



**Board of Education**

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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