



**Summary of Scoping Comments Received by the City of Lake Forest**

<b>Date</b>	<b>Commenter</b>	<b>General Issue(s) Raised</b>	<b>Specific Issue(s) Raised</b>
July 16, 2018	Governor's Office of Planning and Research, State Clearinghouse	N/A	Confirmed the IS/NOP was distributed to appropriate State agencies
July 19, 2018	Natural Communities Coalition	N/A	Noted a recent name change of the organization (formerly known as the Nature Reserve of Orange County)
July 24, 2018	Soltani, Sima	Housing, Growth and Economic Issues (non-environmental)	In favor of new housing on the Nakase site
July 25, 2018	Herrin, Loretta	Traffic	Concerned about additional traffic on Bake Parkway
		Noise and Air Quality	Suggests adding a wall to Bake Parkway to reduce noise and air quality impacts on adjacent residents
		Noise	Suggests evaluating the installation of special pavement along Bake Parkway to reduce traffic noise
		Alternatives	Suggests evaluating the development of a cemetery for veterans or an aquatic center on the Nakase site
July 25, 2018	Holtzclaw, Bob	Traffic	Concerned about additional traffic on Bake Parkway
		Public Services - Schools	Concerned that SVUSD may not use the potential school site
July 25, 2018	Johnson, Jim	Traffic	Concerned about additional traffic on Bake Parkway, suggests that Bake Parkway may need to be widened to 3 or 4 lanes on both sides between Trabuco Road and SR-241
		Traffic	Suggests evaluating a traffic signal coordination program along Bake Parkway
		Water	Suggests evaluating whether sufficient water supplies will be available to serve the project's residents



**Summary of Scoping Comments Received by the City of Lake Forest**

<b>Date</b>	<b>Commenter</b>	<b>General Issue(s) Raised</b>	<b>Specific Issue(s) Raised</b>
July 25, 2018	Saddleback Valley USD	Public Services - Schools	Provided student generation rates and enrollment and capacity information relevant to the school capacity analysis for the EIR
		Traffic and Parking, Air Quality, Noise	Concerned about direct and indirect impacts on District schools, including traffic, pedestrian and bike safety, parking, air pollution, and noise
		Traffic	Concerned with traffic conditions during peak hours, vehicle queuing along BB street and access points, and pedestrian/bike safety along school routes
		Noise	Concerned with noise levels along Bake and Rancho Parkways
		Air Quality and Health Risks	Concerned about air quality in the vicinity of the proposed school site, requested that a Health Risk Assessment be completed; the HRA should address potential health impacts related to hazardous materials facilities within 0.25 mile of the school site, which should include the proposed active play area adjacent to the school, and emissions associated with SR-241
		Hazards	Requested that a Water Pipeline Risk Assessment and EMF Study be completed for the proposed school site, which should include the proposed active play area adjacent to the school
July 25, 2018	Stuart, Bob	Land Use/Planning	Against zoning change for the nursery
July 25, 2018	Sullivan, Richard	Traffic	Concerned with parking and accidents along Normandale Drive and Oesterman
		Air Quality	Concerned with worsening air quality in the neighborhood of Barclay and Normandale
July 30, 2018	Nath, Sue	Traffic	Concerned about additional traffic on Bake Parkway
		Air Quality	Concerned about additional vehicle emissions



**Summary of Scoping Comments Received by the City of Lake Forest**

<b>Date</b>	<b>Commenter</b>	<b>General Issue(s) Raised</b>	<b>Specific Issue(s) Raised</b>
		Alternatives	Suggests evaluating the development of a park and/or garden on the Nakase site
July 31, 2018	OC Fire Authority	Hazards	Suggested that the significance conclusion related to wildland fire hazards be revised to reflect that a Fuel Modification Conceptual Plan and a Fire Protection Plan with Ember Mitigation have been approved for the project
		Public Services – Fire Protection	Suggested mitigation measures to reduce potential impacts to fire services
August 3, 2018	Irvine Ranch Water District	Land Use/Planning and Utilities/Service Systems	Indicated that the Applicant will be required to coordinate with IRWD to prepare a technical memorandum or an addendum to the 2010 Lake Forest Sub-Area Master Plan identifying the proposed project’s potential impacts to IRWD’s potable and recycled water and sewer systems
		Water	Suggests that a Water Supply Assessment may be required
		Water	Suggests the Applicant consider using recycled water at the project, requests that the EIR discuss recycled water demand/use
August 4, 2018	Larson, Charles	Land Use/Planning and Alternatives	In favor of agricultural zoning on the Nakase site
		Public Services - Schools	Concerned that SVUSD may not use the potential school site, Foothill Ranch Elementary is not overcrowded
		Traffic	Concerned about school-related traffic impacts, particularly at Rancho and Bake Parkways
		Hazardous Materials	Concerned about proximity of potential school site to a gas station across Rancho Parkway
August 6, 2018	Alexander, Andrea	Air Quality	Concerned about airborne particulate matter resulting from traffic along Bake Parkway and its link to cancer



**Summary of Scoping Comments Received by the City of Lake Forest**

Date	Commenter	General Issue(s) Raised	Specific Issue(s) Raised
		Noise	Concerned about existing truck and motorcycle noise along Bake Parkway, noise from truck breakdowns, and the apparent lack of enforcement of the City's noise ordinance during the evening and early morning hours
		Traffic	Concerned about the project's contribution to traffic congestion along Bake Parkway
		Traffic	Suggests passing an ordinance to ban trucks and motorcycles on Bake Parkway, especially between Muirlands Boulevard and Trabuco Road, rerouting truck traffic to Alton Parkway
		Noise	Suggests the Applicant build a 10–12 foot wall to protect existing residents along Bake Parkway from additional traffic noise
		Noise	Suggests the Applicant provide triple-paned windows to the existing residents along Bake Parkway
		Traffic	Suggests eliminating tolls on SR-241 at Bake and Portola Parkways to divert traffic away from Bake Parkway
		Traffic	Suggests reducing the number of lanes on Bake Parkway to make Alton Parkway a more attractive route for drivers
August 6, 2018	Esposito, Judy	Population and Housing	Concerned about potential increase in number of people due to the project's residential development
		Traffic, Noise, and Air Quality	General concern about potential increases in traffic, noise, and pollution
		Water Quality	Concerned about water quality in waterways that would receive runoff from the project site
		Utilities and Service Systems	Concerned about sewer capacity
		Biological Resources	Concerned about animals coming in closer to residential areas to scavenge trash



**Summary of Scoping Comments Received by the City of Lake Forest**

<b>Date</b>	<b>Commenter</b>	<b>General Issue(s) Raised</b>	<b>Specific Issue(s) Raised</b>
		Non-Environmental	Concerned about pools leading to more humidity
		Alternatives	Suggests making the nursery site into community gardens or a forest
August 8, 2018	Autumnwood HOA	General Environmental Impacts	Requests that the EIR address all of the project’s potential impacts to the Autumnwood Homeowners Association (HOA), including cumulative impacts, and mitigate those impacts, if necessary
		Hydrology	Requests a full analysis of the project’s potential flooding impacts along Serrano Creek, including erosion and slope stability
		Traffic and Noise	Requests that the EIR evaluate impacts associated with increased traffic and related noise
		Public Services – Public Safety	General concern about potential impacts to public safety services
		Land Use/Planning and Hydrology/Water Quality	Noted that CEQA requires a discussion of any potential inconsistencies between the project and applicable general plans and regional plans, including local and regional flood control and erosion control plans in the EIR
August 8, 2018	Native American Heritage Commission (NAHC)	Tribal Cultural Resources	Outlined the City’s tribal consultation requirements under AB 52 and SB 18
August 9, 2018	Robert (Tim) and Melissa Leech	Noise	Claimed that backyard noise levels in neighborhoods along Bake Parkway between Trabuco Road and Portola Parkway currently exceed 90 dBA during daytime hours and that noise levels exceed acceptable levels for community safety; project-related traffic could exacerbate this issue
		Air Quality	Suggests conducting sampling for particulate matter and dust in the neighborhoods along Bake Parkway between Trabuco Road and Portola Parkway; project-related traffic could exacerbate this issue
		Noise	Suggests establishing a curfew or rerouting industrial traffic between the hours of 10 p.m. and 6 a.m. to help reduce noise



**Summary of Scoping Comments Received by the City of Lake Forest**

Date	Commenter	General Issue(s) Raised	Specific Issue(s) Raised
			impacts to residential areas; project-related traffic could exacerbate this issue
		Economic Impacts (Non-Environmental)	Residential property values for the homes adjacent to Bake Parkway are lower than other homes in the community; project-related traffic could further reduce property values
		Noise and Air Quality	Suggests conducting noise, particulate matter studies for backyards adjacent to Bake Parkway and comparing them against original environmental studies completed prior to the completion of Bake Parkway between Trabuco Road and Portola Parkway
		Noise	Suggests installation of a higher wall and/or landscaping to reduce traffic noise impacts
August 13, 2018	Caltrans	Traffic	Recommends including a discussion of potential impacts to transit, pedestrian, and bicycle facilities, also suggests incorporating transportation safety measures and development of a Safe Routes to School program, and discussing the City's Senior Mobility Program
		Traffic	Recommends the completion of a Traffic Impact Study (TIS) that follows Caltrans guidelines
		Land Use/Planning and Climate Change	Suggests incorporating practices and policies that reduce GHG emissions in accordance with AB 32 and SB 375 into the Area Plan
		Hydrology/Water Quality	Concerned that any potentially significant hydrology/water quality impacts are adequately mitigated, especially those related to discharges entering Caltrans right of way
		Project Description	Recommends coordination with Orange County Flood Control District during the encroachment permit process
		Project Description	Notes that an encroachment permit would be required if the project would require any work within the State Highway System lands



**Summary of Scoping Comments Received by the City of Lake Forest**

<b>Date</b>	<b>Commenter</b>	<b>General Issue(s) Raised</b>	<b>Specific Issue(s) Raised</b>
August 13, 2018	Orange County Public Works	Public Services - Libraries	Concerned about potential increases in demand for library services based on the increased population associated with the project; provides information about County's library service standards and suggests that Development Fees be considered
		Hydrology and Utilities and Service Systems - Flood Control	Concerned about increased runoff caused by development; requests that the EIR identify and mitigate any impacts to affected drainage facilities or natural water courses
		Hydrology and Utilities and Service Systems - Flood Control	Notes that all hydrological and hydraulic studies should comply with current guidelines and criteria specified in the <i>Orange County Hydrology Manual</i> and the <i>Orange County Flood Control Design Manual</i>
		Hydrology and Hazards	Suggests that the City review and approve all local hydrology and hydraulic analyses to confirm that the project is protected from erosion and flooding in a 100-year storm event
		Hazards	Suggests that the City ensure that floodplains are identified and structures conform to FEMA regulations with regard to placement adjacent to flood hazard areas
		Project Description	Notes that an encroachment permit would be required for any project work within the Orange County Flood Control District's right of way
August 14, 2018	Southern California Edison (SCE)	Project Description, Aesthetics, Biological Resources, Traffic, and Noise	Suggests an analysis of the impacts associated with project-related utility work, specifically the relocation and undergrounding of SCE's existing electric transmission lines; impacts to be addressed include biological resources (specifically nesting birds), traffic, noise, and aesthetics
		SCE Access and Maintenance (Non-Environmental)	Concerned about encroachment onto SCE right of way, potential landscaping conflicts with SCE lines, and requests a set of plans from the Applicant



**Summary of Scoping Comments Received by the City of Lake Forest**

<b>Date</b>	<b>Commenter</b>	<b>General Issue(s) Raised</b>	<b>Specific Issue(s) Raised</b>
		Method of Service Agreement (Non-Environmental)	Requests that the Applicant enter into a Method of Service Agreement with SCE and fund an electric service study
August 14, 2018	City of Irvine	Traffic	Requested that the traffic study prepared for the project include certain study area boundaries, including all North Irvine Transportation Mitigation-funded intersections, and all City of Irvine intersections and roadway links within these boundaries
		Traffic	Requested that the traffic study prepared for the project analyze short- and long-term interim year scenarios and a future buildout analysis scenario
		Traffic	Suggests that the traffic study prepared for the project should analyze the missing segment of Portola Parkway (between SR-241 and Alton Parkway)
		Traffic	Suggests clarifying if the project would be part of the Lake Forest Transportation Mitigation fee program
August 14, 2018	California Department of Fish and Wildlife (CDFW)	Biological Resources	Concerned about potential impacts to coastal sage scrub (CSS) and associated species, specifically whether the CSS on the project site is occupied by coastal California gnatcatcher. Comment also outlined the procedure for payment of in-lieu fees to mitigate impacts to occupied CSS and clarified that impacts to unoccupied CSS also constitute impacts
		Biological Resources	Suggests mitigation measures to compensate for potential impacts to riparian corridors and wetlands
		Biological Resources	Noted that completion of a jurisdictional delineation is required
		Biological Resources	Noted that the Applicant is required to enter into a Lake and Streambed Alteration Agreement (LSAA) and requested that impacts to stream or riparian resources be identified in the EIR



**Summary of Scoping Comments Received by the City of Lake Forest**

Date	Commenter	General Issue(s) Raised	Specific Issue(s) Raised
		Biological Resources	Noted that the EIR should satisfy the California Endangered Species Act Incidental Take Permit requirements
		Alternatives	Suggests the EIR describe the proposed project's purpose and need as well as a range of alternatives
		Biological Resources	Suggests a complete floral and faunal species compendium of the project site and adjacent areas be compiled, with particular focus on sensitive-status species; surveys should be undertaken at the appropriate time of year and/or day
		Biological Resources	Suggests that the EIR evaluate potential impacts related to lighting, noise, human activity, exotic species, and drainage on biological resources
		Biological Resources	Suggests mitigation for avoidance or protection of Rare Natural Communities
		Biological Resources	Suggests mitigation for any adverse project-related impacts to sensitive plants, animals, or habitats
		Biological Resources	Suggests mitigation for proposed preservation and/or restoration areas
		Biological Resources	Suggests measures be taken to avoid nesting and migratory birds
		Biological Resources	Concerned with the relocation, salvage, or transplantation of rare, threatened, or endangered species
		Biological Resources	Concerned with the expertise of the persons preparing the plans for restoration and revegetation and the inclusion of certain elements in those plans
		Biological Resources	Concerned with invasive shot hole borer beetles and their impact on trees, suggests consideration of potential mitigation measures



**Summary of Scoping Comments Received by the City of Lake Forest**

<b>Date</b>	<b>Commenter</b>	<b>General Issue(s) Raised</b>	<b>Specific Issue(s) Raised</b>
August 14, 2018	Transportation Corridor Agencies (TCA)	Traffic	Suggests providing a map showing the traffic study area
August 15, 2018	Santa Ana Regional Water Quality Control Board (RWQCB)	Hydrology/Water Quality	Concerned with NPDES permitting and control of residual nitrogen leaving the project site, suggests BMPs to protect from storm runoff and mitigation for any impacts to waters of the US (Serrano Creek)
		Hydrology/Water Quality	Concerned with the adequacy of proposed underground detention basin and increased peak flows downstream of project site, which could contribute to destabilization of Serrano Creek
		Hydrology/Water Quality	Requests clarification regarding whether the existing interior drainage channel on the project site will be filled in or replaced by an underground concrete channel
		Hydrology/Water Quality	Notes that a Water Quality Standards Certification would be required for any impacts to Serrano Creek or the unnamed interior drainage channel, and suggests that a jurisdictional wetland delineation would need to be performed
		Hydrology/Water Quality	Suggests maintaining the flow gaging stations at locations where Serrano Creek and the unnamed interior drainage channel exit the project site
August 15, 2018	Southern California Association of Governments (SCAG)	Land Use/Planning	Concerned with the proposed project's consistency with the 2016 Regional Transportation Plan/Sustainable Community Strategies (RTP/SCS) and suggests including a side-by-side comparison table for consistency analysis in the EIR
		Population/Housing	Concerned with including appropriate demographics and growth forecast data
		Land Use/Planning and All Environmental Topics	Recommends the use of the Final Program EIR for 2016 RTP/SCS for guidance and potential project-level mitigation measures



**Summary of Scoping Comments Received by the City of Lake Forest**

<b>Date</b>	<b>Commenter</b>	<b>General Issue(s) Raised</b>	<b>Specific Issue(s) Raised</b>
August 15, 2018	South Coast Air Quality Management District (SCAQMD)	Air Quality	Recommends the use of SCAQMD’s Air Quality Handbook, the latest version of CalEEMod, and SCAQMD’s regional and localized significance thresholds in the air quality analysis
		Air Quality	Recommends the preparation of an HRA if the proposed project would generate or attract vehicular trips, especially heavy-duty diesel-fueled vehicles
		Air Quality	Suggests potential mitigation measures that could be applied if potentially significant air quality impacts are identified
		Alternatives	Suggests consideration of potential alternatives capable of avoiding or substantially lessening any of the proposed project’s significant air quality impacts, if any
		Air Quality	Provides information about how to obtain a SCAQMD permit, if necessary
		Air Quality	Notes the availability of information about SCAQMD rules, reports, and data
August 30, 2018 <sup>1</sup>	Anonymous	Traffic	Suggests the City analyze circulation throughout the area, considering both north and south directions
		Traffic	Suggests the City analyze the potential of a direct route through the project site from Rancho Parkway South to the Sports Park Complex

<sup>1</sup> This comment was received after the close of the public review period for the IS/NOP; however, the City has elected to address it in the interest of furthering public engagement and the full disclosure of the proposed project’s environmental impacts.



STATE OF CALIFORNIA  
**GOVERNOR'S OFFICE of PLANNING AND RESEARCH**



EDMUND G. BROWN JR.  
 GOVERNOR

KEN ALEX  
 DIRECTOR

**RECEIVED**

Notice of Preparation

JUL 19 2018

July 16, 2018

**CITY OF LAKE FOREST  
 COMMUNITY DEVELOPMENT**

To: Reviewing Agencies  
 Re: Nakase Property Area Plan  
 SCH# 2018071035

Attached for your review and comment is the Notice of Preparation (NOP) for the Nakase Property Area Plan draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

**Marie Luna  
 City of Lake Forest  
 25550 Commercentre Drive  
 Lake Forest, CA 92630**

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan  
 Director, State Clearinghouse

Attachments  
 cc: Lead Agency

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2018071035  
**Project Title** Nakase Property Area Plan  
**Lead Agency** Lake Forest, City of

**Type** NOP Notice of Preparation

**Description** The Nakase Property Area Plan would establish guidelines for the future development of a master-planned community on the project site and would consist of the following: up to 675 two- and three-story single-family residential units; up to 101 affordable apartment units for senior citizens in a two to three story building with an elevator; an elementary school site accommodating up to 1,000 students; parks and open space; an internal circulation system; and a multipurpose water quality basin. As part of the project, a GPA would change the LUD from Business park to low medium residential and institutional. The project proposes to change the project site's zoning classification from general ag to planned community. A vesting tentative tract map would be required to subdivide the property.

**Lead Agency Contact**

**Name** Marie Luna  
**Agency** City of Lake Forest  
**Phone** (949) 461-3449 **Fax**  
**email**  
**Address** 25550 Commercentre Drive  
**City** Lake Forest **State** CA **Zip** 92630

**Project Location**

**County** Orange  
**City**  
**Region**  
**Cross Streets** Rancho Pkwy and Bake Pkwy  
**Lat / Long** 33° 40' 08.2" N / 117° 40' 02.6" W  
**Parcel No.** 612-221-01  
**Township** **Range** **Section** **Base**

**Proximity to:**

**Highways** SR 241  
**Airports**  
**Railways**  
**Waterways** Serrano Crk  
**Schools**  
**Land Use** Z: Gen ag; GP: Business park and BDO

**Project Issues** Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Growth Inducing; Landuse; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian

**Reviewing Agencies** Resources Agency; Department of Conservation; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 5; California Department of Education; Department of Housing and Community Development; Native American Heritage Commission; State Lands Commission; California Highway Patrol; Caltrans, District 12; State Water Resources Control Board, Division of Drinking Water, District 8; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 8

**Document Details Report  
State Clearinghouse Data Base**

---

**Date Received** 07/16/2018

**Start of Review** 07/16/2018

**End of Review** 08/14/2018

2018071035

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

Project Title: Nakase Property Area Plan

Lead Agency: City of Lake Forest Contact Person: Marie Luna
Mailing Address: 25550 Commercentre Drive, Suite 100 Phone: (949) 461-3449
City: Lake Forest Zip: 92630 County: Orange County

Project Location: County: Orange County City/Nearest Community: City of Lake Forest
Cross Streets: Rancho Parkway and Bake Parkway Zip Code:
Longitude/Latitude (degrees, minutes and seconds): 33 ° 40 ' 08.2 " N / 117 ° 40 ' 02.6 " W Total Acres: 122
Assessor's Parcel No.: 612-221-01 Section: Twp.: Range: Base:
Within 2 Miles: State Hwy #: State Route 241 Waterways: Serrano Creek
Airports: N/A Railways: N/A Schools: See attachment

Document Type:

CEQA: [X] NOP [ ] Draft EIR [ ] Joint Document
[ ] Early Cons [ ] Supplement/Subsequent EIR [ ] Final Document
[ ] Neg Dec (Prior SCH No.) [ ] EA [ ] Other:
[ ] Mit Neg Dec Other: Initial Study [ ] Draft EIS [ ] Other:
[ ] FONSI

STATE CLEARINGHOUSE

Local Action Type:

[ ] General Plan Update [ ] Specific Plan [X] Rezone [ ] Annexion
[X] General Plan Amendment [ ] Master Plan [ ] Prezone [ ] Redevelopment
[ ] General Plan Element [ ] Planned Unit Development [ ] Use Permit [ ] Coastal Permit
[ ] Community Plan [ ] Site Plan [X] Land Division (Subdivision, etc.) [X] Other: Area Plan

Development Type:

[X] Residential: Units 675 Acres 61.4
[ ] Office: Sq.ft. Acres Employees [ ] Transportation: Type
[ ] Commercial: Sq.ft. Acres Employees [ ] Mining: Mineral
[ ] Industrial: Sq.ft. Acres Employees [ ] Power: Type MW
[X] Educational: Elementary School [ ] Waste Treatment: Type MGD
[X] Recreational: 28 acres of parks and habitat restoration area [ ] Hazardous Waste: Type
[ ] Water Facilities: Type MGD [X] Other: Affordable Housing (up to 101 units on 3.9 acres)

Project Issues Discussed in Document:

[X] Aesthetic/Visual [ ] Fiscal [X] Recreation/Parks [X] Vegetation
[X] Agricultural Land [X] Flood Plain/Flooding [X] Schools/Universities [X] Water Quality
[X] Air Quality [X] Forest Land/Fire Hazard [X] Septic Systems [X] Water Supply/Groundwater
[X] Archeological/Historical [X] Geologic/Seismic [X] Sewer Capacity [X] Wetland/Riparian
[X] Biological Resources [X] Minerals [X] Soil Erosion/Compaction/Grading [X] Growth Inducement
[ ] Coastal Zone [X] Noise [X] Solid Waste [X] Land Use
[X] Drainage/Absorption [X] Population/Housing Balance [X] Toxic/Hazardous [X] Cumulative Effects
[ ] Economic/Jobs [X] Public Services/Facilities [X] Traffic/Circulation [ ] Other:

Present Land Use/Zoning/General Plan Designation:

Zoning: General Agriculture (A-1); General Plan: Business Park and Business Development Overlay (BDO)

Project Description: (please use a separate page if necessary)

The Nakase Property Area Plan would establish guidelines for the future development of a master-planned community on the Project Site and would consist of the following: up to 675 two- and three-story single-family residential units; up to 101 affordable apartment units for senior citizens in a two to three story building with an elevator; an elementary school site accommodating up to 1,000 students; parks and open space; an internal circulation system; and a multipurpose water quality basin. As part of the project, a General Plan Amendment would change the land use designation from Business Park to Low-Medium Residential and Institutional. The Project proposes to change the Project Site's zoning classification from General Agriculture (A-1) to Planned Community. A Vesting Tentative Tract Map would be required to subdivide the property.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

# NOP Distribution List

County: Orange

SCH# 2018071035

## Resources Agency

- Resources Agency  
Nadell Gayou
- Dept. of Boating & Waterways  
Denise Peterson
- California Coastal Commission  
Allyson Hitt
- Colorado River Board  
Elsa Contreras
- Dept. of Conservation  
Crina Chan
- Cal Fire  
Dan Foster
- Central Valley Flood Protection Board  
James Herota
- Office of Historic Preservation  
Ron Parsons
- Dept of Parks & Recreation  
Environmental Stewardship Section
- S.F. Bay Conservation & Dev't. Comm.  
Steve Goldbeck
- Dept. of Water Resources  
Resources Agency  
Nadell Gayou

- Fish & Wildlife Region 4  
Julie Vance
- Fish & Wildlife Region 5  
Leslie Newton-Reed  
Habitat Conservation Program
- Fish & Wildlife Region 6  
Tiffany Ellis  
Habitat Conservation Program
- Fish & Wildlife Region 6 I/M  
Heidi Calvert  
Inyo/Mono, Habitat Conservation Program
- Dept. of Fish & Wildlife M  
William Paznokas  
Marine Region

## Other Departments

- California Department of Education  
Lesley Taylor
- OES (Office of Emergency Services)  
Monique Wilber
- Food & Agriculture  
Sandra Schubert  
Dept. of Food and Agriculture
- Dept. of General Services  
Cathy Buck  
Environmental Services Section
- Housing & Comm. Dev.  
CEQA Coordinator  
Housing Policy Division

## Independent Commissions, Boards

- Delta Protection Commission  
Erik Vink
- Delta Stewardship Council  
Anthony Navasero
- California Energy Commission  
Eric Knight

- Native American Heritage Comm.  
Debbie Treadway
- Public Utilities Commission  
Supervisor
- Santa Monica Bay Restoration  
Guangyu Wang
- State Lands Commission  
Jennifer Deleong
- Tahoe Regional Planning Agency (TRPA)  
Cherry Jacques

## Cal State Transportation Agency CalSTA

- Caltrans - Division of Aeronautics  
Philip Crimmins
- Caltrans - Planning  
HQ LD-IGR  
Christian Bushong
- California Highway Patrol  
Suzann Ikeuchi  
Office of Special Projects

## Dept. of Transportation

- Caltrans, District 1  
Rex Jackman
- Caltrans, District 2  
Marcelino Gonzalez
- Caltrans, District 3  
Susan Zanchi - North
- Caltrans, District 4  
Patricia Maurice
- Caltrans, District 5  
Larry Newland
- Caltrans, District 6  
Michael Navarro
- Caltrans, District 7  
Dianna Watson
- Caltrans, District 8  
Mark Roberts

- Caltrans, District 9  
Gayle Rosander
- Caltrans, District 10  
Tom Dumas
- Caltrans, District 11  
Jacob Armstrong
- Caltrans, District 12  
Maureen El Harake

## Cal EPA

### Air Resources Board

- Airport & Freight  
Jack Wursten
- Transportation Projects  
Nesamani Kalandiyur
- Industrial/Energy Projects  
Mike Tollstrup
- California Department of Resources, Recycling & Recovery  
Kevin Taylor/Jeff Esquivel

- State Water Resources Control Board  
Regional Programs Unit  
Division of Financial Assistance

- State Water Resources Control Board  
Cindy Forbes - Asst Deputy  
Division of Drinking Water

- State Water Resources Control Board  
Div. Drinking Water # 8

- State Water Resources Control Board  
Student Intern, 401 Water Quality Certification Unit  
Division of Water Quality

- State Water Resources Control Board  
Phil Crader  
Division of Water Rights

- Dept. of Toxic Substances Control Reg. # \_\_\_\_\_  
CEQA Tracking Center

- Department of Pesticide Regulation  
CEQA Coordinator

## Regional Water Quality Control Board (RWQCB)

- RWQCB 1  
Cathleen Hudson  
North Coast Region (1)
- RWQCB 2  
Environmental Document Coordinator  
San Francisco Bay Region (2)
- RWQCB 3  
Central Coast Region (3)
- RWQCB 4  
Teresa Rodgers  
Los Angeles Region (4)
- RWQCB 5S  
Central Valley Region (5)
- RWQCB 5F  
Central Valley Region (5)  
Fresno Branch Office
- RWQCB 5R  
Central Valley Region (5)  
Redding Branch Office
- RWQCB 6  
Lahontan Region (6)
- RWQCB 6V  
Lahontan Region (6)  
Victorville Branch Office
- RWQCB 7  
Colorado River Basin Region (7)
- RWQCB 8  
Santa Ana Region (8)
- RWQCB 9  
San Diego Region (9)
- Other \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_  
Conservancy

**RECEIVED**

July 19, 2018

JUL 23 2018

Shelby Cramton  
LSA  
20 Executive Park, Suite 200  
Irvine, CA 92614-4739

**CITY OF LAKE FOREST**  
**COMMUNITY DEVELOPMENT**

**RE: *Change of Business Name and Address for the Nature Reserve of Orange County.***

Dear Ms. Cramton:

I am in receipt of Notice of Preparation of An Environmental Impact Report from the City of Lake Forest dated July 12, 2018, sent via USPS Priority Mail.

Please note, the Nature Reserve of Orange County has changed its name and business address. Please update your records at LSA to reflect the following changes:

**Old Information**

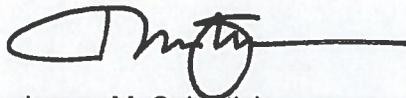
**Nature Reserve of  
Orange County**  
15600 Sand Canyon  
Avenue  
Irvine, CA 92618  
(949) 453-3324

**New Information**

**Natural Communities  
Coalition**  
13042 Old Myford Road  
Irvine, CA 92602  
(714) 973-6651  
[www.occonservation.org](http://www.occonservation.org)

All other information and the organization's mission remains the same. Please do not hesitate to contact me should you have any questions.

Sincerely,



James M. Sulentic  
Executive Director

Cc: **Marie Luna**, City of Lake Forest.

**From:** Luna, Marie  
**Sent:** Tuesday, July 24, 2018 11:04 AM  
**To:** 'Sima Soltani'  
**Subject:** RE: Nakase

Thank you Sima. We will add your comments to the record.

~Marie

*Marie Swami Luna*  
Senior Planner  
City of Lake Forest  
[mluna@lakeforestca.gov](mailto:mluna@lakeforestca.gov)  
949.461.3466/fax: 949.461.3511

**From:** Sima Soltani [<mailto:simasolt@gmail.com>]  
**Sent:** Tuesday, July 24, 2018 10:29 AM  
**To:** Luna, Marie  
**Subject:** Nakase

Hello,

I know there is a scoping meeting on Nakase, and on [lakeforestca.gov](http://lakeforestca.gov) it says we can email our comments. Anyways, I think building homes at the Nakase site will not only bring much needed housing to south OC, but it will take Lake Forest into it's next phase of prosperity. If you are not growing or gaining a population of people who are of working age, you become a dead city. Plus, it increases our tax base/revenue for the city which is great for the community as a whole. Anyways just wanted to add my comments.

Thanks,

--

Sima "Sam" Soltani

---

**PUBLIC SCOPING MEETING**  
**Proposed Nakase Property Area Plan**  
Wednesday, July 25, 2018

NAME: LORETTA HERRIN  
ADDRESS: 25111 CIVERIA CITY: LAKE FOREST ZIP: 92630  
EMAIL ADDRESS: Lbherrin@cox.net  
REPRESENTING: \_\_\_\_\_

Do you wish to be added to the project mailing list?     YES     NO

**Please drop comments in the Comment Box or mail them to:**

City of Lake Forest Community Development Department  
Marie Luna, Senior Planner  
25550 Commercentre Drive, Suite 100  
Lake Forest, CA, 92630  
Phone: (949) 461-3400  
E-mail: mluna@lakeforestca.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

With this project, traffic will increase on  
Bake Pkwy. Please add a wall for residents  
that back to Bake Pkwy. This will help  
with noise + air pollution. Also, look into  
putting the street asphalt that reduces  
noise.

Alternatives to this project would be:  
- put in Veteran's cemetery  
~~aquatic~~

Add aquatic center

**PUBLIC SCOPING MEETING**  
**Proposed Nakase Property Area Plan**  
Wednesday, July 25, 2018

NAME: Bob HOLTZCLAW

ADDRESS: 24672 JONATHAN CITY: LAKE FOREST ZIP: 92630

EMAIL ADDRESS: LAKEFORESTBOB@HOTMAIL.COM

REPRESENTING: RESIDENT

Do you wish to be added to the project mailing list?     YES     NO

**Please drop comments in the Comment Box or mail them to:**

City of Lake Forest Community Development Department  
Marie Luna, Senior Planner  
25550 Commercentre Drive, Suite 100  
Lake Forest, CA, 92630  
Phone: (949) 461-3400  
E-mail: mluna@lakeforestca.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

ATTACHED IS A PICTURE OF BAKE PARKWAY OCT 6TH  
AT 630 PM IF YOU BUILD SCOOT HOMES IN THAT AREA  
TRAFFIC WILL BE A BIGGER PROBLEM.

ON YOUR PLAN IT STILL SHOWS A SCHOOL. THE SCHOOL  
DISTRICT HAS MANY TIMES SAID THEY HAVE NO  
INTENTION TO BUILD A SCHOOL AT THAT LOCATION.





# COMMENT CARD PUBLIC INFORMATION MEETING: JULY 25, 2018 | 5:30 - 7:30 p.m.

NAME:

*Jim Johnson*

ORGANIZATION:

EMAIL:

PHONE:

ADDRESS:

CITY:

ZIP:

ARE YOU A BUSINESS OWNER?

Yes

No

Business Name: \_\_\_\_\_

HOW DID YOU HEAR ABOUT THIS MEETING?

Email

Direct Mail

Social Media

Newspaper

Flyer

Word of Mouth

WHAT ENVIRONMENTAL ELEMENTS MOST INTEREST YOU?

Air Quality

Noise

Land Use

Visual Aesthetics

Water Quality & Storm Water Runoff

Community Impacts

Right-of-Way

Traffic

Hydrology & Floodplain

Other \_\_\_\_\_

If you have questions, please contact Fernando Chavarria of OCTA at (714) 560-5306 or email at [fchavarria@octa.net](mailto:fchavarria@octa.net)

PLEASE WRITE ANY COMMENTS ON THE REVERSE SIDE OF THIS CARD



# COMMENT CARD PUBLIC INFORMATION MEETING: JULY 25, 2018 | 5:30 - 7:30 p.m.

If you have questions, please contact Fernando Chavarria of OCTA at (714) 560-5306.

## COMMENTS

1. BAKE WILL NEED TO INCREASE TO 3 OR 4 LANES ON BOTH SIDES FROM TRAVCO TO 241.
2. INTERCONNECT ALL TRAFFIC LIGHTS ON BAKE
3. HOW WILL NEW HOMES HAVE ENOUGH WATER?



THANK YOU!

Please keep me informed about the I-5/El Toro Road Interchange Improvement Project and add me to your email distribution list.



**Board of Education**

Amanda Morrell, President · Suzie R. Swartz, Vice President · Dr. Edward Wong, Clerk  
Dennis Walsh, Member · Dolores Winchell, Member

July 25, 2018

Crystal Turner, Ed.D.  
Superintendent

Marie Luna  
Community Development Department  
City of Lake Forest  
25550 Commercentre Drive, Suite 100  
Lake Forest, CA 92630

**Subject:** Response to Notice of Preparation of the Nakase Property Area Plan  
Environmental Impact Report

Dear Ms. Luna:

Thank you for the opportunity to comment on the NOP and Initial Study for the upcoming Nakase Property Area Plan Environmental Impact Report.

The Nakase Property Area Plan proposes to create a planned community consisting of single-family residential units in five distinct neighborhoods, affordable housing for senior citizens, an elementary school, parks and open space, an internal circulation system, and multipurpose water quality basin. The project would provide a maximum of 675 two- and three-story single-family residences and a maximum of 101 senior affordable housing units. The Area Plan also includes a school site and adjacent park designed to accommodate 1,000 K–6 students.

The District requests that the Nakase Area Plan EIR address the ability of the District’s existing elementary, intermediate, and high schools to accommodate the additional students generated by the 675 dwelling units based on current enrollment and school capacities. The analysis should address elementary school impacts following two scenarios: the first is based on completion of the elementary school as proposed, and the second is based on the potential for the elementary school to be delayed or not built so that K–6 students are housed at existing elementary schools.

Table 1 presents the student generation rates that should be applied to the 675 dwelling units in the Area Plan. Table 2 provides current enrollment and capacity data for district schools.

**Table 1. Adjusted Student Generation Rates**

SCHOOL LEVEL	STUDENT GENERATION FACTORS
Elementary School	0.1994
Intermediate School	0.0674
High School	0.1505
Total	0.4173

Source: Cooperative Strategies, SVUSD, Residential Development School Fee Justification Study, Table 5, page 11.

**Table 2. Enrollment and Capacity Analysis**

SCHOOL FACILITY	CAPACITY	ENROLLMENT	SURPLUS (SHORTAGE) OF SEATS
Foothill Elementary	932	1,194	(262)
La Madera Elementary	609	610	(1)
Lake Forest Elementary	755	864	(109)
Olivewood Elementary	455	519	(64)
Portola Hills Elementary	664	653	11
Rancho Canada Elementary	872	565	307
Santiago Elementary	520	368	152
<b>Total Elementary School Capacity</b>	<b>4,807</b>	<b>4,771</b>	<b>34</b>
Serrano Intermediate	1,458	1,169	289
<b>Total Intermediate School Capacity</b>	<b>1,458</b>	<b>1,169</b>	<b>289</b>
El Toro High School	2,754	2,435	319
Trabuco Hills High School	2,943	2,831	112
<b>Total High School Capacity</b>	<b>5,697</b>	<b>5,266</b>	<b>431</b>

Source: Cooperative Strategies, SVUSD, Residential Development School Fee Justification Study, Exhibit B.

The District requests that the Nakase Area Plan EIR address all relevant direct and indirect environmental impacts of the project on District schools. The major environmental issues for any receiving school include traffic, pedestrian and bike safety, parking, air pollution, and noise.

The District is especially interested in ensuring that the elementary school site proposed within the Area Plan is suitable from an environmental perspective. For the proposed school site, the EIR should address: 1) traffic conditions during peak hours; 2) vehicle queuing along “BB” Street and access points; 3) pedestrian/bike safety and safe routes to school; 4) noise levels along Bake Parkway and Rancho Parkway; 5) and air quality.

Please clarify whether vehicular access to Neighborhood 2 is limited exclusively via “A” and “B” streets, and “BB” street is intended for school and park access only.

The District also requests that the suitability of the selected school site be reviewed pursuant the State’s school siting requirements, which are addressed in detail below.

### **California School Siting Requirements**

At the request of Saddleback Valley Unified School District, Toll Brothers engaged an environmental consulting firm to prepare a Geological and Environmental Hazards Assessment (GEHA) of the entire 12.83-acre Nakase property. The intent of the study was to inform the site planning process and ensure an appropriate site was selected for the school. The GEHA evaluates potential environmental hazards per the State’s school siting standards, Title 5 of the California Code of Regulations (CCR) Section 14010, and additional codes and regulations applicable to school facilities that are found in the Education, Government and Public Resources Codes (Ed. Code, Gov’t Code, and PRC, respectively).

Based on the GEHA, there are three detailed studies that are required to ensure the selected school site will satisfy the above-referenced standards and be eligible to receive approval of the California Department of Education (CDE):

- **Water Pipeline Risk Assessment (WPRA).** A WPRA is needed to address potential impacts from the 19 large volume (>12-inch diameter) pipelines within 1,500 feet of the project site. Although the school site appears to be more than 1,500 feet from two water tanks west of the site, confirmation that the tanks do not represent a hazard is recommended.
- **EMF Study.** The proximity of the school site to the 66-kV power line in Bake Parkway triggers the need to address EMF exposure and Title 5's 100-foot setback requirement.
- **Health Risk Assessment.** Based on the search conducted in 2017, there are 56 permitted or nonpermitted facilities within a quarter mile of the whole Nakase Area Plan. A refined search using a quarter-mile radius around the selected school site should be conducted and a Health Risk Assessment prepared covering the facilities within that radius. The HRA must also address emissions associated with the site's proximity to the SR-241 freeway.

Based on a review of Figures 2.7 and 2.8 in the Initial Study, the school and park are shown as separate and distinct. However, for the purposes of any review under Title 5 requirements, any measurements from the perimeter of the school boundaries to potential hazards must include both school and park. The school must comply with State requirements for school size, and it appears that the park would also be required to satisfy site size requirements. Additionally, if the park is to be operated under a joint-use agreement to satisfy the school's physical education requirements, CDE will require that the park satisfy all Title 5 requirements as well. For example, although the school site appears to be farther than 1,500 feet from the water tanks to the west, the park appears to be within that zone; if this is so, it triggers the requirement for a water tank inundation study.

The District requests that the EIR address the issues identified above to ensure that the school site will meet all state school site standards.

Thank you for the opportunity to comment on the scope of the upcoming Nakase Area Plan EIR. We look forward to reviewing the Draft EIR and working closely with the City to ensure development of a safe and environmentally-sensitive community.

If you have any questions or need clarification concerning our comments, please call the undersigned.

Sincerely,

**SADDLEBACK VALLEY UNIFIED SCHOOL DISTRICT**



Stella Escario-Doiron

Chief of Facilities, Maintenance, Operations, Construction and Transportation

c: Crystal Turner, Ed.D, Superintendent  
Connie Cavanaugh, Assistant Superintendent, Business Services  
Mark Perez, Director, Communications & Administrative Services

**From:** Bob Stuart  
**To:** [Luna, Marie](#)  
**Subject:** Nursery Zoning change...  
**Date:** Wednesday, July 25, 2018 8:35:52 PM

---

Save it, don't pave it!

PUBLIC SCOPING MEETING  
Proposed Nakase Property Area Plan  
Wednesday, July 25, 2018

NAME: RICHARD SULLIVAN  
ADDRESS: 21081 BARCLAY LANE CITY: LAKE FOREST ZIP: 92630  
EMAIL ADDRESS: RSULLIVAN3@COX.NET  
REPRESENTING: MY HOME & FAMILY  
Do you wish to be added to the project mailing list?  YES  NO

Please drop comments in the Comment Box or mail them to:

City of Lake Forest Community Development Department  
Marie Luna, Senior Planner  
25550 Commercentre Drive, Suite 100  
Lake Forest, CA, 92630  
Phone: (949) 461-3400  
E-mail: mluna@lakeforestca.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

WE CURRENTLY LIVE ON THE CORNER OF BARCLAY & NORMANDALE. ALL OF THE <sup>LATEST</sup> ADDITIONAL HOMES IN THE IMMEDIATE AREA HAS CAUSED MAJOR PARKING ISSUES ON NORMANDALE & CESTERMAN CAUSING ACCIDENTS DAILY ALSO MOST OF THE RESIDENTS HAVE MULTIPLE CARS FOR 1 ALLOTTED SPACE. THESE PEOPLE DUMP FAST FOOD PACKAGING ALL ALONG NORMANDALE AND HAS NOW SPILLED OVER TO BARCLAY PARKING IN FRONT OF MY HOME AND IN FRONT OF THE FIRE HYDRANT ACROSS THE STREET. THE PARKING HAS AFFECTED THE RESALE VALUE OF OUR HOME. ADDING THE TOLL BROS 800 ADDITIONAL HOMES WILL CREATE GREAT HAVOC TO THE NEIGHBOURHOOD, THE AIR QUALITY & THE SAFETY TO ALL CURRENT RESIDENTS, I SUGGEST YOU FIX THE CURRENT ISSUES MENTIONED ABOVE BEFORE YOU DUMP ON ANOTHER TSUNAMI OF TROUBLE

---

**From:** Sue Nath [mailto:suenath@yahoo.com]  
**Sent:** Monday, July 30, 2018 12:22 PM  
**To:** Luna, Marie  
**Subject:** About Nakase Nursery site conversion issue

Dear Marie Luna,

I understand that the Nakase Nursery site is going to be the future site for building more homes. I regret that this is going to increase traffic and hence pollution in this area. We already have enough homes in this area and Bake is what all these current homes mostly use.

What could be done is to build a park in this site. Plant as many shady and eco-friendly trees and may be a place where people can have a gathering (birthday, wedding, etc.). The city can charge a fee for those who want to rent the place for a block of time. Let's convert this place to a natural environment where people can go and breath fresh air.

Since it used to be a nursery, a beautiful garden patch will be ideal to keep the environment pollution-free and healthy for all who have already moved into this neighborhood.

Thank you.  
Regards,  
Sue Nath  
21731 Eveningside Lane  
Lake Forest, Ca. 92630  
(951)760-2991

PS.

I have also attached the Public Scoping Meeting form regarding the same issue here.



# ORANGE COUNTY FIRE AUTHORITY

P. O. Box 57115, Irvine, CA 92619-7115

1 Fire Authority Way, Irvine, CA 92602

Brian Fennessy, Fire Chief • [www.ocfa.org](http://www.ocfa.org) • (714) 573-6000 / Fax (714) 368-8843

July 31, 2018

City of Lake Forest  
Community Development Department  
Attn: Marie Luna, Senior Planner  
25550 Commercentre Drive, Suite 100  
Lake Forest, CA 92630

Ref: Notice of Preparation for the Proposed Nakase Property Area Plan

Dear Marie Luna:

Thank you for the opportunity to review the subject document. The Orange County Fire Authority (OCFA) provides fire protection and emergency medical services response to the project area. Services include: structural fire protection, emergency medical and rescue services, education and hazardous material response. OCFA also participates in disaster planning as it relates to emergency operations, which includes high occupant areas and schools sites and may participate in community disaster drills planned by others. Resources are deployed based upon a regional service delivery system, assigning personnel and equipment to emergency incidents without regard to jurisdictional boundaries. The equipment used by the department has the versatility to respond to both urban and wildland emergency conditions

Orange County Fire Authority has the following comments:

**Statement in Subject Document, Page 4-24: h)** (*Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?*):

**No Impact.** Wildland fires occur in geographic areas that contain the types and conditions of vegetation, topography, weather, and structure density susceptible to risks associated with uncontrolled fires that can be started by lightning, improperly managed camp fires, cigarettes, sparks from automobiles, and other ignition sources. The Project Site and the surrounding areas are developed with urban and suburban uses and do not include brush- and grass-covered areas typically found in areas susceptible to wildfires.

**OCFA Response to Statement in Subject Document, Page 4-24: h)** (*Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?*):

This project currently has an approved Fuel Modification Conceptual Plan with OCFA. It also has a Fire Protection Plan with Ember Mitigation in place. With these plans in place this should be **Less Than Significant With Mitigation Incorporated.**

Serving the Cities of: • Aliso Viejo • Buena Park • Cypress • Dana Point • Irvine • Laguna Hills • Laguna Niguel • Laguna Woods • Lake Forest • La Palma • Los Alamitos • Mission Viejo • Placentia • Rancho Santa Margarita • San Clemente • San Juan Capistrano • Seal Beach • Santa Ana • Stanton • Tustin • Villa Park • Westminster • Yorba Linda • and Unincorporated Areas of Orange County

**RESIDENTIAL SPRINKLERS AND SMOKE DETECTORS SAVE LIVES**

**Statement in Subject Document, Page 4-39: a)(i) (Fire Protection):**

**Potentially Significant Impact.** OCFA is responsible for providing fire protection and suppression, inspection services, paramedic emergency medical services, and hazardous material response to citizens and visitors to Lake Forest. The Project would result in the demolition of existing structures and buildings used for agricultural operations, and construction of up to 675 single-family residential units, up to 101 senior affordable housing units, an elementary school with a capacity of up to 1,000 students, multiple parks and open space areas, recreation amenities, and an internal circulation system on the Project Site. The Project may result in increased demand for fire services on the Project Site compared to existing conditions. **This topic will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse Project effects related to increased demand for fire protection.**

**OCFA Response to Statement in Subject Document, Page 4-39: a) (i) (Fire Protection):**

OCFA agrees this project could potentially have a significant impact on services and response times. We believe the projects impact on fire services will be reduced with the following Mitigation Measures:

- Prior to approval of any subdivision or comprehensive plan approval for a project, the designated site developer may be required to enter into a Secured Fire Protection Agreement with the Orange County Fire Authority.
  - This Agreement shall specify the developer's pro-rata fair share funding of capital improvements necessary to establish adequate fire protection facilities and equipment, and/or personnel. Said agreement shall be reached as early as possible in the planning process, preferably for each phase or land use sector of the project, rather than on a parcel by parcel basis
- The project is subject to review by the City and the OCFA for various construction document plan checks for the applicable fire life safety codes and regulations. The project will be subject to the 2016 editions of the CBC, CFC and related codes.
- Structures of this size and occupancy are required to have automatic fire sprinkler systems designed per NFPA 13 as required in the 2016 CBC, CFC.
- A water supply system to supply fire hydrants and automatic fire sprinkler systems is required. Fire flow and hydrant spacing shall meet the minimums identified in the codes. Please refer to the California Fire Code Appendix section. These tables are also located in OCFA Guideline B09, Attachment 23.
- Fire apparatus and personnel access to and around structures shall meet the minimum development standards of the OCFA and California Fire Code requirements. Please reference Section 2 of the OCFA's Guideline B-09 at [www.ocfa.org](http://www.ocfa.org).
- If the project scope includes or requires the installation of traffic signals on public access ways, these improvements shall include the installation of optical preemption devices.
- Occupancy for senior building shall be after this building is fully complete and final.
- Provide full fire access around each of the 5 neighborhoods, including around the senior unit building

In addition, we would like to point out that all standard conditions with regard to development, including water supply, built in fire protection systems, road grades and width, access, building materials, and the like will be applied to this project at the time of

plan submittal. Thank you for providing us with this information. Please contact me at 714-573-6199 if you have any questions.

Sincerely,



**Tamera Rivers**

Management Analyst  
Strategic Services Section  
tamyivers@ocfa.org  
714-573-6199



RECEIVED

AUG 03 2018

CITY OF LAKE FOREST  
COMMUNITY DEVELOPMENT

August 3, 2018

Ms. Marie Luna, Senior Planner  
Development Services Department  
City of Lake Forest  
25550 Commercentre Drive, Suite 100  
Lake Forest, CA 92630

**Re: Notice of Preparation for Proposed Nakase Property Area Plan Environmental Impact Report**

Dear Ms. Luna:

Irvine Ranch Water District (IRWD) has received and reviewed the Notice of Preparation (NOP)/Initial Study for the subject project, and offers the following comments.

IRWD will be the domestic water, recycled water, and wastewater service provider for the project. While the specified project location has been identified as a future development in the 2010 Lake Forest Sub-Area Master Plan (SAMP), the proposed land use in the NOP/Initial Study is different from what was originally analyzed. Prior to development plan submittal and approval, the project proponent shall coordinate with IRWD to develop a technical memorandum or SAMP Addendum, identifying potential impacts to the potable, recycled, and sewer systems from this proposed project. Please contact Eric Akiyoshi at (949) 453-5552 for additional information on Sub-Area Master Plans.

A water supply assessment (WSA) may be required and should be addressed during project level CEQA analysis. As the service provider, IRWD is required by Section 10910 *et. seq.* of the Water Code to provide the City with a WSA for defined types of projects. Under this law, the City must determine whether this project requires a water supply assessment. If the City determines this project does require a WSA, a WSA request form must be completed and returned to IRWD. IRWD will have 90 days after the receipt of a completed request form to prepare and approve the WSA. Please contact Kellie Welch at (949) 453-5604 for a WSA request form or for additional information on Water Supply Assessments.

The Environmental Impact Report (EIR) should provide a discussion of recycled water demand or uses. Recycled water will be available to the project and IRWD requests the project proponent to maximize the use of recycled water. IRWD requests that Lake Forest City staff contact Mark Tettermer at (949) 453-5592 to review the project's design to determine how recycled water can be used for irrigation, water features and other approved uses.

Ms. Marie Luna, City of Lake Forest  
Notice of Preparation – Proposed Nakase Property Area Environmental Impact Report  
August 3, 2018  
Page 2

IRWD appreciates the opportunity to review and provide input to this NOP/Initial Study. IRWD looks forward to receiving the Draft EIR when it is ready for public review. If you have any questions or require additional information, please contact the undersigned at (949) 453-5325 or Jo Ann Corey, Environmental Compliance Specialist at (949) 453-5326.

Sincerely,



Fiona M. Sanchez  
Director of Water Resources

Cc: Eric Akiyoshi, IRWD  
Kellie Welch, IRWD  
Mark Tettemer, IRWD

**From:** Charles Larson [mailto:ccl Larson777@yahoo.com]  
**Sent:** Saturday, August 04, 2018 5:18 PM  
**To:** Luna, Marie  
**Subject:** Nakase property input

Hello,

Here is my input:

1. I do not want homes built on this property.
2. I understand it is zoned Agricultural by the County, but Business Park (or some such thing) by the City in the General Plan. I would like this inconsistency resolved in favor of Agricultural or Horticultural (if such a sub-designation exists) consistent with its current use.
3. The notion that a school is going to be built is bogus. The facts: a) My son attends FHR Elementary, and I have spoken with the Principal, Mr. MacNevin, about this several times. He insists that FHR Elementary is NOT overcrowded for two reasons: 1) it is well below its historic maximum enrollment; and 2) he can just install more portable classrooms to add capacity. That being the case, what Toll Brothers is asserting is at best mistaken. I have not seen the SVUSD express any interest in buying the property, paying to build a school, and paying to staff a new school so close to an existing school.
4. Regarding the existing school plan, there are also two major problems:
  - a) Traffic. Dropoff traffic at FHR Elementary is torturous in the mornings, and there are long lines. The intersection at Rancho and Bake cannot handle this load.
  - b) A Gas Station Across the Street. Uh, what could \*possibly\* go wrong?

Please do not rezone the property so Toll Brothers can further destroy our community with more homes and traffic.

Charles Larson  
15 Coronado  
Foothill Ranch/Lake Forest

**PUBLIC SCOPING MEETING**  
**Proposed Nakase Property Area Plan**  
**Wednesday, July 25, 2018**

NAME: ANDREA ALEXANDER

ADDRESS: 24412 CALLE TORCIDO CITY: LAKE FOREST ZIP: 92630

EMAIL ADDRESS: andreaalexander12@Ymail.com

REPRESENTING: Residents

Do you wish to be added to the project mailing list?  YES  NO

**Please drop comments in the Comment Box or mail them to:**

City of Lake Forest Community Development Department  
Marie Luna, Senior Planner  
25550 Commercentre Drive, Suite 100  
Lake Forest, CA, 92630  
Phone: (949) 461-3400  
E-mail: mluna@lakeforestca.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

*All attached documentation*

August 6, 2018

City of Lake Forest  
Community Development Dept  
Marie Luna, Senior Planner  
25550 Commercentre Drive, Suite 100  
Lake Forest, CA 92630

To whom it may concern;

I am very concerned about the planned development of the Nakase Nursery site because it will cause more traffic on the already overburdened Bake Parkway. There are currently approximately 3 blocks of homes on Bake Parkway between Trabuco and Muirlands whose backyards are right against Bake Parkway. This is a problem for so many reasons as I have noted below:

1. Fuel particulates are known carcinogens (I have enclosed studies that show this). There are currently 4 diagnosed cancers in my Cul de sac alone.
2. I wipe off my backyard patio table daily and the rag is covered in soot from Bake Parkway pollution and this is constant and cancer causing.
3. We experience traffic is at all hours of the day and night. Trucks and motorcycles in particular make an excessive amount of noise. We have ordinances that apply to noise pollution before 7:00 am and after 8 pm. These noise ordinances are not being enforced on Bake Parkway.
4. Everyone is saying that the flow of traffic on Bake Parkway is so much better and that traffic is not at a stand still. Well I have pictures to show you that prove this is not the case. Lines of cars and trucks sit outside my back wall waiting for the light to change. Not only is this very noisy but it also produces more pollution. At one point a large semi broke down right outside my backyard and sat there all night with the engine running so they could have AC I'm guessing. It was right below my bedroom window.

I realize that, short of chaining myself to the fence at Nakase Nursery, my concerns will be outweighed by the amount of revenue an 800 home development would provide to the city. Some even say the new homes will increase the value of our older homes. However there are pollution and noise issues that need to be addressed and you can insist that the developer, city and county participate in the mitigation of the pollution and noise. I have noted below some ways in which this might happen.

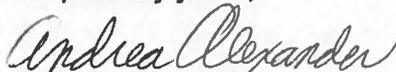
1. Pass an ordinance to remove trucks and motorcycles from Bake Parkway. If not all of Bake Parkway at least those 3 blocks of homes whose backyards butt up against the Parkway. Alton is completely industrial they can use that thoroughfare.
2. We currently have a noise ordinance in LF. (Municipal Code , Chapter 11.16), that speaks to this. We should enforce this ordinance on Bake Parkway and remove the trucks and motorcycles before 7:00 AM and after 8:00 PM.

3. Have the developer build a 10 or 12 foot wall in those areas that are affected by the Bake Parkway pollution and noise. They would have to work with the Association regarding this but they allowed a wall around the lake in our area because of the noise from traffic on Bake and also on Toledo. This development will clearly increase the traffic on Bake and the builder should be responsible for mitigating it, not the Association. If this is route taken then the wall should have some glass in it so we do not loose the sunlight completely. Perhaps a wall that utilizes a few rows of glass brick. Glass brick is easier to maintain than a plexiglass barrier placed on top of our existing wall.
4. The developer could also provide triple paned windows for those homes that butt up against Bake Parkway. This would help to eliminate some of the noise pollution.....until you have to open the windows for ventilation. Alas, not the best fix but does help some.
5. City could work with the Transportation Authority in providing access to the toll roads that would be more desirable for the homeowners and others using Bake Parkway. Perhaps eliminated tolls at the Bake Parkway and Portola Parkway toll road locations would help to divert traffic elsewhere.
6. Everyone talks about the flow of traffic. Keep the flow moving. The flow at some point always has to be interrupted because of the lights. Flow doesn't reduce traffic it just makes it move better. If you want to reduce traffic you must have fewer lanes so people are forced to use another route.....like Alton. People don't use Alton much at all. If you were to compare Alton and Bake I think you will find this to be true. So find a way to move the traffic from Bake that has residential property abutting it to Alton that is completely industrial.

So there you have it.....my complaints and concerns and also ways to mitigate them. I hope you take them to heart and come up with some viable solutions some of which I may have presented herein.

Thank you for your kind consideration. I look forward to hearing your response to these concerns. Please feel free to contact me by cell or text to 415-747-1294.

Respectfully yours,

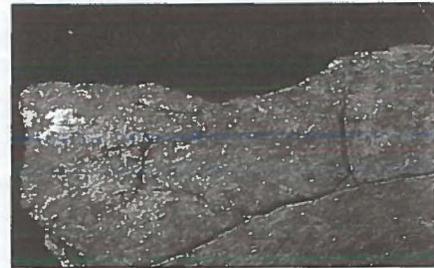


Andrea Alexander  
Resident LF2

## Early human arrivals in North America?

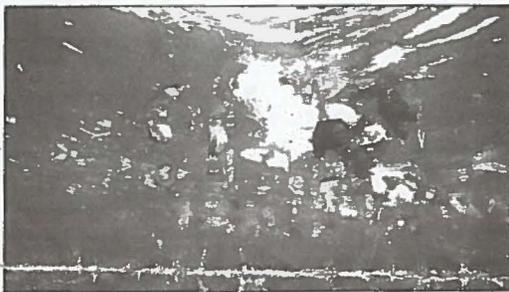
A group of scientists has claimed that ancient humans may have settled in North America as long as 130,000 years ago—some 115,000 years earlier than previously thought. The controversial assertion, which is viewed with skepticism by most other paleontologists, is based on analysis of the fossilized remains of a mastodon, a long-extinct mammoth-like animal. Discovered beside a freeway near San Diego in 1992, the mastodon bones were scratched and broken into many pieces, surrounded by several large rocks that may have served as hammers and anvils. Researchers at the University of Michigan and else-

where have concluded that the bones are 130,000 years old, and that they were opened when fresh by a Neanderthal or other ancient human relative using rocks to try to extract bone marrow. It's widely accepted that *Homo sapiens* arrived in North America about 15,000 years ago, across a land bridge connecting Siberia and Alaska; the mastodon findings, if confirmed, would indicate that another hominin species somehow reached this continent much earlier. If that hypothesis is true, it would rewrite the story of human migration. Skeptics argue that there are more-plausible explanations for the bone fractures and markings, such as



Scratches and dents on the mastodon bones

pressure from the sediment on top of it. Paleontologist Thomas A. Deméré, a co-author of the study, acknowledged that the findings seem "impossible," but said, "People have to be open to the possibility that humans were here this long ago."



Our plastic refuse travels far and wide.

### Trash in the Arctic Ocean

The world's seas have long been littered with trillions of tiny pieces of plastic—and a lot of it is ending up in the Arctic Ocean. The first major survey of the region's icy waters found that the planet's northernmost ocean is clogged with about 300 billion pieces of debris from things like plastic bottles, bags, and fishing lines. Carried there from the North Atlantic by a major ocean current, this seaborne junk has few ways to escape the "dead-end" ocean, reports *The New York Times*. The pollution is different from the "trash patches" that have accumulated in the Pacific and Atlantic oceans; rather than collecting in certain areas, the debris in the Arctic is spreading more evenly throughout the sea. "We don't fully understand the consequences the plastic is having or will have in our oceans," says study leader Andrés Cózar Cabañas. "What we do know is that these consequences will be felt at greater scale in an ecosystem like this." Cabañas says further research is needed to determine whether ocean currents could eventually enable the plastic to work its way out of the region.

### Plastic-eating caterpillars

Scientists may have found an unlikely candidate to clean up the mounds of non-biodegradable plastic trash in the world's

landfills: the humble wax worm.

Federica Bertocchini, a developmental biologist and amateur beekeeper in Spain, first came up with the idea after finding her beehives infested with the beeswax-loving caterpillar larvae of wax moths. She put the grubs in a plastic bag—whereupon they immediately ate their way out. Plastic and wax have similar chemical structures. Bertocchini posited that in evolving to digest wax, wax worms may have also gained the ability to break down polyethylene,

the world's most common plastic. She took her theory to biochemists at the University of Cambridge, who found that 100 wax worms could gulp down 92 milligrams of polyethylene in about 1 1/2 hours and degrade plastic bags much faster than any known method. "If a single enzyme is responsible for this chemical process," study co-author Paolo Bombelli tells *CNN.com*, "its reproduction on a large scale using biotechnological methods should be achievable."

### Diet soda and dementia

Sugar-free versions of soda may increase people's risk of suffering a stroke or developing dementia, reports *The Washington Post*. Scientists at Boston University studied more than 4,000 people over a 10-year period. They found that those who consumed at least one artificially sweetened drink a day were almost three times more likely to have a stroke or be diagnosed with dementia than those who had one or fewer a week. To the researchers'

surprise, a parallel study of sugary drinks did not find a similar association. Matthew Pase, the study's lead author, offered several caveats on the findings, most notably that the actual number of diagnoses was very low and that the results showed only correlation, not causation. He also urged people not to see the study as an incentive to switch to regular soda, noting that sugary drinks have been linked to obesity, poor memory, and accelerated brain aging. But Pase did say the findings suggested consumers should be "cautious" about their diet soda intake and switch to water or other unsweetened drinks.

### Health scare of the week Pollution reaches bloodstream

Tiny airborne pollutants from power plants, cars, and trucks may be able to get through the lungs' filter system and work their way into the bloodstream, new research suggests. Scientists at the University of Edinburgh in the U.K. asked 14 healthy volunteers to inhale air filled with harmless gold nanoparticles. They found that these nanoparticles were detectable in the participants' blood within 15 minutes and were still in their blood and urine three months later. When the researchers then tested 12 people who were due to undergo surgery to clear blocked arteries, they found that the gold nanoparticles accumulated in the fatty plaques that grew inside the patients' blood vessels. If the reactive compounds found in air pollution act in the same way, they could increase the risk for heart disease, stroke, and other health issues. "There is no doubt that air pollution is a killer," Jeremy Pearson from the British Heart Foundation charity tells *Reuters.com*. "This study brings us a step closer to solving the mystery of how air pollution damages our cardiovascular health."





# Diesel Exhaust and Cancer

## What is diesel exhaust?

Diesel is a type of fuel derived from crude oil. Diesel fuel is used in most large engines, including those used in many trucks, buses, trains, construction and farm equipment, generators, ships, and in some cars.

Diesel exhaust is made up of 2 main parts: gases and soot (particles). Each of these, in turn, is made up of many different substances.

- The gas portion of diesel exhaust is mostly carbon dioxide, carbon monoxide, nitric oxide, nitrogen dioxide, sulfur oxides, and hydrocarbons, including polycyclic aromatic hydrocarbons (PAHs).
- The soot (particulate) portion of diesel exhaust is made up of particles such as carbon, organic materials (including PAHs), and traces of metallic compounds.

Both the gases and the soot of diesel exhaust contain PAHs.

Exhaust from diesel engines brings a complex mixture of soot and gases to roadways, cities, farms, and other places. **Health concerns about diesel exhaust relate not only to cancer, but also to other health problems such as lung and heart diseases.**

# How are people exposed to diesel exhaust?

People can be exposed to diesel exhaust at work, around the home, or while traveling mainly by breathing in the soot and gases. Diesel exhaust exposure is widespread in the modern world.

The amount of diesel exhaust people are exposed to varies greatly. Measuring these exposures is not easy because diesel exhaust is chemically complex and many parts of it are also found in a lot of other sources. This is a major challenge when trying to study the health effects of diesel exhaust.

## At work

People with some of the highest work exposures include truck drivers, toll booth workers, miners, forklift drivers and other heavy machinery operators, railroad and dock workers, and garage workers and mechanics. Some farm workers also spend a lot of time around diesel exhaust.

## Where you live and play

People can also be exposed to diesel exhaust where they live and play, although this is typically at lower levels than in the workplace. Exposures are highest where diesel traffic is heaviest, such as along major highways and in cities.

## While traveling in a vehicle

Exposure to diesel exhaust may be higher, especially when traveling on roads with heavier truck or bus traffic. Commuting for work is a potential source of diesel exhaust exposure for many people. One particular area of concern is children's exposures to diesel exhaust and other pollutants while riding in school buses, as the buses themselves typically run on diesel fuel.

## Does diesel exhaust cause cancer?

Two main types of studies are used to try to figure out if a substance or exposure causes cancer.

- **Studies in labs:** In these studies, animals are exposed to a substance (often in very large doses) to see if it causes tumors or other health problems. Researchers might also expose normal cells in a lab dish to the substance to see if it causes the types of changes seen in cancer cells. It's not always clear if the results from these types of studies will apply to humans, but lab studies are a good way to find out if a substance might possibly cause cancer.
- **Studies in people:** Another type of study looks at cancer rates in different groups of people. Such a study might compare the cancer rate in a group exposed to a substance to the cancer rate in a group not exposed to it, or compare it to the cancer rate in the general population. But sometimes it can be hard to know what the results of these studies mean, because many other factors might affect the results.

In most cases neither type of study provides enough evidence on its own, so researchers usually look at both lab-based and human studies when trying to figure out if something causes cancer.

## Results of studies in the lab

In studies of cells done in lab dishes, diesel exhaust (as soot or chemical extracts) has been found to cause changes in the cells' DNA. These types of changes are usually needed for cancer to develop, although not all substances that cause DNA changes also cause cancer.

Several studies have found that long-term, heavy exposure to diesel exhaust can cause lung cancer in lab animals such as rats.

## Results of studies in people

It's not easy to study the possible health effects of diesel exhaust in people. First, it is often very hard to correctly define and measure the level of exposure. It can also be hard to account for the other cancer risk factors that people exposed to diesel exhaust might have, such as smoking.

### Lung cancer

Lung cancer is the major cancer thought to be linked to diesel exhaust. Several studies of workers exposed to diesel exhaust have shown small but significant increases in risk of lung cancer. Men with the heaviest and most prolonged exposures, such as railroad workers, heavy equipment operators, miners, and truck drivers, have been found to have higher lung cancer death rates than unexposed workers. Based on the number of people exposed at work, diesel exhaust may pose a substantial health risk.

The possible link between lung cancer and exposure to diesel exhaust outside the workplace has not been studied extensively.

### Other cancers

Several studies have looked for possible links between diesel exhaust and other cancers, including cancers of the bladder, larynx (voice box), esophagus, stomach, and pancreas. Studies have also looked for links to blood system cancers such as lymphomas and leukemias (including childhood leukemia). While some studies have found possible links, others have not. More research is needed to show if diesel exhaust exposure is linked to any of these other cancers.

## What expert agencies say about diesel exhaust

Several national and international agencies study substances in the environment to determine if they can cause cancer. (A substance that causes cancer or helps cancer grow is called a *carcinogen*.) The American Cancer Society looks to these organizations to evaluate the risks based on evidence from laboratory, animal, and human research studies.

Some of these expert agencies have classified diesel exhaust as to whether it can cause cancer, based largely on the possible link to lung cancer.

The **International Agency for Research on Cancer (IARC)** is part of the World Health Organization (WHO). Its major goal is to identify causes of cancer. **IARC classifies diesel engine exhaust as “carcinogenic to humans,” based on sufficient evidence that it is linked to an increased risk of lung cancer. IARC also notes that there is “some evidence of a positive association” between diesel exhaust and bladder cancer.**

The **National Toxicology Program (NTP)** is formed from parts of several different US government agencies, including the National Institutes of Health (NIH), the Centers for Disease Control and Prevention (CDC), and the Food and Drug Administration (FDA). **The NTP has classified exposure to diesel exhaust particulates as “reasonably anticipated to be a human**

carcinogen,” based on limited evidence from studies in humans (mainly linking it to lung cancer) and supporting evidence from lab studies.

The US **Environmental Protection Agency (EPA)** maintains the Integrated Risk Information System (IRIS), an electronic database that contains information on human health effects from exposure to various substances in the environment. The EPA classifies diesel exhaust as “likely to be carcinogenic to humans.”

The **National Institute for Occupational Safety and Health (NIOSH)** is part of the CDC that studies exposures in the workplace. NIOSH has determined that diesel exhaust is a “potential occupational carcinogen.”

(For more information on the classification systems used by these agencies, see *Known and Probable Human Carcinogens* (/cancer/cancer-causes/general-info/known-and-probable-human-carcinogens.html).)

## Can I reduce my exposure to diesel exhaust?

Diesel exhaust can cause health problems and can most likely increase the risk of lung cancer (and possibly other cancers).

Since most people’s exposure is from exhaust near highways and other roads, government regulations may be as important as personal choices in limiting exposure to potentially harmful chemicals in diesel exhaust. For example, as a result of EPA regulations and improvements in technology, new diesel engines give off much lower amounts of certain chemicals than

older engines. Still, it's not yet clear how much this might lower the risks, and many older diesel engines are still in use, so it makes sense to avoid exposure whenever possible.

## At work

If you are exposed to diesel exhaust at work, there are ways to reduce or prevent exposures. Some of these measures can also help protect you from other chemical exposures that are likely to happen in the workplace.

If you work in or around vehicles that run on diesel fuel, you might be able to limit the amount of time you spend near engines while they are running. Limiting the time spent near idling engines may help lower your exposure to fumes.

Talk with your employer to be sure that you are protected adequately. Personal protective equipment, such as respirators, may be a key part of a workplace protective program. If needed, engineering changes, such as ventilating the exhaust away from where you breathe, can also be important.

For more information on preventing or reducing workplace exposures at your job, consult your company's safety and health manager. If needed, you can get additional assistance from the Occupational Safety & Health Administration (OSHA) (<https://www.osha.gov/SLTC/dieselexhaust/>), the government agency responsible for enforcing workplace safety.

## Where you live and play

If you are exposed to diesel exhaust fumes in your environment, you can take some of the same precautions. For example, try to avoid or limit spending time near large sources of diesel exhaust, such as near trucks and buses. Commuting to and from work exposes many people to possible sources of diesel exhaust, whether they are in a car or on some type of public transportation. For some people, working from home

(telecommuting or teleworking) might be an option to lower their exposure, as well as to save money on commuting expenses.

On a governmental level, regulations such as the Clean Air Act and programs such as the EPA's National Clean Diesel Campaign are designed to reduce diesel emissions from trucks and other large engines, lowering public exposure to diesel exhaust.

Another important program is Clean School Bus USA. Children can be exposed to diesel exhaust during school bus travel or when standing near running school buses outside of school. Clean School Bus USA brings together partners from business, education, transportation, and public-health organizations to reduce children's exposure to bus-related air pollutants by aiming to:

- Reduce unnecessary school bus idling
- Replace older buses with newer, less-polluting buses
- Upgrade existing buses with technologies to reduce their emissions

[Written by](#)   [Additional resources](#)   [References](#)

The American Cancer Society medical and editorial content team



(</cancer/acs-medical-content-and-news-staff.html>) Our team is made up of doctors and master's-prepared nurses with deep knowledge of cancer care as well as journalists, editors, and translators with extensive experience in medical writing.

Last Medical Review: July 24, 2015 | Last Revised: July 27, 2015

2,797 views | Sep 28, 2015, 06:00am

# Dieselgate Is A Cancer Problem



**Elaine Schattner** Contributor   
Pharma & Healthcare

Emissions from diesel engines cause lung cancer. The World Health Organization's IARC confirmed the long-suspected fact that diesel engine exhaust (DEE) is a human carcinogen in 2012.

Like others, I'm concerned about the environmental ramifications and all else that's wrong about the VW emission scandal. But primarily I see this as a public health issue. As with most environmental toxins, the clearest risk of disease from exposure applies to people working or living in places with frequently-high levels. Although everyday (non-occupational) exposure to diesel engine exhaust is hard to gauge, the effects are real.

"Exhaust from diesel engines contributes to air pollution and is a cancer hazard to humans," said Dr. Kurt Straif in a phone interview. "Therefore trying to get around these regulations is certainly a big concern." Straif is a physician and epidemiologist who heads the International Agency for Research on Cancer (IARC) monographs on carcinogens.

"The IARC doesn't get into the politics, we stick with the science." A working group of leading international experts unanimously concluded that diesel exhaust is carcinogenic to humans, Straif noted.

The agency published a report supporting this designation in the Lancet Oncology.

The IARC monographs don't provide recommendations, Straif emphasized. "But my personal opinion as a research scientist, having worked in the field of public health and cancer for many years, is that this is a real concern."



In this Dec. 17, 2010 file photo, trucks make their way on eastbound in Livermore, Calif. The World Health Organization's cancer agency has determined that diesel exhaust causes cancer. (AP Photo/Ben Margot)

## MORE FROM FORBES

"I would think cancer is an important element in this discussion about fuel emissions," Straif said. "There is concern about air pollution and climate change. But certainly also about human health hazards."

I asked Straif if gasoline is a less toxic energy source for vehicles, as compared to diesel. "From the IARC monographs, there is clear evidence that diesel exhaust causes human cancer. There is not such evidence for gasoline. For diesel exhaust, we have it from all lines of evidence: cancer in humans, animals and mechanistic,"

he said.

The incidence of lung cancer in non-smokers has been rising. Among people with lung cancer who haven't smoked and lack occupational risks, the cause is rarely known. Environmental hazards, including air pollution and naturally-occurring substances, like radon, are implicated in lung cancer. With some exceptions, inherited genetic changes are not considered to play a major role in lung cancer risk.

I asked Straif if diesel exhaust might contribute to the recent rise in lung cancer among non-smokers. "It is certainly possible," he said. "In the United Kingdom, exposure to diesel engine exhaust is among the top three occupational causes of cancer," Straif said. "Environmental exposures are harder to measure."

There's evidence that diesel exhaust causes inflammation and is toxic to DNA, Straif added. "But it can be hard to disentangle what in the environment comes from air pollution, in general, and from diesel exhaust. It's a complex mixture."

The nitrogen oxides (NOx), which can be assessed in vehicle exhaust, are probably not the underlying cause of cancer, Straif suggested. "Those measurable compounds are a surrogate for what's in the pollution mix," he said. Teasing out which substance causes cancer in those exposed challenges environmental scientists. "It could be particulate matter or other polycyclic aromatic hydrocarbons, he said.

"It is interesting to note that the Volkswagen problem was first discovered by U.S. regulators," Straif said. In Europe, independent monitoring is less common, he suggested. "The strongest regulations are for the passenger cars."

The fact that diesel engine exhaust is a carcinogen had been suspected at least since 1955. The evidence comes mainly from studies of lung cancer in high-risk workers, such as non-metal miners. In 2011, the *Journal of the National*

*Cancer Institute* published two papers on occupational exposure to diesel exhaust with a focus on lung cancer. In an accompanying editorial, *The Problem with Diesel*, Dr. Lesley Rushton, provides a highly-readable summary of diesel exhaust chemistry, engines in industry and related diseases including exacerbation of asthma, other respiratory problems, heart disease and lung cancer.

In 2014, a paper published in the NIEHS-backed journal *Environmental Health Perspectives* estimated that diesel engine exhaust (DEE) accounts for approximately 6% of all lung cancer deaths, mostly due to occupational exposure. In their discussion, the investigators wrote:

“ Diesel engines were initially used predominantly to power heavy-duty equipment, with trains converting to diesel locomotives mainly after World War II and with heavy-duty trucks converting to diesel primarily during the mid- to late 1950s. Dieselization of equipment in underground mines occurred mostly in the 1960s–1970s. Diesel engines also are used in automobiles, especially in Europe. Large groups in the general population living in urban areas or close to highways are exposed to DEE, albeit to lower levels than in most occupational settings. Given that DEE is classified as a known human carcinogen, the impact of both occupational and environmental exposures on the overall lung cancer burden is potentially significant.\*

The researchers conclude: "Given that DEE is classified as a known human carcinogen, both occupational and environmental exposures on the overall lung cancer burden is potentially significant." They state: "We estimated that approximately 1.3% and 4.8% of annual lung cancer deaths at 70 years of age in the United States and the United Kingdom are due to past occupational and environmental DEE exposures, respectively." The authors admit – and emphasize – that these are rough estimates.

But the insight holds: Because diesel exhaust is carcinogenic, which has been

established over decades, based on numerous studies of occupational exposure, it is a contributor to the toll of lung cancer worldwide. Even if it's just a small fraction of the global tally of 1.2 million new lung cancer cases, and over a million deaths, ever year, a small percent is not be trivial – especially if the diesel exhaust has a synergistic effect with other toxins, some known, others unknown and most unmeasured. It causes DNA damage, inflammation, disease and deaths from lung disease including cancer.

Meanwhile, a recent article [the Guardian](#) suggests that some European governments, while expressing concern about the Volkswagen deception, are pushing for less strict emission controls.

Here in the U.S., plans to reduce regulation of industry and environmental protections have been raised by some presidential candidates. Days ago, the *Wall Street Journal* published an op-ed by Jeb Bush. The Republican contender wrote that he'd [repeal and slash EPA rules](#).

What's evident is that the problem of unchecked toxins, falsification of environmental compliance and hard-to-assess harms extend beyond the wrongdoing of any one company. [The recent Volkswagen problem should be taken as an alarm, about the need for effective regulation of industry, occupational and public health hazards.](#)

---

\*I've removed the in-text references for clarity; I encourage readers to read the original *EHP* paper (vol 122: pp. 172–177), where references are fully listed (and useful), [here](#), ES.

*Please follow me here at [Forbes](#). Also I'm on Twitter: [@ESchattner](#), & [Facebook](#).  
Thank you for your readership!*

*I'm a journalist, physician, and life-long patient who advocates for universal access to modern and compassionate health care. I am writing a book about public attitudes toward cancer. I've been on the faculty at Weill Cornell Medicine since 1993. Earlier in my career, I... MORE*

Accessibility links

- [Skip to article](#)
- [Skip to navigation](#)

# The Telegraph

[Telegraph.co.uk](http://Telegraph.co.uk)

Tuesday 07 August 2018

- [Home](#)
- [Video](#)
- [News](#)
- [World](#)
- [Sport](#)
- [Business](#)
- [Money](#)
- [Comment](#)
- [Culture](#)
- [Travel](#)
- [Life](#)
- [Women](#)
- [Fashion](#)
- [Luxury](#)
- [Tech](#)
- [Film](#)

Advertisement

1. [Home](#)»
2. [Motoring](#)»
3. [Car Manufacturers](#)»
4. [Volkswagen](#)

## The statistics about diesel are crystal clear. It's deadly

Rigorous research over the past twenty years has proved the dangers of the fuel beyond all doubt



Particulate pollution from all sources kills 29,000 Britons a year Photo: ALAMY



By [Geoffrey Lean](#)

5:33PM BST 29 Sep 2015

[Follow](#)

Do diesel fumes really kill thousands of Britons each year? And how can we possibly know for sure? In the wake of the Volkswagen scandal [some reassuring voices have suggested that the claim is alarmist](#). Unfortunately, the evidence for the fuel's deadly effects is powerful.

Diesel exhausts emit two main pollutants: particulates and nitrogen dioxide (NO<sub>2</sub>), and account for almost half the NO<sub>2</sub> and about 70 per cent of the particulates in London air. Measuring the effects, admittedly, is not easy. Doctors don't put "air pollution" or "diesel" on death certificates. Nor can we take a crowd of people, expose them over a long period to diesel fumes and then count how many died. Other, less direct, ways have to be found of getting at the truth.



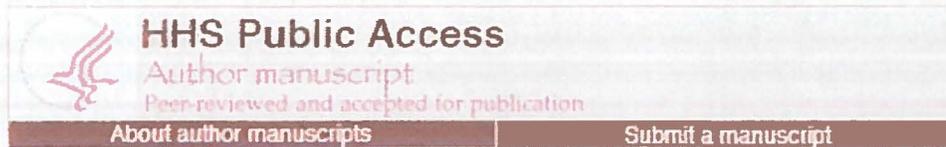
London air

Diesel accounts for about 70 per cent of the particulates in

Particulates – tiny sooty particles in the air – were the first of the pollutants to be identified as toxic, 22 years ago, in a big Harvard study. [The seminal 1993 research](#), dubbed "the six cities study" compared mortality rates in half a dozen representative US urban areas, following the fates of

8,111 adults for at least 14 years. It found – after adjusting for risk factors like obesity, smoking and occupational exposure – that death rates were 26 per cent higher in the city with the highest particulate pollution than the two with the lowest .

By itself this did not constitute proof but, in the intervening years, hundreds of similar studies – some so vast they tracked more than half a million people – have come to similar conclusions, establishing the danger beyond doubt.



[Occup Environ Med](#). Author manuscript; available in PMC 2017 Mar 15.

Published in final edited form as:

[Occup Environ Med](#). 2017 Mar; 74(4): 233–234.

Published online 2017 Jan 9. doi: [10.1136/oemed-2016-104197](#)

PMCID: PMC5352477

NIHMSID: NIHMS837674

PMID: [28069968](#)

## Diesel Exhaust Causes Lung Cancer – Now What?

Debra T. Silverman, ScD, ScM

Debra T. Silverman, Occupational and Environmental Epidemiology Branch, Division of Cancer Epidemiology and Genetics, National Cancer Institute, National Institutes of Health, DHHS, Bethesda, Maryland;

**Correspondence:** Debra T. Silverman, ScD, ScM. Occupational and Environmental Epidemiology Branch, Division of Cancer Epidemiology and Genetics, National Cancer Institute, National Institutes of Health, DHHS, 9609 Medical Center Drive, MSC 9774, Bethesda, Maryland, 20892-9774 ([silvermd@mail.nih.gov](mailto:silvermd@mail.nih.gov), tel: 240-276-7174)

### [Copyright notice](#)

The publisher's final edited version of this article is available at [Occup Environ Med](#)  
See other articles in PMC that [cite](#) the published article.

After three decades of epidemiologic research, diesel exhaust was classified as a carcinogen in humans by the International Agency for Research on Cancer (IARC) in 2012 based on evidence of its carcinogenicity to the lung (1). This determination was largely based on results from two recent epidemiologic studies of occupational diesel exhaust exposures among nonmetal miners (Diesel Exhaust in Miners Study (DEMS)) (2, 3) and truck drivers (4). The next challenge is to determine how to regulate exposure to diesel exhaust. Governmental regulatory agencies are charged with setting safe levels of exposure in the workplace and in the outdoor ambient environment in various countries. Much of the current regulatory activity has been focused on the workplace. Many countries lack workplace regulations, and many others have regulations that need re-evaluation by quantitative risk assessors in light of the new research findings. The new findings and the potential need for regulation has stimulated exposure assessments such as that led by Peters and colleagues in Western Australian mining (5).

In 2013, the Health Effects Institute (HEI) convened an independent panel of scientists to evaluate whether the findings from the two new studies of nonmetal miners and truck drivers were suitable for conducting quantitative risk assessment. In 2015, the HEI panel issued a report indicating that they found the studies to be “well designed and well conducted”; through re-analysis of the primary data, the panel replicated the published results of these studies and concluded that these data were useful for quantitative risk assessment (6). In the past two years, several investigators have attempted to determine what level of exposure would be “safe” in the workplace and in the environment. Based on the exposure-response relationship between cumulative elemental carbon (a key surrogate of diesel exhaust) and lung cancer mortality derived from a meta-regression of data from the studies of nonmetal

miners (2), truck drivers (4), and an older study of truck drivers (7), Vermeulen and colleagues (8) estimated the excess lifetime risk of lung cancer mortality in the U.S. under various exposure scenarios. The estimated numbers of excess lung cancer deaths through age 80 for lifetime workplace exposures of 1, 10, and 25  $\mu\text{g}/\text{m}^3$  elemental carbon (EC) were 17, 200, and 689 per 10,000, respectively, which exceed the typically acceptable levels of occupational risk of 1/1,000 in the U.S. and Europe (8). With regard to environmental exposures, they estimated 21 excess lung cancer deaths per 10,000 for lifetime environmental exposure to 0.8  $\mu\text{g}/\text{m}^3$  EC, which exceeds the typically acceptable level of 1/100,000 in the U.S. and Europe.

In Western Australia, Peters et al (5) conducted an extensive diesel exhaust exposure assessment in 124 mine sites (mainly metal and nonmetal). Based on an approach similar to that taken by Vermeulen et al (8), they estimated that a lifetime underground mining career (45 years), with an estimated average exposure of 44  $\mu\text{g}/\text{m}^3$  EC in 2011, was associated with 38 excess lung cancer deaths per 1,000 miners. However, EC exposure levels have been decreasing over time in these Australian mines, so use of recent measurements likely results in an underestimation of lifetime exposure, and thus, an underestimation of excess lung cancer deaths. Australia has a recommended level of occupational exposure to EC of 100  $\mu\text{g}/\text{m}^3$ , but no workplace regulations exist (5). This lung cancer risk exceeds levels that are acceptable in Europe and the U.S., leading the investigators to call for “the implementation of stringent occupational exposure limits for diesel exhaust” (5).

In 2016, Vermeulen and Portengen (9) conducted a quantitative risk assessment based on the exposure-response relationship derived from the 2014 meta-regression (8) and additional sensitivity analyses based on alternative exposure-response relationships. They estimated workplace EC exposure levels for both acceptable risk (AR) and maximum tolerable risk (MTR) of  $4 \times 10^{-5}$  and  $4 \times 10^{-3}$ , respectively, for lifetime cumulative excess risk of dying from lung cancer. To achieve these AR and MTR limits, they found that EC exposures would need to be 0.01 and 1.0  $\mu\text{g}/\text{m}^3$ , respectively, which are at or far below current workplace exposure levels, leading the authors to suggest that “diesel engines using older technologies should be removed from the workplace when possible or emissions strictly controlled” (9). Lastly, to correct for healthy worker survivor bias that may have led to an underestimation of lung cancer mortality in underground diesel-exposed nonmetal miners in DEMS, Neophytou and colleagues (10) applied an accelerated failure time model to assess the effect of exposures to EC on time to termination of employment and found time to termination decreased with increased EC exposure. Adjusting for time-varying employment status, they applied the parametric g-formula to evaluate the effect of various interventions on lifetime lung cancer mortality. They observed a 20% reduction in mortality with an EC limit of  $\leq 25 \mu\text{g}/\text{m}^3$  compared to no intervention, providing hypothetical evidence of the beneficial effect of lowering EC exposure limits in underground nonmetal mining. The authors concluded that to achieve a risk of 1/1,000 would require reducing EC exposure to below 1  $\mu\text{g}/\text{m}^3$ , making continued use of diesel equipment based on older technology difficult.

With an eye to future research, several pressing scientific questions merit our attention. First, is the carcinogenicity of diesel exhaust in humans limited to the lung? As we observed for cigarette smoke, a product of combustion and a powerful lung carcinogen that causes cancer of 20 other sites, diesel exhaust may cause cancer of sites such as the urinary bladder, larynx, and colon (1). Additionally, diesel exhaust is a major contributor to air pollution in most urban areas, specifically the fine

particulate component (PM<sub>2.5</sub>). IARC classifies outdoor air pollution, specifically particulate matter, as a cause of lung cancer (11). How much of the carcinogenicity of air pollution is attributable to diesel exhaust? Air pollution also causes cardiovascular disease (12). Does diesel exhaust cause cardiovascular disease and other diseases such as nonmalignant respiratory disease?

Finally, the gravity of the adverse health effects of air pollution in some metropolitan areas is perhaps best reflected by the recent proposals by mayors of Mexico City, Paris, Madrid and Athens to ban diesel vehicles by 2025; possibly, more cities will follow suit. Alternatively, would the replacement of “old” with “new” technology diesel engines, which drastically reduce emissions of many compounds and elemental carbon, prove to be sufficient for safety from disease for the millions of diesel-exposed workers and the populations in urban areas worldwide? If so, improving air quality to protect health may depend to a large extent on the turnover rate from old- to new-technology engines in both developed and developing countries.

## Footnotes

Go to:

**Funding:** Intramural Research Program of the National Institutes of Health, National Cancer Institute, Division of Cancer Epidemiology and Genetics.

## References

Go to:

1. IARC. Diesel and gasoline engine exhausts and some nitroarenes. Vol. 105. Lyon, France: International Agency for Research in Cancer; 2013. IARC Monographs on the Evaluation of the Carcinogenic Risks to Humans. [PubMed]
2. Silverman DT, Samanic CM, Lubin JH, et al. The Diesel Exhaust in Miners Study: a nested case-control study of lung cancer and diesel exhaust. *J Natl Cancer Inst.* 2012;104:855–68. [PMC free article] [PubMed]
3. Attfield MD, Schleiff PL, Lubin JH, et al. The Diesel Exhaust in Miners Study: a cohort mortality study with emphasis on lung cancer. *J Natl Cancer Inst.* 2012;104:869–83. [PMC free article] [PubMed]
4. Garshick E, Laden F, Hart JE, et al. Lung cancer and elemental carbon exposure in trucking industry workers. *Environ Health Perspect.* 2012;120:1301–6. [PMC free article] [PubMed]
5. Peters S, de Klerk N, Reid A, et al. Estimation of quantitative levels of diesel exhaust exposure and the health impact in the contemporary Australian mining industry. *Occup Environ Med.* doi: 10.1136/oemed-2016-103808. Epub 2016 Nov 15. [PubMed] [Cross Ref]
6. HEI Diesel Epidemiology Panel. Special Report. Boston, MA: 2015. Diesel emissions and lung cancer: an evaluation of recent epidemiological evidence for quantitative risk assessment. [PubMed]
7. Steenland K, Deddens J, Stayner L. Diesel exhaust and lung cancer in the trucking industry: exposure-response analyses and risk assessment. *Am J Ind Med.* 1998;34:220–8. [PubMed]
8. Vermeulen R, Silverman DT, Garshick E, et al. Exposure-response estimates for diesel engine exhaust and lung cancer mortality based on data from three occupational cohorts. *Environ Health Perspect.* 2014;122:172–7. [PMC free article] [PubMed]

9. Vermeulen R, Portengen L. Is diesel equipment in the workplace safe or not? *Occup Environ Med.* 2016;73:846–8. [[PubMed](#)]
10. Neophytou AM, Picciotto S, Costello S, Eisen EA. Occupational diesel exposure, duration of employment, and lung cancer: an application of the parametric g-formula. *Epidemiology.* 2016;27:21–8. [[PMC free article](#)] [[PubMed](#)]
11. IARC. Outdoor Air Pollution. Vol. 109. Lyon, France: International Agency for Research in Cancer; 2016. IARC Monographs on the Evaluation of the Carcinogenic Risks to Humans.
12. Thurston GD, Burnett RT, Turner MC, et al. Ischemic Heart Disease Mortality and Long-Term Exposure to Source-Related Components of U.S. Fine Particle Air Pollution. *Environ Health Perspect.* 2016;124:785–94. [[PMC free article](#)] [[PubMed](#)]

# Overview: Diesel Exhaust and Health

## CATEGORIES

**Topics** Health, Air Pollution, Truck & Bus, Cars & Trucks, Construction & Earthmoving Equipment, Environmental Justice, Ongoing Vessels & Harbor Craft, Ports, Freight & Moving Goods in California, Trains & Railyards, Transit, VW Diesel Vehicles

**Programs** Exposure, Research Planning, Community Air Protection Program AB 617

**Type** Information

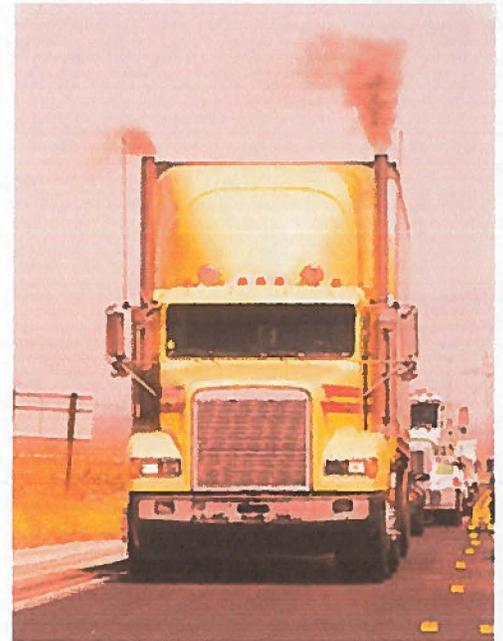
## CONTACT

**Email** [research@arb.ca.gov](mailto:research@arb.ca.gov)

**Phone** (916) 445-0753

## Background

Diesel engines emit a complex mixture of air pollutants, including both gaseous and solid material. The solid material in diesel exhaust is known as diesel particulate matter (DPM). More than 90% of DPM is less than 1  $\mu\text{m}$  in diameter (about 1/70<sup>th</sup> the diameter of a human hair), and thus is a subset of particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>). Most PM<sub>2.5</sub> derives from combustion, such as use of gasoline and diesel fuels by motor vehicles, burning of natural gas to generate electricity, and wood burning. **PM<sub>2.5</sub> is the size of ambient particulate matter air pollution most associated with adverse health effects of the air pollutants that have ambient air quality standards. These health effects include cardiovascular and respiratory hospitalizations, and premature death. As a California statewide average, DPM comprises about 8% of PM<sub>2.5</sub> in outdoor air, although DPM levels vary regionally due to the non-uniform distribution of sources throughout the state.**



DPM is typically composed of carbon particles (“soot”, also called black carbon, or BC) and numerous organic compounds, including over 40 known cancer-causing organic substances. Examples of these chemicals include polycyclic aromatic hydrocarbons, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene. Diesel exhaust also contains gaseous pollutants, including volatile organic compounds and oxides of nitrogen (NO<sub>x</sub>). NO<sub>x</sub> emissions from diesel engines are important because they can undergo chemical reactions in the atmosphere leading to formation of PM<sub>2.5</sub> and ozone.

Most major sources of diesel emissions, such as ships, trains, and trucks operate in and around ports, rail yards, and heavily traveled roadways. These areas are often located near highly populated areas. Because of this, elevated DPM levels are mainly an urban problem, with large numbers of people exposed to higher DPM concentrations, resulting in greater health consequences compared to rural areas. A large fraction of personal exposure to DPM occurs during travel on roadways. Although Californians spend a relatively small proportion of their time in enclosed vehicles (about 7% for adults and teenagers, and 4% for children under 12), 30 to 55% of total daily DPM exposure typically occurs during the time people spend in motor vehicles.

## Diesel Particulate Matter and Health

The majority of DPM is small enough to be inhaled into the lungs. Most inhaled particles are subsequently exhaled, but some deposit on the lung surface. Although particles the size of DPM can deposit throughout the lung, the largest fraction deposits in the deepest regions of the lungs where the lung is most susceptible to injury.

In 1998, the California Air Resources Board (CARB) identified DPM as a toxic air contaminant based on published evidence of a relationship between diesel exhaust exposure and lung cancer and other adverse health effects. In 2012, additional studies on the cancer-causing potential of diesel exhaust published since CARB’s determination led the International Agency for Research on Cancer (IARC, a division of the World Health Organization) to list diesel engine exhaust as “carcinogenic to humans”. This determination is based primarily on evidence from occupational studies that show a link between exposure to DPM and lung cancer induction, as well as death from lung cancer. Download the IARC report (external site).

Because it is part of PM<sub>2.5</sub>, DPM also contributes to the same non-cancer health effects as PM<sub>2.5</sub> exposure. These effects include premature death, hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma, increased respiratory

symptoms, and decreased lung function in children. Several studies suggest that exposure to DPM may also facilitate development of new allergies. Those most vulnerable to non-cancer health effects are children whose lungs are still developing and the elderly who often have chronic health problems.

## Estimated Health Effects of DPM in California

DPM has a significant impact on California’s population. It is estimated that about 70% of total known cancer risk related to air toxics in California is attributable to DPM. Based on 2012 estimates of statewide exposure, DPM is estimated to increase statewide cancer risk by 520 cancers per million residents exposed over a lifetime. Non-cancer health effects associated with exposure to DPM (based on 2009 - 2011 air quality data) are shown in the table below.

Health Effect	Estimated Annual Number of Cases*
Cardiopulmonary Death	1,400 (1,100 – 1,800)
Cardiovascular Hospitalization	100 (0 – 250)
Respiratory Hospitalization	120 (30 – 250)
Respiratory Emergency Room Visits (Including Asthma)	600 (400 – 800)

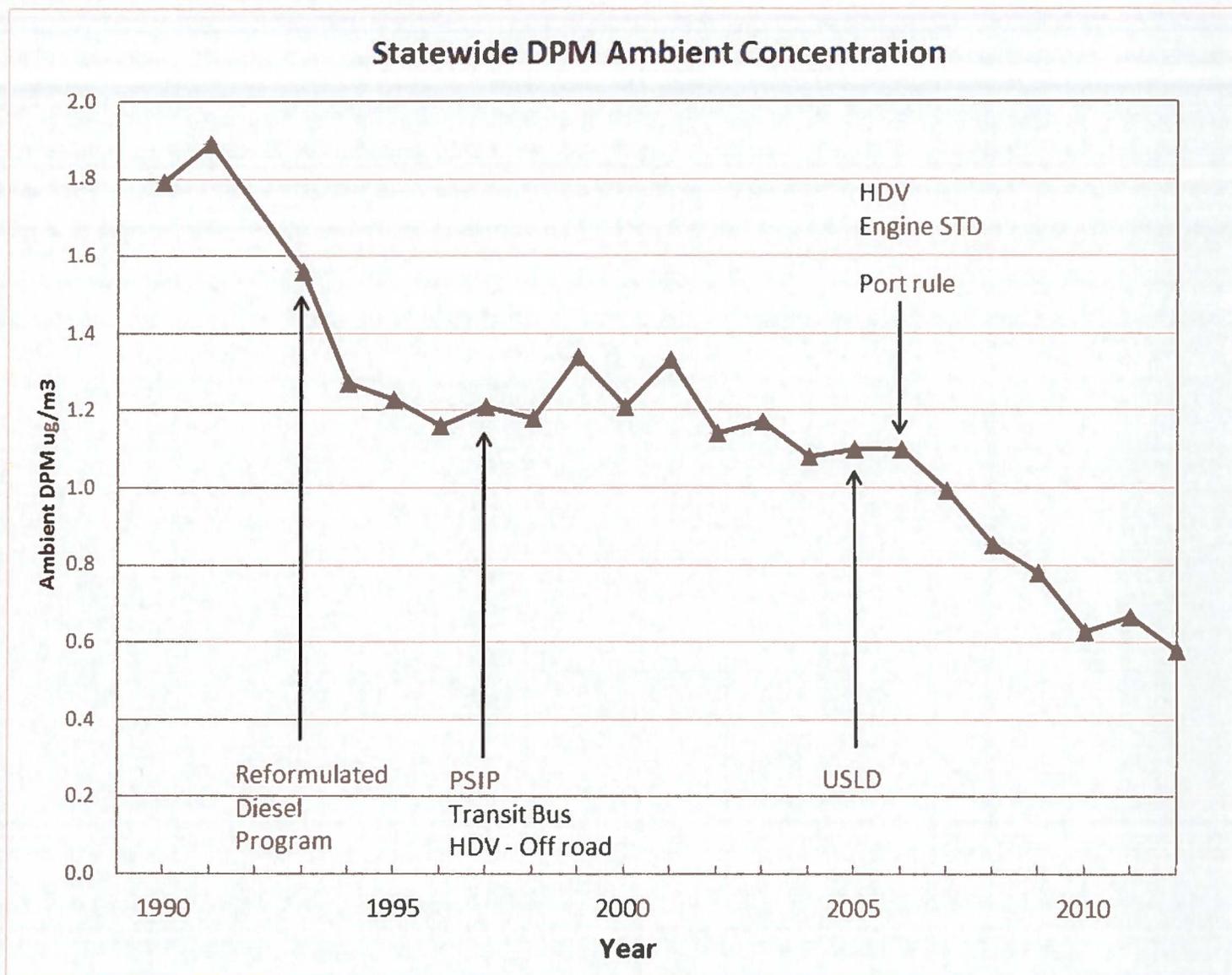
\*Values in parenthesis indicate 95% confidence interval.

More information on DPM and health.

## Trends in Outdoor Levels of DPM

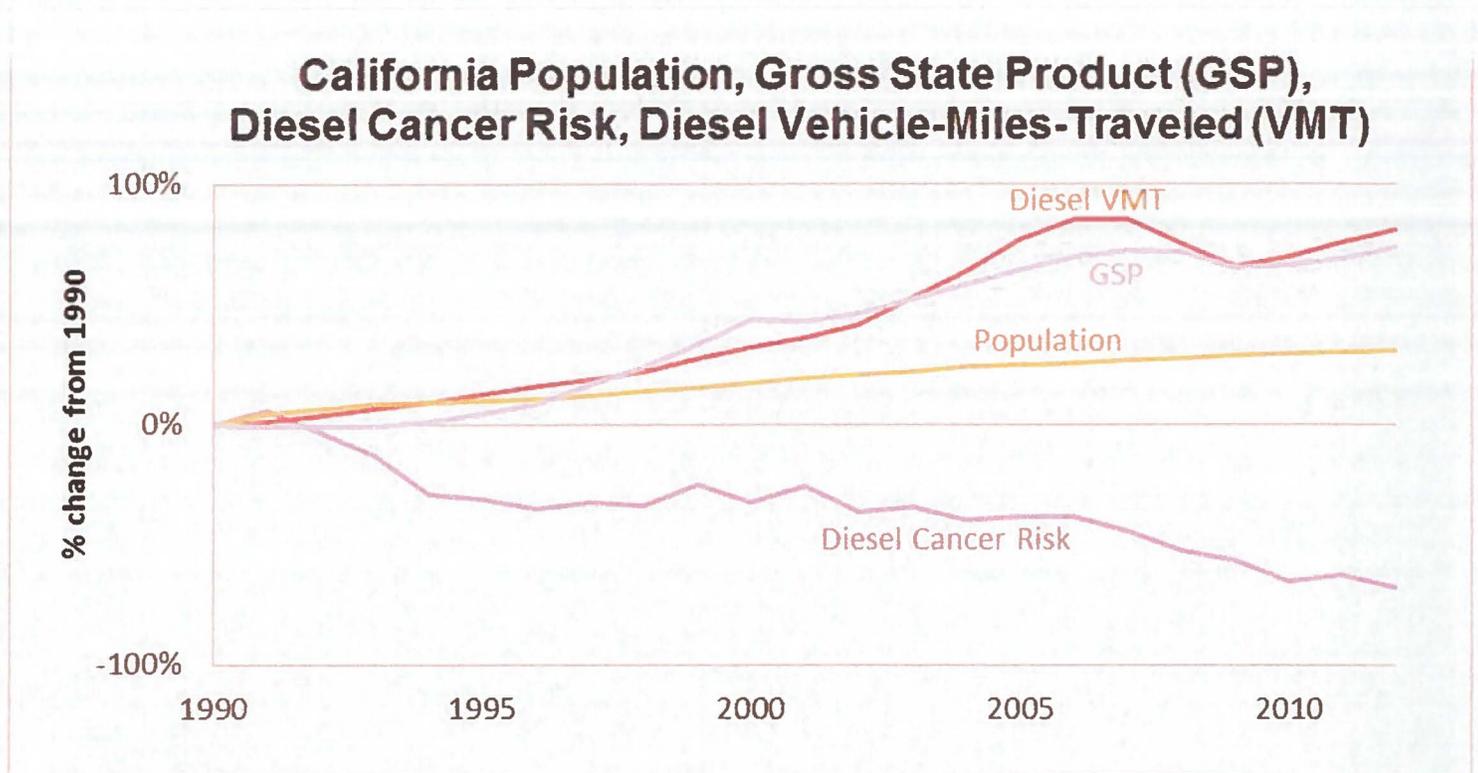
The figure below shows the trend in ambient DPM. CARB regulations\*\* of diesel engines and fuels have had a dramatic effect on DPM concentrations. Since 1990, DPM levels have decreased by 68%. The figure also shows which regulations have had the greatest impact on DPM.

DPM levels are expected to continue declining as additional controls are adopted, and the number of new technology diesel vehicles increases.



**\*\*Abbreviations of CARB regulations used in table: HDV Engine STD = Heavy-duty diesel truck engine standard; HDV - Off road = Heavy-duty off-road diesel engines; Port rule = Port (drayage) trucks; PSIP = Periodic self-inspection program; Transit bus = Urban transit buses; ULSD = Clean diesel fuel**

The figure below shows that despite the increased number of vehicle miles traveled by diesel vehicles (VMT, red line), and despite increases in statewide population (green line) and gross state product (GSP, a measure of growth in the state’s economy, light blue line), CARB’s regulatory programs still led to a decline in statewide cancer risk (dark blue line).



#### **Additional Information:**

- CARB's diesel programs
- CARB's diesel mobile vehicles and equipment activities
- CARB's freight transport, ports and rail programs
- California's diesel fuel program
- Other diesel-related programs
- Selected references on diesel-related health effects

## Environmental Effects of Diesel Exhaust

In addition to its health effects, diesel exhaust significantly contributes to haze that reduces visibility by obscuring outdoor views and decreasing the distance over which one can distinguish features across the landscape. Researchers have reported that in the San Joaquin Valley and in southern California, diesel engines contribute to a reduction in visibility. This decrease in visibility is caused by scattering and absorption of sunlight by particles and gases present in diesel emissions.

DPM also plays an important role in climate change. A large proportion of DPM is composed of BC. Recent studies cited in the Intergovernmental Panel on Climate Change report estimate that emissions of BC are the second largest contributor to global warming, after carbon dioxide emissions. Warming occurs when BC particles absorb sunlight, convert it into infrared (heat) radiation, and emit that radiation to the surrounding air. A recent California-specific study showed that the darkening of snow and ice by BC deposition is a major factor in the rapid disappearance of the Sierra Nevada snow packs. Melting of the snow pack of the Sierra Nevada earlier in the spring is one of the contributing factors to the serious decline in California's water supply. As additional DPM controls are adopted, and the number of new technology diesel vehicles increases, BC emissions will continue to decline.

## Conclusions

Although progress has been made over the past decade in reducing exposure to diesel exhaust, **diesel exhaust still poses substantial risks to public health and the environment.** Efforts to reduce DPM exposure through use of cleaner-burning diesel fuel, retrofitting engines with particle-trapping filters, introduction of new, advanced technologies that reduce particle emissions, and use of alternative fuels are approaches that are being explored and implemented. CARB anticipates that newly adopted diesel exhaust control measures will reduce population exposure even further, and that as the sustainable freight program expands, population exposure to diesel exhaust pollution will decrease even further. It is estimated that emissions of DPM in 2035 will be less than half those in 2010, further reducing statewide cancer risk and non-cancer health effects.

## RELATED RESOURCES

---

**Community Air  
Protection Program  
Consultation Group July  
2018 Community  
Recommendations  
Presentation**

**Community Air  
Protection Program  
Consultation Group July  
2018 Notice**

**Community Air  
Protection Program  
Consultation Group July  
2018 Agenda**

---

(800) 242-4450 | [helpline@arb.ca.gov](mailto:helpline@arb.ca.gov)  
1001 I Street, Sacramento, CA 95814  
P.O. Box 2815, Sacramento, CA 95812

---

Copyright © 2018 State of California

**PUBLIC SCOPING MEETING**  
**Proposed Nakase Property Area Plan**  
Wednesday, July 25, 2018

NAME: RICHARD SULLIVAN  
ADDRESS: 21081 BARCLAY LANE CITY: LAKE FOREST ZIP: 92630  
EMAIL ADDRESS: RSULLIVAN3@COX.NET  
REPRESENTING: MY HOME & FAMILY  
Do you wish to be added to the project mailing list?  YES  NO

**Please drop comments in the Comment Box or mail them to:**

City of Lake Forest Community Development Department  
Marie Luna, Senior Planner  
25550 Commercentre Drive, Suite 100  
Lake Forest, CA, 92630  
Phone: (949) 461-3400  
E-mail: mluna@lakeforestca.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

WE CURRENTLY LIVE ON THE CORNER OF BARCLAY & NORMANDALE. ALL OF THE <sup>LAKE FOREST</sup> ADDITIONAL HOMES IN THE IMMEDIATE AREA HAS CAUSED MAJOR PARKING ISSUES ON NORMANDALE. CESTERMAN CAUSING ACCIDENTS DAILY ALSO MOST OF THE RESIDENTS HAVE MULTIPLE CARS FOR 1 ALLOTTED SPACE. THESE PEOPLE DUMP FAST FOOD PACKAGING ALL ALONG NORMANDALE AND HAS NOW SPILLED OVER TO BARCLAY PARKING IN FRONT OF MY HOME AND IN FRONT OF THE FIRE HYDRANT ACROSS THE STREET. THE PARKING HAS AFFECTED THE RESALE VALUE OF OUR HOME. ADDING THE TOLL BROS 800 ADDITIONAL HOMES WILL CREATE GREAT HAVOC TO THE NEIGHBOURHOOD, THE AIR QUALITY & THE SAFETY TO ALL CURRENT RESIDENTS. I SUGGEST YOU FIX THE CURRENT ISSUES MENTIONED ABOVE BEFORE YOU DUMP ON ANOTHER TSUNAMI OF TROUBLE

RECEIVED

AUG 06 2018

CITY OF LAKE FOREST  
COMMUNITY DEVELOPMENT

**PUBLIC SCOPING MEETING**  
Proposed Nakase Property Area Plan  
Wednesday, July 25, 2018

- Hi
- Je
- Ma
- Drum
- View
- Post
- Seat

NAME: Judy Esposito  
 ADDRESS: 22675 Jubilo Pl CITY: LF ZIP: 92630  
 EMAIL ADDRESS: judyeteacher1@hotmail.com  
 REPRESENTING: citizen of Lake Forest  
 Do you wish to be added to the project mailing list?  YES  NO

ld

Please drop comments in the Comment Box or mail them to:

City of Lake Forest Community Development Department  
 Marie Luna, Senior Planner  
 25550 Commencement Drive, Suite 100  
 Lake Forest, CA, 92630  
 Phone: (949) 461-3400  
 E-mail: mluna@lakeforestca.gov

- Ev
- Re
- Cr
- Lc
- Di
- Gi
- N
- Edited
- Pr
- See
- U
- S
- E
- C

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the environmental issues to be addressed in the EIR (please print).

Environmental Issues - Number of people = increase in people = increase in pollution - house, cars etc traffic increase = emissions, schools, businesses everything "stepped up" increases pollution Noise pollution; increase traffic = increased car pollution, gas stations = pollutants in the ground More roads paved over; water drainage not good quality; sewers over loaded, trash disposal = mounds of trash effects animals = they learn to scavenge instead of their normal way of getting food = diseases from trash spreading of diseases.

Ideas - Make areas for people to rest + make gardens - OR turn it into a FOREST more pools = more humidity

What a loser... must've been seriously trashed to have hit that many cars. Probably alcohol and other drugs. Should be put away for awhile.



August 8, 2018

[mluna@lakeforestca.gov](mailto:mluna@lakeforestca.gov)

Ms. Marie Luna  
Senior Planner  
City of Lake Forest  
25550 Commercentre Drive  
Suite 100  
Lake Forest, CA 92630

Re: Comments By Autumnwood HOA Re Proposed Nakase Property Area Plan

Dear Ms. Luna:

I represent Autumnwood Homeowners Association (“Autumnwood HOA”) and I am providing comments for Autumnwood HOA in response to the City’s notice inviting written comments concerning the scope of the Environmental Impact Report (“EIR”) for the Proposed Nakase Property Area Plan. 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 122 acre proposed project site and the proposed project also includes an elementary school that would accommodate approximately 800 to 1,000 students from kindergarten through sixth grade (the “Project”). The current land use for the Project site is the Nakase Brothers Wholesale Nursery, an agricultural wholesale plant nursery.

The City has determined from the Initial Study completed for the proposed Project that the proposed Project could result in potential impacts related to aesthetics, agriculture and forestry, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use/planning, noise, population/housing, public services, recreation, transportation/traffic, tribal cultural resources, and utilities and service systems. The City has indicated that these potential impacts will be analyzed in the EIR. The City has further indicated that mitigation measures will be developed and included in the EIR, but only “if necessary” to address the proposed Project’s potentially significant adverse effects.

The EIR for the proposed Project must fully analyze all potential impacts to Autumnwood HOA including, without limitation, all cumulative impacts, impacts involving potential flooding along Serrano Creek (including, without limitation, erosion and slope stability), increased traffic, noise, impacts on limited public services including public safety services, besides the potential impacts provided above that have been identified by the City. For purposes of this analysis, “[t]he area involved shall be the area in which significant effects would

Ms. Marie Luna  
August 8, 2018  
Page 2

occur either directly or indirectly as a result of the project. The “environment” includes both natural and man-made conditions.” (14 Cal. Code Regs. 15360)

For each of the above matters, “[t]he EIR shall discuss any inconsistencies between the proposed project and applicable general plans and regional plans.” (14 Cal. Code Regs. 15125(d).) For example, all local and regional flood control and erosion control plans must be analyzed as part of the EIR. Increased traffic impacts must also be fully analyzed, among the other areas of concern provided above.

For each environmental impact that is found to be significant, the EIR must include comprehensive mitigation measures that protect communities like Autumnwood HOA from all adverse environmental impacts. The development of comprehensive mitigation measures that fully protect Autumnwood HOA is essential based on the concerns raised in this letter.

I also request continued notification of all opportunities for comment and public input during the EIR process for the proposed Project. I plan to provide detailed comments to the Draft EIR once it is completed.

Should you have any questions, or if you need any additional information about Autumnwood HOA’s concerns about the proposed Project, please let me know.

Sincerely,

ALESHIRE & WYNDER, LLP

  
Anthony R. Taylor



## AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
  - a. A brief description of the project.
  - b. The lead agency contact information.
  - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code § 21080.3.1 (d)).
  - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code § 21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code § 21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. (Pub. Resources Code § 21080.3.1(b)).
  - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18). (Pub. Resources Code § 21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
  - a. Alternatives to the project.
  - b. Recommended mitigation measures.
  - c. Significant effects. (Pub. Resources Code § 21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
  - a. Type of environmental review necessary.
  - b. Significance of the tribal cultural resources.
  - c. Significance of the project's impacts on tribal cultural resources.
  - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code § 21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code § 21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
  - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
  - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code § 21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
  - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code § 21080.3.2 (b)).
  
8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code § 21082.3 (a)).
  
9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b). (Pub. Resources Code § 21082.3 (e)).
  
10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
  - a. Avoidance and preservation of the resources in place, including, but not limited to:
    - i. Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i. Protecting the cultural character and integrity of the resource.
    - ii. Protecting the traditional use of the resource.
    - iii. Protecting the confidentiality of the resource.
  - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d. Protecting the resource. (Pub. Resource Code § 21084.3 (b)).
  - e. Please note that a federally recognized California Native American tribe or a nonfederally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code § 815.3 (c)).
  - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code § 5097.991).
  
11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
  - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
  - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code § 21082.3 (d)).

*This process should be documented in the Cultural Resources section of your environmental document.*

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)

## SB 18

SB 18 applies to local governments and requires **local governments** to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code § 65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf)

Some of SB 18's provisions include:

1. **Tribal Consultation**: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code § 65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation**. There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality**: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code section 65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction. (Gov. Code § 65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation**: Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

### NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([http://ohp.parks.ca.gov/?page\\_id=1068](http://ohp.parks.ca.gov/?page_id=1068)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have been already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.



**PUBLIC SCOPING MEETING**  
**Proposed Nakase Property Area Plan**  
**Wednesday, July 25, 2018**

Name:	Robert (Tim) and Melissa Leech
Address:	24406 Calle Torcido Lake Forest, CA 92630
Email:	leecht@icloud.com
Cell:	949-514-0367
*Please add me to the email distribution list.	

We have lived in our current home for approximately 16.5 years and love the community. There is little we as citizens can do to stop progress and/or population growth in the area. With that said, we should also not have to shoulder the health effects from increased traffic, products of combustion, particulates and noise without reasonable accommodation and/or attempts to mitigate the exposure. This is a long standing issue that has existed since Bake was open between Trabuco and Portola and continues to worsen with added growth in the area.

Vocationally, I am a Certified Safety Professional and specialize in industrial safety. While our community concerns are of a public nature, the principles of control are similar and potential health effects expressed are of equal if not greater concern than many industrial scenarios.

**Health Concerns**

**Noise:** Noise levels are well above acceptable levels especially at peak traffic hours. Back yard sound level readings exceed 90 dbA during most of the daytime hours. 24 hour average has not been sampled. Safe community levels are generally established at 70 dbA average for a 24 hour threshold.

**Airborne Particulates and Products of Combustion:** While I have not taken total dust samples or tested for other products of combustion, the level of particulate and dust that settle from traffic on our windows, patio and porch would indicate that there is reasonable evidence to support conducting sampling and ensure that there are no unacceptable health exposures.

**Industrial Traffic:** Industrial traffic is permitted 24 hours and causes frequent sleep interruption due to heavy braking and road noise despite the fact that most homes have dual pane windows, foliage, etc. that help to reduce noise levels. Establishing a curfew and/or re-routing industrial traffic between the hours of 10:00 PM and 6:00 AM, as a suggestion, would help to reduce unwanted late night/early morning homeowner noise exposures.

**Property Values:** Property values and marketability are negatively impacted as compared to similar units within the community. Furthering this impacts resident's ability to sale, refinance, etc. While this is secondary to the health concerns expressed, it is still a consideration and negative impact is felt.

**SUGGESTED MITIGATION**

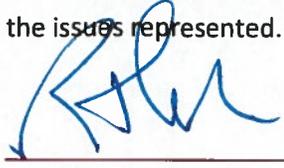
Consider a two pronged approach.

1. Contract an independent firm with proper qualifications (Certified Industrial Hygienist) to conduct and confirm that average noise levels, total dust and product of combustion are at safe levels in

back yards adjacent to Bake Parkway. Compare those levels to the original environmental study conducted prior to opening Bake up between Trabuco and Portola Blvd. I have attempted to acquire original environmental studies in the past yet have failed.

2. Mitigate noise, dust and products of combustion levels to safe public levels using a combination of engineering and administrative controls.
  - a. Engineering controls may include installation of a higher wall with sound absorbing qualities. There are "green" alternatives, landscaping and other methods available as well.
  - b. Administrative controls may include re-routing industrial traffic as outlined previously in this report.

I suspect that the issue has been ignored in the past due to the small number of residents that own homes lining Bake Parkway and also believe that the original environmental studies were inaccurate based on the actual impact we experience daily. It is not our intention to make unreasonable or unattainable requests. I believe there is an acceptable and mutually beneficial resolve and appreciate efforts to fairly address the issues represented.

Signed: 

Aug. 9, 2018

Robert (Tim)othy Leech, CSP, ARM  
24406 Calle Torcido  
Lake Forest, CA 92630

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 12

1750 EAST FOURTH STREET, SUITE 100

SANTA ANA, CA 92705

PHONE (657) 328-6267

FAX (657) 328-6510

TTY 711

[www.dot.ca.gov](http://www.dot.ca.gov)*Making Conservation  
a California Way of Life.*

August 13, 2018

Marie Luna  
City of Lake Forest  
25550 Commercentre Drive  
Lake Forest, CA 92630

File: IGR/CEQA  
SCH#: 2018071035  
12-ORA-2018-00918  
SR 241, PM 22.661  
I-5, PM 19.217

Dear Ms. Luna,

Thank you for including the California Department of Transportation (Caltrans) in the review of the Initial Study Notice of Preparation (NOP) for the Nakase Property Area Plan project in the City of Lake Forest. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability.

The proposed project consists of up to 675 two- and three-story single-family residential units, 101 affordable apartment units for senior citizens in a two to three story building, an elementary school site accommodating up to 1,000 students, parks and open space, an internal circulation system and a multipurpose water quality basin. State Route (SR) 241 is located approximately 0.07 miles northeast of the project site and Interstate 5 (I-5) is located approximately 3.8 miles southwest of the project site. Caltrans is a commenting agency on this project and upon review, we have the following comments:

**Transportation Planning**

Upon review, we recommend a discussion of the potential impacts to transit, pedestrian, and bicycle facilities in the next phase of the project. There are several existing transit, pedestrian, and bicycle facilities located near the project site. To ensure regional connectivity, we recommend that any proposed multi-modal opportunities are coordinated with existing facilities.

The project contains multiple components throughout the project site. Therefore, the city should consider incorporating appropriate elements to address safety. As such, in the next phase of the project, please include a discussion of proposed ADA facilities and opportunities. We also recommend that the city considers developing a Safe Routes to School program for the proposed elementary school and other schools (i.e., middle schools and high schools) within the project vicinity.

The project also contains approximately 101 affordable apartment units for senior citizens. We recommend a discussion of the City of Lake Forest's Senior Mobility Program and its potential in providing transit opportunities for the project.

### **Traffic Impact Study**

The Environmental Impact Report (EIR) should include a Traffic Impact Study (TIS) that analyzes potential short-term and long-term impacts to the State Highway System (SHS) including on-ramps, off-ramps, and freeway mainline specifically for SR 241 and I-5, based on criteria and methodologies established in the Caltrans Traffic Impact Study Guide:

[http://www.dot.ca.gov/hq/tpp/offices/ocp/igr\\_ceqa\\_files/tisguide.pdf](http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf)

The specific intersections requiring study would likely include the intersections of SR 241 at Lake Forest Drive, Portola Parkway, and the I-5 intersections at Lake Forest Drive and Bake Parkway. Additional intersections may be required for study depending on the outcome of the TIS trip distribution analysis.

Please include the following:

- Existing and Build-out Annual Average Daily traffic volumes.
- Existing and Build-out AM and PM Peak Hour traffic volumes.
- A discussion of trip generation and assignments, justification of modal splits, etc.
- A discussion of any Transportation Demand Management measures including potential funding to support longevity of these measures.
- Traffic impact analysis methodology used and any specific assumptions used that are unique to the City of Lake Forest.
- Ninety-five percent queue information for all off-ramps on the SHS under the Build-out condition.
- Potentially significant adverse impacts and its associated mitigation measures. Any impacts to the SHS should not be deemed “Significant and Unavoidable” without consultation with Caltrans to mitigate these impacts in the early development stages of the environmental document.

### **Climate Change Reductions**

AB 32, also known as the California Global Warming Solutions Act of 2006 mandates Greenhouse Gas (GHG) emissions reduction in California. Senate Bill (SB) 375, also known as the Sustainable Communities and Climate Protection Act of 2008, capitalizes on the need for reducing GHG by directing the California Air Resources Board to set regional targets for reducing GHG emissions. SB 375 sets emission reduction standards for the years 2020 and 2035. To be consistent with the goals brought forth by AB 32, SB 375 encourages plans/projects that achieves GHG reductions as those highlighted in the Southern California Association of Governments’ (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). It is important to address these environmental concerns and it is our recommendation for the city of Lake Forest to incorporate these recommended practices and policies within the Nakase Property Area Plan.

### **National Pollutant Discharge Elimination System (NPDES)**

The Hydrology and Water Quality section in the Notice of Preparation for the project states that potentially significant impacts will result from the project. Please ensure that these impacts are

studied and that the project should also include mitigation measures that result in less than significant for discharges that enter Caltrans right of way.

**Encroachment Permit Process**

*Hydrology*

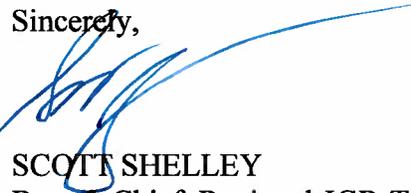
In coordination with Orange County Flood Control District (OCFCD), the city of Lake Forest will need concurring approval of this proposal prior to Caltrans final approval. Final storm drain plans, hydrology calculations and maps (existing and proposed conditions) need to be reviewed and approved during the Encroachment Permit process. Hydraulics calculations and maps (existing and proposed conditions) need to be reviewed and approved during the Encroachment Permit process to clarify that there will be no increase in water surface elevation in existing systems.

*Encroachment Permit*

Please be advised that any project work proposed in the vicinity of the State Highway System (SHS) will require an Encroachment Permit and all environmental concerns must be adequately addressed. If the environmental documentation for the project does not meet Caltrans' requirements, additional documentation would be required before the approval of the Encroachment Permit. For specific details for Encroachment Permits procedure, please refer to the Caltrans' Encroachment Permits Manual. The latest edition of the Manual is available on the web site: <http://www.dot.ca.gov/hq/traffops/developserv/permits/>

Please continue to keep us informed of this project and any future developments which could potentially impact the SHS. If you have any questions, please do not hesitate to contact Joseph Jamoralin, at (657) 328-6276 or [Joseph.Jamoralin@dot.ca.gov](mailto:Joseph.Jamoralin@dot.ca.gov).

Sincerely,



SCOTT SHELLEY  
Branch Chief, Regional-IGR-Transit Planning  
District 12

August 13, 2018

NCL-18-045

Marie Luna  
Senior Planner  
City of Lake Forest  
25550 Commercentre Drive, Suite 100  
Lake Forest, CA 92630

**Subject:** Notice of Preparation of Environmental Impact Report – Nakase Property Area Plan

Dear Ms. Luna:

Thank you for the opportunity to comment on the Environmental Impact Report (EIR) for the Nakase Property Area Plan. The County of Orange offers the following comments for your consideration.

**OC Community Resources/Libraries**

1. The comment below refers to the Notice of Preparation for the Proposed Nakase Area Plan: Initial Study Nakase Nursery/Toll Brothers, specifically page 4-40. Please see excerpt below:
  - a. ***a)(iv) Potentially Significant Impact. The Orange County Public Library (OCPL) has a network of 33 libraries throughout Orange County, and two OCPL branches are located in Lake Forest. The Foothill Ranch Library is located at 27002 Cabriole Way, approximately 1.0 mi northeast of the Project Site. The El Toro library is located at 24672 Raymond Way, approximately 4.5 mi southwest of the Project Site. Operation of the Project may result in increased demand for other public facilities, including libraries. This topic will be analyzed in the EIR, and mitigation will be developed and included in the EIR, if necessary, to address potentially significant adverse Project effects related to increased demand for the other public facilities, including libraries***

Further information will be necessary to determine specific library needs up to and including the need for upgrades of existing nearby branches and/or the need of an additional branch location. New land development proposals increase library user populations. The increase of approximately 776 residences will have potentially significant impact on library resources. The County has service standards including per square foot of facilities and volumes of books per capita, funding would be required to maintain service standards for the area. The County Library requests the review and need for Developmental Fees be a consideration for approval of the new Nakase Area Plan development in Lake Forest.

## **OC Infrastructure Programs /Flood Programs/Hydrology**

1. The Nakase Nursery project development area covers approximately 122 acres of commercial/light industrial land and is proposed to be developed into a residential, park, school, and open space uses, including habitat restoration area. It appears that adjacent to the proposed project there is a portion of Serrano Creek (F19) where the Orange County Flood Control District (OCFCD) has easement rights. The DIER should clearly identify all drainage facilities and unimproved, natural watercourse that may be impacted by the project.
2. The increase in runoff caused by development has the potential to cause adverse impacts to existing drainage facilities and unimproved watercourses within and downstream of the Nakase property development area. Impacts to these facilities should be analyzed and appropriate mitigation measures proposed to alleviate any adverse impacts. The DEIR should analyze and discuss impacts, if any, of the proposed development on natural, unimproved channel segments within and downstream of the project area and propose measures that will mitigate increased peak flows, erosion and scour, that may result from the proposed development.
3. The City of Lake Forest must confirm that all hydrological and hydraulic studies uphold to the current guidelines and criteria as specified in the Orange County Hydrology Manual (OCHM), Addendum No. 1 to the OCHM, and the Orange County Flood Control Design Manual.
4. Since the City of Lake Forest (City) is responsible for land use planning and development within its municipal limits, the City should review and approve all local hydrology and hydraulic analyses. The project proponent should ensure that the proposed development is adequately protected from erosion and from flooding in a 100-year storm event.
5. The City, as floodplain administrator, should ensure that floodplains are properly identified and structures within the flood hazard areas will be located outside the 100-year floodplain in conformance with Federal Emergency Management Agency (FEMA) regulations.
6. Any work related to the proposed project within OCFCD right-of-way will require an encroachment permit from the County Property Permits Section. In addition, all work within OCFCD right-of-way should be performed in a manner that will not adversely impact the hydraulic flow conditions, access and/or maintenance requirements of OCFCD facilities. Information regarding permit application is available on our website – <http://www.ocpublicworks.com/ds>.

If you have any questions regarding these comments, please contact Cindy Salazar at (714) 667-8870 in OC Development Services.

Sincerely,



Richard Vuong, Manager, Planning Division  
OC Public Works Service Area/OC Development Services  
300 North Flower Street  
Santa Ana, California 92702-4048  
[Richard.Vuong@ocpw.ocgov.com](mailto:Richard.Vuong@ocpw.ocgov.com)

cc: Helen Fried, OC Community Resources/Libraries  
Penny Lew, OC Flood Programs/Hydrology & Floodplain Management



**Sent via electronic mail to mluna@lakeforestca.gov**

August 14, 2018

Marie Luna, Senior Planner  
City of Lake Forest Community Development Department  
25550 Commercentre Drive, Suite 100  
Lake Forest CA 92630

RE: Notice of Preparation for the Proposed Nakase Property Area Plan Environmental Impact Report

Dear Ms. Luna:

Southern California Edison (SCE) is pleased to submit the following comments on the above referenced project which would facilitate the development of the 122 acre Nakase property as a master planned community including the development of residential uses, an elementary school site and over 28 acres of parks, open space and habitat restoration areas.

### **SCE's Electrical Facilities**

SCE provides electric service to the City of Lake Forest and maintains electrical transmission and distribution facilities, as well as substations and supporting appurtenances within the City. Page 2-28 of the Project's Notice of Preparation states that "The Project Site receives electricity service from Southern California Edison (SCE). The Project proposes to underground the existing overhead power lines that are currently located on the east side of Bake Parkway. The Project includes gas, cable, and telephone utility lines."

SCE recommends analysis of the construction impacts of the utility work within the DEIR. The relocation and proposed undergrounding of SCE's utility lines, including any temporary structures needed for these relocations, may result in significant environmental impacts. Therefore, the DEIR should identify and discuss any potential impacts that would result from the relocation and undergrounding of the utility lines and structures to avoid additional permitting through the California Public Utilities Commission. Utility work impacts to biological resources (specifically nesting birds), traffic, noise, and aesthetics, amongst others, should be considered.

The design of SCE's generating stations, substations, and transmission lines are regulated by Order of the California Public Utilities Commission (CPUC). Specifically, the undergrounding of SCE's transmission lines is governed under SCE Tariff Rule 20. A Tariff Rule is a rule of service that is approved by the CPUC. See *City of Anaheim v. Pacific Bell Co.*, 119 Cal. App. 4th, 838 (Cal. App. 4th 2004) (undergrounding tariff rule constituted CPUC's entry into field of regulation for utility undergrounding). SCE Tariff Rule 20 will need to be a consideration for this Project.

### **Development within SCE's Rights-of-Way and Access Roads**

As the proposed project has the potential to encroach and impact SCE's existing utility corridors and access roads, please note that it should not unreasonably interfere with SCE's ability to access, maintain, and operate its current and future facilities. Additionally, if any development which includes permanent, temporary or grading within the Right-of-Way (such as bike lanes and landscaping) are planned within SCE's corridors a written consent agreement signed between the developer and SCE is required. Any parkways or pathways (either by foot, bicycles, or other means) that invite the public onto SCE's right-of-way will require the installation of fencing and/or Climbing Discouragers on each transmission line tower at the customer's expense.

SCE's rights-of-way and fee-owned properties are used by SCE to operate and maintain its present and future facilities. SCE will review any proposed use on a case-by-case basis. Approvals or denials will be in writing based upon review of the maps provided by the developer and compatibility with SCE right-of-way constraints and rights. Please forward five (5) sets of plans depicting SCE's facilities and associated land rights to the following location:

Real Properties Department  
Southern California Edison Company  
2 Innovation Way  
Pomona, CA 91768

### **General Order 131-D**

The construction, modification, and relocation of transmission lines, or electrical facilities that are designed to operate at or above 50 kilovolts (kV) may be subject to the California Public Utilities Commission's (CPUC) General Order 131-D<sup>1</sup>. If the construction, modification, or relocation of transmission lines results in significant environmental impacts, they should be identified and discussed in the Draft EIR, specifically as it relates to aesthetics, biological resources (e.g., nesting birds), transportation, noise, and air quality. As mentioned, If the analysis is not included, SCE may be required to pursue a separate, mandatory CEQA review through the CPUC, which could delay approval of the SCE transmission line portion of the project for two years or longer.

### **General Order 95**

SCE must comply with General Order (GO) 95, which establishes rules and regulations for the overhead line design, construction, and maintenance. GO 95 also includes vertical clearance requirements from thoroughfares, ground, and railroads, as well as specific minimum clearances from tree branches and vegetation around overhead wires. The project's landscaping should not conflict with SCE's existing and proposed transmission line designs.

### **Method of Service**

In order to determine electrical infrastructure necessary to support the proposed project, the project proponent must submit a signed Method of Service agreement to SCE and pay engineering fees for an electric service study to be completed. Infrastructure necessary to support this project is subject to licensing and permitting authority of the CPUC.

SCE appreciates the opportunity to comment on the proposed Nakase Property Area Plan Project. SCE looks forward to working and collaborating with the City. If you have any questions regarding this letter, please contact me at [heather.neely@sce.com](mailto:heather.neely@sce.com) or 626.476.7839

Regards,

Heather Neely  
Third Party Environmental Reviews  
Environmental Services  
Southern California Edison  
2244 Walnut Grove Avenue  
Rosemead CA 91770

---

<sup>1</sup> <http://docs.cpuc.ca.gov/PUBLISHED/Graphics/589.PDF>



August 14, 2018

Ms. Marie Luna  
City of Lake Forest  
Community Development Department  
25550 Commercentre Drive, Suite 100  
Lake Forest, CA 92630

**Subject: Notice of Preparation of an Environmental Impact Report for the proposed Nakase Property Area Plan located at 20261 Lake Forest Drive in the City of Lake Forest.**

Dear Ms. Luna:

Thank you for the opportunity to review the Notice of Preparation for the Draft Environmental Impact Report (EIR) for the proposed Nakase Property Area Plan in the City of Lake Forest. The Nakase Property Area Plan would facilitate the development of a 122-acre master planned community consisting of 675, two and three-story, single family residential homes, 101 senior affordable housing units, and a K-6 elementary school.

Staff completed its review and is providing the enclosed comments. If you have any questions, please contact me at 949-724-6364 or by email at [jequina@cityofirvine.org](mailto:jequina@cityofirvine.org).

Sincerely,

Justin Equina  
Associate Planner

Enclosure: Staff Comments

cc: Kerwin Lau, Manager of Planning Services  
Bill Jacobs, Principal Planner  
Lisa Thai, Supervising Transportation Analyst

**Enclosure**  
**City of Irvine Comments for**  
**Initial Study and Notice of Preparation of a Draft EIR for**  
**Nakase Property Area Plan in the City of Lake Forest**

1) The proposed Nakase Property Area Plan is within the North Irvine Transportation Mitigation (NITM) study area and within close proximity to the City of Irvine. Therefore, the study area should include the following:

- Sand Canyon to the west
- Bake to the east
- Portola to the north; and
- I-5 to the south

The study should also include all NITM funded intersections and all City of Irvine intersections and roadway links within these boundaries. In addition, the following intersections and roadway links, consistent with Irvine's performance criteria, should be analyzed using our ITAM model.

Intersections

- Bake/Irvine
- Bake/Toledo
- Bake/Jeronimo
- Bake/Muirlands
- Bake/Rockfield
- I-5 NB Ramps/Bake
- Bake/I-5 SB Ramps
- Alton/Irvine
- Alton/Toledo
- Alton/Jeronimo
- Alton/Muirlands
- Ada/Alton
- Technology W/Alton
- I-5 NB Ramp/Alton
- Alton/Enterprise
- Marine/Alton
- Marine/Barranca
- Marine/Great Park Boulevard
- Portola/SR-241 NB Ramps
- Portola/SR-241 SB Ramps
- Chinon/Irvine
- Modjeska/Irvine
- Bosque/Irvine
- Ridge Valley/Portola

- Ridge Valley/Irvine
- Arrowhead/Irvine
- SR-133 SB Ramps/Irvine
- SR-133/NB Ramps/Irvine
- Sand Canyon/Portola
- Sand Canyon/Irvine
- Sand Canyon/Trabuco
- Ridge Valley/Trabuco
- Lake Forest/Avenida Carlota/I-5

#### Roadway Links

- Bake (Trabuco to I-5 SB Ramps)
- Alton (Irvine to Enterprise)
- Portola (Sand Canyon to SR-241 NB Ramps)
- Irvine (Sand Canyon to Bake)
- Trabuco (Sand Canyon to Ridge Valley)
- Marine Way (Sand Canyon to Muirlands)

Please contact Lisa Thai, 949-724-7360 or [lthai@cityofirvine.org](mailto:lthai@cityofirvine.org), for the latest ITAM model.

- 2) In the traffic study, analyze the following study years and its potential cumulative impacts.
  - Interim Year Short Term
  - Interim Year Long Term
  - Buildout
- 3) In the traffic study, analyze the improvements (including the timing and implementation plan) for the missing segment of Portola Parkway (SR-241 to Alton) located in the City of Irvine's sphere of influence.
- 4) Clarify if the proposed project will be part of the Lake Forest Transportation Mitigation (LFTM) fee program.



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
(858) 467-4201  
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor  
CHARLTON H. BONHAM, Director



August 14, 2018

Ms. Marie Luna  
City of Lake Forest  
25550 Commerce Centre Drive, Suite 100  
Lake Forest, CA 92630  
mluna@lakeforestca.gov

**Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Nakase Property Area Plan, Lake Forest, CA (SCH# 2018071035)**

Dear Ms. Luna:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Notice of Preparation (NOP) and Initial Study (IS) for the Nakase Property Area Plan Draft Environmental Impact Report (DEIR). The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act [CEQA] Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.* The Department also administers the Natural Community Conservation Planning (NCCP) program. The City of Lake Forest (City) is identified as a non-participating landowner in the Central/Coastal Orange County NCCP/Habitat Conservation Plan (HCP).

The project proposes to develop Nakase Brothers Wholesale Nurseries, a 122-acre commercial plant nursery, into a master community that includes up to 675 single-family residential units, an elementary school, a public park, and designated "open space/habitat restoration." Nakase Brothers Wholesale Nurseries is located at 20621 Lake Forest Drive, with Bake Parkway to the north, Rancho Parkway to the east, and Serrano Creek along its southern boundary. The project site is also within the NCCP/HCP planning area, with the boundary of the NCCP/HCP Reserve System approximately 1 mile to the northeast.

The Department offers the following comments and recommendations to assist the City in avoiding or minimizing potential project impacts on biological resources.

### Specific Comment

1. The proposed project proposes to remove approximately 0.25 acre of degraded coastal sage scrub (CSS) habitat (IS, page 4-15). Based on the information provided, it is unclear where the CSS habitat occurs on the property and whether it is occupied by the federal Endangered Species Act threatened coastal California gnatcatcher (*Poliioptila californica californica*, "gnatcatcher"). Because the project is located in a jurisdiction covered by the NCCP/HCP, it is eligible to use the in-lieu fee to address impacts to occupied CSS habitat. The DEIR should specify whether the CSS habitat to be impacted is occupied by gnatcatcher and whether the in-lieu fee will be used to mitigate the 0.25 acre of impact. Use of the in-lieu fee must be coordinated with the NCCP/HCP non-profit

management organization, the Natural Communities Coalition. Unoccupied CSS is still considered sensitive habitat and any impacts should be appropriately mitigated. Depending on the habitat quality, we recommend using a 2:1 or 3:1 conservation-to-impact ratio to mitigate for losses of non-occupied CSS.

### General Comments

1. The Department has responsibility for wetland and riparian habitats. It is the policy of the Department to strongly discourage development in wetlands or conversion of wetlands to uplands. We oppose any development or conversion that would result in a reduction of wetland acreage or wetland habitat values, unless, at a minimum, project mitigation assures there will be "no net loss" of either wetland habitat values or acreage. Development and conversion include but are not limited to conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks that preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. Mitigation measures to compensate for impacts to mature riparian corridors must be included in the DEIR and must compensate for the loss of function and value of a wildlife corridor.
  - a. The project area supports aquatic, riparian, and wetland habitats; therefore, a jurisdictional delineation of the creeks and their associated riparian habitats should be included in the DEIR. The delineation should be conducted pursuant to the U. S. Fish and Wildlife Service wetland definition adopted by the Department.<sup>1</sup> Please note that some wetland and riparian habitats subject to the Department's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers.
  - b. The Department also has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river, stream, or lake or use material from a river, stream, or lake. For any such activities, the project applicant (or "entity") must provide written notification to the Department pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSAA) with the applicant is required prior to conducting the proposed activities. The Department's issuance of a LSAA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. The Department as a Responsible Agency under CEQA may consider the local jurisdiction's (lead agency) Negative Declaration or Environmental Impact Report for the project. To minimize additional requirements by the Department pursuant to

---

<sup>1</sup> Cowardin, Lewis M., et al. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.

section 1600 *et seq.* and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSAA.<sup>2</sup>

2. The Department considers adverse impacts to a species protected by the California Endangered Species Act (CESA), for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, or candidate species that results from the project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085). Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, the Department recommends that the project proponent seek appropriate take authorization under CESA prior to implementing the project. Appropriate authorization from the Department may include an incidental take permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subds. (b),(c)). Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of an ITP unless the project CEQA document addresses all project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.
3. To enable the Department to adequately review and comment on the proposed project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DEIR.
  - a) The document should contain a complete discussion of the purpose and need for, and description of, the proposed project, including all staging areas and access routes to the construction and staging areas.
  - b) A range of feasible alternatives should be included to ensure that alternatives to the proposed project are fully considered and evaluated; the alternatives should avoid or otherwise minimize impacts to sensitive biological resources. Specific alternative locations should be evaluated in areas with lower resource sensitivity where appropriate.

#### Biological Resources within the Project's Area of Potential Effect

4. The document should provide a complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered,

---

<sup>2</sup> A notification package may be obtained by accessing the Department's web site at <http://www.wildlife.ca.gov/Conservation/LSA>

threatened, sensitive, and locally unique species and sensitive habitats. This should include a complete floral and faunal species compendium of the entire project site, undertaken at the appropriate time of year. The DEIR should include the following information.

- a) CEQA Guidelines, section 15125(c), specifies that knowledge on the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed on resources that are rare or unique to the region.
- b) A thorough, recent floristic-based assessment of special status plants and natural communities, following the Department's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see <https://www.wildlife.ca.gov/Conservation/Plants/Info>). The Department recommends that floristic, alliance-based and/or association-based mapping and vegetation impact assessments be conducted at the Project site and neighboring vicinity. The Manual of California Vegetation, second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2008<sup>3</sup>). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
- c) A current inventory of the biological resources associated with each habitat type on site and within the area of potential effect. The Department's California Natural Diversity Data Base in Sacramento should be contacted at [www.wildlife.ca.gov/biogeodata/](http://www.wildlife.ca.gov/biogeodata/) to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.
- d) An inventory of rare, threatened, endangered and other sensitive species on site and within the area of potential effect. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, § 15380). This should include sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service.

#### Analyses of the Potential Project-Related Impacts on the Biological Resources

5. To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the DEIR.
  - a) A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage should also be included. The latter subject should address: project-related changes on drainage patterns on and downstream of the project site;

---

3 Sawyer, J. O., T. Keeler-Wolf and J.M. Evens. 2009. A Manual of California Vegetation, Second Edition. California Native Plant Society Press, Sacramento.

the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site. The discussions should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary, and the potential resulting impacts on the habitat, if any, supported by the groundwater. Mitigation measures proposed to alleviate such impacts should be included.

- b) Discussions regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR.
- c) The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document.
- d) A cumulative effects analysis should be developed as described under CEQA Guidelines, section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

#### Mitigation for the Project-related Biological Impacts

- 6. The DEIR should include measures to fully avoid and otherwise protect Rare Natural Communities from project-related impacts. The Department considers these communities as threatened habitats having both regional and local significance.
- 7. The DEIR should include mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.
- 8. For proposed preservation and/or restoration, the DEIR should include measures to perpetually protect the targeted habitat values from direct and indirect negative impacts. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.
- 9. The Department recommends that measures be taken to avoid project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Title 50, § 10.13, Code of Federal Regulations). Sections 3503.5 and 3513 of the California Fish and Game Code prohibit take of all raptors and other migratory nongame birds and section 3503 prohibits take of the nests and eggs of all birds. Proposed project activities

(including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1- September 1 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, the Department recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

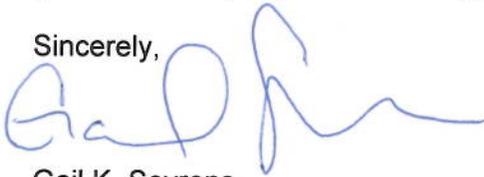
10. The Department generally does not support the use of relocation, salvage, and/or translocation as mitigation for impacts to rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.
11. Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.
12. The Polyphagous and Kuroshio shot hole borers (ISHBs) are invasive ambrosia beetles that introduce fungi and other pathogens into host trees. The adult female (1.8-2.5 mm long) tunnels galleries into the cambium of a wide variety of host trees, where it lays its eggs and propagates the *Fusarium* fungi species for the express purpose of feeding its young. These fungi cause *Fusarium* dieback disease, which interrupts the transport of water and nutrients in at least 58 reproductive host tree species, with impacts to other host tree species as well. With documented occurrences in Serrano Creek 0.8 mile upstream and approximately 2.06 miles downstream, the spread of invasive shot hole borers (ISHBs) could have significant impacts in local ecosystems. Therefore, with regard to ISHBs, we recommend the draft DEIR include the following:
  - a. a thorough discussion of the direct, indirect, and cumulative impacts that could occur from the potential spread of ISHBs as a result of proposed activities in the DEIR;
  - b. an analysis of the likelihood of the spread of ISHBs as a result of the invasive species' proximity to above referenced activities;
  - c. figures that depict potentially sensitive or susceptible vegetation communities within the project area, the known occurrences of ISHB within the project area (if any), and ISHB's proximity to above referenced activities; and
  - d. a mitigation measure or measure(s) within the DEIR that describe Best Management Practices (BMPs) that bring impacts of the project on the spread of ISHB below a level of significance. Examples of such BMPs include:

- i. education of on-site workers regarding ISHB and its spread;
- ii. reporting sign of ISHB infestation, including sugary exudate ("weeping") on trunks or branches and ISHB entry/exit-holes (about the size of the tip of a ballpoint pen), to the Department and UCR's Eskalen Lab;
- iii. equipment disinfection;
- iv. pruning infected limbs in infested areas where project activities may occur;
- v. avoidance and minimization of transport of potential host tree materials;
- vi. chipping potential host materials to less than 1 inch and solarization, prior to delivering to a landfill;
- vii. chipping potential host materials to less than 1 inch, and solarization, prior to composting on-site;
- viii. solarization of cut logs; and/or
- ix. burning of potential host tree materials.

Please refer to UCR's Eskalen lab website for more information regarding ISHBs:  
<http://eskalenlab.ucr.edu/pshb.html>.

We appreciate the opportunity to comment on the referenced NOP. Questions regarding this letter and further coordination on these issues should be directed to Jennifer Turner at (858-467-2717) or [jennifer.turner@wildlife.ca.gov](mailto:jennifer.turner@wildlife.ca.gov).

Sincerely,



Gail K. Sevens  
Environmental Program Manager  
South Coast Region

ec: Scott Morgan, State Clearinghouse  
Christine Medak, U.S. Fish and Wildlife Service



San Joaquin Hills  
Transportation  
Corridor Agency

Chair:  
Fred Minagar  
Laguna Niguel



**Transportation Corridor Agencies™**

Foothill/Eastern  
Transportation  
Corridor Agency

Chair:  
Ed Sachs  
Mission Viejo

Via e-mail: [mluna@lakeforestca.gov](mailto:mluna@lakeforestca.gov)

August 14, 2018

Marie Luna  
City of Lake Forest  
25550 Commercentre Drive, Suite 100  
Lake Forest, CA 92630

Re: Notice of Preparation (NOP) of an Environmental Impact Report for the Proposed Nakase Property Area Plan

Dear Ms. Luna,

The Transportation Corridor Agencies wishes to thank you for the opportunity to review and comment on the above-mentioned notification. We would like to provide the following comment for your consideration for inclusion in the forthcoming Environmental Impact Report (EIR):

- Please provide a map showing the traffic study area.

Again, thank you for the opportunity to review and comment on the NOP. We look forward to reviewing the Draft EIR when it becomes available. Should you have any questions or concerns regarding this information, please feel free to contact me at (949) 754-3487 or via email at [vgomez@thetollroads.com](mailto:vgomez@thetollroads.com).

Sincerely,

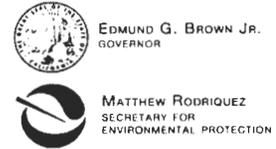
A handwritten signature in blue ink, appearing to read 'V. Gomez'.

Virginia Gomez  
Environmental Planner  
Transportation Corridor Agencies

125 Pacifica, Suite 100, Irvine, CA 92618-3304 • (949) 754-3400 Fax (949) 754-3467

[thetollroads.com](http://thetollroads.com)

Members: Aliso Viejo • Anaheim • Costa Mesa • County of Orange • Dana Point • Irvine • Laguna Hills • Laguna Niguel • Laguna Woods • Lake Forest  
Mission Viejo • Newport Beach • Orange • Rancho Santa Margarita • San Clemente • San Juan Capistrano • Santa Ana • Tustin • Yorba Linda



## Santa Ana Regional Water Quality Control Board

August 15, 2018

Marie Luna, Senior Planner  
City of Lake Forest Community Development Department  
25550 Commercentre Drive, Suite 100  
Lake Forest, CA 92630

Email [MLuna@lakeforestca.gov](mailto:MLuna@lakeforestca.gov)

### **NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT, NAKASE PROPERTY AREA PLAN, CITY OF LAKE FOREST (NO STATE CLEARING HOUSE NUMBER)**

Dear Ms. Luna:

Staff of the Regional Water Quality Control Board, Santa Ana Region (Regional Board) has reviewed the Notice of Preparation and Initial Study (NOP/IS) for the proposed "Nakase Property Area Plan" (Area Plan; Project) in the Serrano Creek watershed in Lake Forest. The 122-acre Nakase property is bounded by Bake Parkway, Rancho Parkway and Dimension Drive. Approval of the Area Plan would facilitate development of a master-planned community on the site of the Nakase Brothers Wholesale Nursery (Nakase Nursery). The Area Plan would establish guidelines for the future development of approximately 61.4 acres of the site, along with open space to include parks and areas of habitat restoration. Area Plan developments would consist of up to 675 single-family residential units, an elementary school, a multi-purpose water quality basin, and roads.

The Nakase Nursery property is bisected by a 0.6-mile-long, unnamed earthen drainage channel. This interior channel is a perennial stream tributary to Serrano Creek, and it is supplied by flows originating upstream of the Nakase property. After leaving the Nakase property, this drainage channel runs underground for 0.5 miles before surfacing as a concrete channel 100 yards upstream of its junction with Serrano Creek (0.6 miles downstream of the Nakase property as measured along Serrano Creek).

We recommend that the DEIR incorporate the following comments in order for the Project to best protect water quality standards (water quality objectives, beneficial uses and antidegradation policy), as defined in the Water Quality Control Plan for the Santa Ana River Basin (Basin Plan):

#### Permitting

1. The Regional Board issued Waste Discharge Requirements (WDRs) to Nakase Nursery in 2005 (Order No. R8-2005-0006) that were primarily intended to ensure facility

compliance with the Total Maximum Daily Load (TMDL) for nutrients in the Newport Bay Watershed. The WDRs will be rescinded when the Nakase Nursery property is converted to residential/urban land uses. However, the property will remain under the requirements of the Regional Board's areawide Municipal Separate Storm Sewer Systems (MS4) permit, Regional Board Order No. RB8-2009-0030, NPDES No. CAS618030 (and iterations), which addresses site runoff and TMDL compliance. Of particular concern is the control of residual nitrogen leaving the nursery site, and this control should be explained in the DEIR.

Coverage is required under State Water Resources Control Board Water Quality Order No. 99-08-DWQ, NPDES General Permit for Storm Water Discharges Associated with Construction Activity, for individual projects occurring on an area of one or more acres. A Notice of Intent (NOI) with the appropriate fees for coverage of the project under this Permit must be submitted to the SWRCB at least 30 days prior to the initiation of construction activity at the site. Information about this permit program can be found at [https://www.waterboards.ca.gov/water\\_issues/programs/stormwater/construction.html](https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.html).

A variety of Best Management Practices (BMPs) should be included in the Project to ensure that the hydrograph of post-project storm runoff approximates pre-project flows. This regulation of flows is necessary to reduce or prevent the hydromodification of on-site and downslope drainages.

We discuss in Comment 3, below, the need for Certification that impacts to waters of the United States (Serrano Creek) have had state-designated beneficial uses mitigated for, including those of tributary streams to Serrano Creek. Waters not specifically named in the Basin Plan are presumed to have the same beneficial uses as the waters to which they are tributary, by virtue of the Basin Plan's tributary rule (Basin Plan pages 3-5). The existing waters on the Project site support the following intermittent beneficial uses:

- a) Groundwater Recharge (GWR)
- b) Water Contact Recreation (REC1)
- c) Non-contact Water Recreation (REC2)
- d) Warm Freshwater Habitat (WARM)
- e) Wildlife Habitat (WILD)

### Drainage Improvements and Their Impacts

2. Based on the site's monthly inflow and outflow data as reported by Nakase Nursery, some of the site's incoming flow is probably from urban runoff, but additional contributions from springs are likely. According to these data, this inflow volume is greater than that of the dry weather runoff leaving the nursery indicating that a significant fraction of the flow entering the property infiltrates prior to reaching the downstream property boundary. The DEIR should acknowledge that the Project must not result in increasing peak flows downstream, in compliance with Order No. R8-2009-0030. Increased peak flows due to urban development have already destabilized Serrano Creek downstream of the Project Site. In 2001, the State of California, the County of Orange, the City of Lake Forest, and the Serrano Creek Conservancy funded a restoration project to halt destabilization along a 1.1-mile segment of Serrano Creek downstream of Trabuco Road.

The surface and subsurface drainage patterns of the Project should be explained more clearly in the DEIR and the impacts evaluated in more detail. The NOP/IS (p. 2.28) states that *"as a result of site grading, runoff flows to the southwestern portion of the Project Site to ultimately discharge into an existing 10-foot box culvert. The drainage system would include an underground detention basin beneath Central Park and would not increase peak flows or discharge rates to Serrano Creek."* About 60 percent of the site would appear to currently drain into the unnamed interior channel and not directly to Serrano Creek. The proposed underground detention basin must therefore be properly sized to accommodate all flows from the newly configured area that will be draining to Serrano Creek and must meet the specific sizing criteria in Order No. R8-2009-0030.

Further, the conceptual land use plan and the conceptual landscape plan (Figures 2.7 and 2.8) indicate that the interior drainage channel will be eliminated, but the DEIR must clarify whether the channel will be completely filled in or replaced by an underground concrete channel. The Initial Study states that the site will be regraded to direct all runoff to Serrano Creek; however, the location of the multipurpose treatment basin along the southwestern boundary of the Nakase property (where the tributary channel exits the property) suggests that this will not be the case.

### Water Quality Standards Certification

3. Any temporary or permanent impacts to Serrano Creek and the unnamed interior drainage channel will require a Clean Water Act Section 401 Water Quality Standards Certification. Impacts to these waters and their beneficial uses should be avoided to the maximum extent possible. Where avoidance is not practicable, impacts to these waters should be minimized. Unavoidable impacts must be mitigated.

However, if the project will cause material to be dredged from, or filled into, federally-jurisdictional waters, then a Clean Water Act (CWA) Section 404 permit is required from the U.S. Army Corps of Engineers (USACE), and a prerequisite CWA Section 401 Water Quality Standards Certification is required from the Regional Board. Where the USACE rules that a water body does not fall under their jurisdiction, the Regional Board may still determine that waste discharge requirements are necessary for protection of waters of the State. Therefore, a jurisdictional wetland delineation will need to be performed for the site. A Streambed Alteration Agreement from the California Department of Fish and Wildlife may be necessary as well.

### Flow Gauging Stations

4. Nakase Nursery constructed flow gaging stations at the locations where Serrano Creek and the unnamed interior drainage channel exit the property. Construction of these stations was funded, in part, by a grant from the U.S. EPA administered by Regional Board staff. Continued operation of these stations will provide useful hydrologic data for the Serrano Creek watershed. The DEIR should consider options to maintain these stations in partnership with other interested stakeholders.

If you have any questions, please contact Glenn Robertson at (951) 782-3259 and [Glenn.Robertson@waterboards.ca.gov](mailto:Glenn.Robertson@waterboards.ca.gov) , or me at (951) 782-4995 and [Terri.Reeder@waterboards.ca.gov](mailto:Terri.Reeder@waterboards.ca.gov)

Sincerely,



Terri S. Reeder, PG, CEG, CHG  
Senior Engineering Geologist  
Supervisor, Coastal Waters Planning and CEQA Section

Cc:

Stephanie J. Hall, U.S. Army Corps of Engineers, Los Angeles – [Stephanie.J.Hall@usace.army.mil](mailto:Stephanie.J.Hall@usace.army.mil)

Karin Cleary-Rose, U.S. Fish and Wildlife Service, Palm Springs office - [karin\\_cleary-rose@fws.gov](mailto:karin_cleary-rose@fws.gov)

State Clearinghouse, Sacramento - [State.clearinghouse@opr.ca.gov](mailto:State.clearinghouse@opr.ca.gov)

Valerie Taylor and Mary Larson, California Department of Fish and Wildlife, Los Alamitos office – [Valerie.Taylor@wildlife.ca.gov](mailto:Valerie.Taylor@wildlife.ca.gov) and [Mary.Larson@wildlife.ca.gov](mailto:Mary.Larson@wildlife.ca.gov)



SOUTHERN CALIFORNIA  
ASSOCIATION OF GOVERNMENTS  
900 Wilshire Blvd., Ste. 1700  
Los Angeles, CA 90017  
T: (213) 236-1800  
www.scag.ca.gov

REGIONAL COUNCIL OFFICERS

President  
**Alan D. Wapner, San Bernardino  
County Transportation Authority**

First Vice President  
**Bill Jahn, Big Bear Lake**

Second Vice President  
**Randon Lane, Murrieta**

Immediate Past President  
**Margaret E. Finlay, Duarte**

COMMITTEE CHAIRS

Executive/Administration  
**Alan D. Wapner, San Bernardino  
County Transportation Authority**

Community, Economic &  
Human Development  
**Peggy Huang, Transportation  
Corridor Agencies**

Energy & Environment  
**Linda Parks, Ventura County**

Transportation  
**Curt Hagman, San Bernardino  
County**

August 15, 2018

Ms. Marie Luna, Senior Planner  
City of Lake Forest Community Development Department  
25550 Commercentre Drive, Suite 100  
Lake Forest, California 92630  
E-mail: mluna@lakeforestca.gov

**RE: SCAG Comments on the Notice of Preparation of a Draft Environmental  
Impact Report for the Nakase Property Area Plan [SCAG NO. IGR9668]**

Dear Ms. Luna,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Nakase Property Area Plan ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS) pursuant to Senate Bill (SB) 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.<sup>1</sup> SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Community Strategies (RTP/SCS) goals and align with RTP/SCS policies.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Nakase Property Area Plan in Orange County. The proposed project includes guidelines for the development of up to 776 residential units including 101 affordable units, an elementary school, and parks and open space on 122 acres.

**When available, please send environmental documentation to SCAG's Los Angeles office in Los Angeles (900 Wilshire Boulevard, Ste. 1700, Los Angeles, California 90017) or by email to [au@scag.ca.gov](mailto:au@scag.ca.gov) providing, at a minimum, the full public comment period for review.**

If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Anita Au, Associate Regional Planner, at (213) 236-1874 or [au@scag.ca.gov](mailto:au@scag.ca.gov). Thank you.

Sincerely,

Ping Chang  
Acting Manager, Compliance and Performance Monitoring

<sup>1</sup> Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2016 RTP/SCS for the purpose of determining consistency for CEQA. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a determination of consistency with the 2016 RTP/SCS for CEQA.

**COMMENTS ON THE NOTICE OF PREPARATION OF A  
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE  
NAKASE PROPERTY AREA PLAN [SCAG NO. IGR9668]**

**CONSISTENCY WITH RTP/SCS**

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS. For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the RTP/SCS.

**2016 RTP/SCS GOALS**

The SCAG Regional Council adopted the 2016 RTP/SCS in April 2016. The 2016 RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health (see <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>). The goals included in the 2016 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2016 RTP/SCS are the following:

SCAG 2016 RTP/SCS GOALS	
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness</i>
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region</i>
RTP/SCS G3:	<i>Ensure travel safety and reliability for all people and goods in the region</i>
RTP/SCS G4:	<i>Preserve and ensure a sustainable regional transportation system</i>
RTP/SCS G5:	<i>Maximize the productivity of our transportation system</i>
RTP/SCS G6:	<i>Protect the environment and health for our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking)</i>
RTP/SCS G7:	<i>Actively encourage and create incentives for energy efficiency, where possible</i>
RTP/SCS G8:	<i>Encourage land use and growth patterns that facilitate transit and active transportation</i>
RTP/SCS G9:	<i>Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies*</i>
	<small>*SCAG does not yet have an agreed-upon security-performance measure.</small>

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

SCAG 2016 RTP/SCS GOALS	
Goal	Analysis
RTP/SCS G1: <i>Align the plan investments and policies with improving regional economic development and competitiveness</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
RTP/SCS G2: <i>Maximize mobility and accessibility for all people and goods in the region</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
etc.	etc.

**2016 RTP/SCS STRATEGIES**

To achieve the goals of the 2016 RTP/SCS, a wide range of land use and transportation strategies are included in the 2016 RTP/SCS. Technical appendances of the 2016 RTP/SCS provide additional supporting information in detail. To view the 2016 RTP/SCS, please visit: <http://scagrtpscscs.net/Pages/FINAL2016RTPSCS.aspx>. The 2016 RTP/SCS builds upon the progress from the 2012 RTP/SCS and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that the SCAG region strives toward a more sustainable region, while the region meets and exceeds in meeting all of applicable statutory requirements pertinent to the 2016 RTP/SCS. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

**DEMOGRAPHICS AND GROWTH FORECASTS**

Local input plays an important role in developing a reasonable growth forecast for the 2016 RTP/SCS. SCAG used a bottom-up local review and input process and engaged local jurisdictions in establishing the base geographic and socioeconomic projections including population, household and employment. At the time of this letter, the most recently adopted SCAG jurisdictional-level growth forecasts that were developed in accordance with the bottom-up local review and input process consist of the 2020, 2035, and 2040 population, households and employment forecasts. To view them, please visit <http://www.scag.ca.gov/Documents/2016GrowthForecastByJurisdiction.pdf>. The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts			Adopted City of Lake Forest Forecasts		
	Year 2020	Year 2035	Year 2040	Year 2020	Year 2035	Year 2040
Population	19,663,000	22,091,000	22,138,800	90,700	90,800	90,700
Households	6,458,000	7,325,000	7,412,300	30,300	30,400	30,500
Employment	8,414,000	9,441,000	9,871,500	44,700	48,700	49,000

**MITIGATION MEASURES**

SCAG staff recommends that you review the Final Program Environmental Impact Report (Final PEIR) for the 2016 RTP/SCS for guidance, as appropriate. SCAG's Regional Council certified the Final PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on April 7, 2016 (please see: <http://scagrtpscscs.net/Pages/FINAL2016PEIR.aspx>). The Final PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

## SENT VIA USPS AND E-MAIL:

mluna@lakeforestca.gov  
Marie Luna, Senior Planner  
City of Lake Forest, Community Development Department  
25550 Commercentre Drive, Suite 100  
Lake Forest, California 92630

August 15, 2018

## **Notice of Preparation of a Draft Environmental Impact Report for the Proposed Nakase Property Area Plan**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (Draft EIR). Please send SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address shown in the letterhead. **In addition, please send with the Draft EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files<sup>1</sup>. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, SCAQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

### **Air Quality Analysis**

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD staff recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analyses. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). The SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: [www.caleemod.com](http://www.caleemod.com).

On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board on March 23, 2017. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional

---

<sup>1</sup> Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

perspective on air quality and the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NO<sub>x</sub>) emissions in 2023 and an additional 55 percent NO<sub>x</sub> reduction beyond 2031 levels for ozone attainment. The 2016 AQMP is available on SCAQMD's website at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

SCAQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and the SCAQMD to reduce community exposure to source-specific and cumulative air pollution impacts, the SCAQMD adopted the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning in 2005. This Guidance Document provides suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. SCAQMD staff recommends that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions. This Guidance Document is available on SCAQMD's website at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>. Additional guidance on siting incompatible land uses (such as placing homes near freeways or other polluting sources) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. Guidance<sup>2</sup> on strategies to reduce air pollution exposure near high-volume roadways can be found at: [https://www.arb.ca.gov/ch/rd\\_technical\\_advisory\\_final.PDF](https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF).

The SCAQMD has also developed both regional and localized significance thresholds. SCAQMD staff requests that the Lead Agency compare the emission results to the recommended regional significance thresholds found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

When specific development is reasonably foreseeable as result of the goals, policies, and guidelines in the Proposed Project, the Lead Agency should identify any potential adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in the Draft EIR. The degree of specificity will correspond to the degree of specificity involved in the underlying activity which is described in the Draft EIR (CEQA Guidelines Section 15146). When quantifying air quality emissions, emissions from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and

---

<sup>2</sup> In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.

entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, for phased projects where there will be an overlap between construction and operation, the air quality impacts from the overlap should be combined and compared to SCAQMD's regional air quality CEQA operational thresholds to determine significance.

In the event that the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

### **Mitigation Measures**

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the Proposed Project, including:

- Chapter 11 of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD's CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- SCAG's MMRP for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy available here: [http://scagtrpdocs.net/Documents/2016/peir/final/2016FP\\_EIR\\_ExhibitB\\_MMRP.pdf](http://scagtrpdocs.net/Documents/2016/peir/final/2016FP_EIR_ExhibitB_MMRP.pdf)
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

### **Alternatives**

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a "no project" alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the Draft EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

### **Permits**

In the event that the Proposed Project requires a permit from SCAQMD, SCAQMD should be identified as a responsible agency for the Proposed Project. For more information on permits, please visit SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

**Data Sources**

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's webpage (<http://www.aqmd.gov>).

The SCAQMD staff is available to work with the Lead Agency to ensure that project air quality and health risk impacts are accurately evaluated and mitigated where feasible. Please contact Robert Dalbeck, Assistant Air Quality Specialist, at [rdalbeck@aqmd.gov](mailto:rdalbeck@aqmd.gov), if you have any questions regarding these comments.

Sincerely,

*Daniel Garcia*

Daniel Garcia  
Program Supervisor  
Planning, Rule Development & Area Sources

DG/RD  
ORC180713-01  
Control Number

---

**From:** noreply@civicplus.com [mailto:noreply@civicplus.com]

**Sent:** Thursday, August 30, 2018 8:49 PM

**To:** Luna, Marie

**Subject:** Online Form Submittal: Submit Scoping Comments

## Submit Scoping Comments

*Use this form to submit comments and suggestions regarding the scope of the Environmental Impact Report (EIR) to be prepared for the proposed Nakase property General Plan Amendment and Zone Change. While the City of Lake Forest values all comments, this form is not intended for comments on the merits of the proposed project. Additional opportunities for public input regarding the project will be provided later in the environmental and project review process when the EIR has been completed and is available for public review and comment. The City's Planning Commission and City Council are both expected to hold public hearings on the project during Summer/Fall 2019.*

---

### Submit Comments Here

---

Regarding this latest Nakase development proposal I do think the city needs to look into the circulation of traffic throughout the area. It would be logical to consider traffics movement from the north and south directions. This should include a direct route through this community from Rancho South to the Sport Park Complex.

---

Email not displaying correctly? [View it in your browser.](#)

[All Comments](#)

### Comments



[Sue Klingseis](#) · 37:06 Interesting

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



[Marietta Bianchini Philpott](#) · 3:27 Interesting

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



[France Imagawa](#) · 2:43 Interesting

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



[Nikita Ganatra](#) · 23:01 Let's go!

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



[Barbara Cangas](#) · 0:00 [Tracy](#)

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



[Eric Koff](#) · 12:43 Toll probably has the option to purchase the land after entitlements are received.

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



[C.d. Larson](#) · 28:29 AirBnB is not allowed! Interesting.

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



[Maria Fernada Nelson](#) · 39:52 Great question?

[Manage](#)

[Like](#)

[· Reply · Message · 5w](#)



**[Josh Abner Vizcay](#)** · 28:32 Interesting how Gayle from the city is not pulling any punches “selling” the Toll Brothers position

[Manage](#)

[Like](#)

[· Reply · Message · 5w](#)



**[Josh Abner Vizcay](#)** · 43:09 Why Gayle are you selling Toll brothers position so hard ? As a business person i am learning the “spin”

[Manage](#)

[Like](#)

[· Reply · Message · 5w](#)



**[Kim Leone](#)** · 30:22 Could we please leave have less concrete? The noise and the heat has increased significantly.

[Manage](#)

[Like](#)

[· Reply · Message · 5w](#)



**[Rose Tingle](#)** · 23:33 City of lake forest are you going to pose our facebook questions to the speakers?

[Manage](#)

[Like](#)

[· Reply · Message · 5w](#)



**[Rose Tingle](#)** · 26:32 How many more trips estimated by cars to the freeway?

[Manage](#)

[Like](#)

[· Reply · Message · 5w](#)



**[Dan Grantham](#)** · 28:24 100 year nursery with 100 years of commercial pesticides and fertilizers... please take that into consideration.

[Manage](#)

[Like](#)

[· Reply · Message · 5w](#)



**[Eric Koff](#)** · 2:39 I can hear him

[Manage](#)

[Like](#)

[· Reply · Message · 5w](#)



**Eric Koff** · 20:55 Don't blame Toll Brothers about the school, blame the school district.

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Michelle Thomas** · 0:20 does the city still have a tree for every building policy?

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Michelle Thomas** · 0:47 How much is it? Maybe the people of Lake Forest can buy it

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**John Ugrin** · 31:57 Regency is a very busy thoroughfare now. Can you imagine the cut through it will become with 800 more homes in that area

1

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Peter Cheng** · 46:37 Melinda its being proposed

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Patrick McDonagh** · 21:18 Respect

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**C.d. Larson** · 49:52<http://www.parks.ca.gov/.../files/savingclover%20valley.pdf> tl;dr: This is a long and sad tale about how the PR firm Toll Brothers used was able to develop some pristine land in Northern California. They had ancient petroglyphs, sacred Native American sites, and Indian tribes on their side. They lost. Our only defense is a 3:2 Council majority.

2

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#) · [Edited](#)



**[Melissa Sims](#)** · 22:52 Voters do

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**[Melissa Sims](#)** · 22:59 Not get a vote

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**[Melinda Kennedy](#)** · 46:57 And Peter

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**[Julie Mayr Grable](#)** · 18:09 Mini van mamas

1

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**[Melinda Kennedy](#)** · 46:42 Thanks Maria

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**[Rose Tingle](#)** · 4:11 NO, its not better

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**[Rob Anthony](#)** · 18:05 No more houses. Need more schools

1

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**[Dustin Miller](#)** · 20:16 WRITE it down. The ppl are talking

1

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**[Kathy Kaufman](#)** · 48:41 Following from FHR

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**[Daniel Warner](#)** · 49:36 No Traders Joe's? 😄

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**[Holly Turner](#)** · 17:30 No more houses!!

1

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**[Dustin Miller](#)** · 19:53 They dont care. Unbelievable

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**[Maria Fernanda Nelson](#)** · 12:29 What about a school?

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**[Maria Fernanda Nelson](#)** · 17:18 No more over crowed FRE

1

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Trisha Goyal** · 23:47 Why not keep it agricultural?

1

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Rose Tingle** · 7:20 now there is an echo

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Maria Fernanda Nelson** · 17:52 Thank you for speaking for all us about FRE

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Trisha Goyal** · 15:57 No more houses

6

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Maria Fernanda Nelson** · 16:10 I agree!

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Pavla Dlab** · 44:08 This proposal is wayyyyy too heavily reliant on a school—which 99% won't happen. Any agency (design, development, etc) should be used to proposing multiple options if one should fail in gathering approval. Clearly, Toll Brothers is banking on ultimate re-designation of the school site, as more housing.

1

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Barbara Cangas** · 0:00 And it's 10 acres of land currently designated for "proposed school site". That'd be a lot of extra homes on that "corner"

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Peter Cheng** · 48:18 Foothill elementary does seem to be over crowded though

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Julie Mayr Grable** · 49:01 and the district doesn't want a school

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Peter Cheng** · 48:54 especially with all the new kids coming in with the new housing

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Tracey Tingley** · 27:23 Of course the property owners are requesting the change. The value of the property increases to developers if it is changed to residential. Developers would not be as interested if it was not residential.

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**C.d. Larson** · 51:52 In case you missed it, the County has the property zoned for Agriculture, but the City General Plan calls for Business/Industrial Parks. Interesting. I'd like the Council to update the General Plan to designate the property for Agriculture, not houses.

3

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**C.d. Larson** · 0:00 Net from tonight: they didn't write anything down, only your written comments matter. email it in and you're ahead of all of us who showed up.

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Judy Elmore** · 0:00 Stop building!!!! Our roads and resources cannot handle the load! This used to be such a nice place to live, but so crowded now it is smothering!

1

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Kim Leone** · 40:39 Thank you Jonathan volzke. I just don't want to see it made worse. 22 yr resident...too hot here now...reduce concrete. We do need more schools, and more fun things to do for families (I'm not a skater)...have to to Irvine Spectrum for fun.

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Peter Cheng** · 45:29 I'm all for a new school, BUT NOT next to the GAS STATION!!! How dangerous is that?!

1

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Sheila Robinson** · 46:20 Yes! The Cal-trans project needs to be looked at in tandem with this one!

1

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Constance Seymour** · 52:49 Much prefer agriculture to homes on top of each other and even more traffic.

1

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Dan Grantham** · 20:43 26 portable buildings at foothill ranch elementary.

1

[Manage](#)

[Like](#)

[Reply](#) · [Message](#) · [5w](#)



**[Josh Abner Vizcay](#)** · 4:43 Already using using Toll Brothers \$\$\$ to fix things

[Manage](#)

[Like](#)

[Reply](#) · [Message](#) · [5w](#)



**[Josh Abner Vizcay](#)** · 9:42 So she is saying people do not not go on vacation during summer or celebrate graduations

[Manage](#)

[Like](#)

[Reply](#) · [Message](#) · [5w](#)



**[Josh Abner Vizcay](#)** · 19:55 The purpose is to make money for Toll Brothers stakeholders & shareholders

1

[Manage](#)

[Like](#)

[Reply](#) · [Message](#) · [5w](#)



**[Pavla Dlab](#)** · 11:48 So, has the project site officially been sold to Toll Brothers?

[Manage](#)

[Like](#)

[Reply](#) · [Message](#) · [5w](#)



**[Sean Fletcher](#)** · 20:31 Remember SVUSD has an elementary school that it may be able to reopen in the future.

1

[Manage](#)

[Like](#)

[Reply](#) · [Message](#) · [5w](#)



**[Terri Gordon Grisenti](#)** · 20:53 Condition any future project such that the developer is required to garner an agreement from the school district to build a school.

[Manage](#)

[Like](#)

[Reply](#) · [Message](#) · [5w](#)



**[Maria Fernanda Nelson](#)** · 21:44 This 👍

[Manage](#)

[Like](#)

[· Reply](#) · [Message](#) · [5w](#)



**[Pavla Dlab](#)** · 22:49 Omg if it's zoned as agricultural, then you keep it agricultural.

1

[Manage](#)

[Like](#)

[· Reply](#) · [Message](#) · [5w](#)



**[Pavla Dlab](#)** · 23:19 None of this forced zone change to make it developable

[Manage](#)

[Like](#)

[· Reply](#) · [Message](#) · [5w](#)



**[Pavla Dlab](#)** · 26:41 Yes, but quite a few of us are interested in ag options

[Manage](#)

[Like](#)

[· Reply](#) · [Message](#) · [5w](#)



**[Pavla Dlab](#)** · 40:19 So it would be a dirt lot if there is no school?

[Manage](#)

[Like](#)

[· Reply](#) · [Message](#) · [5w](#)



**[Pavla Dlab](#)** · 52:54 C.d. Larson sounds like maybe an alternative Party needs to contact Nakase, to counter the Toll Bros. proposal

1

[Manage](#)

[Like](#)

[· Reply](#) · [Message](#) · [5w](#)



**[Madison Ortiz](#)** · 48:55 What can we do to oppose this? FRE is way overcrowded. 1/2 kids in portables or more. Wasn't built for this impactation

[Manage](#)

[Like](#)

[· Reply](#) · [Message](#) · [5w](#)



[Sylvia Walker](#) · 4:40 Still can't hear what is being said.

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



[Melissa Sims](#) · 26:56 Houses are fine as long as they build more schools and infrastructure to handle if

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



[Melissa Sims](#) · 27:20 The property owners are being paid a lot by developers to change it

1

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



[Trisha Goyal](#) · 16:59 What why all the lake forest schools are already low enrollment

1

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



[Maria Fernanda Nelson](#) · 18:32 Irvine builds homes and schools at the same time

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



[Rose Tingle](#) · 3:11 City of Lake Forest can't hear speakers!!!

1

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



[Maria Fernanda Nelson](#) · 27:36 Melissa they said school is up to the school distric to approve it

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



[Michelle Thomas](#) · 0:20 just like the sewage is up to IRWD but shouldn't the city stand up for us and advocate for it?

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



[Maria Fernanda Nelson](#) · 45:14 It would be the same when Baker Ranch proposal came out.

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



[Maria Fernanda Nelson](#) · 45:32 No school, more homes, more traffic

1

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



[Trisha Goyal](#) · 18:48 Good schools are crowded because people transfer their kids from the low rated schools

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



[Rose Tingle](#) · 42:54 I'm curious in what city the Toll Bros. rep lives?

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



[Melinda Kennedy](#) · 45:58 Sorry, late to the game here - so the Nakase site will def be residential?

1

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



[Julie Mayr Grable](#) · 16:39 Toll builds lovely houses and what they develop will be an asset to our community!

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



[Holly Turner](#) · 0:00 Please share how more houses, more people, more cars, and more traffic to our small city will be an asset outlet community. Oh yeah your husband is the developer so it will be an asset to your pocket..

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#) · [Edited](#)



**Susan Wattles** · 0:00 I've lived in Lake Forest for thirty years and have seen no benefit, and no improvement to the quality of my life from all the new homes. How would this be any different?

1

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Julie Mayr Grable** · 0:00 Susan 30 years. means you didn't buy the first house built in the City. So you got yours now nobody else should get theirs, right?

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Julie Mayr Grable** · 0:00 Holly you know nothing about my husband or my "pocket" 

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Holly Turner** · 0:00 Julie Mayr Grable except that he works for a builder in Irvine, so your interest is in support of the developers & builders for your own interest and not the true interest of the community. I know more than you think. My interest is my city and commun...[See More](#)

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Julie Mayr Grable** · 0:00 Wow. Lots of assumptions there. You have NO IDEA of my involvement with, or interest in, the city or our county. Nice of you to speak my "truth" for me though.

1

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Holly Turner** · 0:00 Julie Mayr Grable You say in a previous post that it's not personal, but you seem to be taking it personal. I am against big developers/builders in my city. You are obviously for them because one provides your husband with a paycheck..I get it. I am ...[See More](#)

1

[Manage](#)

[Like](#)

[Reply](#) · [Message](#) · [5w](#) · [Edited](#)



**Susan Wattles** · 0:00 Julie Mayr Grable. Laughable argument.

[Manage](#)

[Like](#)

[Reply](#) · [Message](#) · [5w](#)



**Judy Elmore** · 0:00 What are you smoking!!!! Our nice community is going to hell in a handbasket! Closed businesses, over crowded roads, packed schools, open your eyes!

1

[Manage](#)

[Like](#)

[Reply](#) · [Message](#) · [5w](#)



**Delcie RH** · 17:14 We don't need anymore houses please, a school would be great!

[Manage](#)

[Like](#)

[Reply](#) · [Message](#) · [5w](#)



**Delcie RH** · 22:06 Do the voters have to approve a zone change to allow housing?

[Manage](#)

[Like](#)

[Reply](#) · [Message](#) · [5w](#)



**Julie Mayr Grable** · 19:33 Perhaps SVUSD knows they don't need a school..... hmmm? Without housing, population decreases and schools are not as needed...

[Manage](#)

[Like](#)

[Reply](#) · [Message](#) · [5w](#)



**Julie Mayr Grable** · 21:37 SVUSD doesn't want a school. They've said so repeatedly

[Manage](#)

[Like](#)

[Reply](#) · [Message](#) · [5w](#)



**Delcie RH** · 35:58 There weren't ever supposed to be trucks allowed on bake when Alton opened.

[Manage](#)

[Like](#)

[Reply](#) · [Message](#) · [5w](#)



**Julie Mayr Grable** · 42:20 Might become a Tent City if homes aren't built...

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Delcie RH** · 46:00 No Melinda but that is what they are looking at

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Julie Mayr Grable** · 53:20 Guys: Nakase wants to sell the land. You want to try force them to keep it?

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Michelle Thomas** · 0:20 how much are they selling it for? maybe the community can purchase it, to prevent the new housing

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Julie Mayr Grable** · 0:00 Michelle Thomas "the community"?

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Rebecca Goddard** · 20:41 SVISD won't allow school choice into any lake forest schools

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Julie Mayr Grable** · 23:01 They have an application online to do intra district transfers....

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Rebecca Goddard** · 22:04 Tax revenue and secret money to the city council

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**John Claycomb** · 0:00 Secret money? Like to see the proof on this one. As for tax revenue, why else would we want to build homes or commercial property?

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Rebecca Goddard** · 0:00 John Claycomb traffic quality of life, environmental damage.

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**John Claycomb** · 25:21 Pavla, most land was agriculture before homes were built.

1

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**John Claycomb** · 30:02 Homes can include low density and middle density for senior living

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Dan Grantham** · 18:59 SVUSD has already said no school.

2

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Rose Tingle** · 15:23 How much more water will be needed to support each new house per year?

2

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Rebecca Goddard** · 1:34 You're RUINING OUR CANYON. STOP lining your pockets and ruining our environment and making traffic.

2

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Josh Abner Vizcay** · 6:06 City Attorney's job is make sure city does not get sued : not to investigate Toll brother payoffs to rig the process

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Delcie RH** · 28:12 My concerns are with the additional traffic that will come with 800 houses. We need more green space, a park with a splash pad perhaps...a city pool, etc Center, etc.

1

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Julie Mayr Grable** · 31:50 And who will pay for this? Home building brings revenue to City. Build the homes and condition them to add these types of amenities.

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Josh Abner Vizcay** · 14:45 Already giving "talking points" to to change the zoning so Toll Brothers share holders can make more \$\$\$ current stock price \$34.00 down from \$54 ....

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**C.d. Larson** · 28:07 Bicycle paths...hahahahahahahahahahaha. For all those cyclists who ride to the store and the gym....wait, that's me. That's \*nobody\* but me.

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Madison Ortiz** · 47:19 They can not force the school district to build a school and the district already said they wouldn't. This is just get more \$ resulting in more traffic.

1

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Kim Leone** · 29:04 But the city rarely does enough for infrastructure, nor have they considered the safety of residents simply trying to cross streets or get out of your neighborhood

1

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Madison Ortiz** · 50:14 They are proposing something as part of this "plan" that they have no ability to follow thru with. It's all up to the district

2

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Brian FitzGerald** · 34:06 Shouldn't the people who will be impacted, the residents of Lake Forest, be able to vote on whether there is a change of zoning from agricultural to commercial and residential?

2

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**C.d. Larson** · 10:07 Guy into and out of frame on the right side works for Toll Brothers. He entered unannounced. Blue shirt, tan pants, smoothie. He spoke at the session at Baker Ranch. Polite guy.

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**Kim Leone** · 34:21 City, my concern is that these impact studies are rarely done on offshoot streets. For example, when Alton was opened, you increased the traffic and danger along Antibes and Paloma when we have one way out.

Did anyone consider this impact and the danger you have already placed on us and our kids? Will you consider those streets, for example, Commerce Center and Towns Center?

1

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



[City of Lake Forest - Government](#) · 36:04 Great comment, Kim - I (Jonathan Volzke here), am not familiar with the Alton impact study. We can follow up on that. But in this case, yes, we will. Great comment, thank you.

[Manage](#)

[Like](#)

· [Reply](#) · Commented on by [Don Jose Serrano](#) · [5w](#)



[Rose Tingle](#) · 2:26 Please tell the speakers to use a mike, can't hear Mayor [Jim Gardner](#)

1

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



[City of Lake Forest - Government](#) · 3:40 Sound should be better now.

[Manage](#)

[Like](#)

· [Reply](#) · Commented on by [Don Jose Serrano](#) · [5w](#)



[Pavla Dlab](#) · 24:51 Exactly Trisha. But agricultural isn't appealing from a tax revenue standpoint

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



[City of Lake Forest - Government](#) · 27:02 The property owners are requesting the change.

1

[Manage](#)

[Like](#)

· [Reply](#) · Commented on by [Don Jose Serrano](#) · [5w](#)



[Trisha Goyal](#) · 0:00 [City of Lake Forest - Government](#) of course the property owners are requesting the change so they can sell to the highest bidder. Sadly that would most likely be a housing development. 🙄

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#)



**City of Lake Forest - Government** · 13:33 That is Planning Director Gayle Ackerman speaking.

[Manage](#)

[Like](#)

· [Reply](#) · Commented on by [Don Jose Serrano](#) · 5w



**City of Lake Forest - Government** · 13:52 [Saddleback Valley Unified School District](#) will decide on whether a school is included.

[Manage](#)

[Like](#)

· [Reply](#) · Commented on by [Don Jose Serrano](#) · 5w



**Dan Grantham** · 0:00 They already said no.....

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · 5w



**Dustin Miller** · 0:00 Dan Grantham really?

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · 5w



**Barbara Cangas** · 0:00 Yes, SVUSD has declined building new schools because of costs and declining attendance numbers in older areas of the city and in the district. I went to one of the first meetings about the land use of Nakase Nursery. Toll Brothers hosted it at Baker Ranch Club House

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · 5w



**City of Lake Forest - Government** · 52:49 Thank you for joining us online tonight - we had as many people "attend" via Facebook as were in the room. This will remain up; remember to read the documents on the planning pages at [www.lakeforestca.gov](http://www.lakeforestca.gov) and follow us on social media - we will keep you abreast of meetings and deadlines. Thank you.

[Manage](#)

LAKEFORESTCA.GOV

**[Lake Forest, CA - Official Website |...](#)**

2

[Like](#)

· [Reply](#) · [Remove Preview](#) · Commented on by [Don Jose Serrano](#) · 5w



**City of Lake Forest - Government** · 8:56 Thank you! Sorry for the audio challenges tonight; different room without formal audio system.

[Manage](#)

[Like](#)

· [Reply](#) · Commented on by [Don Jose Serrano](#) · [5w](#)



**City of Lake Forest - Government** · 11:12 We will be updating the Planning Website with notes and information from tonight as well.

[Manage](#)

[Like](#)

· [Reply](#) · Commented on by [Don Jose Serrano](#) · [5w](#)



**City of Lake Forest - Government** · 16:03 About 15 people in the room.

[Manage](#)

[Like](#)

· [Reply](#) · Commented on by [Don Jose Serrano](#) · [5w](#)



**City of Lake Forest - Government** · 44:10 We will be taking comments online, as well.

[Manage](#)

[Like](#)

· [Reply](#) · Commented on by [Don Jose Serrano](#) · [5w](#)



**City of Lake Forest - Government** · 30:40 Traffic will be studied; the EIR identifies the mitigation necessary to offset the impacts. A speaker just identified traffic and noise as potential impacts.

1

[Manage](#)

[Like](#)

· [Reply](#) · Commented on by [Don Jose Serrano](#) · [5w](#)



**City of Lake Forest - Government** · 14:34 An important key made earlier: The proposed developer pays for the environmental study, but the firm doing the study (LSA) works for the City.

[Manage](#)

[Like](#)

· [Reply](#) · Commented on by [Don Jose Serrano](#) · [5w](#)



**City of Lake Forest - Government** · 38:35 Remember to go to the planning page on [www.lakeforestca.gov](http://www.lakeforestca.gov) - you will find documents there, including detailed application for the proposed project.

[Manage](#)

LAKEFORESTCA.GOV

**Lake Forest, CA - Official Website |...**

[Like](#)

· [Reply](#) · [Remove Preview](#) · Commented on by [Don Jose Serrano](#) · [5w](#)



[City of Lake Forest - Government](#) · 46:01 If you stay online, I will try to take the portable camera up to show the display boards.I will mute the sound to prevent the feedback we had earlier.

2

[Manage](#)

[Like](#)

· [Reply](#) · Commented on by [Don Jose Serrano](#) · [5w](#)



[Dan Grantham](#) · 0:00 Thank you for doing all of this! It makes a difference'

3

[Manage](#)

[Like](#)

· [Reply](#) · [Message](#) · [5w](#) · [Edited](#)



[City of Lake Forest - Government](#) · 33:54Responding to a question, City officials pointing out that the City also studies nearby development - even in other cities - to determine the impacts and how a potential project will fit in.

[Manage](#)

[Like](#)

· [Reply](#) · Commented on by [Don Jose Serrano](#) · [5w](#)