002. As further described below and as shown on Figure 3.2-1, there are areas within the City and Project Area that are categorized as Prime Farmland.
- *Farmland of Statewide Importance*—Farmland similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date. As shown on Figure 3.2-1, there is no Farmland of Statewide Importance within the City or Project Area.
- *Unique Farmland*—Farmland of lower-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 as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date. As further described below and as shown on Figure 3.2-1, there are areas within the City and Project Area that are categorized as Unique Farmland.
- *Farmland of Local Importance*—Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee. According to the DOC, the Orange County Board of Supervisors determined that there will be no Farmland of Local Importance for Orange County. As there is no Farmland of Local Importance within the City or Project Area, this particular category is not shown on Figure 3.2-1.
- *Grazing land*—Land on which the existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen's Association, University of California Cooperative Extension, and other groups interested in the extent of grazing activities. The minimum mapping unit is 40 acres. As shown on Figure 3.2-1, although there is grazing land west of Site 1 in the City of Irvine, there is no grazing land in the City or Project Area.

Two additional, non-farmland categories are shown in Figure 3.2-1. “Urban and built-up land” encompass developed areas with a building density of at least one unit to 1.5 acres. Common examples include residential, industrial, commercial, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, and water control structures. The majority of land within the City, with the primary concentration in the southern portion of the City, is categorized as urban and built-up land, as illustrated on Figure 3.2-1.

“Other land” is land not included in any other mapping category. Common examples include low-density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land. As illustrated on Figure 3.2-1, northern portions of the City and some areas surrounding the Project Area are categorized as other land.

In addition, as illustrated on Figure 3.2-1, “Urbanization,” which is shown in yellow, shows the land that has been converted from farmland to urban and built-up land between 1990 and 2002. On the next round of farmland mapping by the DOC, the urbanization areas will be labeled as urban and built-up land.

For the purposes of CEQA, in addition to the DOC characterizations of farmland, agricultural use can also be defined as:<sup>1</sup>

- (1) Land that qualifies for rating as class I or class II in the Natural Resource Conservation Service land use capability classifications.
- (2) Land that qualifies for rating 80 through 100 in the Storie Index Rating.
- (3) Land that supports livestock used for the production of food and fiber and which has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the United States Department of Agriculture.
- (4) Land planted with fruit- or nut-bearing trees, vines, bushes or crops that have a nonbearing period of less than five years and which will normally return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than two hundred dollars (\$200) per acre.<sup>2</sup>

## ■ Regional Characteristics

The nature of the rural landscape in Orange County has changed dramatically over the years as a result of growth. Thousands of acres of farmland or grazing land are being urbanized or otherwise taken out of agricultural use around the state, according to DOC’s FMMP.

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<sup>1</sup> CEQA Statute, Section 21060.1

<sup>2</sup> California Government Code Section 51201, subdivision (c), paragraphs (1), (2), (3), and (4).





As shown on Figure 3.2-1, the majority of the City consists of urban and built-up land and other land. The total acreage of agricultural land in the City has declined as development has occurred, as illustrated in yellow within the figure. Most agricultural land is being converted to nonagricultural (mostly urban) uses. In addition, the FMMP rating of some agricultural land is also being downgraded; that is, prime farmland is being converted to farmland of statewide or local importance, or to unique farmland, etc. Such downgrading does not result in a net loss of agricultural land, but it represents degradation in the quality of the remaining agricultural land.

As shown by DOC's data mapping efforts and included as Appendix C, Orange County saw 4,609 acres of land—including 2,346 acres of important farmland—converted to urban uses between 2000 and 2002. In addition, a net total of 3,535 acres of agricultural land were reclassified to urban land by the FMMP. Further, 7,115 acres of “other” land—neither built-up nor used for agriculture, such as wetlands, low-density “ranchettes,” or brush and timberlands unsuitable for grazing—were reclassified as urban (Department of Conservation).

In addition, approximately 9,920 acres—7,467 of it agricultural—were committed to non-agricultural use. Typically, this is land earmarked for development. In some cases the development, such as sanitary sewer installation, already may be underway (Department of Conservation). Orange County agricultural land will continue to face development pressure in the foreseeable future due to the projected growth forecasts, as discussed further in Section 3.11 (Population and Housing).

Similar to the rest of Orange County, the City of Lake Forest was historically used for agriculture, and some remnants of agricultural uses remain in the Project Area, which are further discussed below.

## ■ Project Area Characteristics

As stated above and shown on Figure 3.2-1, limited agricultural production exists within the City boundaries. However, a majority of the existing agricultural land within the City is primarily located within two parcels in the Project Area: Site 1 (Shea/Baker Ranch) and Site 7 (Nakase). According to the most current DOC maps, these parcels are designated as a mixture of prime and unique farmland. Specifically, the Site 1 property is primarily comprised of unique farmland, except for the western boundary of the property, which is prime farmland. Conversely, Site 7 property is primarily comprised of prime farmland, except for an interior portion of the site, which extends from the center to the southern boundary of the property, and is comprised of unique farmland.

Although Site 1 is largely vacant, existing land uses include: two single-family residential units with surrounding open space; agricultural uses consisting of a nursery, avocado grove, and composting area; an RV storage facility; and large vacant graded areas adjacent to Bake Parkway. According to aerial photographs of the sites, it appears that approximately 45 percent of Site 1 is currently used for agricultural operations, or approximately 174 acres.

Similarly, the 121-acre Site 7 currently contains an active wholesale nursery (Nakase Brothers Nursery) and support structures such as a greenhouse and office area. It appears that approximately 95 percent of Site 7 is currently used for agricultural operations (not including the ancillary structures and parking lot),

or approximately 115 acres. However, the proposed project would only utilize the northernmost 45 acres of this parcel, bordering Rancho Parkway, and the remaining area within the site would continue with existing agricultural operations. Therefore, as shown below in Table 3.2-1 and for purposes of this analysis, the approximate area used for agricultural operations on Site 7 is approximately 45 acres because the remaining 76 acres are not part of the proposed project.

In addition, recent photographs and site visits also suggest that in addition to these two areas, although not mapped by DOC, limited agricultural activities also take place on Site 3 (IRWD/Lewis). Site 3 includes a mixture of agricultural row crops and support structures, and Irvine Ranch Water District (IRWD) facilities. Aerial photographs suggest that approximately 30 percent of Site 3 is currently used for agricultural activities, which results in approximately 25 acres. Table 3.2-1 shows the approximate breakdown of agricultural acreages within the Project Area.

| <b>Table 3.2-1 Agricultural Land in the Project Area</b> |                                |  |                              |   |
|--|--------------------------------|--|------------------------------|---|
| <b>Site</b>  | <b>Gross Site Area (acres)</b> | <b>Approximate Acreages of Agricultural Land in Production</b> | <b>Prime/Unique Farmland</b> | <b>Current Zoning</b>   |
| Site 1 (Shea/Baker)                                      | 387                            | 174  | Yes (387 acres)              | Urban Activity - Baker Ranch Planned Community                            |
| Site 2 (Portola Center)                                  | 243                            | 0  | No (0 acres)                 | Business Park, Commercial – Portola Hills Planned Community               |
| Site 3 (IRWD)  | 82                             | 25   | No (0 acres)                 | Agriculture (A1)  |
| Site 4 (Baker)   | 50                             | 0  | No (0 acres)                 | Urban Activity (Sand & Gravel Overlay)- Baker Ranch Planned Community     |
| Site 5 (Whisler/Greystone)                               | 13                             | 0  | No (0 acres)                 | Agriculture (A1)  |
| Site 6 (Pacific Heritage)                                | 18                             | 0  | No (0 acres)                 | Open Space/High Density Residential – Serrano Highlands Planned Community |
| Site 7 (Nakase)  | 45                             | 45   | Yes (45 acres)               | Agriculture (A1)  |
| <b>Total</b>   | <b>838</b>                     | <b>244</b>   | <b>2 sites (432 acres)</b>   | <b>N/A</b>  |

As shown above in Table 3.2-1, approximately 244 acres in the Project Area within three separate parcels (Sites 1, 3, and 7) are currently used for agricultural operations. Of these acreages, approximately 219 acres are designated as either prime or unique farmland. However, it should be noted that although only 219 acres of the 432 acres of Sites 1 and 7 are currently used for agricultural purposes, the entirety of both parcels appear to be designated as such (Figure 3.2-1). As such, the total prime and unique farmland within the Project Area is approximately 432 acres.

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### 3.2.3 Planning and Regulatory Framework

#### ■ Federal

There are no federal regulations pertaining to agricultural resources that would be applicable to the Proposed Project.

#### ■ State

##### ***California Land Conservation Act of 1965 (the Williamson Act)***

California adopted the *Williamson Act* to preserve both prime and nonprime agricultural land for continued production. Participation in the *Williamson Act* program is voluntary, wherein property owners enter a minimum ten-year rolling contract with the respective city or county, in which they agree to commit the land to agricultural and/or a compatible use, in return for property tax assessment based upon agricultural productivity, rather than upon the parcel's assessed market value.

At the end of each year, another year is automatically appended to the contract term, so that the minimum commitment remains ten years. Only under extraordinary circumstances may a contract be canceled outright; however, the owner may decline to renew the contract (as specified in provisions of the Act) at any year's end, resulting in its expiration ten years hence, during which time the property taxes increase until they eventually equal the land's assessed value at the end of the contract's term. As of January 1, 2003, 16.6 million acres were enrolled under the *Williamson Act* statewide. This represents over half of California's farmland total of about 30 million acres, and nearly one-third of California's privately owned land. However, none of the land in the City is subject to *Williamson Act* contracts.

##### ***California Code of Regulations (Title 3, Food and Agriculture)***

California Code of Regulations (CCR) Title 3, Sections 6000–6920 regulate the registration, management, use, and application of pesticides on agricultural lands. Generally, specific regulations vary for each pesticide, its method of application and use. However, Sections 6600 and 6614 have some general regulations relating to the application of pesticide uses. Section 6600 provides regulations regarding general standards of care in the application of pesticides, and Section 6614 includes regulations that are intended to protect people, animals, and property, and which limit the conditions under which pesticides may be applied.

##### ***Farmland Mapping and Monitoring Program***

In 1982, California began assisting the United States Department of Agriculture, Soil Conservation Service (USDA-SCS) with the completion of the Important Farmland Maps for California by establishing the FMMP within the California DOC. The FMMP carried on the mapping activity with a greater level of detail and modified the federal criteria for use in California by incorporating irrigation in the criteria for farmland significance. The primary purpose of the FMMP is to monitor conversion of the State's agricultural lands. The State considers both Prime Farmland and Farmland of Statewide Importance as

important farmland. Prime Farmland is generally defined as land with the best combination of physical and chemical characteristics for the production of crops. Farmland of Statewide Importance is generally defined as land with a good combination of physical and chemical characteristics for the production of crops. The DOC's 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 mapping and research programs, including the FMMP.

## ■ Local

### ***Orange County Resources & Development Management Department***

Under direction of the Orange County Resources & Development Management Department (RDMD), the Pesticide Regulation Program enforces State pesticide laws and regulations to protect the urban and agricultural environment as well as protect people working with and around pesticides from exposure to hazardous pesticide levels. This is accomplished through an ongoing inspection program focused on commercial pesticide use. The California Department of Pesticide Regulation oversees the County's Pesticide Regulation Program.

### ***General Plan***

The City of Lake Forest General Plan contains goals, policies, and plans that are intended to guide land use and development decisions. The General Plan consists of a Land Use Policy Map and the following six elements, or chapters, which together fulfill the State requirements for a General Plan:

- Land Use Element
- Housing Element
- Circulation Element
- Recreation and Resources Element
- Safety and Noise Element
- Public Facilities/Growth Management Element

There are no policies that relate to Agricultural resources within the City's General Plan.

### ***Municipal Code***

Guidelines and provisions related to agricultural development are addressed in Chapters 9.10 (A1—Agricultural District) and 9.24 (AR—Agricultural Residential District) of the City Municipal Code.

#### **Chapter 9.10 (A1 Agricultural District)**

The A1 District provides for agriculture, outdoor recreational uses, and those low-intensity uses, which have a predominately open space character. It is also intended that this district may be used as an interim zone in those areas, which the General Plan may designate for more intensive urban uses in the future. Presently, three sites within the Project Area are zoned A1, including Sites 3, 5, and 7.



### Chapter 9.24 (AR-Agricultural Residential District)

The AR District provides for the development and maintenance of medium density single-family residential neighborhoods in conjunction with agricultural and outdoor recreational uses. There are no sites within the Project Area that are currently zoned AR.

## 3.2.4 Methodology

The analysis of agricultural impacts focuses on the nature and magnitude of changes in the agricultural value and character of the Project Area parcels due to development under the Proposed Project. The examination of agricultural resource issues is based upon information obtained from review of existing published documents, including the DOC's FMMP, the Orange County Agricultural Commissioner's Annual Crop Report, and the existing City of Lake Forest's General Plan. In addition, site visits by EIP staff during December 2004 (Appendix C), as well as previous environmental documentation for the Project Area, determined the existing agricultural uses and character of the area. Further, the California DOC website was consulted as well as Important Farmland Maps and the Orange County Soil Survey. Within the Project Area, Sites 1, 3, 5, and 7 have a combination of either existing on-site agricultural uses, or are designated for general agricultural operations. Consequently, only these sites (or a combination of these sites) are analyzed within this section.

## 3.2.5 Thresholds of Significance

As the City's 2001 CEQA Significance Thresholds do not cover agricultural resource issues, the following thresholds of significance are based on Appendix G of the 2005 CEQA Guidelines. For purposes of this EIR, the proposed project would result in significant impacts related to agricultural resources if it would:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use
- Conflict with existing zoning for agricultural use, or a Williamson Act contract
- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use

As there are no lands covered by Williamson Act contracts in the City, the Proposed Project would have no impact with respect to this threshold and this issue is not addressed in the EIR.

### 3.2.6 Impacts

CEQA requires that the Proposed Project's potential environmental impacts be compared to on-the-ground conditions in the Project Area at the time the Notice of Preparation is issued or at the time the analysis of such impacts is commenced. Such on-the-ground conditions are considered, and often referred to as, the environmental or CEQA "baseline." Thus, the following section analyzes the Proposed Project's potential environmental impacts on baseline conditions. However, it should be noted that the land under consideration for the Proposed Project, while currently undeveloped, would not necessarily remain undeveloped. Most sites within the Project Area are subject to existing development agreements or entitlements and, in the absence of the Proposed Project, would in the future likely be developed with approximately 9.8 million square feet of industrial and commercial space under the existing General Plan. Given this, the analysis of alternatives to the Proposed Project in Chapter 4 of this EIR, under the "No Project/Reasonably Foreseeable Development" alternative, analyzes the potential environmental impacts associated with buildout of the existing General Plan. That analysis includes a comparison of the impacts of buildout of the existing General Plan with the potential environmental impacts of the Proposed Project.

**Impact 3.2-1            Development under the Proposed Project would result in the conversion of Prime Farmland and Unique Farmland to nonagricultural uses.**

**Significance Level:    Significant and unavoidable (Sites 1 and 7); no impact (Sites 2 through 6)**

Implementation of the Proposed Project would convert two sites presently designated by the FMMP as prime and unique farmland from agricultural to residential, commercial, and public facilities uses. Specifically, Site 1, which is 387 acres in size, would be converted to residential and commercial uses, while 45 acres at the north end of the 121-acre Site 7 would be converted to public facilities uses to allow a sports park and civic center/Community Center. As discussed previously, the remaining 76 acres on Site 7 are not a part of the Proposed Project, and this area would continue with existing agricultural (nursery) operations.

Once the land is converted to urban uses, the ability to use the land for agricultural production will be lost. Although not all of the land is currently being used for agricultural production, the loss of approximately 432 acres of prime and unique agricultural land is considered a substantial and significant conversion. Therefore, implementation of the Proposed Project would have a significant impact on agricultural resources.

The most recent DOC data (Farmland Conversion Reports 2000-2002) indicates that as of 2002, Orange County contained a total of 14,607 acres of prime farmland, farmland of statewide importance, and unique farmland. The conversion of Site 1 and a 45-acre portion of Site 7 in the Project Area from agricultural to residential, commercial, and public facilities uses would result in a reduction of the total amount of these farmland types within the County by approximately three percent. In addition, the conversion of this land could result in the elimination of approximately 85 percent of the prime and unique farmland within the City's boundaries.

It is important to note that the conversion of the agricultural land in the Project Area has been anticipated as expected urban growth by the City of Lake Forest. Impacts related to the conversion of

such prime and unique farmland to urban uses were considered previously by the City when the existing General Plan was adopted (revised in 2001). In addition, the conversion of Site 1 from agricultural to urban uses was previously analyzed in the General Plan Amendment and zone change EIR for the Baker-Salvatori Group (SCH#81121811) in 1982 when Site 1 was under the County of Orange's jurisdiction. The Land Use Element Amendment analyzed in that EIR revised the County's A1 zoning designation for the site to the present-day Baker Ranch Planned Community designation. That EIR determined that the loss of prime farmland was a significant and unavoidable impact and that it would contribute incrementally to the countywide and statewide loss of agricultural lands.

Although this impact and the associated loss of farmland have already been addressed by the County, this EIR analysis is based on current conditions, and not on the conclusion of the conversion of Site 1 on the County's previous environmental determinations or its designation for business park uses under the City's General Plan even though the conversion of Site 1 from agricultural uses to business park uses has already been evaluated and was subject to the County's Statement of Overriding Considerations in at least one previous EIR, as referenced above. Given the prior evaluation of this site, the County has previously determined that while the loss of agricultural land would present a significant impact, the future benefits provided by development outweigh the unavoidable adverse environmental effects. However, this EIR recognizes that the loss of prime and unique farmland on Site 1 that would result from implementation of the Proposed Project is considered significant and unavoidable.

Sites 1 and 7 are currently surrounded by urban uses (light industrial and commercial) and, therefore, future development would be primarily compatible with adjacent uses. Unlike Site 1, the conversion of Site 7 was not previously evaluated in any environmental documentation. Thus, given that a substantial area of prime and unique farmland on Site 7 would be converted to nonagricultural uses under the Proposed Project, significant and unavoidable impacts would also occur on this site if the Proposed Project were implemented.

Aside from Sites 1 and 7, no other prime or unique farmland presently exists in the Project Area. Consequently, the Proposed Project as it relates to Sites 2, 3, 4, 5, and 6 would have no impact on agricultural resources.

**Impact 3.2-2            Development under the Proposed Project would conflict with existing zoning for agricultural use for Sites 3 and 5 and portions of Site 7.**

**Significance Level:    Significant and unavoidable (Sites 3 and 5 and portions of Site 7); no impact (Sites 1, 2, 4, 6, and portions of Site 7)**

Implementation of the Proposed Project would convert Project Area sites that are currently zoned for agricultural uses to allow urban development. Presently, Sites 3, 5, and 7 are zoned A1 general agricultural, which represent a total of approximately 140 acres. The remaining sites under the proposed project (1, 2, 4, and 6) are zoned for urban activity, business park, commercial, and open space.

If the proposed future development were to occur under the existing agricultural zoning designations, the development would conflict with zoning for agricultural use. However, implementation of the Proposed Project would specifically amend the existing General Plan and zoning designations for the

Project Area. As such, existing agricultural zoning in the Project Area for Sites 3 and 5 would be revised to reflect the newly permitted residential uses, as proposed. In addition, Site 7 would include a zone change to reflect business park uses with a public facility overlay, which would allow the three community facilities on 45 acres in the northern portion of the site. As stated previously, the remaining 76 acres of Site 7 would continue existing agricultural (nursery) operations on site, and would not conflict with the agricultural zoning for the site. Consequently, implementation of the Proposed Project would conflict with existing zoning for agricultural uses on sites 3 and 5, and a portion of Site 7. The Proposed Project has no impact with respect to Sites 1, 2, 4, 6, and portions of Site 7 in terms of presenting a conflict with existing zoning for agricultural use, and impacts to Sites 3 and 5, and a portion of Site 7 would be significant and unavoidable.

**Impact 3.2-3            Development under the Proposed Project would involve other changes in the existing environment which, due to their location or nature, could result in the conversion of Farmland to a nonagricultural use.**

**Significance Level:    Less than significant (Sites 1 through 6); significant and unavoidable (Site 7)**

The majority of the City of Lake Forest has been built out with urban uses. Most of the vacant property within the City is either properties within the Proposed Project Area or land, which may currently be vacant and undeveloped, but not used for agricultural purposes now and would not be suitable for agricultural activity (due in large part to the size of the property and its location in an urban environment). Although approximately 244 acres in the Project Area within three separate parcels (Sites 1, 3, and 7) are currently used for agricultural operations, the development of the Proposed Project on Sites 1 and 3 would not result in other changes in the existing environment, which could result in the conversion of Farmland to non-agricultural use on areas other than the Project Area. Site 1 is already surrounded by land, which was formerly farmed, but has been converted to commercial, industrial and retail uses. Where adjacent open space exists to the west of Site 1, that land (on the former MCAS El Toro) has already been designated for habitat conservation. Site 3 is similarly located in an urban environment and its development would not necessarily result in other Farmland in the City to be converted to nonagricultural uses. Sites 2, 4, 5 and 6 area also located within developed or urbanizing areas and the development of these sites would not create additional pressures on other Farmland areas to convert to nonagricultural uses.

On the other hand, Site 7 is comprised of a wholesale container nursery. Although nurseries in and of themselves may not be considered agricultural uses like row crops, the parcel is designated as a combination of prime and unique farmland.

Implementation of the Proposed Project would result in the conversion of a portion of Site 7 currently designated Farmland to urban uses. As noted previously, only 45 acres of Site 7 are being proposed for development under the Proposed Project with the remaining 76 acres of Site 7 continuing for nursery uses. However, the potential conversion of a portion of Site 7 to urban uses could impose greater pressures on the owner of Site 7 to convert the remainder of the property to non-agricultural uses, and could potentially result in the conversion of the remaining 76 acres of Farmland to nonagricultural uses. Because implementation of the Proposed Project would allow changes in the character of development

that could result in the conversion of farmland to a non-agricultural use, this impact is considered significant and unavoidable for Site 7.

Since no agricultural uses presently exist on or in the vicinity of the remaining sites (2, 4, 5, and 6), impacts associated with the conversion of farmland to non-agricultural uses on these sites would be less than significant.

### **3.2.7 Mitigation Measures**

As discussed above, implementation of the Proposed Project would result in significant and unavoidable impacts. Although a variety of mitigation measures were considered, which are discussed below, it was determined that there are no feasible mitigation measures that would reduce the impacts to a less-than-significant level. In order to reach this conclusion, three other recent EIRs from surrounding jurisdictions, including the City of Irvine and the County of Orange, were evaluated because each project included the conversion of existing agricultural land. In a comparison of the EIRs for the Ranch Plan (County of Orange), Northern Sphere, and the Great Park (both City of Irvine), there were significant and unavoidable agricultural impacts for each. The associated mitigation measures provided alternative means of agricultural uses that could be incorporated into an urban lifestyle. Each of the alternatives for these projects designated agricultural uses as an interim use until the time of project development.

The Ranch Plan for the County of Orange addressed the loss of agriculture and cattle grazing activities. In order to mitigate this loss, the project incorporated areas of ongoing grazing and provided for the continuation of citrus production and avocado orchards. In addition, the Northern Sphere and the Great Park used a City of Irvine Implementation Policy of the City's General Plan, which encourages the maintenance of agriculture in undeveloped areas of the City until the time of development. They also created farming opportunities through the Agricultural Legacy Program, including: edible landscape, metro-farming, heritage farming, model farming, education, and community service farming. Similar to the Ranch Plan, agricultural uses were permitted until the time of development. The Northern Sphere specifically required a five-year period for the 300 acres to be available for agricultural use before development would be permitted.

Each of the above-mentioned EIRs found it infeasible to replace the existing agricultural uses with the same acreage that is currently provided. However, they did provide for mitigation of impacts on agricultural resources through the continuation of agricultural uses as interim uses, the set aside of certain lands for agricultural uses and through the identification of areas where small scale, specialty heritage or multi-use of agricultural operations could occur. After a thorough review of potential mitigation measures, those that were initially considered for the Proposed Project but ultimately rejected as infeasible included two options: (1) excluding relevant sites (designated as Prime and Unique Farmland, or land currently containing agricultural uses) from future development; and (2) replacing agricultural uses. Unlike the City of Irvine, the City of Lake Forest does not have adopted policies encouraging the continuation of agricultural crops. In fact, the City's General Plan Land Use Element contemplates the urbanization of all agricultural lands. The amendment of the Land Use Element to accommodate agricultural uses would likely cause significant land use impacts due to the adjacency of agricultural uses not contemplated in the existing and planned urban setting. In addition, replacing or relocating the

agricultural uses, as was done for the other projects described above, would not be feasible simply because of the lack of unentitled vacant land within the City and the lack of the availability of land for agricultural preservation in surrounding areas.

Excluding relevant sites from future development would preclude development of any kind on those sites. For those sites zoned A1, the preclusion of future development would conflict with the intended use of the designation, as it is also intended to be used as an interim zone where more intensive urban uses may be designated in the future. In addition, excluding development on these sites would not fulfill the Project Objectives proposed for the Project Area. Regardless of implementation of the Proposed Project, Sites 1 and 2 are already vested for commercial/industrial development through development agreements with the City. As such, although the type of development that is permitted on each site may be modified by implementation of the Proposed Project, future development on these sites has been anticipated for quite some time and Sites 1 and 2 have development agreements, which vest the development of urban uses on these sites. To preclude these sites from development of any kind would be in violation of the development agreements and would require compensation by the City for potential inverse condemnation. This option therefore would not be feasible due to legal constraints.

Replacing existing agricultural uses on other sites within the City would be infeasible because of the limited number of undeveloped areas. Approximately 457 acres (432 acres of Prime and Unique Farmland and 25 acres of permitted agricultural uses) of undeveloped land would be necessary to relocate the existing agricultural uses in the Project Area or elsewhere in the City. Although the City presently has over 4,300 acres of open space in the northern portion of the City, this area is preserved within the Whiting Ranch Wilderness Park for habitat and open space conservation purposes. Because some of these areas are also within designated habitat areas, conversion of these lands to agricultural uses may require additional approvals under the Endangered Species Act or Natural Community Conservation Planning Act and may be inconsistent with the requirements these Acts. In addition to the mountainous terrain, which would make agricultural activities difficult, the undeveloped area within Whiting Ranch as well as that within the Southern California Edison easement is protected from future development. Thus, relocating agricultural uses to the existing undeveloped areas in the City would not be feasible.

Relocating agricultural uses to areas outside of the City's boundaries was also considered; however, suitable lands in the region have already been utilized for the mitigation of impacts on agricultural resources or have already been preserved as permanent open space by landowners such as The Irvine Company pursuant to state and federal statutes such as the Endangered Species Act and the Natural Community Conservation Planning Act. As noted above, the City of Irvine and the County of Orange have implemented agricultural mitigation programs within their jurisdictions to the maximum extent feasible. Other available lands in the region have already been restricted to permanent open space uses, which may include some agricultural uses, through the creation of conservation easements or through the public acquisition of agricultural lands such as in the City of San Juan Capistrano. Given the high value of lands which have been entitled for urban uses and the fact that agricultural mitigation programs have already been implemented in surrounding jurisdictions, the potential for the acquisition of offsite properties, which could feasibly replace the loss of agricultural resources within the Project, is considered to be highly unlikely. Therefore, relocation of agricultural uses to areas outside of the City is considered

to be infeasible. Consequently, there are no feasible mitigation measures that would reduce or avoid significant impacts associated with the conversion of farmland to nonagricultural uses to a less-than-significant level.

### 3.2.8 Summary of Impacts

Table 3.2-2 summarizes the potential long-term adverse impacts of the Proposed Project related to agricultural resources in the Project Area, and identifies the significance of those impacts after any applicable mitigation measures.

| Table 3.2-2 Summary of Impacts |  |   |
|--------------------------------|--|---|
| Impact                         | Threshold  | Significance  |
| 3.2-1                          | Development under the Proposed Project would result in the conversion of Prime Farmland and Unique Farmland to nonagricultural uses.   | Significant and unavoidable for Sites 1 and 7 only; no impact remaining sites                 |
| 3.2-2                          | Development under the Proposed Project would conflict with existing zoning for agricultural use for Sites 3 and 5 and portions of Site 7.  | Significant and unavoidable for Sites 3, 5, and portions of 7 only; no impact remaining sites |
| 3.3-3                          | Development under the Proposed Project would involve other changes in the existing environment, which, due to their location or nature, could result in the conversion of Farmland to a nonagricultural use. | Significant and unavoidable for Site 7 only; less than significant remaining sites            |

### 3.2.9 References

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