IPT ENTERPRISE BUSINESS CENTER LLC PROJECT
FINAL ENVIRONMENTAL IMPACT REPORT

SCH NO. 2024030755

CITY OF LAKE FOREST
100 CIVIC CENTER DRIVE
LAKE FOREST, CA 92630

MAY 2026

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IPT ENTERPRISE BUSINESS CENTER LLC PROJECT

CITY OF LAKE FOREST, CALIFORNIA

SCH # 2024030755

LSA

May 2026

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H: REVISED CHAPTER 7.0: MITIGATION MONITORING AND REPORTING PROGRAM

1.0 INTRODUCTION

This document comprises the Final Environmental Impact Report (EIR) for the proposed IPT Enterprise Business Center LLC Project (Project). It is composed of the Draft EIR, Technical Appendices, comments received during the public review period, responses to those comments, and an Errata section that clarifies, amplifies, or makes minor modifications to the Draft EIR text. The chapters and sections of the Draft EIR that have been revised are provided in Appendices A through H of this document.

In compliance with *State CEQA Guidelines* Section 15201, the City of Lake Forest (City) has provided opportunities for public participation in the environmental process. The City distributed a Notice of Preparation (NOP) on March 20, 2024, to the California State Clearinghouse, responsible agencies, and interested parties for a 56-day public review period, from March 20, 2024, to May 15, 2024. The City also made the NOP available on the City's website to inform agencies and the public about the proposed Project and to solicit input on the scope of the Draft EIR. The NOP described the Project and identified potential environmental impacts associated with Project development and operation. In addition, the City held two public scoping meetings at the Lake Forest City Hall on Wednesday April 3, 2024, and Wednesday April 24, 2024, to present the proposed Project and to solicit input from interested parties regarding environmental issues that should be addressed in the Draft EIR. Section 2.2.2, page 2-3, of the Draft EIR identifies areas of concern raised in response to the NOP or during the scoping meeting. Appendix A of the Draft EIR contains a copy of the scoping comments received.

The California Environmental Quality Act (CEQA) requires a Draft EIR to have a review period lasting at least 45 days for projects that have been submitted to the California State Clearinghouse for review (*State CEQA Guidelines* Section 150105[a]). As required by *State CEQA Guidelines* Section 15087, the City provided a public Notice of Availability (NOA) of the Draft EIR for the IPT Enterprise Business Center LLC Project at the same time it filed a Notice of Completion (NOC) with the State Clearinghouse. The Draft EIR was circulated for public review for a period of 67 days, from July 10, 2025, to September 15, 2025.

The City of Lake Forest used several methods to solicit comments on the Draft EIR. The City placed the NOA in the Orange County Register on July 10, 2025. The NOA was mailed to the last known name and address of agencies, organizations, and individuals who previously requested such notice in writing. The City submitted the Draft EIR to the State Clearinghouse for distribution to, and review by, State agencies. The City made copies of the Draft EIR available at the City's Community Development Department and at two public libraries: the El Toro Branch Library and the Foothill Ranch Branch Library. In addition, the City posted the Draft EIR and all technical appendices on the City website.

One hundred twenty-two (122) comment letters were received during the public review period or immediately thereafter. Comments were received from State agencies, organizations, and individual members of the public. The comments are included and responded to in this Final EIR. Comments that address environmental issues are responded to thoroughly. Comments that (1) do not address the adequacy or completeness of the Draft EIR; (2) do not raise environmental issues; or (3) do

request the incorporation of additional information not relevant to environmental issues do not require a response, pursuant to Section 15088(a) of the *State CEQA Guidelines*.

State CEQA Guidelines Section 15088, Evaluation of and Response to Comments, states:

a) The lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response. The lead agency shall respond to comments received during the noticed comment period and any extensions and may respond to late comments.

b) The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed Project to mitigate anticipated impacts or objections). In particular, major environmental issues raised when the lead agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail, giving the reasons that specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice.

c) The response to comments may take the form of a revision to the Draft EIR or may be a separate section in the final EIR. Where the response to comments makes important changes in the information contained in the text of the Draft EIR, the lead agency should either:

   1. Revise the text in the body of the EIR; or

   2. Include marginal notes showing that the information is revised in the responses to comments.

Information provided in this Final EIR clarifies, amplifies, or makes minor modifications to the Draft EIR. No significant changes have been made to the information contained in the Draft EIR as a result of the responses to comments, and no significant new information has been added that would require recirculation of the document pursuant to *State CEQA Guidelines* Section 15088.5. Therefore, as stated above, this Final EIR includes the Draft EIR, Technical Appendices, comments received during the public review period, and responses to those comments. This Final EIR also includes an Errata section (Section 3.0) that clarifies and makes minor modifications to the Draft EIR.

1.1 INDEX OF COMMENTS RECEIVED

Table A below provides an index list of the agencies, organizations, and persons that commented on the Draft EIR prior to the close of the public comment period or immediately thereafter. The comments received have been organized in a manner that facilitates finding a particular comment or set of comments. Each comment letter received is indexed or coded with a number as shown in the table below. Where they raise the same or similar issues, the response to the comment refers to the applicable Master Response for that issue.

Table A: Comments Received During the Public Comment Period

Comment Code	Commentor/Signatory	Date Received
State (S)		
S-1	South Coast Air Quality Management District, Danica Nguyen	July 22, 2025
S-2	South Coast Air Quality Management District, Danica Nguyen	September 11, 2025
S-3	Caltrans District 12, Joseph Jamoralin	September 15, 2025
Organizations (O)		
O-1	We The Meadows, Harrison Jiang	July 30, 2025
O-2	California Cultural Resources Preservation Alliance, Inc., Patricia Martz	August 15, 2025
O-3	Californians Allied for a Responsible Economy, Lorrie Lele	September 10, 2025
O-4	Irvine Ranch Water District, Emily Le	September 11, 2025
O-5	Californians Allied for a Responsible Economy, Shiela Sannadan	September 12, 2025
O-6	We The Meadows, Michelle Black	September 15, 2025
O-7	We The Meadows, Harrison Jiang	September 15, 2025
Individuals (I)		
I-1	Michael Ciauri	July 17, 2025
I-2	Harrison Jiang	July 21, 2025
I-3	Harrison Jiang	July 22, 2025
I-4	Bin Zhou	July 27, 2025
I-5	June Bian	July 27, 2025
I-6	Lily Chu	July 27, 2025
I-7	Amy Liu	July 27, 2025
I-8	David Florence	July 27, 2025
I-9	Linda Liu	July 28, 2025
I-10	Anna Peng	July 28, 2025
I-11	Hu Yu	July 28, 2025
I-12	Ranbo Zhao	July 28, 2025
I-13	Weidong Zhao	July 28, 2025
I-14	Vivian Wu	July 28, 2025
I-15	Emily Jiang	July 29, 2025
I-16	Jeff Yu	July 30, 2025
I-17	Hua Jiang	July 30, 2025
I-18	Chao Huang	July 30, 2025
I-19	Cherie Liu	July 30, 2025
I-20	Connie Ding	August 1, 2025
I-21	Harrison Jiang	August 2, 2025
I-22	Gordon Hu	August 2, 2025
I-23	June Bian	August 2, 2025
I-24	Mindy Li	August 3, 2025
I-25	Bin Zhou	August 4, 2025
I-26	Sharon Hu	August 6, 2025
I-27	Yubo Mu	August 9, 2025
I-28	Jinguo Wang	August 10, 2025
I-29	Yijia Wang	August 10, 2025
I-30	Xiuying Zhou	August 10, 2025
I-31	Harrison Jiang	August 10, 2025
I-32	Zachary Xu	August 11, 2025
I-33	Iris Li	August 11, 2025
I-34	Connie Ding	August 11, 2025
I-35	William Wang	August 11, 2025
I-36	Connie Ding	August 12, 2025

Table A: Comments Received During the Public Comment Period

Comment Code	Commentor/Signatory	Date Received
I-37	Fengyi Yang	August 12, 2025
I-38	Jingping Guo	August 12, 2025
I-39	Lucy Cai	August 12, 2025
I-40	Yaling Zhou	August 12, 2025
I-41	Caijiyue	August 12, 2025
I-42	Yi Qin	August 13, 2025
I-43	Sharon Chen	August 13, 2025
I-44	May Cai	August 14, 2025
I-45	Xiangan Cai	August 14, 2025
I-46	Cherie	August 14, 2025
I-47	Aaron Xie	August 14, 2025
I-48	Deborah Walck	August 14, 2025
I-49	Rui Luo	August 15, 2025
I-50	Zhu Wang	August 15, 2025
I-51	Nanbo Li	August 17, 2025
I-52	Qiyuan Liu	August 22, 2025
I-53	Jason Ye	August 27, 2025
I-54	Connie Ding	August 27, 2025
I-55	Connie Ding	August 27, 2025
I-56	Connie Ding	August 27, 2025
I-57	Connie Ding	August 27, 2025
I-58	Connie Ding	August 27, 2025
I-59	Connie Ding	August 27, 2025
I-60	Yan Nan	August 27, 2025
I-61	Jenny Liu	August 27, 2025
I-62	Weiwei Zhang	August 27, 2025
I-63A	Hu Yu	August 27, 2025
I-63B	Yang Li and Weiwei Zhang	August 27, 2025
I-64	Kevin Xie	September 3, 2025
I-65	Isabel Duong	September 4, 2025
I-66	Tim Zhou and Eliza Wang	September 5, 2025
I-67	Hsintien Chou	September 7, 2025
I-68	Linda Gu	September 8, 2025
I-69	Jian Wei	September 8, 2025
I-70	Jun Xie	September 8, 2025
I-71	Luka Zhao	September 8, 2025
I-72	Bin Zhou	September 9, 2025
I-73	Diana Lees	September 9, 2025
I-74	Connie Ding	September 10, 2025
I-75	Connie Ding	September 10, 2025
I-76	Lily Chu	September 11, 2025
I-77	Wenjing Yang	September 11, 2025
I-78	Connie Ding	September 11, 2025
I-79	Jason Ye	September 12, 2025
I-80	Carina Cai	September 12, 2025
I-81	Bin Zhou	September 13, 2025
I-82	Luna	September 13, 2025
I-83	Shelly Wang	September 14, 2025

Table A: Comments Received During the Public Comment Period

Comment Code	Commentor/Signatory	Date Received
I-84	Harrison Jiang	September 14, 2025
I-85	Amy Ouyang	September 14, 2025
I-86	Vivian Wu	September 14, 2025
I-87	Victor Zhao	September 14, 2025
I-88	Vivian Zhao	September 14, 2025
I-89	Yishu Zhu	September 14, 2025
I-90	Jianyan Ye	September 14, 2025
I-91	Stephen Bian	September 14, 2025
I-92	Serena Bian	September 14, 2025
I-93	Yu Ting Ding	September 14, 2025
I-94	Kai Zhong	September 14, 2025
I-95	Paul Rataj	September 14, 2025
I-96	Tim Liu	September 14, 2025
I-97	Tim Huang	September 14, 2025
I-98	Linda Gu	September 15, 2025
I-99	Chao Huang	September 15, 2025
I-100	Alex Wang	September 15, 2025
I-101	Bob Huang	September 15, 2025
I-102	Perng Nian Chu	September 15, 2025
I-103	Ge Shi	September 15, 2025
I-104	YongZhen Lu	September 15, 2025
I-105	Grace Shi	September 15, 2025
I-106	Jiayi Zhu	September 15, 2025
I-107	June Bian	September 15, 2025
I-108	Mindy Li	September 15, 2025
I-109	Donghai Xu	September 15, 2025
I-110	Vivian Zhao	September 15, 2025
1-111	Connie Ding	September 15, 2025 (late)

1.2 FORMAT OF RESPONSES TO COMMENTS

Responses to each of the indexed/coded comment letters are provided on the following pages. The comment index numbers are provided in the upper right corner of each comment letter, and individual comments within each letter are numbered along the left-hand margin of each letter. The City's responses to each comment letter immediately follow each letter and are referenced by the index numbers in the margins.

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2.0 RESPONSES TO COMMENTS

The written responses presented in this chapter summarize the nature of any significant environmental issues raised and provide a good faith and reasoned analysis in response. The range of responses includes providing clarification on the Draft EIR, making factual corrections, explaining why certain comments may not warrant further response, or simply acknowledging the comment for consideration by the decision-making bodies. The responses in this chapter cover the entirety of the issues raised in the comments. In addition, this chapter begins with Master Responses to address common themes or issues that were raised throughout the comment letters received during public review of the Draft EIR. These Master Responses are commonly referred to throughout the responses to comments received by agencies, organizations, and individuals.

Where comments on the Draft EIR concern issues requiring technical expertise, the responses to comments, like the analysis in the Draft EIR, rely on the knowledge and professional analysis of qualified experts.

Where revisions to the Draft EIR text are called for, the page is identified followed by the appropriate revision. Added text is indicated with double underlines, and deleted text is shown in ~~strikeout~~. Text revisions to the Draft EIR are summarized in Section 3.0, Errata, of this document.

2.1 MASTER RESPONSES

Many of the comments received on the Draft EIR involve variations of the same key issues. In order to consolidate responses to questions and comments related to these topics, and to address concerns comprehensively, the following Master Responses have been prepared. Master Responses are included below for the following topics and are referenced in certain responses, as appropriate:

- Master Response 1: Draft EIR Public Review Period
- Master Response 2: Purpose and Adequacy of the Draft EIR
- Master Response 3: Speculation Without Substantial Evidence
- Master Response 4: CEQA Mitigation Requirements
- Master Response 5: Scope of Alternatives
- Master Response 6: Cumulative Analysis
- Master Response 7: Zoning and Land Use Compatibility
- Master Response 8: Transportation Analysis
- Master Response 9: Health Risk Assessment and Sensitive Receptors
- Master Response 10: Greenhouse Gas Emissions Analysis
- Master Response 11: Noise and Vibration Analysis
- Master Response 12: Light and Glare Analysis
- Master Response 13: Hazards and Hazardous Materials
- Master Response 14: Disproportionate Environmental Burden

Master Response 1: Draft EIR Public Review Period

A number of comments expressed concerns related to the timing and duration of the public review period, noticing, and circulation of the Draft Environmental Impact Report (EIR) for public review. Some comments also expressed opinion that the Draft EIR should be circulated at the same time as the Draft EIRs for other projects proposed in the vicinity of the proposed project. However, each individual project is undergoing separate and independent environmental review based on the time that the project's application was deemed complete. Each project will be considered on its individual merits after the CEQA determination is made at separate and duly noticed hearings.

The Draft EIR, all technical appendices, and its Notice of Availability (NOA) were originally circulated on July 10, 2025, for a period of 45 days. The NOA, which included an electronic link to the location of the Draft EIR and technical appendices on the City's website and a list of locations where a hard copy of the Draft EIR was available for viewing, was mailed to public agencies, neighborhood organizations, and property owners within 300 feet of the project site, as well as individuals who had previously expressed an interest in the potential impacts of the project. In accordance with *State CEQA Guidelines* Section 15087, in addition to mailing the NOA to all organizations and individuals who had previously requested to be noticed in writing about the project, the NOA was also submitted to the Governor's Office of Land Use and Climate Innovation (LCI)[1], State Clearinghouse division (which is the repository for State review of environmental documents), was posted by the County Clerk for at least 30 days, and was published in the Saddleback News.

The 45-day comment period was originally identified to close at 5:00 p.m. on August 25, 2025. The NOA identified that the project and associated Draft EIR would be discussed at a future Planning Commission hearing to be held at the Lake Forest Civic Center; the specific dates of future hearings to be noticed separately. In accordance with *State CEQA Guidelines* Section 15087, the NOA only needs to disclose public meetings or hearings known to the lead agency at the time of the notice.

In accordance with *State CEQA Guidelines* Section 15087, the NOA specified the manner in which the lead agency would be receiving comments during the comment period including via email (EnterpriseProjects@lakeforestca.gov), or postal/courier service to Amy Stonich, Assistant Director of Community Development, 100 Civic Center Drive, Lake Forest, CA 92630. The email address provided is a City-established address set up specifically to receive public communications regarding the proposed project and other projects in the vicinity, for internal tracking and record keeping purposes. Additionally, in accordance with *State CEQA Guidelines* Section 15088, in this RTC document, the lead agency has provided written responses to all comments received during the comment period.

As a general rule, CEQA requires a 45-day public review period for a Draft EIR. While failure to circulate a Draft EIR for the required 45-day period is an abuse of discretion, there is no legal requirement to grant a request for an extension (*State CEQA Guidelines* Section 15105).

Following initial circulation of the NOA, the City was made aware that Section 4.3, Air Quality, of the Draft EIR was inadvertently omitted from the original posting (online and at the library) of the Draft EIR. Once the oversight was discovered, the City immediately reposted (and redistributed to the

[1] Formerly known as the Governor's Office of Planning and Research (OPR).

library) the revised Draft EIR with Section 4.3 to the City's website, revised the paper copies of the Draft EIR available at the City's Community Development Department, Foothill Ranch Library, and El Toro Library, and elected to extend the review period to allow an opportunity for review and comment of Section 4.3 of the Draft EIR. The amended NOA extended the public review period for the Draft EIR by 22 days to September 15, 2025, for a total of 67 days of public review.

In addition, on July 30, 2025, an amended NOA was submitted to the State Clearinghouse; on July 31, 2025, the amended NOA was mailed to public agencies, neighborhood organizations, and property owners within 300 feet of the project site, as well as individuals likely to be or who had previously expressed an interest in the potential impacts of the project; and on August 7, 2025, the amended NOA was published in the Saddleback News.

Commenters allege that in addition to Section 4.3, of the Draft EIR, the City failed to provide Appendix C of the Draft EIR in the July 10, 2025 posting which includes the Air Quality, Greenhouse Gas, and Energy Impact Report and Health Risk Assessment (totaling approximately 1,790 pages combined) (see Comment Letters I-2, I-3, I-4, I-6, and I-18). The City confirmed that Appendix C had been available on both the City's website and the State Clearinghouse's website (CEQAnet) since July 10, 2025, and no changes to Appendix C had been made following its initial posting. As noted above, the City extended the comment period by 22 days to allow for opportunity to review and comment on Section 4.3, Air Quality, of the Draft EIR, and the extension was available to all parties desiring to comment.

Additionally, although not required, the City responded to a late comment letter dated September 15, 2025, at 6:20 p.m. (Comment Letter I-111), and responses to this comment letter is included in this document. As a result, the public review period for the Draft EIR complies with CEQA's requirements, and no further action is necessary.

Master Response 2: Purpose and Adequacy of the Draft EIR

A number of comments state that the Draft EIR contains errors or omissions that require revisions and/or recirculation of a revised Draft EIR for public review and comment. Some of these comments are responded to individually in the responses below where specific assertions are made; however, many of these comments did not provide evidence supporting their claim that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that significant impacts would be substantially more severe than those identified in the Draft EIR. Additionally, some comments express concerns regarding certification of the Final EIR when significant and unavoidable impacts are identified.

This response provides an overview of the requirements of CEQA when considering recirculation of an EIR. CEQA requires recirculation of a Draft EIR or components of a Draft EIR only when "significant new information" is added to a Draft EIR after public notice of the availability of the Draft EIR has occurred but before the Final EIR is certified. (Pub. Res. Code Section 21092.1; *State CEQA Guidelines* Section 15088.5). Section 15088.5 of the *State CEQA Guidelines* specifically states: "New information added to an EIR is not 'significant' unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement." It further states:

> (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice of its availability. "Significant new information" requiring recirculation includes, for example, a disclosure showing that:
>
> (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
>
> (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
>
> (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
>
> (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.
>
> (b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in the adequate EIR.
>
> (c) If the revision is limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified.
>
> (d) Recirculation of an EIR requires notice pursuant to Section 15087, and consultation pursuant to Section 15086.
>
> (e) A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.

(*State CEQA Guidelines* Section 15088.5.)

In this case, there has been no significant new information, changes to the project, or changed circumstances that will result in: (1) new significant impacts; (2) a substantial increase in the severity of an environmental impact; or (3) the availability of new considerably different feasible alternatives or mitigation measures that the project sponsor declines to adopt. As demonstrated by the specific responses to comments in this RTC Document, information added to the Draft EIR or in this RTC Document clarifies or modifies statements and mitigation measures to further explain the information, analysis, and conclusions in the Draft EIR and further ensures that, to the extent feasible, all impacts are less than significant. Therefore, these comments do not contain significant new information requiring recirculation of the Draft EIR.

Additionally, added regulatory compliance and mitigation measures in particular, as identified in Regulatory Compliance Measure (RCM) TRA-1 and Mitigation Measure (MM) TRA-2, provide clarity for Municipal Code requirements applicable to the proposed project, additional environmental protection, and further reduce identified impacts; these additional measures do not change the significance conclusions in the Draft EIR. Under applicable provisions of *State CEQA Guidelines* Section 15088.5(a)(1) and (3), modifications to mitigation measures are permissible when agreed to by the project sponsor and do not deprive the public or decision makers of the opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect.

The mitigation measure modifications in the Final EIR are responsive to public comments and neither result in adverse environmental impacts nor identify mitigation measures the project sponsor declines to adopt; therefore, the modifications do not constitute new information. The Draft EIR, with the minor changes identified in this RTC Document, provides an adequate level of information to allow the City decision-makers to consider the significant impacts associated with the project and make a determination regarding project approvals. The changes and clarifying information do not preclude meaningful public review and comment. Thus, the Final EIR can be certified and need not be recirculated.

Finally, the purpose of an EIR is to analyze a project's significant environmental impacts, identify ways to avoid and/or minimize them, and present alternatives to a project. An EIR is an informational document that serves to inform decision makers and the public about a project's potential environmental impacts. The determination that significant and unavoidable impacts would result from implementation of the project does not make an EIR invalid. The Final EIR, in conjunction with the findings of fact, is used by the decision makers in determining whether to approve or disapprove a project or approve a project alternative. In accordance with *State CEQA Guidelines* Section 15043, a public agency can approve a project even though a project would cause a significant impact on the environment provided there is no feasible way to lessen or avoid the significant impact, and specifically identified expected benefits from the project outweigh the policy of reducing or avoiding the significant environmental impacts of the project. In such instances, the lead agency must state in writing the specific reasons to support its action based on the Final EIR and/or other information in the record in a statement of overriding considerations supported by substantial evidence. The findings of fact and statement of overriding considerations will be circulated after the Final EIR is published and when the public hearing for Final EIR certification is noticed.

Master Response 3: Speculation Without Substantial Evidence

Some comments assert or request that impacts should be considered significant or that significance conclusions in the Draft EIR should be revised based only on the commenter's opinion.

However, whether a project may have a significant effect on the environment must be "based on substantial evidence in light of the whole record" (*State CEQA Guidelines* Section 21082.2[a]). Substantial evidence includes facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts (*State CEQA Guidelines* Section 15064[b]). Argument, speculation, unsubstantiated opinion or narrative, evidence that is clearly inaccurate or erroneous, or evidence that is not credible does not constitute substantial evidence (*State CEQA Guidelines* Section 15064[a]).

Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments (*State CEQA Guidelines* Section 15204[c].) Pursuant to State CEQA Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence. Because the commenters' opinion(s) are speculative and not supported by substantial evidence, no revisions to the Draft EIR are necessary.

In the interest of working cooperatively through issues that reflect the interests of the public, agencies, and organizations, the City, as Lead Agency under CEQA, has thoroughly responded to all comments received through September 16, 2025 (the public comment period closed on September 15, 2025) and provided additional information and analysis to clarify the conclusions of the Draft EIR, whether or not the legal standard of substantial evidence has been met in the comments.

Finally, the Draft EIR analysis relies on a number of technical evaluations and reports prepared by qualified technical experts with specific technical knowledge and credentials relative to the applicable subject area. These reports are provided in the appendices to the Draft EIR, are incorporated by reference, and include the following:

- Photometric Plan (Appendix B)
- Air Quality, Greenhouse Gas, and Energy Impact Report and Health Risk Assessment (Appendix C)
- Biological Resources Report and CNDDB Record Search (Appendix D)
- Geotechnical Investigation and Infiltration Testing Results (Appendix E)
- Phase I Environmental Site Assessment (Appendix F)
- Water Quality Management Plan and Preliminary Hydrologic and Hydraulic Drainage Report (Appendix G)

- Noise and Vibration Impact Analysis (Appendix H)
- Traffic Impact Analysis (Appendix J)

The analysis in the Final EIR provides substantial evidence supporting the analysis and conclusions in the EIR.

Master Response 4: CEQA Mitigation Requirements

Some comments suggest additional mitigation measures to be required of the project in order to either reduce the significance of identified impacts or to address topics that are perceived as impacts but were not identified as such in the Draft EIR. This response addresses the purpose and applicability of mitigation measures under CEQA, the nexus for requiring mitigation, and the specific situations that would constitute deferral of mitigation measures.

Under CEQA, an agency may not approve a project with significant environmental impacts if there are feasible mitigation measures that would substantially lessen impacts that are deemed significant. A mitigation measure is only considered feasible when it is capable of being accomplished in a successful manner within the constraints of the project, taking into consideration economic, environmental, legal, social, and technological factors (*State CEQA Guidelines* Section 15021). Feasibility is evaluated based on the measure's ability to be enforced and to achieve the desired outcome. Thus, if an impact is considered "significant" under CEQA, the agency must mitigate the impact to the extent necessary to render the impact less than significant, unless the agency finds that doing so is not feasible. If an impact is less than significant, either with or without mitigation, an agency is not required to mitigate the impact further, even though some level of adverse environmental change will occur (*State CEQA Guidelines* Section 15126.4). Stated differently, the goal of mitigation under CEQA is not to eliminate the impact of a proposed project, but to reduce significant impacts to the greatest degree feasible.

Further, when imposing mitigation, lead agencies must ensure that there is a "nexus" and "rough proportionality" between the required mitigation measure and the significant environmental effect of the project (*State CEQA Guidelines* Section 15126.4[a][4][A-B]). Mitigation measures are not required for effects which are not found to be significant based on the established significance thresholds (refer to Chapter 4.0, page 4-4 of the Draft EIR for a description of the methodology for developing and applying the thresholds of significance for the analysis). Further, impact evaluations assume compliance with federal, State, and local regulatory requirements and such requirements are not incorporated as mitigation measures because they are mandatory and are therefore already required. Mitigation measures do not need to repeat the details in these regulations.[2] The City may decide to impose additional conditions of approval separately from the environmental review process (i.e., not required or authorized under CEQA), but the need for these conditions must also be supported by evidence in the record, such as demonstrated requirements for compliance with City standards, policies, and regulations and to support making the findings required by City Code for project approval. The mitigation measures described in the Draft EIR have been recommended in order to reduce the identified potential physical environmental impacts of the project, to the extent feasible and as authorized under CEQA.

CEQA also prohibits the unjustified deferral of mitigation measures. But when it is impractical or infeasible to identify the specific details of mitigation during the EIR review process, the Lead Agency may defer these details only when the mitigation measure establishes the performance

[2] Association of Environmental Professionals (AEP). 2020. CEQA Portal Topic Paper: Mitigation Measures. February 10. The topic paper states: "Avoid repeating federal, State, or local legal requirements. If there is already a law that addresses the impact, compliance with the law should be discussed in the analysis but does not need to be a mitigation measure."

standard that must be met and identifies the types of actions that may be implemented to achieve the performance standard (*State CEQA Guidelines* Section 15126.4[a][1][B]). The Lead Agency commits itself to implement the mitigation, and compliance with the performance standard will ensure mitigation of the impact. In no case do the mitigation measures identified in the Draft EIR constitute impermissible mitigation deferral because the reasons that details cannot currently be specified are provided, all required performance standards for future studies are specifically outlined, and examples of actions that could be implemented to meet those standards are provided. The implementation strategy and timing for all mitigation measures is further presented in the Mitigation Monitoring and Reporting Program (MMRP) (refer to Chapter 7.0 of the Draft EIR). In some cases commenters suggest that mitigation is deferred simply because mitigation is not identified for a perceived significant effect of the project; however, as demonstrated in the responses to such individual comments, mitigation measures are not warranted to reduce an impact that is not significant, or to further reduce an impact that is less than significant with the incorporation of a mitigation measure in the MMRP. Moreover, no new or more severe significant impacts that would require mitigation are identified as part of the Final EIR. Also refer to Master Response 3, which addresses comments related to speculation without substantial evidence. Additionally, as discussed in Master Response 10, Mitigation Measure (MM) GHG-1 has been revised in Section 4.8, Greenhouse Gas Emissions, of the Final EIR, to clarify the timing of installation of on-site electric truck charging stations. As explained in Master Response 10, these revisions were made for clarification and have no effect on the analysis or conclusions contained in the Draft EIR. Similarly, as discussed in Master Response 8, Regulatory Compliance Measure (RCM) TRA-1 was added to Section 4.17, Transportation and Traffic, of the Final EIR, to provide clarity on the applicable regulations and code requirements governing VMT reductions as specified in the EIR. However, as explained in Master Response 8, this new regulatory compliance measure does not address new or more severe significant impacts of the project and was added only to clarify applicable regulations with which the project Applicant must comply as a matter of law. These applicable requirements were already considered in the Draft EIR analysis. Furthermore, as discussed in Master Response 8, MM TRA-2, Pedestrian-Scale Transit Access Lighting, has been added to Section 4.17, Transportation and Traffic, of the Final EIR consistent with measure T-18 in the California Air Pollution Control Officers Association (CAPCOA) 2024 Handbook to further encourage the use of transit and displace the use of vehicles for travel to and from the project site. As explained in Master Response 8, this new mitigation measure does not address new or more severe significant impacts of the project and has no effect on the analysis or conclusions contained in the Draft EIR.

Lastly, the purpose of the MMRP is to ensure that the adopted mitigation measures are implemented according to the procedures, timing, and responsibilities identified in the mitigation measures outlined in the Final EIR. The MMRP is required to be adopted and implemented per *State CEQA Guidelines* Section 15097 if the project is approved and identifies: (1) the timing for implementation (e.g., prior to issuance of permits, certain phases of construction, certificate of occupancy), including the applicable project development phase; (2) the responsibility for implementation; and (3) the entity responsible for providing implementation oversight, whether it be the City or another public agency, and how that measure would be monitored and enforced. The MMRP ensures that the mitigation measures identified in the Final EIR are implemented and fully enforced by the applicable oversight agencies through City-issued permit conditions. Other potential responsible agencies such as the Orange County Flood Control District (OCFCD), State Water

Resources Control Board (SWRCB), and South Coast Air Quality Management District (SCAQMD) are authorized to enforce compliance with their applicable regulations. It should also be noted that, as part of normal construction practices, a construction manager or construction supervisor is typically responsible for ensuring that a project site is in full compliance with federal, State, and local laws and regulations, as well as implementing all project-associated mitigation measures. These requirements are outlined specifically in a bid package and construction contract prior to the start of the project and are addressed during daily project activities.

Master Response 5: Scope of Alternatives

Some commenters requested consideration of additional alternatives to the proposed project beyond those evaluated in the Draft EIR. A number of general suggestions for project alternatives were provided by these commenters. For the most part, the suggested alternatives did not provide sufficient specificity regarding the type, location, or size of suggested alternatives. The suggested scope of additional alternatives included, but was not limited to, the following general themes: 1) Reduced Project Size or Operational Characteristics; 2) Revised Site Design; 3) Alternative Land Uses; and 4) Off-site Location.

This response initially broadly addresses the purpose and intent of an alternatives analysis as required by CEQA; where specific alternatives are suggested in the comments, those are also more specifically categorized and addressed in the subsections below. For a detailed discussion of the alternatives analysis in the Draft EIR, please refer to Draft EIR Chapter 5.0, Alternatives.

PRC Section 21100(b)(4) states that an EIR shall include a detailed statement setting forth alternatives to the project. Under the *State CEQA Guidelines*, the range of alternatives to the proposed project should include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more significant effects (*State CEQA Guidelines* Section 15126.6 [a]). An EIR need not consider all potential alternatives to the project (*State CEQA Guidelines* Section 15126.6 [a]). Rather, CEQA requires that the EIR discuss only a "reasonable range" of alternatives (*State CEQA Guidelines* Section 15126.6 [a][f]).

The following alternatives to the project were evaluated in the Draft EIR: (1) No Project Alternative, (2) Previous Use and Associated Site Development Permit Alternative, and (3) Reduced Project Alternative. These alternatives represent a reasonable range of potential alternatives to the proposed project in light of the objective of avoiding or reducing the severity of significant and unavoidable impacts and/or impacts identified as less than significant with mitigation. A few other potential alternatives were also considered; however, none of these alternatives would substantially reduce or avoid the environmental impacts of the proposed project and/or would not meet many of the basic project objectives and therefore were ultimately not selected for further analysis. The Draft EIR compared the potential environmental effects of the proposed project to the potential effects of each alternative in relation to the environmental baseline and existing physical environmental setting.

To summarize, the Draft EIR must include alternatives that are:

1. Potentially feasible,
2. Attain most of the basic objectives of the project, and
3. Avoid or substantially lessen any of the significant effects of the project.

Under CEQA, a Lead Agency may structure its alternatives analysis around a reasonable definition of a fundamental underlying purpose, and need not study alternatives that cannot achieve that basic purpose. An EIR need not consider alternatives that are infeasible (*State CEQA Guidelines* Section 15126.6). Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan

consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent) (*State CEQA Guidelines* Section 15126.6[f]). As explained in Chapter 5, Section 5.3, Alternatives Initially Considered But Rejected From Further Consideration, starting on page 5-4 of the Draft EIR, the Reduced Daily Trip Alternative is the only alternative to the project that would sufficiently reduce the identified vehicle miles traveled and greenhouse gas emissions impacts to below the established thresholds and achieve a level of less than significant. However, this alternative would not meet the above criteria and was determined to be infeasible.

CEQA establishes no legal imperative as to the scope of alternatives to be analyzed in an EIR, and there is no set number of alternatives that must be analyzed to fulfill the requirements of CEQA. Rather, as stated in *State CEQA Guidelines* Section 15126.6 and supported by abundant CEQA case law, the range of alternatives required in an EIR is governed by the "rule of reason," which requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.

In summary, the Draft EIR followed the requirements of CEQA in identifying a range of reasonable alternatives to the project that feasibly attain the project's basic objectives while avoiding or substantially lessening significant adverse environmental effects of the project for consideration by City decision-makers.

As stated above, a number of additional alternatives to the proposed project were suggested by commenters and each suggestion falls generally under one of four common categories. Each of these categories is further addressed below with a discussion of the reasons for which consideration of such alternatives is rejected from further review, given the factors outlined previously in this master response.

1. **Reduced Project Size or Operational Characteristics.** A number of comments suggested alternatives to the project that would reduce the overall size or scale of the proposed project in terms of overall square footage or by reducing or changing the proposed operating characteristics. These include:

    a) A 50 percent reduction in building square footage;

    b) An alternative that includes the unspecified downsizing of existing buildings and/or a reduction in the number of dock doors;

    c) A low-impact logistics use with limited truck activity;

    d) A reduced-hours alternative that prohibits 24/7 operations and/or establishes a curfew for truck activity; and

    e) A warehouse development with a 100 percent zero-emission truck fleet.

    As described in Section 5.3, Alternatives Initially Considered but Rejected From Further Consideration, starting on page 5-4 of the Draft EIR, a Reduced Daily Trip Alternative and a Reduced Project Alternative were considered by the City as potential alternatives to the

proposed project. Therefore, the outcome of a reduced project size or scale of operations has already been accounted for in the Draft EIR.

As discussed in Section 5.3.2, page 5-5, of the Draft EIR, the Reduced Daily Trip Alternative, which is similar in nature to some of the commenters' suggested alternatives, would substantially reduce the proposed building to a scale that generates fewer than 110 daily trips in order to qualify for screening from project-level vehicle miles traveled (VMT) assessment (and therefore result in a presumed less-than-significant impact with respect to VMT). Development of a smaller building pursuant to this alternative would also incrementally reduce impacts associated with Air Quality, Greenhouse Gas Emissions, Noise, and Transportation and Traffic. However, the analyzed building sizes would yield a very low land coverage that would not justify the relation between land value, building construction costs, and potential revenue, resulting in an infeasible project from a financial standpoint. Additionally, tenants required to support the smaller building sizes and assumed uses are not present in the market to facilitate the required financial viability, exacerbating the infeasibility of this alternative. Pursuant to *State CEQA Guidelines* Section 15126.6(a), an EIR is not required to consider alternatives which are infeasible and which do not meet most of the basic project objectives. Therefore, the Draft EIR appropriately rejects this alternative from further consideration.

While the Reduced Daily Trip Alternative was rejected from further consideration, the Draft EIR provided a full analysis of a Reduced Project Alternative, which is similar in nature to some of the commenters' suggested alternatives. Under this alternative, the square footage of the proposed project would be reduced by 25 percent, resulting in 48 fewer employees and a net decrease of 298 daily trips as compared to the proposed project. While the Reduced Project Alternative would result in lesser impacts than the proposed project with respect to aesthetics, air quality, energy, utilities and service systems, and noise, significant and unavoidable impacts with respect to VMT and GHG emissions would still occur under this alternative. The Reduced Project Alternative was ultimately determined to be the environmentally superior alternative given that it would result in similar or reduced environmental impacts compared to the proposed project and would achieve all identified project objectives, though not to the same degree as the proposed project. Therefore, the Draft EIR discusses the concept of a reduced project size in a manner to foster meaningful public participation and informed decision-making. Reducing the project size further (e.g., by 50 percent or another unspecified amount) or reducing the project's hours of operation would not result in a greater reduction in impacts without resulting in financial infeasibility or inconsistencies with project objectives. Further, the analysis of 24/7 project operations represents a worst-case scenario, allowing for a conservative analysis.

As discussed in Section 4.8.9.2, page 4.8-21, of the Draft EIR, and Master Response 10, MM GHG-1 would require the installation of four on-site electric truck charging stations. This could eventually contribute to electrification of the fleet associated with the proposed project, which would be consistent with commenters' zero-emission truck suggestions.

2. **Revised Site Design.** A number of comments suggested alternatives to the project that would involve redesign of the project, presumably to reduce perceived impacts related to land use compatibility and noise. These include:

   a) An alternative that increases setbacks from residential uses, relocates truck access/drives, and/or provides substantial soundwalls between the site and adjacent uses;

   b) An alternative layout that increases the buffer between the proposed use and residences to at least 1,000 feet;

   c) Reorientation of the proposed building.

   The orientation of the proposed project was designed in a manner to maximize land coverage in order to justify the relation between land value, building construction costs, and potential revenue; while ensuring compliance with applicable Orange County Fire Authority (OCFA) fire access route and fire truck turning radii requirements as well as setbacks and other requirements of the Site Development Standards from the LI zoning district in the Pacific Commercentre Planned Community and the Zoning Code.

   The suggested setbacks, buffers, and orientation shift alternatives could only be accommodated through reduction of the proposed building size or reduction of the proposed drive aisle size. As discussed above, the outcome of a reduced building size (Reduced Project Alternative) has already been accounted for in Chapter 5.0 of the Draft EIR. The reduction of the proposed drive aisle size would potentially result in conflicts with applicable OCFA requirements for fire access route widths and fire truck turning radii, thereby resulting in a potentially significant impact with respect to emergency access and evacuation plans (refer to Draft EIR thresholds).

   Further, the proposed project design already incorporates setbacks and buffers between the proposed industrial uses and nearby residential communities, as described in Master Response 7. The proposed project would include the installation of additional landscaping and mature trees (exceeding the City's landscaping requirements set forth in its Municipal Code) along the northeastern corner of the project site adjacent to the Meadows residential community which would further buffer the visibility of the project site from the residences. Furthermore, the proposed building was designed so that the dock doors and loading area are oriented to the southeast (not facing the residential properties) and is located over 200 feet away from the nearest residential property line. Additionally, the proposed project includes a 16-foot high, 65-foot long wall located at the eastern end of the loading docks, west of the proposed trash enclosure that would screen the project's loading area from the adjacent residences.

   Therefore, any changes to the orientation of the proposed project would not necessarily result in avoidance or substantial lessening of any of the significant impacts identified in the Draft EIR. Furthermore, the Draft EIR identifies significant and unavoidable impacts with respect to VMT and GHG emissions, both of which result from the operational

characteristics of the proposed project rather than its orientation. Because the suggested alternative site designs would not necessarily avoid or substantially lessen any significant impacts of the project, these alternatives would not be required for consideration under *State CEQA Guidelines* Section 15126.6.

3. **Alternative Land Uses.** A number of comments suggested alternatives to the project that would involve a change in the permitted land use and zoning of the project site and/or alternative uses that are perceived to be less intensive but are still consistent with the existing General Plan and zoning. These include:

   a) A mixed-use development, consisting of small businesses, neighborhood-serving commercial uses, residential uses, and/or green space;

   b) A business or office complex;

   c) A selection of research and development, medical, or clean-technology non-industrial uses; and

   d) A rezoning of the site to allow uses compatible with existing adjacent uses.

   As described in Section 5.4.2, starting on page 5-13, of the Draft EIR, the operation of office uses on the project site (Alternative 2) was already considered by the City as a potential alternative to the proposed project. Therefore, the outcome of this alternative land use has already been accounted for in the Draft EIR. As described under Section 5.4.2, starting on page 5-13, of the Draft EIR, Alternative 2 would result in a net increase in 844 daily trips compared to the proposed project, and therefore, would result in an increase in operational impacts to air quality, energy, greenhouse gas emissions, and transportation, compared to the proposed project. Similarly, shifting the proposed land use to other suggested land uses (mixed-use, research and development, medical, or clean-technology non-industrial uses) could also result in a potential increase in trip generation and subsequent increases in operational impacts to air quality, energy, greenhouse gas emissions, and transportation. Further, significant and unavoidable impacts related to VMT and GHG emissions would still occur under these alternatives and similar land use change alternatives.

   The project site currently has a Lake Forest General Plan land use designation of Light Industrial. The Light Industrial designation is intended to provide for a variety of light industrial uses. The project site is located within the Pacific Commercentre Planned Community and has a zoning designation of LI – Light Industrial. Therefore, as described in Master Response 7, the proposed project is consistent with the site's current land use designation and zoning. Alternatives proposing land uses beyond what is allowable under the Light Industrial land use and zoning designations would change the site's land use from what is currently envisioned by the City, rendering it incompatible with surrounding development within the Pacific Commercentre Planned Community, and thereby requiring a General Plan Amendment and/or Zoning Change. Such changes could potentially result in significant impacts with respect to land use and planning, and growth.

Therefore, additional land use alternatives, as suggested, would not necessarily feasibly attain most of the basic objectives of the project or substantially lessen any significant impacts of the project, and could potentially result in significant impacts to a greater degree than the proposed project related to land use and planning and growth. Therefore, these alternatives would not be required for consideration under *State CEQA Guidelines* Section 15126.6.

4. **Off-Site Location.** Some comments also suggested an alternative that relocates the proposed project to an unspecified location in the City away from residential areas and to what commenters perceive may be a more suitable area.

   Pursuant to *State CEQA Guidelines* Section 15126.6(f)(2)(A), only locations that would avoid or substantially lessen any of the significant impacts of the project need be considered for inclusion in the EIR. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, General Plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the applicant can reasonably acquire, control, or otherwise have access to the alternative site (*State CEQA Guidelines* Section 15126.6[f][1]). If it is determined that no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion (State CEQA Guidelines Section 15126.6[f][2][B]).

   As described in Master Response 7, the project site already has the appropriate zoning and General Plan land use designations to accommodate the proposed project. As described in Section 5.3.1, page 5-4, of the Draft EIR, the Applicant/Developer does not own or control any other property in the vicinity of the project site that would be suitable for development of the proposed project or that would meet the proposed project objectives, including redevelopment of an existing underutilized property.

   Additionally, the City has not identified any currently underutilized/vacant properties within the project vicinity with a Light Industrial land use and zoning designation that would allow for the implementation of a project with similar uses and square footage. Furthermore, the Draft EIR identifies significant and unavoidable impacts with respect to VMT and GHG emissions, both of which result from the operational characteristics of the proposed project rather than its location. Therefore, development of the proposed project on an alternative site would likely result in many of the same environmental impacts as development of the proposed project on the project site. Therefore, the Draft EIR determined that no feasible alternative locations exist and provided sufficient reasoning to support this conclusion consistent with *State CEQA Guidelines* Section 15126.6(f)(2)(B).

Master Response 6: Cumulative Analysis

Several comments were received regarding the cumulative impacts analysis conducted for the proposed project. The main focus of these comments is related to cumulative impacts that could occur with concurrent approvals, construction, and operation of the proposed project and the proposed Western Realco Enterprise Way Industrial Project (Projects 1 and 2), and the resulting cumulative greenhouse gas emissions, air quality, noise, traffic, and VMT impacts. Additionally, more general comments were received related to a decrease in quality of life for the nearby Meadows residential community. As stated in Section 4.0, page 4-3, of the Draft EIR, cumulative impacts refer to potential environmental changes to the existing physical conditions that may occur as a result of project implementation together with all other reasonably foreseeable, planned, and approved future projects in the vicinity of the project site that produce related impacts. *State CEQA Guidelines* Section 15355 defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." Cumulative impacts may result from individually minor but collectively significant projects taking place over a period of time. Projects that have progressed to the stage where CEQA review has been initiated are normally treated as foreseeable probable future projects. Pursuant to *State CEQA Guidelines* Section 15130(b)(1)(a), either a list of past, present, and probable future projects or a summary of projections contained in an adopted planning document can be used in the evaluation of potential cumulative impacts. Under the list approach, all proposed, recently approved, under construction, and reasonably foreseeable projects that could produce a related or cumulative impact on the local environment when considered in conjunction with a proposed project are evaluated in an EIR.

In coordination with the City of Lake Forest, 13 proposed, recently approved, under construction, and reasonably foreseeable projects within a 4-mile radius of the proposed project (defined as the cumulative study area) were identified at the time of the Notice of Preparation was issued for the proposed project (March 20, 2024). A list of the 13 projects identified in the project's cumulative study area is provided in Table 4.A in the Draft EIR and the locations of the cumulative projects relative to the proposed project are shown on Figure 4-1 of the Draft EIR. Once the list of cumulative projects is identified for a project at the time the NOP is issued, it does not change over the course of the environmental review because the cumulative assumptions must remain stable and reliable for use in the supporting technical analyses. Any future projects that are proposed after this date would be required to consider the proposed project and other future cumulative projects in a separate and individual environmental review process specific to that project and the applicable current and future physical conditions.

As shown in Table 4.A, the proposed project's cumulative project list includes the proposed Western Realco Enterprise Way Industrial Project (Projects 1 and 2) (Cumulative Project Nos. 3 and 4), along with other industrial developments, residential developments, commercial developments, electrical testing facility, and cemetery expansion projects. The potential impacts of the cumulative projects identified in Table 4.A, page 4-5, of the Draft EIR combined with potential impacts from implementation of the proposed project were analyzed for each individual impact category addressed in Chapter 4.0 of the DEIR and the resulting cumulatively considerable impact and significance conclusion is provided under the Cumulative Impacts subheading in each section of Chapter 4.0. According to a CEQA Topic Paper published by the Association of Environmental

Professionals (AEP), it is possible that a significant cumulative impact may occur where the project's contribution (either on its own or with implementation of mitigation) can be determined to be less than cumulatively considerable.[3]

In addition, as noted in Section 4.3.7, starting on page 4.3-39 of Section 4.3, Air Quality, and Section 4.13.7, starting on page 4.13-21 of Section 4.13, of the Draft EIR, because the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) is a reasonably foreseeable project that would be located in the immediate vicinity of the project site and for the purposes of the analyses are assumed to have construction schedules that overlap with the proposed project, a quantitative evaluation of the combined impacts of constructing and operating the proposed project and the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) was prepared and presented in Sections 4.3.7 and 4.13.7 of the Draft EIR. Additionally, the Health Risk Assessment (Appendix C of the Draft EIR) also quantitatively evaluated the impacts of implementing the proposed project in combination with the Western Realco Enterprise Way Industrial Project (Projects 1 and 2). It should be noted that the traffic analysis conducted for the proposed project is cumulative by nature in that it considered Opening Year (2027) with Cumulative Projects and therefore analyzed the proposed project combined with the projects identified in the cumulative projects list (Table 4.A, starting on page 4-5, of the Draft EIR) which includes the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) (refer to Section 4.17.7, starting on page 4.17-16 of the Draft EIR). Construction and operational details for the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) were provided by that project applicant and reviewed by the City and its consultants to ensure that the assumptions were reasonable and consistent with the projects' applications. Refer to Appendices C, H, and J of the Draft EIR for copies of the cumulative modeling prepared for the proposed project.

According to *State CEQA Guidelines* Section 15130(a), when a project's incremental effect "is not 'cumulatively considerable,' a lead agency need not consider that effect significant, but shall briefly describe its basis for concluding that the incremental effect is not cumulatively considerable." Similarly, when a project's cumulative contribution is not significant, the EIR shall "briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR. A lead agency shall identify facts and analysis supporting the lead agency's conclusion that the cumulative impact is less than significant." (*State CEQA Guidelines* Section 15130 [a][2]).

As stated in the AEP CEQA Topic Paper, cumulative impact analyses may provide a general discussion that addresses all of the potential cumulative impacts for a particular issue area. Consistent with this approach, each section of Chapter 4.0, which focused on individual environmental issue areas, included a sub-section discussing cumulative impacts. Based on the analysis provided in Chapter 4.0 of the Draft EIR, with the exception of GHG and VMT, the proposed project when evaluated in combination with the cumulative projects listed in Table 4.A of the Draft EIR and with implementation of applicable mitigation measures, would not result in significant cumulatively considerable impacts to the resources included in the Draft EIR. As noted in the AEP CEQA Topic Paper, mitigation measures identified as part of the individual project evaluation were

[3] Association of Environmental Professionals. 2020. CEQA Portal Topic Paper: Cumulative Impacts. December 18.

applied to the cumulative analysis to ensure less than significant cumulative impacts to most resources.

As described in Section 4.8.7, page 4.8-20, and Section 4.17.7, page 4.17-16, of the Draft EIR, because the proposed project would result in a significant and unavoidable impact related to GHG (conflict with the 2022 Scoping Plan) and VMT even after implementation of mitigation, the proposed project would also result in a cumulatively considerable impact related to GHG and VMT. Refer to Master Responses 8 and 10 for more information related to GHG and VMT impacts and mitigation.

Based on the above, the Draft EIR adequately analyzes potential cumulative impacts in accordance with CEQA guidelines and therefore the analysis and conclusions of the Draft EIR regarding the evaluation of cumulative impacts remain valid.

Master Response 7: Zoning and Land Use Compatibility

Several comments were received regarding the zoning and land use compatibility of the proposed project with surrounding land uses, specifically with the Meadows Residential Community adjacent to the project site.

As stated in Section 4.11, Land Use and Planning, page 4.11-1 of the Draft EIR, the potential land use and planning impacts were assessed based on the context of the proposed project (i.e., its geographic location and compatibility with surrounding development) and the proposed project's consistency with relevant land use plans, policies, and regulations contained in applicable planning documents adopted by the City and other agencies for the purpose of avoiding or mitigating an environmental effect that could cause a significant environmental impact.

As noted in Chapter 3.0, Project Description, page 3-9 of the Draft EIR, the project site is currently designated Light Industrial in the City of Lake Forest General Plan and is located within the Pacific Commercentre Planned Community with a zoning designation of LI – Light Industrial. Permitted uses include a variety of office, manufacturing, and warehouse uses. The project site has been zoned Light Industrial (LI) since 1987 and was vacant until the existing structure was developed in 1999. From 2000 to 2021 the existing building was occupied by avionic corporations and used as an office, manufacturing, and research testing facility from 2006 to 2021.

On May 4, 2017, applicant and developer Toll Brothers West Inc. filed a General Plan Amendment application requesting an amendment to the land use designation for the Nakase Nursery Site, located at 20261 Lake Forest Drive from Business Park to Low-Medium Density Residential, Medium Density Residential, High Density Residential, Public Facility, Community Park/Open Space, and Regional Park/Open Space (Resolution No. 2020-10). The property covered by this General Plan Amendment was bounded by Bake Parkway, Rancho Parkway, Serrano Creek Trail, and Dimension Drive (Resolution No. 2020-10). The Dimension Drive side included commercial, industrial and office uses (Resolution No. 2020-10).

The above General Plan Amendment included the property where the Meadows Residential Development (Meadows) is located. The Meadows is a 126-acre planned community located at the southeast corner of Bake Parkway and Rancho Parkway (Resolution No. PC 2021-10).

On January 21, 2020, the City of Lake Forest City Council took the following actions to allow for the development of the Meadows: approved a General Plan Amendment to change the land use designation of the site to Residential, Public Facility, and Community and Regional Park/Open Space; and approved a zone change to change the zoning of the site to Nakase Planned Community (Resolution No. PC 2021-10).

On July 8, 2021, the City of Lake Forest Planning Commission approved a site development permit for the development of 75 single family units in the Meadows (Resolution No. PC 2021-10). The Resolution approving the site development permit acknowledged that "[t]he subject neighborhood is located in the southwest portion of the Meadows Residential Community and includes landscaped buffers between the neighborhood and the adjacent industrial uses on Enterprise Way." (Resolution No. 2021-10) (emphasis added).

Approval of the site development permit for the Meadows was based, in part, on the fact that the Meadows would not create any significant impacts that "may be objectionable, detrimental, or incompatible with other [existing] permitted uses in the vicinity," including the pre-existing industrial uses (Resolution No. PC 2021-10).

The Meadows EIR (certified in January 20, 2020) stated that the site of the Meadows "borders the master planned community of Baker Ranch and Borrego Canyon to the west, Foothill Transportation Corridor and Towne Center to the north, Lake Forest Drive to the east, and existing commercial and light industrial to the south." (Nakase Property Area Plan, page 7) (emphasis added). The Meadows EIR further stated that the light industrial designation was clearly identified and incorporated as part of the City's consideration of the Meadows project, including under Section 1.6 entitled "Existing Surrounding Land Uses." (Nakase Property Area Plan, page 8).

The zoning designation of the IPT Enterprise Business Center LLC Project was in place before, during, and after development of the Meadows (refer to Chapter 3.0, Project Description, page 3-17, of the Draft EIR). Subsequent applications for development within the Meadows, such as "The Redwoods," which consists of 75 detached single-family units, was reviewed and determined to be consistent with the General Plan as well as compliant with CEQA (Resolution No. PC 2021-10). At all times, zoning information was accessible and available to the public, including prospective residents of the Meadows.

As noted in the Draft EIR, the existing building is currently vacant. As shown in Table 4.11.A in Section 4.11, Land Use and Planning, page 4.11-2 of the Draft EIR, permitted uses on the project site include wholesale businesses, light manufacturing and processing, research and development uses, warehousing and storage, distribution and sales, high technology production, ancillary retail sales, and related uses. Although the tenant has not been determined yet, the proposed project includes a mix of office (approximately 10,000 sq ft), manufacturing (up to 65,000 sq ft), and warehouse space (the remainder of the building square footage not otherwise utilized as office or manufacturing).

Table 4.11.B in Section 4.11, Land Use and Planning, starting on page 4.11-10 of the Draft EIR provides a consistency analysis of the goals, policies, and actions of the City of Lake Forest General Plan. Although the project site is adjacent to the Meadows Residential Community to the northeast/east, it is not connected to the Meadows Residential Community by any streets or walkways and a landscape buffer separates the Meadows Residential Community and the industrial area. The proposed project would include the installation of additional landscaping and mature trees along the northeastern corner of the project site, adjacent to the Meadows Residential Community. This new landscaping will further reduce the visibility of the industrial site as viewed from the Meadows Residential Community. Furthermore, the building was designed so that the truck dock and loading area of the proposed building is oriented to the southeast (not facing the residential properties), is located over 200 feet away from the nearest residential property line, and would not be readily visible from the residences (refer to Table 4.1.B in Section 4.10, Land Use and Planning, page 4.1-21, of the Draft EIR). Therefore, the new proposed building is compatible with the surrounding land uses. It is also important to note that truck traffic associated with the proposed project would be restricted to arterial roadways and truck traffic would not be allowed on residential streets. Additionally, as noted in Table 4.11.C, the proposed project would be consistent

with all of the applicable site development standards of the City's Pacific Commercentre Planned Community.

The proposed project has also been designed to be consistent with the Lake Forest Citywide Design Guidelines. These Guidelines are intended to guide proposed development so that it is aesthetically pleasing, high quality, and reflective of the character of the surrounding community. Furthermore, the proposed project would require a Site Development Permit, which would provide an opportunity for the City to review the physical improvements to the project site, including the overall building scale, massing, and design to ensure compatibility and compliance with the Citywide Design Guidelines.

The analysis provided in Section 4.11, Land Use and Planning, page 4.11-25 of the Draft EIR also concluded that the proposed project would be consistent with the applicable goals and policies of the Southern California Association of Governments (SCAG) 2008 Regional Comprehensive Plan (RCP) since the proposed project would be consistent with the existing site use and would not interfere or conflict with the existing land use patterns and visual character of the surrounding industrial business park or established residential neighborhoods near the site. Therefore, the proposed project would be consistent with RCP Goal 5 which calls for preserving existing single-family neighborhoods. The proposed project is also consistent with the SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) in that it aims to provide employment opportunities and facilitate job-creation for the residents of Lake Forest and surrounding communities to reduce the need for members of the local workforce to commute outside the area for employment and to contribute to the City's fiscal benefits. The proposed project would cluster land uses in proximity to other similar industrial/commercial uses and close to access points of the State highway system, such as SR-241, which reduces traffic congestion on surface streets and reduces local air pollution emissions from vehicle sources.

Given the information above and the analysis provided in Section 4.11 (Land Use and Planning) of the Draft EIR, the analysis and conclusions of the Draft EIR regarding the land use and zoning compatibility of the proposed project with the surrounding area remain valid.

Master Response 8: Transportation Analysis

Comments related to the transportation analysis presented in Section 4.17, Transportation and Traffic, of the Draft EIR, and supported by the Traffic Impact Analysis (TIA) included as Appendix J in the Draft EIR, addressed the following general themes: 1) increased traffic congestion and adverse effects to the community; 2) truck traffic and safety; 3) the cumulative effects of increased traffic congestion and vehicle miles traveled (VMT); and 4) adequacy of mitigation measures identified to reduce VMT impacts. Each of these related topics are responded to individually below.

A. Roadway Congestion Impacts

Several comments were received regarding the potential traffic impacts that would result from project operations. The main concern expressed in these comments is that the proposed project would add traffic (especially truck trips) to the existing roadway network which, in the commentor's opinion, would increase traffic congestion and cause impacts on the neighborhoods nearby the proposed project site. Perceived adverse effects to the neighborhoods cited by commenters include an increase in accidents, safety risks to pedestrians and bicyclists, increased traffic congestion related to school pick-up and drop-off, and crosswalk safety.

First, it should be noted that, as of July 1, 2020, VMT (not level of service, or LOS) is the only legally acceptable threshold for transportation-related environmental impacts pursuant to CEQA. However, the roadway LOS assessment provided in the TIA and the Draft EIR evaluates the potential for the project to increase vehicle and truck trips on the roadway network such that acceptable service levels could not be maintained. This information is provided as required by the City of Lake Forest's Transportation Analysis (TA) Guidelines (July 21, 2020) and for local planning purposes, specifically consistency with General Plan Mobility Element Goal 1 and Policy M-10.2. In addition, as stated on pages 4.17-13 through 4.17-14 of the Draft EIR, the proposed project itself includes off-site improvements at 5 intersections to enhance public safety and address concerns regarding truck turning movements. These improvements are considered in the analysis of roadway operations. Per California Public Resources Code (PRC) Section 21099(b), policy conflicts related to automobile delay and roadway congestion as measured by LOS standards are not considered environmental impacts under CEQA. Nevertheless, this evaluation was provided in the EIR for public disclosure purposes and to identify any potential deficiencies that should be addressed by the City or the project applicant via conditions of project approval or contribution to identified infrastructure improvements through traffic impact fees assessed by the City.

Table C: Project Trip Generation Summary, in the TIA (refer to page 18 of Appendix J in the Draft EIR) summarizes the project trip generation. As shown in Table C, the proposed project is estimated to generate 115 daily truck trips, including 15 a.m. peak-hour and 15 p.m. peak-hour truck trips. To present a conservative analysis, the project truck trips were converted into passenger car equivalents (PCEs). One 2-axle truck is equivalent to 1.5 passenger cars; one 3-axle truck is equivalent to 2 passenger cars; and one 4-or-more-axle truck is equivalent to 3 passenger cars. With the application of PCE conversion factors, the proposed project is estimated to generate 269 daily truck trips, including 35 a.m. peak-hour and 36 p.m. peak-hour truck trips, in PCEs. Inclusive of passenger vehicles, the proposed project is estimated to generate 727 daily trips, including 94 a.m. peak-hour trips and 99 p.m. peak-hour trips, in PCEs. Compared to the previous (approved) use on the site that is now currently vacant but could resume operations without any discretionary action

on the part of the City (1,571 daily trips, including 220 a.m. peak-hour trips and 209 p.m. peak-hour trips), the proposed project represents a significant reduction in trips to and from the site. It should be noted that the number of daily and peak-hour trips mentioned above includes both inbound and outbound trips to and from the project site.

The TIA evaluated typical weekday a.m. peak-hour conditions (inclusive of area school drop-offs) and p.m. peak-hour (evening) conditions, which is the industry standard and consistent with the City's traffic analysis requirements.

As stated on page 4.17-10 of the Draft EIR, based on the LOS analysis provided in the TIA (refer to Appendix J), the seven study area intersections are forecast to operate at an acceptable LOS during the a.m. and p.m. peak hours. Additionally, the project driveways are forecast to operate at satisfactory LOS (B or better) during both the a.m. and p.m. peak hours. Therefore, the analysis provided in the TIA and summarized in the Draft EIR demonstrates that the proposed project (including the proposed off-site improvements at five study area intersections) is not expected to significantly affect the intersection operation (level of service [LOS] and queuing) within the study area. With the development of the proposed project, the intersections within the project study area would continue to meet the City's required performance standards (LOS D), and therefore the proposed project would not conflict with any program, plan, ordinance or policy addressing roadways and intersection facilities, or decrease the performance of such facilities.

The intersection operational performance is measured using LOS, where LOS A represents free-flow activity and LOS F represents overcapacity operation. LOS A (free-flow conditions, maximum speed, and virtually no delays) is the ideal operational condition for every individual driver including the residents living in the area adjacent to the proposed site. However, in reality, intersections and roadways are often designed and expected to operate at LOS D or E during the peak hours. Per the City's TA Guidelines, the City has identified LOS D as the threshold for acceptable intersection operations. There may be a misconception between a driver's perception/expectation and the City's performance standard. LOS D is the acceptable and satisfactory LOS condition based on the City's performance standard; however, drivers may experience negative feelings of "busy" and "congested" conditions. However, these are not considered impacts under CEQA and no substantial evidence has been provided that demonstrates that existing or future roadway operational conditions would operate at unacceptable levels pursuant to the City's established performance standards. As stated above, the intersections within the project study area would continue to meet the City's performance standard with implementation of the proposed project.

B. Truck Impact and Safety Concern

Several comments were received regarding the potential truck traffic and safety impacts presumed to be caused by the proposed project. The main concern expressed in these comments is that the proposed project would add truck traffic to the existing roadways, which would potentially worsen traffic congestion and increase the risk for children, pedestrians, and cyclists. Commenters generally assert that the addition of project traffic, especially trucks, would also potentially lead to more accidents, compromise emergency response, and degrade neighborhood quality of life.

Project truck trips may utilize Interstate 5 (I-5), Interstate 405 (I-405), State Route 241 (SR-241), Bake Parkway, Lake Forest Drive, Dimension Drive, and Commercentre Drive, like other trucks currently traversing these highways and roadways. These roadways are considered acceptable designated routes for truck traffic and the roadway speed, widths, signalization, and sight distance have been designed for these vehicles. The proposed project would not add truck trips to any truck-prohibited roads or add truck trips to minor roads primarily serving the neighborhoods nearby the project site. The presence and addition of project trucks do not inherently increase hazards for children, pedestrians, and cyclists; increase the risk for accidents and collisions; compromise neighborhood safety and quality of life; or impact emergency response times/evacuation. All drivers to and from the project site are subject to the rules and regulations of the California Vehicle Code (CVC). As stated above, roadway operations would continue at an acceptable level of service with the addition of project truck trips; therefore, there would be no substantial adverse effects related to emergency response or evacuation.

In addition, a truck turning template analysis was conducted and off-site improvements were identified at five study area intersections as part of the proposed project to ensure that the inbound and outbound truck turning movements (including wheelbase 67 [WB-67] trucks) are feasible and safe. Refer to pages 33 through 35 of the TIA and pages 4.17-14 through 4.17-15 of the Draft EIR.

Furthermore, the project truck trips would travel to/from the project site over the course of the day, rather than occurring simultaneously. Based on the results of the TIA (Appendix J of the Draft EIR), the proposed project (including proposed off-site improvements at five study area intersections) is not expected to cause any operational deficiencies (both LOS and queuing) within the study area in either the Existing or Opening Year (cumulative) horizon.

C. Cumulative Impact on Traffic and VMT

Several comments were received regarding the cumulative impacts analysis conducted for the proposed project. The main focus of these comments is related to cumulative impacts from the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) on traffic and VMT. Refer to Master Response 6 regarding related comments to the overall cumulative methodology.

In coordination with the City, 13 proposed, recently approved, under construction, and reasonably foreseeable projects within a 4-mile radius of the proposed project (defined as the cumulative study area) (refer to Table 4.A in the Draft EIR) were identified at the time of the Notice of Preparation (NOP) was issued for the proposed project (March 20, 2024). The Western Realco Enterprise Way Industrial Project (Projects 1 and 2) (Cumulative Project Nos. 3 and 4) was included in the cumulative project list for the proposed project. It should be noted that any future projects that are proposed after the NOP date would be required to consider the proposed project and other future cumulative projects in a separate and individual environmental review process specific to that project and the applicable current and future physical conditions.

A cumulative (Opening Year 2027) traffic analysis is currently presented in the TIA (refer to pages 12 through 16 and 25 of the Project's TIA included in Appendix J of the Draft EIR). To develop Opening Year 2027 conditions, an ambient growth rate of 3 percent (1 percent per year, compounded over 3 years from 2024 to 2027) was applied to the Existing 2024 traffic volumes. In addition, traffic

volumes from cumulative projects, including the Western Realco Enterprise Way Industrial Projects (Cumulative Project Nos. 3 and 4), were added.

Section 3.2, VMT Methodology of the City's TA Guidelines states that VMT is defined as the amount and distance of automobile travel attributed to a project. Different from the traffic operational analysis (i.e., LOS and queuing), the VMT assessment is primarily focused on the VMT directly attributable to and generated by the proposed project. Per the City's TA Guidelines, the assessment metric for the proposed project is "Home-Based Work VMT per employee" rather than "total VMT." Home-Based Work VMT is an efficiency metric that measures the average daily distance traveled by employees commuting to or from a specific place of employment. In addition, the City has adopted a VMT threshold for office/employment projects based on the existing Countywide Home-Based Work VMT per employee (refer to Table 3 VMT Thresholds Summary of the City's TA Guidelines). For comparable comparison, project VMT should be evaluated in existing conditions based on the City's TA Guidelines. Page 6 of T*echnical Advisory on Evaluating Transportation Impacts in CEQA* (Governor's Office of Planning and Research [OPR], 2018) states that analyzing the combined impacts for a cumulative impacts analysis may be appropriate when using an absolute VMT metric (i.e., total VMT); however, metrics such as VMT per capita or VMT per employee, metrics framed in terms of efficiency, which are applied in the proposed project analysis (as recommended for use on residential and office projects), cannot be summed because they employ a denominator. The City's TA Guidelines are consistent with the OPR Technical Advisory. Therefore, cumulative projects (such as the Western Realco Enterprise Way Industrial Project) are not required to be included in the VMT analysis.

As discussed in Section 4.17.7, page 4.17-6, of the Draft EIR, the TAZ zone associated with the proposed project and the Western Realco Enterprise Way Industrial Project is above the countywide threshold for VMT, and all projects within this TAZ zone would contribute to higher VMT rates within the TAZ zone. The proposed project would have a significant project-specific impact on VMT and when considered with the other cumulative projects, particularly those in the same TAZ, the proposed project would have a cumulatively considerable impact on VMT. There are no feasible mitigation measures that can reliably guarantee that VMT can be reduced below the City's threshold; therefore, the proposed project would have a cumulatively significant and unavoidable transportation impact related to VMT even with implementation of mitigation.

D. VMT Impact Mitigation

Several comments were received regarding the project's "significant and unavoidable" VMT impact. The VMT analysis conducted for the proposed project is consistent with the City's TA Guidelines (refer to page 36 of the TIA, Appendix J in the Draft EIR). As identified under Threshold 4.17.2 in Section 4.17, page 4.17-11 of the Draft EIR, the proposed project's VMT rate exceeds the City's VMT threshold (Target VMT Rate) by 20 percent and, therefore, the proposed project would be required to reduce its VMT by 20 percent in order for impacts to be less than significant.

LSA, in coordination with the City, reviewed all potential mitigation measures that are listed in the City's TA Guidelines and 2024 California Air Pollution Control Officers Association (CAPCOA) Handbook to mitigate the project's VMT impact as much as possible. As discussed in Section 4.17, page 4.17-2 of the Draft EIR, the proposed project would be required to implement feasible Traffic

Demand Management (TDM) measures as stipulated by MM TRA-1 (consistent with measures T-32 and T-33 in 2024 CAPCOA Handbook). Providing bike lanes and an enhanced bikeway network, as required by MM TRA-1, can increase access to and from transit hubs and encourage a mode shift from vehicles to bicycles; thereby displacing VMT. As discussed in Section 4.8, page 4.8-21, of the Draft EIR, and Master Response 10, the proposed project would also be required to implement MM GHG-1 requiring the provision of on-site electric truck charging stations (consistent with measure T-14 in the 2024 CAPCOA Handbook). Additionally, because of the size of the proposed development, the project Applicant is required to comply with the site development standards specified in Section 9.160.040 of the City's Municipal Code related to employee parking spaces, parking for carpool vehicles, parking for vanpool vehicles, bicycle parking, shower facilities, locker facilities, commuter information areas, rideshare vehicle loading areas, and the provision of transit/bus shelters. To provide clarity on the applicable VMT reduction measures in the Draft EIR, the following Regulatory Compliance Measure (RCM) TRA-1 has been added to Section 4.17.9.1 identify these code requirements:

RCM TRA-1: Development Standards Pursuant to Section 9.160.040 of the City's Municipal Code. The provisions of Zoning Code Chapter 9.160 (Facility Design Regulations) shall be implemented as follows:

- Prior to the issuance of the building permits for the construction of the primary building, the site plan and/or floor plans in the construction drawings shall clearly show the location of the required carpool parking stalls, vanpool parking stalls, ride share vehicle loading area, bicycle parking, shower facilities, locker facilities, and commuter information area, in accordance with the regulations in Zoning Code Section 9.160.040.

- Prior to issuance of building permits for the construction of the primary building, the applicant shall retain a licensed Civil Engineer by the State of California to prepare Civil Street Improvement Plans for the installation of a bus shelter with solar-powered lights, a bus bench, and a trash receptacle for the existing bus stop located on the northwest corner of the intersection of Dimension Drive at Commercentre Drive/Enterprise Way, in accordance with the regulations in Zoning Code Section 9.160.040 and Orange County Transportation Authority Guidelines.

  The bus stop improvements shall be designed in accordance to the standards provided in the Orange County Transportation Authority (OCTA) Transit-Supportive Design Guidelines (June 30, 2021 or latest edition). As appropriate, the existing sidewalk shall be widened within the existing right-of-way (ROW) to a minimum eight feet wide to accommodate wheelchair bus boardings. If that is not feasible due to ROW constraints, then the sidewalk shall be widened to greatest extent practical.

The project Applicant shall submit these Civil Street Improvement Plans to the City's Engineering Division and obtain a Public Works Encroachment Permit to construct the improvements to the existing bus stop.

- Prior to issuance of Certificate of Occupancy of the building, all provisions of Chapter 9.160 shall be implemented, as approved on the construction drawings and civil street improvement plans, including but not limited to, the required carpool parking stalls, vanpool parking stalls, ride share vehicle loading area, bicycle parking, shower facilities, locker facilities, commuter information area, and improvements to the existing bus stop located on the northwest corner of the intersection of Dimension Drive at Commercentre Drive/Enterprise Way.

Additionally, the following mitigation measure has been added to Section 4.17.9.1 consistent with measure T-18 in the California Air Pollution Control Officers Association (CAPCOA) 2024 Handbook to further encourage the use of transit and displace the use of vehicles for travel to and from the project site:

MM TRA-2: Pedestrian-Scale Transit Access Lighting. To reduce vehicle miles traveled (VMT) and improve first-/last-mile access to transit, the applicant/developer shall install pedestrian-scale lighting along the on-site pedestrian pathway between the primary building entrance and the public right-of-way, leading to the existing bus stops. Lighting shall provide adequate nighttime visibility for pedestrians (generally achieving a maintained average of 1.0 foot-candle), avoid glare, and limit spillover to adjacent properties in accordance with Lake Forest Municipal Code section 9.72.085(3). Fixtures shall include automatic dusk-to-dawn controls.

Prior to issuance of a building permit, a lighting plan depicting fixture types, locations, heights, and illumination levels shall be submitted by the Applicant to the City for review and approval.

Prior to issuance of a certificate of occupancy, all required lighting shall be installed and operational and shall be maintained by the property owner for the life of the project.

Because the proposed project was already required to comply with Section 9.160.040 of the City's Municipal Code and the requirements specified in RCM TRA-1 as a matter of regulatory control applicable to all development projects, the addition of this RCM in the Draft EIR has no effect on the analysis or conclusions contained within the Draft EIR. RCM TRA-1 does not address new or more severe significant impacts of the project and was added only to clarify applicable regulations with which the project Applicant must comply as a matter of law. Similarly, the addition of MM TRA-2, pedestrian-scale lighting, does not address new or more severe environmental impacts of the project and has no effect on the analysis or conclusions contained within the Draft EIR.

Other potential mitigation measures identified in the City's TA Guidelines related to Land Use, Neighborhood Enhancements, Parking Policy/Pricing, Transit Improvement, Commute Trip, School Trip, and Clean Vehicles and Fuels were determined to be infeasible for the proposed project due to the project's geographic location, redundancy with the City's Municipal Code requirements for the project site, requirements for participation and approval from third-party transit agencies which cannot be enforced by the City, incompatibility with the project's proposed use, cost, uncertain effectiveness based on a speculative tenant, lack of enforceability, or existing factors such as on- and off-street parking at the project site is currently free. As explained in Master Response 4, a mitigation measure is only considered feasible when it is capable of being accomplished in a successful manner within the constraints of the project, taking into consideration economic, environmental, legal, social, and technological factors. Feasibility is evaluated based on the measure's ability to be enforced and to achieve the desired outcome.

Based on the above and as concluded in Section 4.17, page 4.17-18 of the Draft EIR, even with implementation of RCM TRA-1 and MM TRA-1 and MM TRA-2, the proposed project's VMT would still exceed the City's VMT threshold and therefore would result in a significant and unavoidable impact.

Master Response 9: Health Risk Assessment and Sensitive Receptors

Several comments state that the air quality analysis included in Section 4.3 of the Draft EIR understates impacts on sensitive populations, particularly those related to the long-term effects on children and the elderly associated with truck exhaust and the number of proposed loading dock doors. Additionally, a number of comments claim that the Draft EIR does not adequately analyze health risks and potential issues related to the topic of environmental justice, including cumulative impacts from the proposed project.

First, it should be clarified that environmental justice is not a specific topic that is required to be evaluated or considered pursuant to *State CEQA Guidelines* Sections 15120-15132 (Contents of Environmental Impact Reports). However, several aspects of the Draft EIR address CEQA-mandated topics that touch upon this issue. Specifically, the topic of air quality addresses potential impacts to sensitive receptors, which are defined by the SCAQMD as people who have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptors consist of structures that house persons (e.g., children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise) or places where persons gather (i.e., residences, schools, playgrounds, child-care centers, convalescent centers, retirement homes, and athletic fields) (refer to page 4.3-31 of the Draft EIR). Refer to Master Response 14, which more fully addresses the topics of environmental justice and disadvantaged communities in the context of CEQA.

Modeling software and methodologies exist to evaluate impacts to sensitive receptors, such as residences, near the project site, including those located in disadvantaged communities. Specifically, CalEnviroScreen is a computer model released by the Office of Environmental Health Hazard Assessment (OEHHA) on behalf of the California Environmental Protection Agency (CalEPA) to identify California communities by census tract that are disproportionately burdened by, and vulnerable to, multiple sources of pollution. Pollution burden scores for each census tract are derived from the average percentiles of the seven Exposures indicators (ozone and PM2.5 concentrations, DPM emissions, drinking water contaminants, pesticide use, toxic releases from facilities, and traffic density) and the five Environmental Effects indicators (cleanup sites, impaired water bodies, groundwater threats, hazardous waste facilities and generators, and solid waste sites and facilities). Although CEQA does not require air quality impacts to be assessed based on census tract locations, this tool provides useful context. According to CalEnviroScreen, the project site is not located within a Senate Bill (SB) 535-designated disadvantaged community. Additionally, the pollution burden percentile for the project site is 45 out of 100, which is considered moderate. Therefore, while the project area does experience some environmental stressors, it is not considered a heavily burdened community (also refer to Master Response 14).

Currently, there is no methodology to quantify the cumulative areawide or localized health risks within a community-wide area. The SCAQMD's recommended thresholds of significance apply to individual development projects and evaluate the incremental increase in emissions from a proposed source. In developing thresholds of significance for individual projects, the SCAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. The City relies on the SCAQMD's recommended methodology to evaluate cumulative

impacts, which is to conclude that an impact considered to be significant on a project-specific basis would also cause a significant cumulative impact.

Notwithstanding, the Draft EIR includes a Health Risk Assessment (HRA) (Appendix C of the Draft EIR and fully summarized on pages 4.3-31 through 4.3-35 of the Draft EIR) that fully analyzes the health risks to all sensitive receptors, which include residences, schools, workplaces, etc., surrounding the project site. As described in Section 4.3, pages 4.3-31 through 4.3-22, of the Draft EIR, the HRA was conducted using three models (1) CARB's California Emissions Factor Model, Version 2021 (EMFAC2021) for on-road vehicle emissions factors and percentages of fuel type within the overall vehicle fleet; (2) the USEPA's AERMOD air dispersion model to determine how the TACs would move through the atmosphere after release from sources both on site and on surrounding roadways; and (3) CARB's HARP2 model to translate the pollutant concentrations from AERMOD into individual health risks at any sensitive receptor locations surrounding the project site. In addition, the HRA follows the Office of Environmental Health Hazard Assessment guidance, including *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*[4] as well as guidance from South Coast Air Quality Management District (SCAQMD), California Air Pollution Control Officers Association (CAPCOA), and CARB.

The HRA fully analyzes the health risks to children and adults of all ethnicities and backgrounds. The HARP model specifically includes the risks for children by using higher breathing rates and a 9-year exposure period, both of which are designed to be protective of children's health. As described on Pages 10-14 of the HRA, Appendix C of the Draft EIR, the HRA includes all traffic information, including vehicle daily trips and number of truck trips generated, number of loading dock doors, truck idling and on-site queuing to determine the potential risk to all nearby sensitive receptors, including the senior residential apartment building located east of the project site and the Meadows residential community. Furthermore, the operational HRA analysis assumes continuous exposure over a 25- and 30-year exposure period for both people living and working near the project site. This represents a conservative scenario because it assumes that individuals are exposed to the maximum potential emissions consistently over the entire duration without accounting for potential mitigating factors such as improved vehicle technology, or implementation of emission-reduction measures over time. By modeling the worst-case exposure conditions, the HRA ensures that the analysis is conservative and likely overstates rather than understates the impact, thereby providing a protective assessment for public health.

As shown in Table 4.3.M, page 4.3-34 of Section 4.3, of the Draft EIR, with implementation of Mitigation Measure (MM) AQ-1, which requires the project to utilize Tier 4 Interim equipment or the most effective Verified Diesel Emission Control Strategies (VDECS) available for the engine type as certified by the CARB during the construction period, the maximum cancer risk for the residential receptor MEI would be reduced from 41.14 in 1 million to 5.12 in 1 million, which is below the SCAQMD cancer risk threshold of 10 in 1 million. Requiring the use of Tier 4 Interim equipment or most effective VDECS available for engine types is a common method of substantially reducing construction emissions attributed to the vehicles and is applied to development projects throughout

[4] California Environmental Protection Agency Office of Environmental Health Hazard Assessment, 2015. Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. March. Website: https://oehha.ca.gov/air/air-toxics-hot-spots (accessed October 2025).

the State. This equipment is readily available across fleet sizes, equipment types, and horsepower bins.[5] Further, the project Applicant is committed to meeting the mitigation requirements as outlined in the Draft EIR and will be responsible for mitigation implementation through the MMRP. Therefore, with implementation of MM AQ-1, construction of the proposed project would not cause an exceedance of the SCAQMD health risk thresholds and would not result in the exposure of nearby sensitive receptors to substantial pollutant concentrations and no further mitigation is required. Additionally, as shown in Table 4.3.N, page 4.3-35 of Section 4.3, of the Draft EIR, all health risk levels to nearby receptors from operation-related emissions of TACs would be well below the SCAQMD's health risk thresholds. Therefore, operation of the proposed project would not expose sensitive receptors to substantial pollutant concentrations during project operations.

As mentioned above, there is no methodology to quantify the cumulative areawide or localized health risks within a community-wide area. Therefore, it is not required by CEQA, and recommendations or guidance for conducting such an analysis is not provided by expert agencies such as the SCAQMD. It is not feasible to prepare a cumulative HRA for all projects within the project area (refer to Master Response 6 regarding the cumulative analysis), as the detailed operations for each project are not known. However, the Draft EIR does include a construction and operational HRA that analyzes the impacts of the proposed project in combination with the nearby Western Realco Enterprise Way Industrial Project (Projects 1 and 2), including the impact on children and all adults, without distinguishing ethnicity, disadvantage level, or poverty level. The Western Realco Enterprise Way Industrial Project (Projects 1 and 2) (refer to Table 4.A in the Draft EIR; Cumulative Project Nos. 3 and 4) are reasonably foreseeable projects that would be located in the immediate vicinity of the project site and for the purposes of this analysis are assumed to have construction schedules that overlap with the proposed project. Additionally, operational details for the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) were provided by that project applicant and reviewed by the City and its consultants to ensure that the assumptions were reasonable and consistent with the projects' applications. As detailed in Section 4.3, pages 4.3-46 through 4.3-50, of the Draft EIR and as shown on Tables 4.3.U and 4.3.V, no significant health risk would occur from cumulative construction emissions with the project's implementation of MM AQ-1 and MM AQ-3. It is also important to note that the cumulative analysis assumes that the two projects, the proposed project and the Western Realco Enterprise Way Industrial Project (Projects 1 and 2), would be constructed and operated at the same time. The likelihood of the two projects being constructed at the same time represents a conservative, "worst-case" assumption. Nevertheless, the HRA results show that with implementation of MM AQ-1 and MM AQ-3 the proposed project's cumulative health risk would be reduced to a less than significant level. Therefore, no additional mitigation is required and no additional analysis is needed.

[5] Emission standards are phased in over time. As of 2015, newly manufactured engines across all horsepower sizes are required to meet Tier 4 final emissions standards.

Master Response 10: Greenhouse Gas Emissions Analysis

Several comments state that Mitigation Measure (MM) GHG-1 inadequately mitigates the proposed project's impacts related to greenhouse gases (GHG) and that all feasible mitigation measures must be incorporated into the Draft EIR. Additional comments express concern that the Final EIR cannot be certified with identification of a significant unavoidable GHG-related impact.

Consistent with Appendix G of the *State CEQA Guidelines*, the relevant question for Threshold 4.8.2 is whether the proposed project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. As noted in Section 4.8.4, starting on page 4.8-5 of the Draft EIR, the relevant plans that were adopted for the purposes of reducing GHG emissions were identified to be the CARB's 2022 Scoping Plan and the SCAG's RTP/SCS.

For the analysis of Threshold 4.8.2 in the Draft EIR, compliance with certain design standards (rather than quantity of GHG emissions) was used to demonstrate compliance with the goals established in the 2022 Scoping Plan. The Draft EIR evaluates project compliance with the 2022 Scoping Plan based on the Bay Area Air District's recommended GHG significance thresholds, which include a list of design criteria that Air District has concluded demonstrate that a land use project is doing its fair share to meet the State's GHG reduction goals. Although this study was produced by the Bay Area Air District, this methodology is applicable to air districts across the State because the thresholds are intended to demonstrate Statewide compliance with the 2022 Scoping Plan. This methodology has been justified in the Bay Area Air District's[6] *Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans* (Justification Report).[7] According to the Bay Area Air District's Justification Report, a project would have a less than significant impact related to consistency with the 2022 Scoping Plan if the proposed project achieves a reduction in project-generated VMT below the regional average consistent with the current version of the 2022 Scoping Plan (currently 15 percent) or meets a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's *Technical Advisory on Evaluating Transportation Impacts in CEQA*. Additionally, a project must not include natural gas appliances or natural gas plumbing and should not result in any wasteful, inefficient, or unnecessary electrical usage as determined by the analysis required under *State CEQA Guidelines* Section 21100(b)(3) and § 15126.2(b). Lastly, a project must achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2. If a project is designed and built to incorporate these design elements related to VMT, natural gas, energy, and EVs, then it would contribute its portion of what is necessary to achieve California's long-term climate goals and an agency reviewing the project under CEQA can conclude that the project would be consistent with the State's 2022 Scoping Plan.

As discussed under Threshold 4.8.2, starting on page 4.8-16 of Section 4.8, Greenhouse Gas Emissions, of the Draft EIR, the proposed project would comply with two criterion related to natural gas usage and efficiency energy usage. The proposed project would also comply with the third criterion related to EV requirements with implementation of MM GHG-1. The passenger vehicle standards for EV charging stations provided in the CALGreen Code, Table 5.106.5.3.1, were used by

[6] Formerly known as the Bay Area Air Quality Management District.

[7] Bay Area Air Quality Management District (BAAQMD). 2022. *Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans*. April.

the City to determine EV truck charging stations required for the proposed project (23 dock doors = 4 EV truck charging stations). MM GHG-1 was imposed to ensure that the proposed project would comply with this requirement. To clarify the timing of installation of on-site electric truck charging stations, revisions to MM GHG-1 have been made in Section 4.8, Greenhouse Gas Emissions, of the Final EIR as shown below and as noted in Section 3.0, Errata, of this RTC document:

MM GHG-1: **Electric Vehicle Charging.** Provisions shall be made at the Project site for emerging electric truck technology. Prior to the issuance of a shell building permit, the ~~City shall verify that the site plan identifies an on-site location for future electric truck charging stations, with space available for a minimum of four (4) trucks to simultaneously charge when charging stations are installed in the future. The conduit trenching shall be installed to that location for future conduit pull as a requirement of the shell building permit. In conjunction with the approval of tenant improvement plans and permits, the applicant shall install electric truck charging stations on the site for a minimum of four (4) electric truck to simultaneously charge.~~ construction plan set shall:

(a) Provide for installation of all necessary infrastructure, including conduit, wiring, and sufficient electrical capacity, to support the future installation of on-site electric truck charging stations; and

(b) Designate sufficient space to accommodate a minimum of four electric trucks charging simultaneously.

Prior to issuance of tenant improvement permits for the building, the tenant improvement plans shall include installation of a minimum of four electric truck charging stations at the predesignated locations. The charging stations shall be installed and operational prior to tenant occupancy of the building.

As explained in Master Response 8, the revisions to MM GHG-1 do not address new or more severe significant impacts of the project and were made only to clarify the timing of installation of on-site electric truck charging stations and have no effect on the analysis or conclusions contained in the Draft EIR.

The fourth criterion requires that the proposed project be below the City's VMT threshold (Target VMT Rate). As described in further detail in Section 4.17, Transportation and Traffic, page 4.7-12 of the Draft EIR, the proposed project VMT would exceed the City's VMT threshold by 20 percent and therefore would be required to implement Traffic Demand Management (TDM) measures (Mitigation Measure TRA-1). Additionally, because of the size of the proposed development, the project Applicant is required to comply with the site development standards specified in Section 9.160.040 of the City's Municipal Code related to employee parking spaces, parking for carpool vehicles, parking for vanpool vehicles, bicycle parking, shower facilities, locker facilities, commuter information areas, rideshare vehicle loading areas, and the provision of transit/bus shelters. Additionally, as discussed in Master Response 8, Regulatory Compliance Measure (RCM) TRA-1 has been added to Section 4.17, Transportation and Traffic, of the Final EIR to provide clarity on the applicable regulations and code requirements governing VMT reductions as specified in the EIR.

However, as explained in Master Response 8, this new regulatory compliance measure does not address new or more severe significant impacts of the project and was added only to clarify applicable regulations with which the project Applicant must comply as a matter of law. These applicable requirements were already considered in the Draft EIR analysis. Furthermore, as discussed in Master Response 8, Measure (MM) TRA-2, Pedestrian-Scale Transit Access Lighting, has been added to Section 4.17, Transportation and Traffic, of the Final EIR consistent with measure T-18 in the California Air Pollution Control Officers Association (CAPCOA) 2024 Handbook to further encourage the use of transit and displace the use of vehicles for travel to and from the project site. As explained in Master Response 8, this new mitigation measure does not address new or more severe significant impacts of the project and has no effect on the analysis or conclusions contained in the Draft EIR. As discussed in Section 4.8, Greenhouse Gas Emissions, page 4.8-21 of the Draft EIR, and in Master Response 8, even with implementation of MM TRA-1, MM TRA-2, and RCM TRA-1, project-generated VMT cannot be reduced to below the City's VMT threshold and, as a result, the impact remains significant and unavoidable. Because the project would result in a significant and unavoidable VMT impact, the proposed project would not meet the VMT design criterion and would therefore result in a conflict with the 2022 Scoping Plan.

Other potential mitigation measures identified in the City's TA Guidelines related to Land Use, Neighborhood Enhancements, Parking Policy/Pricing, Transit Improvement, Commute Trip, School Trip, and Clean Vehicles and Fuels were determined to be infeasible for the proposed project due to the project's geographic location, redundancy with the City's Municipal Code requirements for the project site, requirements for participation and approval from third-party transit agencies which cannot be enforced by the City, incompatibility with the project's proposed use, cost, uncertain effectiveness based on a speculative tenant, lack of enforceability, or existing factors such as on- and off-street parking at the project site is currently free. As explained in Master Response 4, a mitigation measure is only considered feasible when it is capable of being accomplished in a successful manner within the constraints of the project, taking into consideration economic, environmental, legal, social, and technological factors (*State CEQA Guidelines* Section 15364). Feasibility is evaluated based on the measure's ability to be enforced and to achieve the desired outcome. MM TRA-1 represents all feasible mitigation for the project that may reduce VMT. In addition, MM GHG-1 would ensure that the EV criterion is met in its entirety. The relevant thresholds used in this analysis are compliance with specific design criteria and, consistent with *State CEQA Guidelines* Section 15126.4(b), the measures directly address the specific components which may trigger an impact. Therefore, the mitigation measures set forth in Section 4.8, Greenhouse Gas Emissions, page 4.8-21 of the Draft EIR adequately reduce impacts to the maximum extent feasible.

As described in Master Response 2, Purpose and Adequacy of the Draft EIR, the purpose of an EIR is to analyze a project's significant environmental impacts, identify ways to avoid and/or minimize them, and present alternatives to a project. An EIR is an informational document that serves to inform decision makers and the public about a project's potential environmental impacts before a project is approved. The presence of significant and unavoidable impacts does not make an EIR invalid. The Final EIR, in conjunction with the findings, is used by the decision makers in determining whether to approve or disapprove a project or approve a project alternative. In accordance with *State CEQA Guidelines* Section 15043, a public agency can approve a project even though a project would cause a significant impact on the environment provided there is no feasible way to lessen or

avoid the significant impact, and specifically identified expected benefits from the project outweigh the policy of reducing or avoiding the significant environmental impacts of the project. In such instances, the lead agency must state in writing the specific reasons to support its action based on the Final EIR and/or other information in the record. Those reasons are presented in the statement of overriding considerations and are supported by substantial evidence. In the case of the GHG analysis, the conclusion that the proposed project would result in a conflict with the 2022 Scoping Plan due to VMT that exceeds City thresholds and therefore result in a significant unavoidable impact remains valid.

Master Response 11: Noise and Vibration Analysis

Comments related to the noise and vibration analysis presented in Section 4.13, Noise of the Draft EIR, and supported by the Noise and Vibration Impact Analysis included as Appendix H of the Draft EIR addressed the following general themes related both to the adequacy of the analysis and generally expressing concerns about the identified and perceived noise related effects of the project: 1) project-specific noise and vibration impacts; 2) cumulative noise and vibration impacts; 3) daily and nighttime operational noise; 4) requested construction noise reduction measures; 5) requested operational noise reduction measures; and 6) potential noise related health effects. Each of these related topics are responded to individually below. Please refer to Master Response 7 regarding zoning and land use compatibility.

A. Project-Specific Noise and Vibration Impacts

A number of comments expressed general concern with elevated noise impacts associated with construction and operational noise from the proposed project. These comments did not specify a specific perceived deficiency or inaccuracy in the analysis, but rather assert that impacts would be potentially significant based on speculation. These comments are generally addressed below in the summary of the Draft EIR analysis by subtopic, for informational purposes and to provide a consolidated response to these general comments. Please refer to Master Response 3 regarding speculation without substantiation.

Note that Section 4.13 of the Draft EIR and the supporting Noise and Vibration Technical Analysis include an assessment of the construction noise (see page 4.13-17 of the Draft EIR, page 22 of Appendix H), construction vibration (page 4.13-20 of the Draft EIR, page 25 of Appendix H), off-site traffic noise and vibration (page 4.13-17 of the Draft EIR, page 28 of Appendix H), and off-site operational noise and vibration impacts (page 4.13-18 of the Draft EIR, page 31 of Appendix H) for the proposed project. The impact conclusion for each of the sections related to construction noise, operational noise, and traffic noise indicated that noise generated by the proposed project would not exceed established standards and standards that apply citywide and/or are specific to the project type and location, as applicable, and therefore, would not generate excessive noise to surrounding sensitive uses. Each of these topics and the resulting determination, based on substantial evidence, is further discussed below.

Construction Noise. As it related to short-term construction activities associated with the development of the proposed project, the project-related construction noise levels, when the highest reference noise level is operating from the center of primary construction activity nearest the sensitive receiver location, would average 71 dBA L_{eq} at the sensitive receiver locations, and therefore would not exceed the daytime construction noise level threshold of 80 dBA L_{eq} at any receiver location. Compliance with Regulatory Compliance Measure (RCM) NOI-1 would ensure that construction activities would only occur during the allowed hours within the City's Municipal Code. Construction-related noise impacts would be less than significant, and no mitigation is required.

Construction Vibration. Ground-borne vibration levels resulting from construction activities occurring within the project site were estimated using data published in the Caltrans Manual. Based on the reference vibration levels provided by the Caltrans Manual, a large bulldozer represents the peak source of vibration with a reference velocity of 0.089 in/sec PPV at 25 feet. The closest

structures are the industrial buildings (26180 and 26190 Enterprise Way), which are within 10 feet of the northern project construction boundary. If large construction equipment with a reference vibration level of 0.089 in/sec PPV is used within 8 feet of these structures, they would experience vibration levels of up to 0.312 PPV (in/sec). These vibration levels would exceed the 0.3 in/sec PPV threshold. With implementation of RCM NOI-2, which details the construction vibration assessments pursuant to Municipal Code Section 11.16.090 necessary to ensure that vibration levels would be less than 0.3 in/sec PPV, construction vibration impacts would be less than significant. Since there are no other receptor locations within 12 feet of the project site, vibration levels at all other buildings would be below the 0.3 in/sec PPV threshold and no construction-related vibration impacts would occur. Construction impacts would be less than significant, and no mitigation is required.

Off-site Operational Traffic Noise. To assess the off-site transportation-related noise level impacts associated with the proposed project operations, the existing (2024) and opening year without and with project scenario traffic volumes were obtained from the project's Traffic Impact Analysis (Appendix J of the Draft EIR). A summary of off-site traffic noise impacts is presented in Table 4.13.H of the Draft EIR. Project-related traffic noise would generate the greatest increase of 3.3 dBA along Enterprise Way. There are no noise sensitive uses along this roadway segment and the resultant noise level would be well below 65 dBA L_{dn}. All other roadway segments would be less than 1 dBA. Noise level increases below 3 dBA would not be perceptible to the human ear in an outdoor environment. Project-related traffic would have a less than significant impact on off-site sensitive receptors, and no mitigation is required.

Off-site Operational Vibration. The proposed project would not result in vibration impacts related to on-site stationary source operations because the proposed stationary equipment would not generate perceptible vibration levels. In addition, the proposed project would not result in vibration impacts from project-related traffic on site or on the adjacent roadways because the rubber tires and suspension systems of on-road vehicles reduce vibration. Based on a reference vibration level of 0.076 in/sec PPV, structures greater than 20 feet from the roadways along which project vehicles would be traveling, would experience vibration levels below the standard of 0.3 in/sec PPV. Vibration levels generated from project-related traffic on site or on the adjacent roadways would be less than significant, and no mitigation is required.

Off-Site Stationary Operational Noise. Adjacent off-site land uses would be potentially exposed to stationary-source noise impacts from the proposed on-site heating, ventilation, and air conditioning (HVAC) equipment, trash bin emptying activities, parking lot activities, and truck deliveries and loading and unloading activities. A 3-D noise model, SoundPLAN[8], was used to determine the future noise impacts from project operations to the noise-sensitive uses. The noise model considered site topography, the shielding provided by the proposed on-site building, and a planned 16 foot high, 60 foot long wall, which would be located at the eastern end of the loading docks, west of the proposed trash enclosure. The hourly noise levels associated with the proposed on-site HVAC equipment, trash bin emptying activities, parking lot activities, and truck deliveries and loading and

[8] https://222.soundplan.eu/en/software/soundplannoise/standards SoundPLAN is a 3-D model that utilizes all industry accepted standards and methodologies for predicting noise impacts and necessary reduction applications.

unloading activities were modeled at the surrounding sensitive receptors to range from 50.0 dBA L_{eq} to 52.7 dBA L_{eq}. These levels would not exceed the City's daytime and nighttime noise standards of 55 dBA L_{eq} and 50 dBA L_{eq}, respectively, and therefore are considered less than significant noise impacts, and no mitigation is required.

B. Cumulative Noise and Vibration Impacts

A number of comments expressed general concerns related to the cumulative operations of the two separate sites. These comments did not specify a specific perceived deficiency or inaccuracy in the analysis, but rather assert that impacts would be potentially significant based on speculation. These comments are generally addressed below in the summary of the Draft EIR analysis by subtopic, for informational purposes and to provide a consolidated response to these general comments. Please refer to Master Response 3 regarding speculation without substantiation. Also refer to Master Response 6 regarding cumulative methodology.

Section 4.13, pages 4.13-17 and 4.13-20 of the Draft EIR and supporting Noise and Vibration Impact Analysis (Appendix H of the Draft EIR) include an assessment of the construction noise, construction vibration, off-site traffic noise and vibration, and off-site operational noise and vibration impacts for the proposed project, as explained above. The Noise and Vibration Impact Analysis also includes a cumulative assessment of the proposed project along with the Western Realco Enterprise Way Industrial Project (Projects 1 and 2), and other nearby projects.

Cumulative Construction Noise. For cumulative construction noise, the assessment assumes that the peak noise level phase of each site would occur simultaneously and generate the greatest potential noise levels at surrounding sensitive uses. As detailed in Section 4.13, page 4.13-22 of the Draft EIR, the closest residence (sensitive receptor) to the project site is located 470 feet from the center of the project site. Based on the reference construction noise levels, construction noise levels from the proposed project and the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) would be 71 dBA L_{eq} and 68 dBA L_{eq}, respectively, at the sensitive receptor. The cumulative construction noise levels from both the proposed project and the Western Realco Project (Projects 1 and 2) would be 72.8 dBA L_{eq} at the sensitive receptor, which is below the construction noise level threshold of 80 dBA L_{eq}. Therefore, implementation of the proposed project, when evaluated in combination with the Western Realco Project (Projects 1 and 2), would not contribute to cumulatively considerable construction-related noise impacts in excess of standards established in a general plan or noise ordinance. Therefore, there would be no cumulatively significant construction noise impact, and no mitigation is required.

Cumulative Operational Noise. Hourly noise levels generated by operational activities from the Western Realco Project (Projects 1 and 2) were modeled at the closest off-site land uses using SoundPLAN. Operational assumptions were similar to those for the proposed project and were scaled based on the number of docks and estimated trip generation for the Western Realco Project (Projects 1 and 2).

The results show that the noise levels generated by the combination of the proposed project and the Western Realco Project (Projects 1 and 2) would be below the daytime and nighttime standards of 55 dBA L_{eq} and 50 dBA L_{eq}, respectively, and would not approach thresholds levels at the nearby

sensitive uses. Therefore, implementation of the proposed project, when evaluated in combination with the Western Realco Project (Projects 1 and 2), would not contribute to a cumulatively considerable operational stationary noise impact in excess of standards established in a general plan or noise ordinance. Therefore, there would be no cumulatively significant operational stationary noise impact, and no mitigation is required.

Cumulative Off-site Traffic Noise. As shown in Table 4.13.H of the Draft EIR, cumulative traffic noise levels associated with the operation of the proposed project and the Western Realco Project (Projects 1 and 2) would increase noise levels by up to 1.0 dBA along Enterprise Way. Noise level increases below 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, implementation of the proposed project, when evaluated in combination with the Western Realco Project (Projects 1 and 2), would not contribute to a cumulatively considerable operational traffic noise impact in excess of standards established in a general plan or noise ordinance. Therefore, there would be no cumulatively significant operational traffic noise impact, and no mitigation is required.

Cumulative Construction Vibration. As detailed in Section 4.13, starting on page 4.13-20 of the Draft EIR, vibration impacts would not occur at buildings located beyond 12 feet from the edge of construction at the project site. Similarly, vibration impacts associated with the Western Realco Project (Projects 1 and 2) would also not extend beyond 12 feet from the edge of construction. There are no buildings that are within 12 feet of both the proposed project and the Western Realco Project (Projects 1 and 2). Therefore, implementation of the proposed project, when evaluated in combination with the Western Realco Project (Projects 1 and 2), would not contribute to a cumulatively considerable construction vibration impact. Therefore, there would be no cumulatively significant construction vibration impact, and no mitigation is required.

Cumulative Operational Vibration. The proposed project would not result in vibration impacts related to on-site stationary source operations because the proposed stationary equipment would not generate perceptible vibration levels. Similarly, the vibration impacts related to on-site stationary source operations from the Western Realco Project (Projects 1 and 2) would also be below perceptible vibration levels. Stationary sources do not generate significant vibration levels. Therefore, implementation of the proposed project, when evaluated in combination with the Western Realco Project (Projects 1 and 2), would not contribute to a cumulatively considerable on-site stationary source-induced vibration impact. Therefore, there would be no cumulatively significant on-site stationary source-induced impact, and no mitigation is required.

Cumulative Off-site Traffic Vibration The proposed project would not result in vibration impacts from project-related traffic on-site or on the adjacent roadways because the rubber tires and suspension systems of on-road vehicles reduce vibration. Similarly, and for the same reason, the vibration impacts from on-site and off-site traffic associated with the Western Realco Project (Projects 1 and 2) would also remain below impact thresholds. Therefore, implementation of the proposed project, when evaluated in combination with the Western Realco Project (Projects 1 and 2), would not contribute to a cumulatively considerable traffic-induced vibration impact. Therefore, there would be no cumulatively significant traffic-induced vibration impact, and no mitigation is required.

C. Daily and Nighttime Operational Noise

Several comments expressed concern that the proposed project would operate for 24 hours per day, generating a continuous noise nuisance and nighttime noise impact. Multiple comments also requested that the operational hours be modified and/or reduced to eliminate nighttime operations. Although future tenants and operational characteristics are unknown at this time, it is conservatively assumed that the proposed project as well as the other nearby cumulative projects would have the potential to operate during the more-sensitive nighttime hours as a worst-case scenario, which was considered in the Draft EIR analysis. Section 4.13.6, starting on page 4.13-17, of the Draft EIR and supporting Noise and Vibration Impact Analysis, as described above, appropriately consider this condition and present specific operational noise assessments to ensure that nighttime noise impacts do not exceed applicable noise standards. Daytime and nighttime analyses are consistent with the City's established standards which account for increased sensitivity during nighttime hours. Furthermore, the City's nighttime noise standards take into account the sensitivity of the nighttime hours at which most people sleep, thus the analysis also considers this time of day which could be seen as potentially more impacted by industrial operations. The daytime noise standard is 55 dBA L_{eq} whereas the nighttime noise standard is 50 dBA L_{eq}. Because of this consideration, the nighttime noise level standard is 5 dBA less than the daytime standard. As discussed on pages 4.13-18 and 4.13-19 of the Draft EIR, nighttime operational noise impacts would be less than significant pursuant to the established thresholds. The Noise and Vibration Impact Analysis was prepared by qualified technical experts with specific technical knowledge and credentials related to this subject area. Please refer to Master Response 4 regarding CEQA mitigation requirements. There is no nexus to require reduced operating hours as a potential mitigation for nighttime noise impacts, as nighttime operational noise impacts would be less than significant. Additionally, operation of the proposed project during nighttime hours is allowable under the Light Industrial zoning designation.

D. Requested Construction Noise Reduction Measures

Multiple comments suggest that the hours of construction be modified from the City approved times within the City's Municipal Code. However, as discussed above and in Section 4.13, pages 4.13-17 and 4.13-20 of the Draft EIR, impacts related to construction period noise would be less than significant pursuant to the established thresholds with required adherence to standard regulatory compliance measures, specifically RCMs NOI-1 and NOI-2. Please refer to Master Response 4 regarding mitigation requirements under CEQA; no mitigation measures are required because impacts would not exceed the established thresholds. Given there are no impacts expected during construction of the proposed project as stated on page 4.13-17 of the Draft EIR and page 22 of Appendix H, there would not be a need to consider altering approved construction hours. These hours are established by the City to give certainty to residents, businesses, and construction contractors etc. about the allowable short term noise conditions that the City has deemed to be acceptable while ensuring the overall health and welfare of the community. Additionally, the allowed construction hours are all within the daytime hour range of 7:00 a.m. to 10:00 p.m., therefore, the more sensitive nighttime hours are avoided during standard construction hours. Furthermore, the proposed project would not include impact equipment such as pile driving.

E. Requested Operational Noise Reduction Measures

A number of comments suggest that additional noise reduction or mitigation measures are necessary to reduce operation period noise impacts. These included construction of property line walls and hours restrictions. However, as discussed above and in Section 4.13, page 4.13-18 of the Draft EIR, impacts related to operation period noise would be less than significant pursuant to the established thresholds. Please refer to Master Response 3 regarding mitigation requirements under CEQA; no mitigation measures are required because impacts would not exceed the established thresholds. Further, the proposed project is designed to reduce noise impacts to the greatest degree feasible. Specifically, proposed loading docks would not face residential uses and a 16-foot-high, 60-foot-long wall would be placed adjacent to the loading docks as presented on page 4.13-18 of the Draft EIR and page 31 of Appendix H. With the proposed site layout and loading dock wall, the proposed operations would not generate a potential noise impact to surrounding uses. As described above, the project design also considers, where appropriate and necessary, noise reduction practices similar to those of the Attorney General such that impacts to sensitive receptors are mitigated. More specifically, the Attorney General state the location of a logistics facility should be considered when determining the potential impact to surrounding sensitive receptors. The analysis supporting the project has accurately considered the proximity of the sources of noise to the surrounding uses and determined that there are no significant impacts.

F. Potential Noise Related Health Effects

A number of comments suggest that health effects can occur when sensitive uses are exposed to increased noise levels. Such health effects could consist of heart conditions and elevated stress. Consistent with the above discussion, the City of Lake Forest has established noise standards which are based on federal and State level requirements. The federal and State level requirements appropriately consider the health effects of excessive noise which also guide the establishment of local standards. By incorporating the policies and guidelines from the State and Federal requirements, the City has appropriately considered the health effects of potential noise impacts. It should be noted that because there are no exceedances of local jurisdiction noise level standards, there are no expected adverse health effects.

Master Response 12: Light and Glare Analysis

Several comments were received regarding the potential for light and glare from the proposed project to impact nearby residential areas, most specifically the Meadows. Comments related to light and glare generally expressed concerns regarding general light pollution, dynamic sources of light (headlights, brake lights, and reversing lights of trucks), and cumulative impacts related to light and glare from the combination of the proposed project and the Western Realco Enterprise Way Industrial Project (Projects 1 and 2). These comments did not specify a specific perceived deficiency or inaccuracy in the analysis, but rather assert that impacts would be potentially significant based on speculation. Please refer to Master Response 3 regarding speculation without substantiation.

As noted in Chapter 3.0, page 3-9 of the Draft EIR, the project site is currently designated Light Industrial in the City of Lake Forest General Plan and is located within the Pacific Commercentre Planned Community with a zoning designation of LI – Light Industrial. Permitted uses include a variety of office, manufacturing, and warehouse uses. The project site has been zoned LI since 1987[9] and was vacant until the existing structure was developed in 1999. From 2000 to 2021 the existing building was occupied by avionic corporations and used as an office, manufacturing, and research testing facility from 2006 to 2021. As noted in Chapter 3.0, Project Description, page 3-1 of the Draft EIR, the existing building is currently vacant. Although the existing building is currently vacant, existing sources of light and glare on the project site include building façade lighting, security lighting, and pole-mounted lighting in the parking area. Similar to the project site, existing sources of light and glare in the project vicinity are typical of industrial areas and include vehicle headlights on nearby roadways, streetlights in the nearby vicinity, building façade and interior lighting, and pole-mounted lighting in the parking areas within adjacent developments. Lighting from existing surrounding development within Lake Forest (including commercial and residential land uses) also contributes to the background lighting in the project vicinity.

An analysis of new sources of light and glare as a result of the proposed project is included in Section 4.1, starting on page 4.1-25 of the Draft EIR. The analysis of light and glare identified the location of light-sensitive land uses (including the Meadows residential community) and took into consideration the existing ambient conditions on and in the vicinity of the project site. The analysis described the proposed project's light and glare sources and the extent to which project lighting would spill off the project site onto adjacent light-sensitive areas (including the Meadows residential community). The analysis also considered the potential for glare that could be produced during the daytime, but also during evening and nighttime hours by artificial light sources, such as illuminated signage and vehicle headlights (a dynamic source of light). It should be noted that the headlights associated with project-related vehicles, including passenger vehicles and trucks, would be consistent with existing vehicle headlights on nearby roadways in the nighttime hours. Pages 4.1-25 and 4.1-26 of the Draft EIR include a thorough analysis of potential impacts related to project stationary lighting, including during evening and nighttime hours, and a description of how the shielding of lighting fixtures would address this issue.

[9] The zoning for the project site was Light Industrial at the time of the adoption of the Pacific Commercentre Planned Community. The Planned Community was approved under Zone Change 87-2P by the County of Orange and adopted by Ordinance #3561 on July 22, 1987.

As described in Section 4.1, page 4.1-12, of the Draft EIR, the project site is generally flat with north- and west-facing slopes along the eastern and southern boundaries of the site. These slopes ascend 10 to 15 feet from the project site to the adjacent properties. The project site is separated from the adjacent Meadows residential community by this slope which contains existing ornamental vegetation. As described in Table 4.1.B in the Draft EIR, in addition to the required site landscaping that would serve as a screen along all streets and property boundaries consistent with the Pacific Commercentre Planned Community District Regulations and the Citywide Design Guidelines, the proposed project includes the installation of additional landscaping and densely placed mature trees along the northeastern corner of the project site (along the slope), adjacent to the Meadows residential community. The proposed new building would be the same height as the existing building (35-foot tall) and the additional landscaping and mature trees would reduce the visibility of the project site as viewed from the adjacent residential community.

With the exception of the rooftop photovoltaic system (which would be flat and therefore, is not anticipated to generate significant amounts of glare onto adjacent properties), the type and location of light sources for the proposed project and the proposed building materials (e.g., concrete, glass, metal) would be similar to those that currently exist on site. Sources of light and glare associated with the proposed project (both stationary and dynamic) would be consistent with and not contribute to a substantial increase in the existing surrounding uses during both daytime and nighttime hours. All lighting associated with the proposed project would be hooded or shielded to focus the light downward and prevent light spillage onto adjacent properties and would be required to comply with Section 9.72.085 of the City of Lake Forest Municipal Code, which require that lighting be confined to the project site and that adjacent properties are protected from light trespass and glare in both daytime and nighttime scenarios. Additionally, a photometric plan was prepared for the proposed project as provided in Appendix B of the Draft EIR. A photometric plan is a lighting design simulation that uses data to predict how much light will be present in a space and can be used to confirm a project's lighting plan meets specific requirements and compliance with applicable local codes. As shown in the photometric plan, the proposed project would result in low illumination (0.1 foot-candle (fc) at the existing 6-foot high split face block wall but would result in no noticeable illumination (0.0 fc) at and past the property line of the Meadows. The photometric plan demonstrates the project's compliance with the lighting requirements of the City's Municipal Code. Additionally, as stated above, the proposed project would include the installation of landscaping and densely placed mature trees along the northeastern corner of the project site to reduce the visibility of the project site from adjacent residential uses (the Meadows). The addition of densely placed mature trees along the northeastern corner of the project site would further reduce visible light and glare from the proposed project on adjacent residential uses.

As stated in Section 4.1, page 4.1-26, of the Draft EIR, in addition to the proposed project complying with Title 24 and Section 9.72.085 of the City of Lake Forest Municipal Code to ensure that project-related light and glare impacts would be less than significant, development within the cumulative study area would also be required to comply with existing regulatory requirements related to light and glare including Title 24 and the City's Municipal Code to reduce potential impacts associated with light and glare. If significant light and glare impacts of individual development projects within the cumulative study area are anticipated, appropriate mitigation measures would be implemented as part of the CEQA environmental review process for such projects. Therefore, the proposed project would not result in cumulatively considerable impacts related to light and glare.

The light and glare analysis that was conducted for the proposed project took into consideration both stationary and dynamic lighting as well as potential cumulative impacts from implementation of the proposed project in combination with the cumulative projects identified in Table 4.A of the Draft EIR; therefore, the analysis and conclusions of the Draft EIR regarding evaluation of light and glare remain valid. Please also refer to Master Response 4 regarding CEQA mitigation requirements.

Master Response 13: Hazards and Hazardous Materials

Numerous comments were received regarding hazards and hazardous material concerns. Comments related to hazards and hazardous materials generally expressed concerns regarding the site's former use and the potential presence of on-site hazardous materials; the potential for accidental spill or upset of hazardous materials that may occur during operation of the proposed use; and the uncertainty of the volume and/or type of hazardous materials that may be transported to, stored at, or used during the course of project operations. Additionally, concerns were expressed regarding the condition of emergency access to and through the project area post-development with the addition of project-related and cumulative traffic. The commenters further questioned the severity of the cumulative hazardous material impact when considered with the Western Realco Enterprise Way Industrial Project (Projects 1 and 2). While these comments express general concerns related to the potential hazardous materials-related effects of the proposed project and articulate perceived project impacts which are contrary to the conclusions of the Draft EIR, none of the comments provide specific substantiated claims regarding the adequacy of the information or analysis provided in the Draft EIR and none of the comments and responses result in a change to or increase in the severity of identified impacts. Also refer to Master Response 2 regarding the adequacy of the Draft EIR and Master Response 3 regarding speculation without substantiation. The general concerns regarding hazardous material impacts as expressed by a number of commenters are addressed below, for additional clarity.

Existing conditions and potential project impacts related to hazardous materials are described in Section 4.9, Hazards and Hazardous Materials, pages 4.9-1, 4.9-2, and 4.9-9 through 4.9-16 of the Draft EIR. As described in Section 4.9, page 4.9-1 of the Draft EIR the project site was used for agricultural purposes between 1938 and 1952. However, given the length of time since the project site has been used for agricultural activity and given the fact that the project site is currently fully developed and the soils have been previously graded and disturbed, there is a low possibility that residual amounts of pesticides or herbicides remain in the soil. The Phase I Environmental Site Assessment (ESA) prepared for the project (refer to Appendix F of the Draft EIR) did not identify any RECs, historic RECs, or controlled RECs in connection with the existing uses on or surrounding the project site that would result in a potential release of hazardous materials into the environment during construction. In addition, the Phase I ESA determined that radon and visible fungal growth were not present at the project site.

Site reconnaissance was completed as part of the Phase I ESA and the following hazardous materials were observed at the project site: small volumes of isopropyl alcohol (less than one gallon) used in the lab for cleaning; small quantities of janitorial cleaning chemicals; pad-mounted transformers; hydraulic elevators; and two liquid nitrogen aboveground storage tanks including a 3,000-liter single-walled steel tank and a 1,500-liter liquid nitrogen tank that were not currently in use. Further, a vapor encroachment screening (VES) was completed at the project site and determined that no chemicals of concern vapors exist in the subsurface of the project site. Suspect asbestos-containing materials (ACMs) were identified on the project site and included wallboard, tape and joint compound, vinyl floor tile and mastic, vinyl sheet flooring and mastic, acoustical panels, cove base and mastic, carpet mastic, and roofing materials. No other existing hazardous material concerns were observed.

The demolition and construction phase of the proposed project would require the short-term transport, use, and/or disposal of petroleum-based fuels, lubricants, pesticides, and other similar materials required for construction and may pose a potential hazard to construction workers. Any ACMs or other regulated materials encountered during demolition would be managed in accordance with EPA, OSHA, and State requirements. To ensure that potential hazardous materials during construction would not affect water quality, management of hazardous materials during construction activities would be subject to the requirements of the Stormwater Construction General Permit (CGP), which requires preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP), which includes hazardous materials storage requirements (refer to Section 4.10, page 4.10-30 of the Draft EIR). Although the future tenant for the proposed project is unknown, because of the project's industrial land use designation and proposed manufacturing and warehouse uses, for the purposes of the environmental analysis, it was conservatively assumed that the proposed project would involve storage and/or use of hazardous materials.

As detailed in Section 4.9 (refer to pages 4.9-10 through 4.9-12 of the Draft EIR), future activities at the project site, including both construction and operation, would be subject to existing federal, State, and local regulatory program for hazardous materials including compliance with the U.S. Department of Transportation (USDOT) hazardous materials regulations; the Resource Conservation and Recovery Act (RCRA); and applicable CalEPA, Cal/OSHA, and Orange County Health Care Agency Certified Unified Program Agency (CUPA) requirements. Additionally, any business that handles hazardous materials in the State is required to prepare and maintain a Hazardous Materials Business Plan (HMBP). The HMBP must be submitted to the local CUPA and the California Environmental Reporting System (CERS). Information required in a HMBP includes an inventory of hazardous materials, emergency response procedures, and employee training programs. Facilities handling larger quantities of regulated substances would also be required to prepare a Risk Management Plan (RMP) under the California Accidental Release Prevention (CalARP) program. These programs would ensure that appropriate emergency response, storage, and safety measures are in place prior to project occupancy.

As identified under Threshold 4.9.3 (refer to page 4.9-14 of the Draft EIR), the closest school to the project site is the Bella Montessori School (20602 Prism Place) located approximately 733 feet (0.14 mile) south of the project site. Additionally, Fullbright Montessori located at 20411 James Bay Circle is approximately 1,500 feet (0.29 mile) west of the project site. The proposed project would be required to comply with all regulations discussed above including requirements for HMBPs and RMPs for facilities handling significant quantities of hazardous materials, OSHA and Cal/OSHA regulations, CCR Title 8; the CGP; and USDOT, RCRA, and State regulations, which would ensure that the proposed project would not use, emit, or handle hazardous or acutely hazardous materials, substances, or waste in sufficient quantities to create a significant hazard to the public or nearby schools.

As detailed under Threshold 4.9.6 (refer to page 4.9-15 of the Draft EIR), the proposed project would require temporary lane closures during construction and would be required to comply with the California Manual on Uniform Traffic Control Devices (CA MUTCD), which would ensure that any temporary lane closures that may result from the proposed project would not result in inadequate emergency access at the project site or in the project vicinity. Therefore, construction of the proposed project would not physically impair or otherwise interfere with emergency response or

evacuation in the project vicinity. The existing building is vacant with no vehicle traffic generated from the site. As shown in Table C of the project TIA, (Draft EIR, Appendix J), the proposed project is estimated to generate 269 daily truck trips, including 35 a.m. peak-hour and 36 p.m. peak-hour trips. operation, the proposed project would increase the number of trucks operating near the site and would generate an increase in the amount and volume of traffic on local and regional roadway networks. However, in accordance with the California Fire Code, the project applicant is required to design, construct, and maintain structures, roadways, and facilities to maintain appropriate emergency/evacuation access to and from the project site.

Occurrence of a cumulative effect related to hazards and hazardous materials would require that multiple projects release hazardous materials at the same time within in the same concentrated vicinity. Out of the 13 cumulative projects listed in Table 4.A in Chapter 4.0, page 4-5 of the Draft EIR, three are located adjacent to or in the immediate vicinity of the proposed project. In addition to the requirements noted above for the proposed project, development within the cumulative study area would also be required to comply with existing hazardous materials regulations including the USEPA, USDOT, RCRA, OSHA, Cal/OSHA, the California Fire Code, California Health and Safety Code, CCR, and Caltrans, and other federal, State and local regulations, to reduce potential impacts associated with the routine transport, use, or disposal of hazardous materials or release of hazardous materials into the environment, including hazardous emissions near schools. Therefore, the proposed project would not result in cumulatively considerable impacts related to the routine transport, use, or disposal of hazardous materials or accidental release of hazardous materials into the environment, including hazardous emissions near schools. In addition, implementation of the City's General Plan policies and programs would ensure that the City maintains an effective emergency response program that accounts for development of the project and cumulative projects. Therefore, the proposed project would not contribute a cumulatively considerable impact related to emergency response or evacuation plans within the City.

Compliance with these existing regulations and programs would prevent reasonably foreseeable upset or accident conditions involving hazardous materials during both construction and operation. Therefore, the Draft EIR adequately addresses hazardous materials storage, emergency response, and potential upset scenarios.

Master Response 14: Disproportionate Environmental Burden

Several comments state that the Draft EIR fails to address the proposed project's potential to result in a disproportionate environmental burden on nearby communities, particularly the Meadows community. Additionally, a number of comments claim that the Draft EIR fails to address the potential environmental justice implications of this potential burden.

According to California Government Code § 65040.12(e)(1), environmental justice can be defined as "…the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies." Under California Government Code § 65040.12(e)(2), the State (and, subsequently, local jurisdictions including the City) are obligated to further environmental justice through 1) providing a healthy environment for all people and 2) deterring, reducing, and eliminating pollution burdens for populations and communities experiencing the adverse effects of that pollution, so that the effects of the pollution are not disproportionately borne by those populations and communities.

Senate Bill (SB) 1000, enacted in 2018, requires local governments to identify environmental justice communities (referred to as "Disadvantaged Communities") within their jurisdictions and take into account disproportionate pollution burdens faced by these communities. As defined by California Government Code § 65302(h)(4)(A), a Disadvantaged Community is either an area identified by the California Environmental Protection Agency (CalEPA) or a low-income area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation. SB 535 provides direction on how to identify Disadvantaged Communities within jurisdictions. In addition, Assembly Bill (AB) 1550 requires local governments to identify low-income communities and, in the event that a low-income community is located within 0.5-mile of a Disadvantaged Community, treat these communities in a similar manner to Disadvantaged Communities in their General Plans. CalEPA created a mapping tool to assist local governments in the identification of Disadvantaged Communities and adjacent low-income communities within their jurisdictions (refer to https://calepa.ca.gov/envjustice/ghginvest/). This mapping tool incorporates data from CalEnviroScreen, which is recognized as one of the State's main environmental justice mapping tools. CalEnviroScreen is a computer model released by the Office of Environmental Health Hazard Assessment (OEHHA) on behalf of CalEPA to identify California communities by census tract that are disproportionately burdened by, and vulnerable to, multiple sources of pollution. Pollution burden scores for each census tract are derived from the average percentiles of the seven Exposures indicators (ozone and $PM_{2.5}$ concentrations, DPM emissions, drinking water contaminants, pesticide use, toxic releases from facilities, and traffic density) and the five Environmental Effects indicators (cleanup sites, impaired water bodies, groundwater threats, hazardous waste facilities and generators, and solid waste sites and facilities). However, air quality impacts are not required to be assessed based on census tract locations under CEQA.

The City acknowledges environmental justice and relevant laws in the Health and Wellness Element of its General Plan (refer to Page HW-2). Therefore, environmental justice is a component of a City's General Plan and overall planning process. While the Health and Wellness Element acknowledges that several low-income communities are present within the City, it should be noted that the Meadows community is not identified as a Disadvantaged Community or a low-income community

based on a review of the latest version of the CalEPA tool referenced above. Therefore, the Meadows community is not necessarily facing an existing burden of pollution or other disproportionate environmental impacts with the potential to be exacerbated by the proposed project. Where relevant, the Draft EIR analyzes potential impacts to sensitive receptors, which, as described in Master Response 9, consist of structures that house persons (e.g., children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise) or places where persons gather (i.e., residences, schools, playgrounds, child-care centers, convalescent centers, retirement homes, and athletic fields). However, the presence of sensitive receptors within a community does not necessarily mean the community can be considered an environmental justice or disadvantaged community.

It should be clarified that environmental justice is not a specific topic that is required to be evaluated or considered pursuant to *State CEQA Guidelines* Sections 15120-15132 (Contents of Environmental Impact Reports). However, *State CEQA Guidelines* Section 21083(b)(3) states that a project may be found to have a significant effect on the environment if the environmental effects of a project would cause substantial adverse effects on human beings, either indirectly or directly. The Draft EIR adequately analyzes the potential for the proposed project to cause substantial adverse effects on human beings with respect to each resource topic identified in Appendix G (Environmental Checklist Form) to the *State CEQA Guidelines.* As summarized in Table 1.A (beginning on Page 1-7 of the Draft EIR), with the exception of VMT and GHG (project impacts related to inconsistency with the 2022 Scoping Plan as a result of project-related VMT impacts), the Draft EIR found that the proposed project would not result in significant environmental impacts to the resources included in the Draft EIR following the incorporation of identified mitigation measures. This includes topics that are generally associated with pollution burdens, such as air quality, noise, and water quality. It should be noted that while impacts related to VMT and GHG (described in Section 4.17 and Section 4.8 of the Draft EIR, respectively) were determined to be significant and unavoidable, these topics are regional in nature and generally not associated with tangible pollution burdens that could be experienced by nearby communities. Therefore, the proposed project would not result in an environmental burden, disproportionate or otherwise, on any community.

As required under *State CEQA Guidelines* Section 21083(b)(2), the Draft EIR's analysis of cumulative impacts (refer to each section within Chapter 4.0, Environmental Impact Analysis) evaluates the potential incremental effects of the proposed project in connection with the effects of past, current, and probable future projects, as listed in Table 4.A of the Draft EIR. As acknowledged by the California State Attorney General's Office, a community already experiencing a pollution burden is more likely to experience a significant impact resulting from additional pollution contributions. Therefore, the cumulative analysis presented in the Draft EIR inherently addresses the potential for the proposed project to result in a disproportionate environmental burden. With the exception of GHG and VMT, the Draft EIR found that the proposed project would not result in significant cumulatively considerable impacts to the resources included in the Draft EIR following the incorporation of identified mitigation measures. As described in Section 4.8, page 4.8-22, and Section 4.17, page 4.17-18 of the Draft EIR, because the proposed project would result in a significant and unavoidable impact related to VMT and thereby GHG (impacts related to inconsistency with the 2022 Scoping Plan as a result of project-related VMT impacts) even after implementation of mitigation, the proposed project would also result in a cumulatively considerable impact related to VMT and GHG. However, as previously stated, these topics are generally not

associated with pollution burdens in the same sense as topics such as air quality, noise, and water quality. Therefore, the proposed project would not create a new cumulative pollution burden, nor would it exacerbate an existing pollution burden, for any communities in the project site vicinity.

Ultimately, approval of the proposed project would not preclude the State's goals to provide a healthy environment for all people and to deter, reduce, and eliminate pollution burdens for populations and communities experiencing the adverse effects of that pollution, so that the effects of the pollution are not disproportionately borne by those populations and communities. The Draft EIR satisfies all applicable provisions in the *State CEQA Guidelines* pertaining to the analysis of the proposed project's potential to cause substantial adverse effects on human beings, either indirectly or directly. Further, no substantial evidence has been provided to indicate that the project site is located in close proximity to any disadvantaged communities, environmental justice communities, or communities experiencing disproportionate pollution burdens. Therefore, the analysis and conclusions presented in the Draft EIR remain valid, and no revisions are necessary.

2.2 STATE AGENCIES

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From: Danica Nguyen
To: EnterpriseProjects
Cc: Sam Wang
Subject: Technical Data Request: Proposed IPT Enterprise Business Center LLC Project
Date: Tuesday, July 22, 2025 7:50:09 AM

Dear Amy Stonich,

South Coast AQMD staff received the Notice of Availability of a Draft Environmental Report (NOA/DEIR) for the **Proposed IPT Enterprise Business Center LLC Project (SCH No.: 2024030755)** (South Coast AQMD Control Number: ORC250711-02). Staff is currently in the process of reviewing the NOA/DEIR. According to the NOA/DEIR, the public comment period is from 07/10/2025 - 08/25/2025.

Upon review of the files provided as part of the public review period, I was able to access the NOA/DEIR and Appendices via the City's website.

Please provide an electronic copy of any live modeling and emission calculation files (complete data files, not summaries) that were used to quantify the air quality impacts from construction and/or operation of the Proposed Project as applicable, including the following:

S-1-1

- CalEEMod Input Files (.csv and .json files);
- Live EMFAC output files;
- Any emission calculation file(s) (live version of excel file(s); no PDF) used to calculate the Project's emission sources (i.e. truck operations);
- AERMOD Input and Output files, including AERMOD View file(s) (.isc);
- HARP Input and Output files and/or cancer risk calculation files (live version of excel file(s); no PDF) used to calculate cancer risk, and chronic and acute hazards from the Project;
- Any other files related to post-processing done outside of AERMOD to calculate pollutant-specific concentrations (if applicable).

You may send the above-mentioned files via a Dropbox link in which they may be accessed and downloaded by South Coast AQMD staff by **07/29/2025**. Without all files and supporting documentation, South Coast AQMD staff will be unable to complete a 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.

Thank you for your assistance. If you have any questions regarding this request, please feel free to contact me.

Regards,

Danica Nguyen
Air Quality Specialist, CEQA-IGR
Planning, Rule Development & Implementation
South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765
Phone: (909) 396-3531
E-mail: dnguyen1@aqmd.gov
Please note South Coast AQMD is closed on Mondays.

CAUTION: Think Security! This email is not from someone at the City of Lake Forest. **Do not click any links or open any attachments you are not expecting.**

South Coast Air Quality Management District, Danica Nguyen, Air Quality Specialist, CEQA-IGR

Letter Code: S-1
Date: July 22, 2025

Response to Comment S-1-1

This comment requests an electronic copy of any live modeling and emission calculation files that were used to quantify the air quality impacts from construction and/or operation of the proposed Project as applicable.

Emissions modeling and calculations for the proposed Project were prepared using the California Emissions Estimator Model (CalEEMod), as described in Section 4.3.2, starting on page 4.3-1 of Section 4.3 Air Quality; Section 4.6.2, starting on page 4.6-1 of Section 4.6 Energy; and Section 4.8.2, starting on page 4.8-1 of Section 4.8 Greenhouse Gas Emissions, of the Draft EIR. The CalEEMod output files are included in Appendix C, *Air Quality, Greenhouse Gas, and Energy Impact Report and Health Risk Assessment*, of the Draft EIR. These modeling files quantify emissions associated with both construction and operational activities of the proposed Project and form the basis for the air quality, greenhouse gas, and energy impact analyses presented in the Draft EIR. As requested by the SCAQMD, an electronic copy of the live modeling and emission calculation files that were used to quantify the air quality impacts from construction and operation of the proposed Project were shared with the SCAQMD via email on July 29, 2025.

From: Danica Nguyen
To: Stonich, Amy; EnterpriseProjects
Cc: Sam Wang
Subject: South Coast AQMD Staff"s comments on the Draft EIR for the IPT Enterprise Business Center LLC Project
Date: Thursday, September 11, 2025 7:26:35 AM
Attachments: ORC250711-02 DEIR IPT Enterprise Business Center LLC Project.pdf

Dear Amy Stonich,

S-2-1 Attached are the South Coast AQMD staff's comments on the Draft Environmental Impact Report for the IPT Enterprise Business Center LLC Project (South Coast AQMD Control Number: ORC250711-02). Please contact me if you have any questions regarding these comments, and **confirm that you have received the letter**.

Regards,

Danica Nguyen
Air Quality Specialist, CEQA-IGR
Planning, Rule Development & Implementation
South Coast Air Quality Management District
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SENT VIA E-MAIL:
enterpriseprojects@lakeforestca.gov
astonich@lakeforestca.gov
Amy Stonich, Assistant Director of Community
City of Lake Forest
100 Civic Center Drive
Lake Forest, CA 92630

September 11, 2025

Draft Environmental Impact Report (EIR) for the Proposed IPT Enterprise Business Center LLC Project (Proposed Project) (SCH No.: 2024030755)

S-2-2 South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Lake Forest is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments, organized by topic of concern.

Summary of Project Information in the Draft EIR

S-2-3 Based on the Draft EIR, the Proposed Project involves the demolition of the existing two-story building and the redevelopment of a new 165,803-square-foot (sq. ft.) industrial building[1] that includes approximately 10,000 sq. ft. office space, up to 65,000 sq. ft. of manufacturing use, and the remainder for warehouse use.[2] The building would have a maximum of 23 dock doors[3] and generate 38 two-axle, 21 three-axle, and 58 four-axle truck trips associated with the operation.[4] The Proposed Project is located at 26200 Enterprise Way in Lake Forest.[5] Based on the review of the aerial photograph, the nearest sensitive receptor (e.g., residence) is located less than 100 feet east of the Proposed Project boundary. The Proposed Project is tentatively scheduled to commence in January 2026 and is expected to be completed within approximately one year.[6]

South Coast AQMD Comments

Outdated Meteorological Data Used in AERMOD Modeling

S-2-4 Appendix C states that meteorological (MET) data from the South Coast AQMD's Mission Viejo Version 9 were utilized in the AERMOD modeling.[7] It should be noted that this version of the Version 9 MET data is no longer available. South Coast AQMD has released a newer version of AERMOD-ready MET data files (Version 11) in October 2024.[8] The updated dataset was developed using the

[1] Draft EIR. p. 3-9.
[2] *Ibid*. 3-13.
[3] *Ibid*.
[4] *Ibid*. p. 4.3-29.
[5] *Ibid*. p. 3-1.
[6] *Ibid*. p. 3-19.
[7] Appendix C. p. 390 of PDF.
[8] South Coast AQMD AERMOD-Ready MET Data Files available at https://www.aqmd.gov/assets/aermet/AERMET_files_And_HRA_Tool.html

S-2-4 cont.

U.S. EPA's AERMET processor Version 22112, along with pre-processors AERMINUTE Version 15272 and AERSURFACE Version 20060.[9] To ensure consistency and transparency in the environmental analysis, the Lead Agency is recommended to utilize the correct MET dataset in the AERMOD modeling, revise the modeling accordingly, and include the updated result in the Final EIR.

Truck Idling Duration and Emissions Modeling

Appendix C: Air Quality, Greenhouse Gas, and Energy Impact Report and Health Risk Assessment of the Draft EIR indicates that a default assumption of 15 minutes of idling per truck per day was used to estimate diesel particulate matter (DPM) emissions for the operational health risk assessment (HRA).[10] However, it may not accurately reflect actual operating conditions for a facility. The Proposed Project is anticipated to generate approximately 117 truck trips per day (38 two-axle, 21 three-axle, and 58 four-axle truck trips). It is reasonable to expect that individual trucks may experience extended periods of idling due to on-site queuing, security checks, staging, loading, and unloading operations, particularly during peak hours or in constrained circulation areas. As such, a 15-minute idling duration may underestimate actual on-site idling behavior and, consequently, DPM emissions, which are a key contributor to localized health risks.

S-2-5

While the California Air Resources Board (CARB) limits diesel truck idling to five minutes as set forth in the Airborne Toxic Control Measure (ATCM), an exemption from this requirement is allowed for trucks equipped with engines that meet the optional low-NOx idle emission standard, which is typically applicable to model year 2008 and newer trucks. These vehicles, often referred to as "clean idle" certified, are permitted to idle longer than five minutes when situated more than 100 feet from sensitive land uses such as homes and schools.[11] Furthermore, CARB's EMFAC2021 Volume III Technical Document (Table 4.4.2-5) indicates that heavy-duty trucks may idle for up to five hours at a single location under certain conditions.[12] As a practical matter, the idling duration for onsite heavy-duty trucks visiting the Proposed Project site could idle for a much longer duration than what was analyzed in the Draft EIR. Thus, the HRA may have substantially underestimated the full extent of operational health risks associated with the DPM emissions from the anticipated onsite heavy-duty truck activities.

Accurate characterization of idling activity is essential to fully assess a project's potential health risk impacts, particularly for nearby sensitive receptors. Therefore, to ensure the HRA provides a conservative and health-protective estimate of potential exposure, the Lead Agency is recommended to either: 1) revise the operational emissions modeling in the Final EIR to assume a minimum of 30 minutes of idling per truck per day, unless site-specific data or operational constraints justify a shorter duration; or 2) provide empirical evidence, such as facility-specific queuing and processing time studies, vehicle circulation modeling, or comparable industry data, to substantiate the 15-minute assumption as representative of expected operations of the Proposed Project.

S-2-6

Additional Recommended Air Quality and Greenhouse Gas Mitigation Measures and Project Design Features for Consideration

[9] South Coast AQMD Data for AERMOD available at https://www.aqmd.gov/home/air-quality/meteorological-data/data-for-aermod

[10] Appendix C: Air Quality, Greenhouse Gas, and Energy Impact Report and Health Risk Assessment. p. 374 of PDF.

[11] CARB, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling was promulgated in Chapter 13 of the California Code of Regulations, Section 2485: Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling, https://ww2.arb.ca.gov/sites/default/files/2022-06/13_CCR_2485_OAL_06222022-2_ADA_06272022_0.pdf

[12] CARB, EMFAC2021 Volume III Technical Document, Table 4.4.2-5, p. 161., https://ww2.arb.ca.gov/sites/default/files/2021-03/emfac2021_volume_3_technical_document.pdf

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. To further reduce the Proposed Project's air quality impacts, South Coast AQMD recommends incorporating the following mitigation measures and project design considerations into the Final EIR.

Mitigation Measures to Reduce Operational Air Quality Impacts from Mobile Sources

1. Require zero-emission (ZE) or near-zero emission (NZE) on-road haul trucks, such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible.

   Note: Given CARB's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks, such as the Advanced Clean Trucks Rule and the Heavy-duty Low NOx Omnibus Regulation, ZE and NZE trucks will become increasingly more available for use.

2. Require a phase-in schedule to incentivize the use of cleaner operating trucks to reduce any significant adverse air quality impacts.

   Note: South Coast AQMD staff are available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

3. Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final EIR. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.

S-2-6 cont.

4. Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure, and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

Mitigation Measures to Reduce Operational Air Quality Impacts from Other Area Sources

1. Maximize the use of solar energy by installing solar energy arrays.

2. Use light-colored paving and roofing materials.

3. Utilize only Energy Star heating, cooling, and lighting devices and appliances.

Design Considerations for Reducing Air Quality and Health Risk Impacts

1. Clearly mark truck routes with trailblazer signs so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, daycare centers, etc.).
2. Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors, and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.

3. Design the Proposed Project such that any truck check-in point is inside the Proposed Project site to ensure no trucks are queuing outside.

S-2-6 cont.

4. Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.

5. Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

Lastly, the South Coast AQMD also suggests that the Lead Agency conduct a review of the following references and incorporate additional mitigation measures as applicable to the Proposed Project in the Final EIR:

S-2-7

1. State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act[13]

2. South Coast AQMD 2022 Air Quality Management Plan,[14] specifically:

   a) Appendix IV-A – South Coast AQMD's Stationary and Mobile Source Control Measures

   b) Appendix IV-B – CARB's Strategy for South Coast

   c) Appendix IV-C – SCAG's Regional Transportation Strategy and Control Measure

3. United States Environmental Protection Agency (U.S. EPA) Transportation, Air Quality, and Climate Change.[15]

Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program

S-2-8

Since the Proposed Project consists of the development of a 165,803 square foot industrial building with warehouse uses, and once the warehouse is occupied, the Proposed Project's warehouse owners and operators will be required to comply with South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – WAIRE Program[16] and Rule 316 – Fees for Rule 2305.[17] Rule 2305 and Rule 316 aim to reduce regional and local emissions of NOx and particulate matter (PM), including DPM, so as to reduce adverse public health impacts on communities located near warehouses. Rule 2305 applies to owners and operators of warehouses greater than or equal to 100,000 square feet of indoor floor space in a single building. Under Rule 2305, operators are subject to an annual WAIRE Points Compliance Obligation that is calculated based on the annual number of truck trips to the warehouse. WAIRE Points can be earned by implementing actions in a prescribed menu in Rule 2305, implementing a site-specific custom plan, or paying a mitigation fee. Warehouse owners are only required to submit limited information reports, but they can opt to earn WAIRE Points on behalf of their tenants if they choose, because certain actions to reduce emissions may be better achieved at the warehouse development phase, for instance, the installation of solar and charging infrastructure. Rule 316 is a companion fee rule for Rule 2305 to allow South Coast AQMD to recover costs associated with Rule 2305 compliance

[13] State of California – Department of Justice, Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act available at https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf
[14] South Coast AQMD, 2022 Air Quality Management Plan (AQMP) available at http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan
[15] United States Environmental Protection Agency (U.S. EPA) Transportation, Air Quality, and Climate Change available at https://www.epa.gov/transportation-air-pollution-and-climate-change
[16] South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – WAIRE Program available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf
[17] South Coast AQMD Rule 316 -Fees for Rule 2305 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-iii/r316.pdf

S-2-8 cont.

activities. Therefore, the Lead Agency is recommended to review Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements, design features/enhancements, and CEQA mitigation measures can be identified and implemented at the Proposed Project that may help future warehouse operators meet their compliance obligation. For questions concerning Rule 2305 implementation and compliance, please call (909) 396-3140 or email waire-program@aqmd.gov. For implementation of guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage.

South Coast AQMD Air Permits and Role as a Responsible Agency

S-2-9

If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., one or more air permits from South Coast AQMD will be required. The Final EIR should include a discussion about the South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,[18] Rule 203 – Permit to Operate,[19] Rule 401 – Visible Emissions,[20] Rule 402 – Nuisance,[21] Rule 403 – Fugitive Dust,[22] Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,[23] Rule 1113 – Architectural Coatings,[24] Regulation XIII – New Source Review,[25] Rule 1401 – New Source Review of Toxic Air Contaminants,[26] and Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,[27] etc. It is important to note if air permits from the South Coast AQMD are required, South Coast AQMD's role under CEQA will become the Responsible Agency of the Proposed Project. Per CEQA Guidelines Section 15086, the Lead Agency is required to consult with South Coast AQMD. CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Also, as set forth in CEQA Guidelines Section 15096(h), the Responsible Agency is required to make Findings in accordance with CEQA Guidelines Section 15091 for each significant effect of the project and issue a Statement of Overriding Considerations in accordance with CEQA Guidelines Section 15093, if necessary. Lastly, as set forth in CEQA Guidelines Section 15096(i), the Responsible Agency may file a Notice of Determination.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits.

[18] South Coast AQMD, Rule 201 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf
[19] South Coast AQMD, Rule 203 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf
[20] South Coast AQMD, Rule 401 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf
[21] South Coast AQMD, Rule 402 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf
[22] South Coast AQMD, Rule 403 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403
[23] South Coast AQMD, Rule 1110.2 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf
[24] South Coast AQMD, Rule 1113 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf
[25] South Coast AQMD, Regulation XIII available at: https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii
[26] South Coast AQMD, Rule 1401 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf
[27] South Coast AQMD, Rule 1470 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf

S-2-9 cont.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at https://www.aqmd.gov/home/permits.

S-2-10

Conclusion

As set forth in Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

Thank you for the opportunity to provide comments. South Coast AQMD staff are available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

SW:DN
ORC250711-02
Control Number

South Coast Air Quality Management District, Danica Nguyen, Air Quality Specialist, CEQA-IGR

Letter Code: S-2
Date: September 11, 2025

Response to Comment S-2-1

This comment is introductory and transmits SCAQMD's formal comments on the Draft EIR.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment S-2-2

This comment is an introduction to SCAQMD's comments on the Draft EIR.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment S-2-3

This comment provides a summary of the proposed Project.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment S-2-4

This comment asserts that the Draft EIR utilizes outdated meteorological data and recommends that the City revise the Draft EIR utilizing SCAQMD AERMOD-ready MET data from October 2024.

Per *State CEQA Guidelines* Section 15125, the time a Notice of Preparation is issued generally establishes the environmental baseline at the beginning of the CEQA process. An NOP for the proposed Project was distributed by the City via the State Clearinghouse on March 20, 2024. As shown on page 380 of the Health Risk Assessment included as Appendix C to the Draft EIR, the dispersion modeling conducted for the health risks assessment was conducted in July 2024, before the October 2024 dataset was made available. Therefore, the dispersion modeling used the most recent meteorological data available at the time, and remodeling is not warranted.

Additionally, it is not expected that the meteorological conditions measured from Mission Viejo would be substantially different over the more recent five-year period as compared to the previous five-year period, and the modeled emission rates of pollutants would not change. Therefore, remodeling with more recent meteorological data is not expected to result in substantially different pollutant concentrations at the maximally exposed receptors, and the analysis and conclusion presented in the Draft EIR would not change.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment S-2-5

This comment expresses concern regarding truck idling duration and emissions modeling, claiming that the Draft EIR and HRA's default assumption of 15 minutes of idling per truck per day may not accurately reflect operating conditions for the facility, which in turn could underestimate the full extent of operational health risks associated with the diesel particulate matter (DPM) emissions anticipated from operation of the proposed Project. This comment also recommends the Draft EIR revise the operational emissions modeling in the Final EIR with a minimum assumption of 30 minutes of idling or provide facility-specific data to justify the shorter duration.

The operational health risk assessment conservatively assumed 15 minutes of idling per truck per day to estimate DPM emissions. As noted on page 4.3-38 of the Draft EIR, on-site idling of trucks would be limited by the CARB's In-Use Off-Road Diesel Vehicles regulation, which limits idling to 5 minutes or less. In addition, the Project would incorporate anti-idling signage, and on-site queuing would be reduced to the maximum extent feasible. Although certain newer trucks (e.g., model year 2008 and newer) equipped with engines meeting the optional low-NOx idle emission standard may be exempt from the 5-minute limit, these vehicles are certified with cleaner engine technology that substantially reduces emissions, including DPM and NOx. Consequently, even where limited longer idling may occur for operational reasons, emissions would be lower than those associated with older diesel engines. Accordingly, the assumption of 15 minutes of idling per truck per day represents a conservative estimate of potential DPM emissions relative to expected conditions under applicable regulations and project operations..

In addition, this assumption is appropriate for the facility being proposed. The Project includes adequate on-site circulation and loading dock design to prevent extended queuing, and truck movements would be scheduled and managed to avoid overlapping arrivals that could result in prolonged idle periods. Because trucks would pull directly into loading bays upon arrival and would not require extended warm-up or staging, idling durations at this site are not expected to exceed the modeled 15-minute assumption.

Furthermore, the operational health risk assessment was prepared in accordance with the SCAQMD's *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis.* Finally, if it were conservatively assumed that all operational emissions were due to truck idling (which is not the case, as other emissions occur while trucks move on- and off-site), and truck idling time was doubled, as requested by SCAQMD in Comment S-2-5, the cancer inhalation health risk would be expected to double. As shown in Table 4.3.N on page 4.3-35 of the Draft EIR, the maximum cancer risk is 3.06 in 1 million. Even if this value were doubled to 6.12 in one million, it would still remain below the SCAQMD significance threshold of 10 in one million. Therefore, the analysis and conclusion presented in the Draft EIR would not change.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment S-2-6

This comment provides recommendations for additional mitigation measures and Project design features to address air quality and greenhouse gas emissions, including zero-emission or near-zero emission on-road haul trucks, a phase-in schedule for the use of cleaner operating trucks, limiting the daily number of trucks allowed at the Project site, providing EV charging stations, maximizing solar energy use, using light-colored paving and roofing materials, utilizing clean energy, clear marking of truck routes, revision of design to ensure truck entrances and exits face away from sensitive receptors, and providing overnight truck parking inside the Project site.

The suggested additional mitigation measures have been reviewed by the City and its technical consultants. Several of the suggested additional mitigation measures are already included in the Project's design including the provision of EV charging stations, solar panels, and clear marking of truck routes. Additionally, the building has been oriented on the site so that the truck loading areas and dock doors are facing south, and not towards sensitive receptors (i.e., residences) to the east. Mitigation measures have been prescribed in the Draft EIR where applicable to reduce potentially significant impacts. As discussed in Section 4.3, Air Quality, pages 4.3-27, 4.3-42, and 4.3-50, of the Draft EIR, Mitigation Measures (MM) AQ-1 through MM AQ-3 would reduce potentially significant air quality impacts to a less than significant level. Therefore, no additional mitigation measures are required. Please refer to Master Response 4 regarding mitigation requirements under CEQA.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment S-2-7

The comment requests the City conduct a review of the State of California – Department of Justice publication entitled *Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act*[10]*(Warehouse Projects: Best Practices)*; the South Coast Air Quality Management District *2022 Air Quality Management Plan* and its Appendices IV-A, IV-B, and IV-C (2022 AQMP) [11]; and the United States Environmental Protection Agency (U.S. EPA) Transportation, Air Quality, and Climate Change Rule 2305 – Warehouse Indirect Source Rule –

[10] California Department of Justice, Office of the Attorney General. 2022. *Warehouse Projects: Best Practices and Mitigation Measures to Comply with CEQA*. September. Website: https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf (accessed November 2025)

[11] South Coast Air Quality Management District (SCAQMD). 2022. *Final 2022 Air Quality Management Plan*. December 2. Website: https://www.aqmd.gov/home/air-quality/air-quality-management-plans/air-quality-mgt-plan/2022-aqmp-archive (accessed November 2025)

Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program [12]. The *Warehouse Project: Best Practices* explicitly states Lead Agencies are not relieved from conducting project-specific analysis of impacts and evaluation of feasible mitigation. Therefore, the Draft EIR relied on detailed technical evaluation to support determinations of project impacts and the development of appropriate mitigation for impacts that exceeded established thresholds (see below). The Project satisfies a number of suggested best practices for warehouse siting, including provision of a landscape buffer between existing residences and the project site, orientating the building so that loading areas face away from residential areas, and providing truck movement features sufficient to prevent queuing on local streets, and provision of a screening wall along the eastern end of the loading docks. Additionally, as suggested by the *Warehouse Projects: Best Practices*, the Project prepared project-specific and cumulative analyses of air quality, greenhouse gas, and health risk assessments impacts utilizing anticipated truck volumes and movements.

The referenced documents further provide regional and Statewide guidance to minimize air quality and greenhouse gas emissions from warehouse operations. The 2022 AQMP was reviewed and utilized in preparation of the Draft EIR, as described in Section 4.3, Air Quality, pages 4.3-15, 4.3-16, 4.3-22, and 4.3-23 of the Draft EIR. Additionally, the City has reviewed the referenced materials and determined that the Draft EIR already incorporates mitigation measures and regulatory compliance measures consistent with the intent of these programs. Specifically, as discussed in Section 4.3, Air Quality, pages 4.3-27, 4.3-42, and 4.3-50, the Draft EIR includes MM AQ-1 through MM AQ-3, which require implementation of construction-phase emission controls, and MM GHG-1, which would ensure that EV charging infrastructure is available on the Project site. These measures satisfy the intent of *Warehouse Projects: Best Practices* by requiring the implementation of practices or actions to reduce air quality and greenhouse gas emissions. In addition, the proposed Project is required by law to comply with the *SCAQMD* Rule 2305 (WAIRE) and future owners and operators of the proposed Project would be required to comply with the WAIRE Program's point-based emission reduction and reporting requirements through the SCAQMD permitting process, as described in Section 3.7, Sustainability Features, page 3-19 of Section 3.0, Project Description, and as noted in Table 3.A, page 3-21 of the Draft EIR.

Because the Draft EIR already incorporates equivalent and enforceable measures that achieve compliance with applicable air quality, greenhouse gas, and energy reduction objectives (refer to Section 4.3.9.2 starting on page 4.3-50, and Section 4.8.9.2, starting on page 4.8-21, respectively), no additional mitigation measures or revisions to the Draft EIR are required. Please refer to Master Response 4 regarding mitigation requirements under CEQA.

Response to Comment S-2-8

This comment provides information on SCAQMD Rule 2305 and recommends the City review Rule 2305 and WAIRE program.

[12] SCAQMD. 2021. *Rule 2305 – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program.* May 7. Website: https://www.aqmd.gov/home/rules-compliance/compliance/waire-program (accessed November 2025)

As described in Response to Comment S-2-7, the WAIRE program is described in Section 3.7, Sustainability Features, page 3-19 of Section 3.0, Project Description, of the Draft EIR. In addition, SCAQMD Rule 2305 is described in the Draft EIR on page 4.3-14, and compliance with the measure is noted on page 4.3-38. This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment S-2-9

This comment provides information on required permits for the proposed Project and SCAQMD's role as a Responsible Agency and recommends the Draft EIR be revised to include a discussion about any and all new stationary and portable equipment requiring SCAQMD air permits.

As described in Section 4.3, Air Quality, starting on page 4.3-2, of the Draft EIR, the SCAQMD is the regional agency responsible for regulating stationary and area sources of air emissions within the South Coast Air Basin and for implementing both the federal and California Clean Air Acts through its regulatory programs.

Although the future tenant of the Project site is unknown, any stationary or portable equipment associated with the proposed Project would obtain the required permits to construct or operate under SCAQMD jurisdiction pursuant to SCAQMD Rules 201 and 203.

In response to this comment, Table 3.A on page 3-21 of the Draft EIR is revised as follows:

Table 3.A: Probable Future Actions by Responsible Agencies

Responsible Agency	Action
Orange County Fire Authority (OCFA)	Approval of Secured Fire Protection Agreement and Fire Master Plan.
State Water Resources Control Board (SWRCB)	Applicant/Developer must submit Permit Registration Documents, including a Notice of Intent, to comply with the National Pollutant Discharge Elimination System (NPDES) North Orange County Permit (Order No. R8-2009-030 as amended by Order No. R8-2010-0062).
South Coast Air Quality Management District (SCAQMD)	The requirements of SCAQMD Rule 2305 would be applicable to the proposed Project. The Applicant/Developer must submit a Warehouse Operations Notification to the SCAQMD, disclosing building and tenant information, and must submit annual documentation to SCAQMD demonstrating ongoing compliance with Rule 2305. <u>If stationary or portable equipment would be used by the future tenant, the tenant would be required to obtain permits to construct and operate under SCAQMD Rules 201 and 203.</u>

Source: Compiled by LSA (2025).

These revisions represent a minor change to the Draft EIR in order to clarify the probable future actions by the SCAQMD. These revisions do not change the conclusions or analysis of impacts in the Draft EIR.

Response to Comment S-2-10

This comment concludes the letter and requests the City adequately address the comments provided in this letter and provide those responses to SCAQMD 10 days prior to certifying the Final EIR. The City will comply with *State CEQA Guidelines* Section 15088(a-b) and provide responses to SCAQMD comments on the Draft EIR 10 days prior to certifying the Final EIR.

Weiss, Jennifer

From: Jamoralin, Joseph@DOT <Joseph.Jamoralin@dot.ca.gov>
Sent: Monday, September 15, 2025 4:30 PM
To: EnterpriseProjects
Cc: Shelley, Scott@DOT; State.Clearinghouse@lci.ca.gov
Subject: Comment Letter for IPT Enterprise Business Center LLC Project
Attachments: 12-ORA-2024-02890 - IPT Enterprise Business Center LLC Project.pdf

Hello Ms. Stonich,

I have attached comments from Caltrans for the IPT Enterprise Business Center LLC Project for the City of Lake Forest. Should you have any questions regarding these comments, feel free to reach out.

S-3-1

Please confirm receipt of this message by responding.

Thank you,

Joseph Jamoralin
Associate Transportation Planner
Caltrans District 12 | Local Development Review
Division of Planning and Local Assistance
1750 East 4th Street Suite100
Santa Ana, CA 92705
(805) 732-8047

CAUTION: Think Security! This email is not from someone at the City of Lake Forest. **Do not click any links or open any attachments you are not expecting.**

California Department of Transportation

DISTRICT 12
1750 East 4th Street, Suite 100 | SANTA ANA, CA 92705
(657) 328-6000 | FAX (657) 328-6522 TTY 711
https://dot.ca.gov/caltrans-near-me/district12

September 15, 2025

Ms. Amy Stonich
Assistant Director of Community Development
City of Lake Forest
100 Civic Center Drive
Lake Forest, CA 92630

File: LDR/CEQA
SCH: 2024030755
12-ORA-2024-02890
SR 241, PM 22.455

Dear Ms. Stonich,

Thank you for including the California Department of Transportation (Caltrans) in the review of the Draft Environmental Impact Report for the IPT Enterprise Business Center LLC Project in the City of Lake Forest. The mission of Caltrans is improving lives and communities through transportation.

The project proposes the demolition of an existing 144,906 sq ft building to build a new 35-foot tall, 165,803 sq ft industrial building with gated truck loading and approximately 301 parking spaces. Additionally, the project also involves off-site improvements at 5 intersections. Regional access to the project area is provided by State Route 241 (SR 241). Caltrans is a commenting agency for this project and upon review, we have the following comments:

S-3-2

1. Caltrans supports the design of Complete Streets that include high-quality pedestrian, bicycle, and transit facilities that are safe and comfortable for users of all ages and abilities. Improvements may include providing secure bicycle parking, pedestrian-oriented LED lighting, wayfinding signage, and comfortable connections to nearby active transportation and/or transit facilities. Complete Streets improvements also promote regional connectivity, improve air quality, reduce congestion, promote improved first-/last-mile connections, and increase safety for all modes of transportation. Continue to incorporate Complete Streets in project development.

2. Caltrans supports the inclusion of bicycle storage facilities pursuant to CALGreen code. Caltrans also recommends following bicycle parking best practices described in the "Essentials of Bike Parking" guide created by the Association of

Pedestrian and Bicycle Professionals (link to online PDF: https://www.apbp.org/Publications).

Bike parking should be installed a minimum of 24" away from walls and other objects (e.g., trash cans, plants, etc.). With the growing popularity of electric bikes and cargo/utility bikes (which tend to be bigger and heavier), Caltrans also recommends that bicycle storage facilities be designed to accommodate a range of bicycle styles, sizes, and weights.

3. The provided documents mention several bicycle lanes near the project location, but do not appear to mention the Class II bicycle lanes on Dimension Drive, Monarch, and Catalina to the west and northwest of the project limits, despite mentioning bicycle lanes that are a further distance from the project. Please account for these missing bike lanes in the relevant analyses and language.

S-3-2 cont.

4. OCTA Community Route 177 is located within proximity of the project site. Please consider encouraging or incentivizing the use of public transit among construction workers of the proposed development and future employees. Increasing multimodal transportation will lead to a reduction to congestion, Vehicle Miles Traveled, and improve air quality.

Please continue to coordinate with Caltrans for any future developments that could potentially impact State transportation facilities. If you have any questions, please do not hesitate to contact Joseph Jamoralin at Joseph.Jamoralin@dot.ca.gov.

Sincerely,

Scott Shelley (Sep 15, 2025 16:21:16 PDT)

Scott Shelley
Branch Chief, Local Development Review-Climate Change-Transit Grants
Caltrans, District 12

Caltrans District 12, Joseph Jamoralin, Assistant Transportation Planner

Letter Code: S-3
Date: September 15, 2025

Response to Comment S-3-1

This comment is introductory and transmits the State of California, Department of Transportation's (Caltrans) formal comments on the Draft EIR.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment S-3-2

This comment provides a summary of the proposed Project and generally outlines comments related to Complete Streets design, CALGreen Code and bicycle standards, discussion of existing Class II bicycle lanes, public transit incentives, and coordination with Caltrans on any future developments.

The City acknowledges Caltrans' comments regarding Complete Streets design, CALGreen Code (Title 24, Part 11) and bicycle standards, public transit incentives, and ongoing coordination for future development. Transportation and circulation, including bicycle and pedestrian facilities, are addressed starting in Section 4.17.3.3, page 4.17-4, of Section 4.17 Transportation and Traffic, of the Draft EIR. As described therein, the Project site is served by a network of local and regional roadways, including Class II bicycle lanes on Bake Parkway, Lake Forest Drive, and Rancho Parkway, as well as sidewalks along all major frontages (refer to Section 4.17.3, starting on page 4.17-2, of the Draft EIR). However, based on the anticipated Project trip distribution (refer to Page 17 of the TIA [Appendix J of the Draft EIR]), Class II bicycle lanes on Dimension Drive (north of Bake Parkway), Monarch, and Catalina are beyond the Project study area and are not directly relevant to the proposed Project.

To promote multimodal connectivity consistent with Caltrans Complete Streets policies, the Project includes Mitigation Measure (MM) TRA-1, which requires construction of new Class II bike lanes in both directions along Commercentre Drive between Alton Parkway and Dimension Drive. These facilities would connect the Project site to the Irvine Transportation Center, a multimodal hub served by Metrolink, Amtrak, and Orange County Transportation Authority (OCTA) bus routes. Additionally, the proposed Project would be required to comply with the site development standards specified in Section 9.160.040 of the City's Municipal Code related to employee parking spaces, parking for carpool vehicles, parking for vanpool vehicles, bicycle parking, shower facilities, locker facilities, commuter information areas, rideshare vehicle loading areas, and the provision of transit/bus shelters. Refer to Master Response 8 regarding VMT regulatory compliance and mitigation measures proposed for the Project.

As described in Section 3.7, Sustainability Features, page 3-19, of Section 3.0 Project Description; Section 4.6.4.2, page 4.6-6, of Section 4.6 Energy; Section 4.8, Greenhouse Gas Emissions pages 4.8-

9, 4.8-10, 4.8-18, and 4.8-19; Section 4.13.4.1, page 4.13-9 of Section 4.13, Noise; Section 4.19, and Utilities and Service Systems pages 4.19-8, 4.19-10, 4.19-18. 4.19-19; Project design and operation would comply with the CALGreen Code requirements related to bicycle parking, electric vehicle (EV) infrastructure, and energy-efficient site design.

Community Route 177 is an OCTA Community Route that provides transit service between Foothill Ranch and Laguna Hills via Lake Forest Drive, Muirlands Boulevard, and Los Alisos Boulevard. The nearest Route 177 stops are located approximately 2,200 feet from the project driveways at the southwest and northeast corners of the Lake Forest Drive/Dimension Drive intersection. These transit facilities are accessible from the project site via existing sidewalks along Enterprise Way, Dimension Drive, and Lake Forest Drive, which support safe and direct pedestrian connections. The City will continue to coordinate with Caltrans and OCTA regarding future developments or roadway improvements affecting regional mobility.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

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2.3 ORGANIZATIONS

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From:	Haibo Jiang
To:	Stonich, Amy; EnterpriseProjects
Cc:	Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject:	Public Comments on DEIR – IPT Enterprise Business Center Project
Date:	Wednesday, July 30, 2025 7:34:50 AM
Attachments:	Public Comments on the IPT Enterprise Business Center Project - Harrison Jiang 07302025.pdf

Dear Amy, Members of the Planning Commission, and Honorable City Council Members,

My name is Harrison Jiang, a resident of the City of Lake Forest and President of We the Meadows, a community-based non-profit organization committed to safeguarding the health, safety, and well-being of our residents and environment.

On behalf of myself and our organization, I am writing to formally submit our public comments on the Draft Environmental Impact Report (DEIR) for the IPT Enterprise Business Center Project (SCH No. 2024030755). **Please find our full comment document attached to this email.**

A. Overview of Concerns

While we acknowledge the professional efforts made by the City of Lake Forest and LSA in producing the DEIR, it is clear from our thorough review that the report is critically **deficient** in multiple areas—particularly in its treatment of **cumulative impacts** from the three proposed industrial warehouse developments (the IPT project and two adjacent projects by Western Realco).

O-1-1

Our organization has identified over 100 specific areas of concern that point to a broader pattern of:

1. **Insufficient cumulative impact analysis**
2. **Understated or misclassified environmental effects**
3. **Failure to evaluate feasible alternatives**
4. **Inadequate and unenforceable mitigation measures**
5. **Disregard for long-term impacts on nearby sensitive residential neighborhoods**

B. Specific Deficiencies

The DEIR already concedes that the project will result in **"Significant and Unavoidable" impacts** to:

1. **Greenhouse Gas Emissions**
2. **Vehicle Miles Traveled (VMT)** / Transportation & Traffic

Based on our analysis, **Air Quality**, **Noise**, and **Human Health Risks** should also be classified as **"Significant and Unavoidable"**—especially when accounting for the **combined impacts** of all three warehouse projects, during both **construction and**

operation phases. The DEIR further fails to account for unknown future tenants, truck trip volumes, and 24/7 operations—factors that directly influence environmental health and safety outcomes.

C. Broader Impacts on the Community

The proposed industrial warehouses are situated **immediately adjacent to established residential neighborhoods**, including The Meadows at Lake Forest and Baker Ranch. These developments will:

1. Introduce heavy diesel truck traffic within 100 feet of family homes and schools
2. Exacerbate cancer and respiratory health risks, particularly among vulnerable populations (children, seniors, and low-income residents)
3. Increase air, noise, and light pollution in a currently surrounding quiet residential zone
4. Undermine the long-term livability, safety, and environmental integrity of our city

In their current form, the projects are **fundamentally incompatible** with surrounding land uses and **violate the intent and spirit of CEQA**, the **City's General Plan**, and basic principles of **Environmental and Social Justice**.

O-1-1 cont.

D. Our Position and Recommendations

We, the residents of Lake Forest, **strongly oppose** the approval of these warehouse developments in their current form. We urge the City to:

1. **Reject the current DEIR** and require a **comprehensive revision** that addresses cumulative impacts, tenant uncertainty, and monitorable and monitorable mitigations.
2. **Fully consider alternative land uses** that are economically viable and more compatible with nearby residential communities—such as:
    a. Mixed-use developments (e.g., small business + residential condos)
    b. Business office complexes
    c. Research, medical, or clean-tech non-industrial facilities
3. **Prioritize community engagement** and **the long-term well-being** of residents over short-term industrial gains.

E. Closing

We stand united in **our commitment to protecting** the health, safety, and quality of life for current and future generations of Lake Forest residents. **The risks** posed by these projects **are far too severe to be overlooked—let alone taken on** by our City and broader community. We remain firmly committed to **opposing these developments** and **advocating for more responsible, community-centered alternatives**.

O-1-1 cont.

Please confirm receipt of this email and the attached public comment document.

Thank you for your attention to these urgent and important matters.

Sincerely,

Harrison Jiang

Resident, City of Lake Forest
President, We the Meadows

CAUTION: Think Security! This email is not from someone at the City of Lake Forest. **Do not click any links or open any attachments you are not expecting.**

We the Meadows

United we stand

Public Comments on the IPT Enterprise Business Center Project Draft Environmental Impact Report (DEIR)

Harrison Jiang, Individually and On Behalf of We the Meadows

07/30/2025

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We the Meadows

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A. General Concerns Regarding Cumulative Analysis and Proximity to Sensitive Receptors

1. The DEIR frequently notes that the City of Lake Forest requested a quantitative evaluation of the combined cumulative impacts with the Western Realco Projects due to their **immediate vicinity and assumed overlapping construction schedules** (Air Quality, Greenhouse Gas, and Energy Impact Report, Introduction, June 2025, page 1; Air Quality, Greenhouse Gas, and Energy Impact Report, Cumulative Impacts, June 2025, page 7; Health Risk Assessment, Cumulative Impacts, June 2025, page 15; Draft EIR, Section 4.3 Air Quality, page 4-29). However, the **level of detail and specificity in demonstrating how these combined impacts are reduced to a less than significant level** often appears insufficient, especially given the residential community's close proximity, as noted in the query that truck routes are **<100 feet from residential block walls** [User Query].
2. The DEIR mentions that if a project falls below the SCAQMD significance threshold, its contribution would not be cumulatively considerable (Health Risk Assessment, Cumulative Impacts, June 2025, page 15; Draft EIR, Section 4.3 Air Quality, page 4-29). However, given the **explicit acknowledgment of significant and unavoidable VMT and GHG impacts** (Draft EIR, Section 1.4.1 Transportation and Traffic, page 1-8; Draft EIR, Section 5.2.2 Project-Related Impacts, page 5-2; Draft EIR, Section 6.1.2 Greenhouse Gas Emissions, page 6-2), this general statement for other impacts seems to **contradict the overall finding of significant cumulative effects** and warrants re-evaluation for all environmental factors.
3. The community has been "protesting these projects" and "successfully stopped MND process and forced the City to go through EIR" [User Query], indicating a high level of public concern that demands a **more robust and transparent cumulative analysis** to ensure the EIR meets CEQA's informational objectives as outlined in Public Resources Code Section 21000 et seq..

O-1-2

We the Meadows

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B. Aesthetics

4. The DEIR states that "eleven comment letters included comments related to aesthetics" raising concerns about the project's **compatibility with surrounding land uses and community character, alterations to the existing visual landscape, and the potential for increased nighttime lighting** (Draft EIR, Section 4.1 Aesthetics, page 4-1). The current cumulative analysis for aesthetics is deemed "less than significant" based on individual project compliance (Draft EIR, Section 4.1 Aesthetics, page 4-15). This **lacks comprehensive analysis of the combined visual impact** of three large industrial buildings in such close proximity to a residential community.
5. The DEIR suggests that "landscaping along the north perimeter of the project site would be enhanced to provide additional screening from the Meadows Residential Development" (Draft EIR, Section 3.4.3 Landscaping, page 3-8). However, a **detailed analysis of how this landscaping, combined with the visual impact of three simultaneously operating large warehouses, will effectively screen the significant visual alteration** from the Meadows community is absent from the cumulative discussion.

O-1-3

6. The DEIR asserts that the building was designed so that the "truck dock and loading area… is oriented to the southeast (not facing the residential properties), is located over 200 feet away from the nearest residential property line, and would not be readily visible from the residences" (Draft EIR, Section 4.11 Land Use and Planning, page 4-99). This assertion needs to be **re-evaluated cumulatively**, considering that the *user's query states the closest distance from Truck Ingress and Egress route to the residential property block wall is <100 feet* [User Query]. The cumulative visual impact of three such facilities operating 24/7 with lighting and truck movements needs a **more realistic assessment** for proximate residences, as stated by the commenter Xiuying Zhou: "It will be very noisy and bright 24 hours a day out of our window" (Scoping Summary Memorandum, March 29, 2024, page 11).
7. The DEIR mentions general compliance with Title 24 and City Municipal Code sections for lighting (Draft EIR, Section 4.1 Aesthetics, page 4-15). However, the cumulative effect of **increased light and glare from *all three* projects on nighttime views and residential quality of life**, especially given the **24/7 operation** mentioned by multiple commenters (e.g., Xiuying Zhou, Scoping Summary Memorandum, March 29, 2024, page 11), is not adequately quantified or addressed in the cumulative impact section.

O-1-3 cont.

8. The cumulative impact analysis for aesthetics states that "development within the cumulative study area would also be required to comply with existing regulatory requirements related to light and glare… to reduce potential impacts" (Draft EIR, Section 4.1 Aesthetics, page 4-15). This is a **general statement of compliance that fails to provide a comprehensive, detailed analysis of the combined aesthetic impacts of three proximate industrial developments**, as required for a robust cumulative analysis under CEQA.

C. Air Quality

9. The DEIR states that "eighty-one (81) comment letters included comments related to air quality" raising concerns about **additional air pollution, impacts to sensitive populations, and the need for additional analysis, mitigation measures, emission reduction strategies, and pollution hotspot identification** (Draft EIR, Section 4.3 Air Quality, page 4-23). The cumulative analysis, while quantitative, needs to **explicitly demonstrate how all these specific concerns are addressed for all three projects simultaneously**.
10. The Health Risk Assessment (HRA) indicates that the "closest sensitive receptor includes single-family homes located adjacent to the east property line at approximately 82 feet from the project site's eastern boundary" (Health Risk Assessment, Health Risk Impacts, June 2025, page 14). For the cumulative analysis, the "residential MEI for the cumulative analysis is an apartment building reserved for seniors located to the east of Project Site 1, within 125 feet from the project site's eastern boundary" (Health Risk Assessment, Cumulative Construction Health Risk, June 2025, page 16; Draft EIR, Section 4.3 Air Quality, page 4-37). Given these **extremely close proximities**, the EIR's conclusion that "all health risk levels to nearby receptors from operation-related emissions of TACs would be well below the SCAQMD's HRA thresholds" (Health Risk Assessment, Health Risk Impacts, June 2025, page 15) for the *individual* project needs to be **rigorously re-evaluated for the *cumulative* impact of all three projects**, considering the close distance and "concentrated truck traffic" noted by Daniel Hu (Scoping Summary Memorandum, March 27, 2024, page 4).

O-1-4

11. Multiple commenters requested a **"Comprehensive Air Quality Study" and "Pollution Hotspot Identification"**, specifically mentioning "Assessment of Impact on Sensitive Populations" (Shaoxia Wu, Scoping Summary Memorandum, March 28, 2024, page 5;

Jason Ye, Scoping Summary Memorandum, April 16, 2024, page 26; Xin Jin, Scoping Summary Memorandum, May 11, 2024, page 41; Bing Wang, Scoping Summary Memorandum, May 15, 2024, page 45; Celine Wang, Scoping Summary Memorandum, May 15, 2024, page 45). The DEIR's cumulative analysis, while referring to CalEEMod, must explicitly detail how these specific studies and hotspot analyses were conducted for the **combined emissions of all three projects** to assure the safety of nearby children and seniors (Chao Huang, Scoping Summary Memorandum, May 13, 2024, page 42).

12. The DEIR states that cumulative construction of the proposed project and Western Realco Projects 1 and 2 "would have the potential to result in cumulative pollutant emissions of NOx and VOC during construction" (Air Quality, Greenhouse Gas, and Energy Impact Report, page 8; Draft EIR, Section 2.0 Introduction, page 2-3). While Mitigation Measures AQ-2 and AQ-3 are proposed (Air Quality, Greenhouse Gas, and Energy Impact Report, page 8; Draft EIR, Section 2.0 Introduction, page 2-3), the analysis should **explicitly quantify the *total combined emissions after* mitigation for all three projects and demonstrate clearly that these are less than SCAQMD thresholds, not just state that the Western Realco projects would be reduced to less than significant *individually***.

O-1-4 cont.

13. Mitigation Measure AQ-3 relies on the Project Applicant consulting with the City on the status of Western Realco Projects 1 and 2 to determine if construction schedules overlap (Air Quality, Greenhouse Gas, and Energy Impact Report, page 8; Draft EIR, Section 2.0 Introduction, page 2-3; Draft EIR, Section 7.0 Mitigation and Monitoring Reporting Program, page 7-2; Draft EIR, Section 4.3 Air Quality, page 4-38). This **places a future burden on consultation rather than providing a definitive cumulative impact assessment based on the "reasonably foreseeable" assumption already made in the EIR** (Air Quality, Greenhouse Gas, and Energy Impact Report, Cumulative Impacts, June 2025, page 7; Health Risk Assessment, Cumulative Impacts, June 2025, page 15; Draft EIR, Section 4.3 Air Quality, page 4-29). A robust EIR should assume the worst-case (overlap) and demonstrate mitigation effectiveness *now*.
14. The DEIR acknowledges that "diesel trucks visiting warehouses emit nitrogen oxide (NOx)" and "diesel particulate matter" which contribute to respiratory problems and cancer (Bureau of Environmental Justice letter, Attachment to Scoping Summary Memorandum, April 5, 2024, page 1). Given the user's concern about "concentrated warehousing and manufacturing facilities near residential areas", the cumulative analysis needs to **thoroughly assess the combined exposure to these pollutants**

from all three projects, particularly for sensitive populations like children and seniors, who are "extra vulnerable" (Chao Huang, Scoping Summary Memorandum, May 13, 2024, page 42).

15. The DEIR states that the "total peak emissions from Western Realco Projects 1 and 2, along with the peak emissions from the proposed project were summed and compared to the SCAQMD regional thresholds" (Draft EIR, Section 4.3 Air Quality, page 4-34). However, the **tables summarizing these cumulative emissions (e.g., Table 4.3.Q or 4.3.R) were not provided in the excerpts**, making it impossible to verify the sufficiency of the "less than significant" finding, which is a critical omission for public review. *[Request user to provide the tables for verification or include this as a comment if not available in the full document.]*
16. The DEIR uses CalEEMod for emissions calculations (Draft EIR, Section 4.3 Air Quality, page 4-25). Commenters like Daniel Hu specifically requested a "LST study or concentration study tailored to the unique conditions of the Project Site" that "should surpass the limitations of generic models like the California Emissions Estimator Model (CalEEMod)" (Scoping Summary Memorandum, March 27, 2024, page 4). The cumulative analysis, which relies on CalEEMod for all three projects, needs to **address why a more refined, site-specific cumulative concentration study was not deemed necessary** given the proximity of multiple projects to sensitive receptors.

O-1-4 cont.

17. The DEIR notes that Western Realco Project 1 includes "79,000 sq ft of manufacturing use" and Project 2 includes "69,000 sq ft of warehouse use" (Air Quality, Greenhouse Gas, and Energy Impact Report, Cumulative Impacts, June 2025, page 7). The **lack of "clear definition and description of material type, toxicity classification and pollution" for the "future manufacture" facility** in the IPT project (Lily Chu, Scoping Summary Memorandum, March 29, 2024, page 6), combined with the scale of manufacturing proposed for Western Realco, means the cumulative impact of hazardous air pollutants from manufacturing activities across all three projects **may not be fully assessed**. Shaoxia Wu requested a "Manufacturing Activity Emission Impact Study" for the DEIR (Scoping Summary Memorandum, March 28, 2024, page 5).
18. The DEIR states that the **cumulative operational emissions** for Western Realco Projects 1 and 2, along with the proposed project, are shown in Table T (Air Quality, Greenhouse Gas, and Energy Impact Report, Table T). However, **this table is incomplete in the provided excerpts**, making it impossible to assess the basis for the cumulative operational air quality conclusion. *[Request user to provide the complete*

Table T for verification or include this as a comment if not available in the full document.]

D. Biological Resources

19. The DEIR states that "Two comment letters included comments related to biological resources," raising concerns about "potential for the proposed project to cause habitat destruction and disrupt wildlife" (Draft EIR, Section 4.4 Biological Resources, page 4-40). The cumulative impact section for biological resources concludes that impacts are "less than significant" based on adherence to regulations (Draft EIR, Section 4.4 Biological Resources, page 4-46). This analysis **fails to provide a detailed, site-specific assessment of the cumulative impacts of *three adjacent* industrial developments on wildlife movement, foraging habitats, or even urban-adapted species**, particularly when the user has noted the projects are in very close proximity to a residential community, which itself often has associated green spaces.
20. The DEIR states that the "project site and surrounding area provides minimal foraging and nesting habitat for a variety of bird species adapted to a significant degree of human disturbance and urban environments" (Draft EIR, Section 4.4 Biological Resources, page 4-43). While a Regulatory Compliance Measure (RCM BIO-1) requires nesting bird surveys (Draft EIR, Section 2.0 Introduction, page 2-4), the cumulative impact analysis does not adequately address how **three concurrent or sequential construction phases in an "urban-wildland interface" could collectively impact the already "minimal" habitat and urban-adapted species beyond a "temporary" determent** (Draft EIR, Section 4.4 Biological Resources, page 4-45).

O-1-5

21. The DEIR mentions that the "project site does not correspond to essential connectivity areas, natural landscape blocks or potential riparian connections as documented in the California Essential Habitat Connectivity Project Report" (Draft EIR, Section 4.4 Biological Resources, page 4-45). While this may be true for this individual project, the **cumulative impact of three such large facilities, which would increase impervious surfaces and alter existing landscaping on an 8.83-acre parcel** (Draft EIR, Section 3.4.2 Impervious Surface Area, page 3-8), could collectively contribute to **fragmentation or degradation of *local* ecological functions not captured by broader regional connectivity studies**. A more detailed cumulative assessment on habitat modification for urban wildlife, as raised by public comments, is warranted.

E. Cultural Resources / Tribal Cultural Resources

22. The DEIR notes that one comment letter raised concerns about the "possibility of buried archaeological resources in the project area, stating that this potential necessitates, at a minimum, monitoring by qualified archaeologists and culturally related Native Americans during ground disturbance within undisturbed soil areas" (Scoping Summary Memorandum, April 10, 2024, page 18; Draft EIR, Section 4.5 Cultural Resources, page 4-47). The cumulative impact section for cultural resources is very general, stating that projects would be evaluated and mitigated individually (Draft EIR, Section 4.18 Tribal Cultural Resources, page 4-150). This **fails to provide a comprehensive cumulative analysis of all three large industrial projects, especially if all involve significant ground disturbance potentially impacting shared or contiguous cultural resource areas**.
23. The DEIR states that for the Pacific Business Park Project (1987), mass grading included "1,000,000 cubic yards of cut and fill material, with a maximum cut depth of 85 feet and fill depth of 35 feet" (Draft EIR, Section 4.18 Tribal Cultural Resources, page 4-149). Given this **extensive historical ground disturbance**, the cumulative analysis for all three projects needs to explicitly detail how further extensive ground disturbance from the *proposed* projects (including the Western Realco projects, which involve demolition and reconstruction) will be monitored and mitigated for potential impacts to undiscovered cultural resources, especially given tribal consultation requests.

O-1-6

24. Mitigation Measure TCR-1 requires Native American tribal monitoring of ground-disturbing activities (Draft EIR, Section 4.18 Tribal Cultural Resources, page 4-149). The cumulative analysis should clarify how **monitoring for *all three concurrent* projects** would be coordinated to ensure effective protection of shared or contiguous tribal cultural resources.
25. The DEIR states that tribal consultation concluded on May 11, 2025 (Draft EIR, Section 4.18 Tribal Cultural Resources, page 4-149). It is important to confirm that **all specific concerns and recommendations from the Native American Heritage Commission (NAHC)**, as outlined in their March 25, 2024 comment letter (Scoping Summary Memorandum, March 25, 2024, page 3), have been fully incorporated into the cumulative analysis and mitigation plan for *all three projects*.

F. Energy

26. The DEIR states that "No comments related to energy were received during the public scoping period" (Draft EIR, Section 4.6 Energy, page 4-53). However, energy consumption is a component of greenhouse gas emissions. The DEIR asserts that energy impacts are "negligible" at the regional level and "less than significant" for the project (Air Quality, Greenhouse Gas, and Energy Impact Report, page 2; Draft EIR, Section 4.6 Energy, page 4-58). This conclusion for *cumulative* energy consumption of three large industrial projects needs a more **detailed, quantitative analysis, considering the combined operational energy demands**, rather than simply assuming individual compliance with codes.

O-1-7

27. The DEIR concludes that the proposed project would not result in "wasteful, inefficient, or unnecessary consumption of energy" (Draft EIR, Section 6.2 Energy Impacts, page 6-3). This determination for the *individual* project needs to be **explicitly justified and quantified for the cumulative scenario of three large industrial facilities operating simultaneously**, considering the combined demand on the regional energy grid and the overall contribution to greenhouse gas emissions, especially as the project contributes to a **significant and unavoidable cumulative GHG impact** (Draft EIR, Section 6.1.2 Greenhouse Gas Emissions, page 6-2).

G. Geology and Soils

28. The DEIR states that "No comments related to geology and soils were received during the public scoping period" (Draft EIR, Section 4.7 Geology and Soils, page 4-63). However, the DEIR describes the project as involving demolition and construction with "cuts and fills of 4 to 6± feet" (Geotechnical Investigation, Site and Project Description, April 7, 2021, page 7; Water Quality Management Plan, Geotechnical Soils Report, April 7, 2021, page 5). The cumulative analysis for geology and soils generally states that "development within the cumulative study area would also be required to comply with recommendations in site-specific geotechnical investigation reports" (Draft EIR, Section 4.7 Geology and Soils, page 4-68). This approach **does not adequately assess the *combined* potential for ground shaking, liquefaction, or subsidence from three adjacent large-scale construction projects and their operations**, especially considering the underlying engineered fill soils and bedrock transition (Geotechnical Investigation, Geotechnical Design Considerations, April 7, 2021, page 19).

O-1-8

O-1-8 cont.

29. The Geotechnical Investigation notes that "the City has no such records" documenting the placement and compaction of existing engineered fill soils (Geotechnical Investigation, Geotechnical Design Considerations, April 7, 2021, page 19; Water Quality Management Plan, Geotechnical Soils Report, April 7, 2021, page 2). Given this **lack of comprehensive historical data**, the cumulative analysis should provide a more robust discussion of how the **combined future grading and construction activities of all three projects** will be managed to prevent significant cumulative impacts related to soil stability or seismic hazards.

H. Greenhouse Gases (GHG)

30. The DEIR states that "Twenty-eight (28) comment letters included comments related to GHG emissions" raising concerns about "increases in air pollution and GHG emissions" and "the need for hotspot analyses for key pollutants and a study on manufacturing emissions" (Draft EIR, Section 4.8 Greenhouse Gas Emissions, page 4-75). Crucially, the DEIR concludes that the proposed project would result in a **"significant and unavoidable cumulatively considerable impact related to GHG emissions"** because it would conflict with the goals of the 2022 Scoping Plan related to Vehicle Miles Traveled (VMT) (Draft EIR, Section 6.1.2 Greenhouse Gas Emissions, page 6-2). This finding makes the general "less than significant" conclusions for *other* environmental factors in the cumulative analysis seem less credible without very detailed justification.

O-1-9

31. Since the DEIR explicitly identifies a **significant and unavoidable cumulative GHG impact**, the analysis should **more thoroughly explore additional feasible mitigation measures** beyond just bike lanes, as the current mitigation "would not reduce the project's VMT to below the City's VMT threshold" (Draft EIR, Section 6.1.1 Transportation and Traffic (Project-Specific Vehicle Miles Traveled Impact), page 6-1). CEQA requires that EIRs propose "mitigation measures that will minimize, offset, or otherwise reduce or avoid the identified potentially significant environmental impacts" (Draft EIR, Section 1.0 Executive Summary, page 1-1).
32. The DEIR states that the proposed project will comply with SCAQMD's Warehouse Indirect Source Rule (ISR) (Rule 2305) and seek LEED certification, with features like "drought-tolerant landscaping, low-flow fixtures, high-efficiency lighting, solar, and infrastructure for EV charging" (Draft EIR, Section 3.7 Sustainability Features, page 3-12). While positive individually, the cumulative analysis needs to **quantify how these measures *across all three projects collectively*** contribute to reducing the

cumulatively considerable GHG impact, especially when the VMT impact remains significant.

O-1-9 cont.

33. Commenters requested "a study on manufacturing emissions" (Draft EIR, Section 4.8 Greenhouse Gas Emissions, page 4-75). Given that the Western Realco Project 1 includes 79,000 sq ft of manufacturing (Air Quality, Greenhouse Gas, and Energy Impact Report, Cumulative Impacts, June 2025, page 7), the cumulative GHG emissions from **combined manufacturing processes** across the projects need a **dedicated and comprehensive assessment**, beyond general operational emissions.

I. Hazards and Hazardous Materials

34. The DEIR states that "Twenty-two comment letters included comments related to hazards and hazardous materials" raising concerns about "safety of people in the vicinity of the site and the health of nearby residents, contamination of the environment, hazardous waste incidents, and the emissions and storage of hazardous materials" (Draft EIR, Section 4.9 Hazards and Hazardous Materials, page 4-86). The cumulative impact analysis states that impacts are "less than significant" as "occurrence of a cumulative effect related to hazards and hazardous materials would require that multiple projects release hazardous materials at the same time near each other" (Draft EIR, Section 4.9 Hazards and Hazardous Materials, page 4-92). This **definition of cumulative impact is overly narrow and dismissive**. Cumulative risks can arise from **increased *potential* for incidents due to higher volumes of hazardous materials, increased traffic, or greater density of operations, even if simultaneous releases are not assumed**.

O-1-10

35. The DEIR notes that the proposed project involves a mix of office, manufacturing (up to 65,000 sq ft), and warehouse space, but the **"future tenant has not been determined yet"** (Draft EIR, Section 5.2 Proposed Project, page 5-1). Commenter Lily Chu was "strongly against the 'future manufacture' facility, with no clear definition and description of material type, toxicity classification and pollution" (Scoping Summary Memorandum, March 29, 2024, page 6). Without knowing the specific types of hazardous materials that may be stored or used across *all three* industrial facilities (including Western Realco's manufacturing component), the cumulative impact analysis on potential hazardous material accidents and exposure to nearby sensitive receptors (especially those within **82-125 feet** and <100 feet from truck routes [User

Query]) is **inadequate and speculative**, potentially failing to meet CEQA's requirement for a good faith effort at disclosure.

36. The DEIR states that "all projects within the cumulative study area would be required to comply with OCFA and City requirements regarding site design and access routes to allow for proper site evacuation and avoid interfering with an adopted emergency response or evacuation plan" (Draft EIR, Section 4.9 Hazards and Hazardous Materials, page 4-93). This **general statement of compliance is insufficient for a comprehensive cumulative analysis of emergency response and evacuation**. The increased traffic from *three* projects (which is already a significant and unavoidable impact for VMT) could still *cumulatively* impede emergency response, especially on narrow local streets near residences (Eric Zhou, Scoping Summary Memorandum, April 6, 2024, page 17). A **more detailed quantitative analysis of combined traffic on evacuation routes** is needed.

O-1-10 cont.

37. Previous environmental assessments for Panasonic Avionics Corporation at the subject property indicated various compliance evaluations regarding hazardous materials, including diesel, sulfuric acid, and other waste (Phase I Environmental Site Assessment, Regulatory Database Report, March 11, 2021, pages 115, 122, 123, 125, 127). The cumulative analysis needs to explicitly address how the **combined history and future potential for such materials across *all three* sites** will be monitored and regulated to prevent cumulative environmental harm.

J. Hydrology and Water Quality

38. The DEIR states that "Seven comment letters included comments related to hydrology and water quality" raising concerns about the project's potential to "contaminate or pollute local water bodies, affect drainage, and increase runoff" (Draft EIR, Section 4.10 Hydrology and Water Quality, page 4-94). While the individual project proposes mitigation measures (RCM WQ-1, WQ-2, WQ-3, WQ-4), the cumulative analysis for hydrology and water quality relies on the general statement that "each related project must include BMPs to reduce impacts" and would be "evaluated and mitigated by each individual private development or public works project" (Draft EIR, Section 4.10 Hydrology and Water Quality, page 4-106). This **lacks a comprehensive, integrated assessment of how the *combined* increased impervious surface area and runoff volume from three adjacent industrial facilities will cumulatively impact Serrano**

O-1-11

Creek, which is explicitly mentioned by commenters (Kevin Chiang, Scoping Summary Memorandum, May 15, 2024, page 48).

39. The proposed project would "decrease the pervious surface area to 0.9 acres (11 percent) and increase impervious surface area to 7.5 acres (89 percent)" (Draft EIR, Section 3.4.2 Impervious Surface Area, page 3-8). The cumulative analysis should quantify the **total increase in impervious surface area and associated runoff from *all three* projects** and provide a more detailed hydrological model demonstrating that downstream systems, particularly Serrano Creek, will not experience "cumulatively considerable" impacts.
40. The project plans to use "three linear modular wetland systems and three underground detention systems to reduce site discharge during the 100-year, 24-hour peak runoff rate by 47 percent" (Hydrology & Hydraulic Study, Conclusion, page 4; Draft EIR, Section 4.10 Hydrology and Water Quality, page 4-102). The cumulative analysis should discuss how these types of systems will be **implemented and maintained *collectively* across all three projects to handle extreme weather events** and ensure cumulative impacts on water quality and drainage are truly less than significant, rather than relying on individual project compliance.

O-1-11 cont.

41. Commenters raised concerns about "potential contamination of local water bodies through stored substances" (Guoliang Xu, Scoping Summary Memorandum, April 14, 2024, page 21; Jie Hu, Scoping Summary Memorandum, April 14, 2024, page 22). The cumulative analysis should specifically address the **combined risk of spills or leaks from hazardous materials across *all three* projects, particularly given the unknown tenants and manufacturing activities** for the IPT project, and how this cumulative risk will be managed to protect water quality.
42. The DEIR states that the "Orange County Flood Control District (OCFCD)" and the "Lake Forest Public Works Director" must approve drainage and hydrology analyses (RCM WQ-4, Draft EIR, Section 7.0 Mitigation and Monitoring Reporting Program, page 7-7). While this is a regulatory compliance measure, the cumulative analysis should provide **more specific detail on how these agencies ensure that the *combined impact* of all three projects on stormwater runoff and quality will not exceed the capacity of regional systems or adversely affect Serrano Creek**, especially if "industrial operations" could cause "water pollution" (Kevin Chiang, Scoping Summary Memorandum, May 15, 2024, page 48).

K. Land Use and Planning

43. The DEIR states that "Twenty-six comment letters included comments related to land use and planning," specifically on "incompatibility with existing surrounding land uses and the Lake Forest 2040 General Plan and zoning" (Draft EIR, Section 4.11 Land Use and Planning, page 4-108). While the DEIR concludes "No Impact" related to physically dividing an established community (Draft EIR, Section 4.11 Land Use and Planning, page 4-98) and "No Impact" related to conflict with plans (Draft EIR, Section 4.11 Land Use and Planning, page 4-99), the cumulative analysis for land use and planning relies on a general statement that projects are "consistent with applicable General Plan land use designations and zoning designations" (Draft EIR, Section 4.11 Land Use and Planning, page 4-108). This **fails to adequately address the *cumulative perception* of incompatibility and change in community character** as expressed by numerous residents, regardless of individual zoning compliance.
44. Commenters such as Cherie Liu expressed concern about the "proposed project's incompatibility with Land Uses, quality-of-life, safety and health risks, and a lack of long-term planning on behalf of the City" (Scoping Summary Memorandum, March 26, 2024, page 3). The cumulative analysis for land use and planning needs to **explicitly reconcile these strong community concerns about "quality-of-life" and "community harmony" (Harrison Jiang, Scoping Summary Memorandum, April 11, 2024, page 19) with the blanket statement of no impact**, particularly when three large industrial facilities are concentrated adjacent to residential zones.

O-1-12

45. Commenters pointed out that the Meadows community "transitioned from an agricultural zone to a residential one" and that "building a warehouse next to a new residential subdivision is not fair" (Susan Zhao, Scoping Summary Memorandum, April 16, 2024, page 28; Shuqin Jin, Scoping Summary Memorandum, March 28, 2024, page 10). The DEIR confirms this history (Cherie Liu, Scoping Summary Memorandum, March 26, 2024, page 2). The cumulative land use analysis needs to **address the *cumulative perceived inconsistency* with the original vision for the residential area and the impacts on "property values" and "quality of life"** as repeatedly raised (e.g., Shelly Wang, Scoping Summary Memorandum, May 13, 2024, page 43; Sherry Liu, Scoping Summary Memorandum, April 16, 2024, page 28; Susan Zhao, Scoping Summary Memorandum, April 16, 2024, page 28).
46. Policy LU-2.7 of the Lake Forest General Plan aims to "Promote compatibility of adjacent land uses along the interface of different residential density and non-

residential intensity categories by paying special attention to buffers and transitional areas" (Draft EIR, Section 4.11 Land Use and Planning, page 4-96). While the DEIR states additional landscaping will be provided (Draft EIR, Section 3.4.3 Landscaping, page 3-8), the cumulative analysis should provide a **more robust assessment of how the *combined buffers and transitional areas* for all three projects ensure land use compatibility given their density and intensity** adjacent to residential homes.

47. Harrison Jiang (representing "We the Meadows organization") questioned the "lack of detailed or consistent information" and "discrepancies in the information presented to the public" regarding the project, including the "uncertainty surrounding the future tenant" (Scoping Summary Memorandum, April 11, 2024, page 18). This lack of definitive information, applied to *three* projects, makes a **comprehensive and credible cumulative land use and planning assessment difficult**, potentially undermining CEQA's goal of "informed decision-making."

O-1-12 cont.

48. Commenters suggested the site be "rezoned to education, office, shopping, or gym to improve the City's planning for sustainable development" (Lily Yang, Scoping Summary Memorandum, April 3, 2024, page 14). While the DEIR states the project is consistent with "Light Industrial" zoning and no General Plan Amendment is required (Draft EIR, Section 3.2.2 General Plan Land Use Designations, page 3-6), the cumulative analysis should address how the **City's long-term planning considers the cumulative effects of *all three* industrial projects on overall community balance and sustainable development**, given the strong public preference for alternative land uses.

L. Noise

49. The DEIR states that "Fifty-seven (57) comment letters included comments related to noise" raising concerns about "potential of the proposed project to generate noise during construction (including demolition of the existing structures) and operations..., such as an increase in heavy vehicle traffic... and on-site loading/unloading activities, which would be disruptive to nearby residents" (Draft EIR, Section 4.13 Noise, page 4-118). The cumulative noise analysis in the *Noise and Vibration Impact Analysis* (May 2025) appears general (Noise and Vibration Impact Analysis, Cumulative Projects Operations Noise Assessment, May 2025, page 12), stating it includes all "reasonably foreseeable projects" (Noise and Vibration Impact Analysis, Cumulative Projects Immediately Adjacent to the Proposed Project, May 2025, page 3). This analysis needs to be **more comprehensive and detailed to specifically quantify the *combined***

O-1-13

noise levels from all three projects, particularly for sensitive receptors located as close as 82 feet, as indicated by the user's concern about the "closest distance from Truck Ingress and Egress route to the residential property block wall is <100 feet" [User Query].

50. Commenters highlighted that the "proposed project will be very noisy and bright 24 hours a day" (Xiuying Zhou, Scoping Summary Memorandum, March 29, 2024, page 11), and that "trucks and on-site loading activities can also be loud, bringing disruptive noise levels during 24/7 operation" (Bureau of Environmental Justice letter, Attachment to Scoping Summary Memorandum, April 5, 2024, page 1). The DEIR confirms that the *Noise and Vibration Impact Analysis* was prepared to evaluate noise impacts and "evaluating noise reduction measures that the project may require" (Noise and Vibration Impact Analysis, Introduction, May 2025, page 1). The cumulative analysis must **explicitly quantify the *combined 24/7* noise impacts from all three projects on residential sleep patterns and quality of life** (Rick Xu, Scoping Summary Memorandum, March 29, 2024, page 7), beyond general statements of compliance with City noise criteria (Noise and Vibration Impact Analysis, Regulatory Setting, May 2025, page 4).

O-1-13 cont.

51. The Noise and Vibration Impact Analysis states that "construction-related traffic would increase noise by up to 0.4 dBA" and that "a noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment" (Noise and Vibration Impact Analysis, Short-Term Construction Noise Impacts, May 2025, page 9). This **finding applies to *individual* project construction**. The cumulative analysis must quantify the **combined noise increase from *overlapping construction schedules of all three projects***, which could result in a much greater and perceptible noise increase.
52. The DEIR discusses City noise compatibility standards (Noise and Vibration Impact Analysis, Regulatory Setting, May 2025, page 4). The cumulative analysis should **explicitly model and present the *combined noise levels* from all three operational facilities** against these standards, especially at the nearest sensitive receptors, to demonstrate that the **cumulative noise impact is truly less than significant, and not just that individual projects would comply.**
53. Kevin Chiang, whose residence is "directly behind the planned building," provided "personal experience" of constant noise from a 24-hour warehouse even with a wall (Scoping Summary Memorandum, May 15, 2024, page 48). This highlights the need for the cumulative noise analysis to conduct **more detailed modeling that accounts for real-world scenarios and specific receptor locations**, rather than generalized noise

O-1-13 cont.

increases, to fully assess the "cumulatively considerable" impact on residential quality of life.

M. Population and Housing

54. The DEIR states that "Four comment letters included comments related to population and housing" concerning "property value loss, loss of community character, and population loss" (Draft EIR, Section 4.14 Population and Housing, page 4-127). The DEIR concludes "less than significant impact" by asserting that new jobs would be filled by existing residents and the project is consistent with the General Plan (Draft EIR, Section 4.14 Population and Housing, page 4-128, Draft EIR, Section 6.2 Energy Impacts, page 6-3). The cumulative analysis for population and housing in the DEIR is also deemed "less than significant" for similar reasons (Draft EIR, Section 5.3 Alternatives, page 5-7). This **conclusion does not directly address the *perceived* population loss and decrease in property values** due to the cumulative industrialization of the area as expressed by residents, which is a key concern in the query and in scoping comments (e.g., Alex Wang, Scoping Summary Memorandum, April 18, 2024, page 36; Shelly Wang, Scoping Summary Memorandum, May 13, 2024, page 43; Nanbo Li, Scoping Summary Memorandum, May 14, 2024, page 44; Sherry Liu, Scoping Summary Memorandum, April 16, 2024, page 28).

O-1-14

55. The DEIR states that the proposed project is estimated to generate 187 new jobs (Draft EIR, Section 4.14 Population and Housing, page 4-128; Draft EIR, Section 4.15 Public Services, page 4-136). The cumulative impact analysis should **quantify the total number of jobs generated by *all three* projects** and provide a more robust analysis of how these jobs will *not* induce significant indirect population growth or put unanticipated strain on housing resources.
56. The DEIR states that the project does not include a housing component (Draft EIR, Section 6.2 Energy Impacts, page 6-3). While true individually, the cumulative impact analysis should more thoroughly address how the **combined presence of *three* large industrial facilities impacts the *desirability* of the surrounding residential areas for new population and housing growth**, especially given concerns about quality of life (e.g., Emily J., Scoping Summary Memorandum, April 2, 2024, page 8; Shuqin Jin, Scoping Summary Memorandum, March 28, 2024, page 10).

N. Public Services

57. The DEIR states that "One comment letter included comments related to public services" concerning "the need for heightened security" (Draft EIR, Section 4.15 Public Services, page 4-134; Kevin Chiang, Scoping Summary Memorandum, May 15, 2024, page 48). The cumulative impact analysis states that all cumulative projects would "comply with CEQA" and "implement appropriate mitigation measures to reduce or eliminate project-specific impacts to public resources" (Draft EIR, Section 4.15 Public Services, page 4-138). This is a **general statement of compliance that fails to provide a comprehensive, detailed assessment of the *cumulative demand* on police, fire, and other public services from *three* large industrial facilities operating simultaneously or sequentially**, particularly regarding "heightened security" concerns for the adjacent residential community.
58. The DEIR concludes that the proposed project's "increase in demand for new or expanded fire protection services would be negligible" (Draft EIR, Section 4.15 Public Services, page 4-136), and that it would not "drive the need for a new police facility or expanded facility" (Draft EIR, Section 4.15 Public Services, page 4-137). The cumulative analysis should **quantify the *combined* increase in demand for fire and police services from *all three* projects**, particularly given the potential for increased hazardous materials storage and truck traffic (Draft EIR, Section 4.9 Hazards and Hazardous Materials, page 4-86), and demonstrate how existing services can **cumulatively accommodate this increased demand without requiring new or expanded facilities, or impacting response times**.

O-1-15

59. The DEIR states that the OCFA believes "the project will have less than a significant impact" (OCFA Letter, December 31, 2024, page 1). **However, this letter is for the *individual* project**. The cumulative analysis should include **updated or combined consultation with OCFA that explicitly addresses the *combined risk and demand* posed by *all three* large industrial facilities** operating near a dense residential area, including a senior apartment complex, and confirm that cumulative impacts remain less than significant.

O. Recreation

60. The DEIR states that "No comments related to recreation were received during the public scoping period" (Draft EIR, Section 4.16 Recreation, page 4-140). The DEIR

O-1-16

concludes "less than significant" for individual and cumulative impacts on recreation, primarily arguing that new jobs would be filled by existing residents (Draft EIR, Section 4.16 Recreation, page 4-140; Draft EIR, Section 5.3 Alternatives, page 5-8). This conclusion **does not adequately consider the *qualitative impact* on the enjoyment of existing recreational facilities and green spaces** due to increased noise, air pollution, and traffic from *three* adjacent industrial projects, even if the absolute number of new residents is small. Residents often use parks for "quiet enjoyment," which could be compromised.

O-1-16 cont.

P. Transportation and Traffic

61. The DEIR states that "59 comment letters included comments related to transportation and traffic" raising concerns about "increased traffic and congestion, generate truck trips that would cause impacts on nearby residential uses, and cause safety hazards for pedestrians and cyclists on nearby roadways" (Draft EIR, Section 4.17 Transportation, page 4-141). The DEIR concludes that the proposed project's **Vehicle Miles Traveled (VMT) rate would exceed the City's VMT threshold by 20 percent and would result in a "significant and unavoidable impact" even with mitigation** (Draft EIR, Section 1.4.1 Transportation and Traffic, page 1-8; Draft EIR, Section 5.2.2 Project-Related Impacts, page 5-2; Draft EIR, Section 6.1.1 Transportation and Traffic (Project-Specific Vehicle Miles Traveled Impact), page 6-1). This *explicitly significant* finding underscores the **overall insufficiency of the transportation analysis to fully mitigate impacts**, and necessitates a *more robust and detailed cumulative analysis* of how three such projects contribute to regional VMT and congestion.

O-1-17

62. The user's query highlights the "closest distance from Truck Ingress and Egress route to the residential property block wall is <100 feet" [User Query]. Commenters like Rick Xu stated, "there is no doubt that noise pollution will affect nearby residents' quality of life. With the big trucks moving in and out of the facility, I can't imagine how I sleep at night and how I work from home during the day" (Scoping Summary Memorandum, March 29, 2024, page 7). The cumulative transportation analysis, despite the significant VMT finding, **does not sufficiently detail the *combined localized impacts* of truck traffic from *all three* projects on residential streets and sensitive receptors**, particularly concerning safety hazards for pedestrians, cyclists, and children (Emily J., Scoping Summary Memorandum, April 2, 2024, page 8; Siqi Chen, Scoping Summary Memorandum, April 17, 2024, page 34).

63. The DEIR lists five intersections where off-site improvements would be made to "enhance public safety and accommodate large truck turning movements" (Draft EIR, Section 5.2 Proposed Project, page 5-1). The cumulative analysis should provide a **detailed, quantitative assessment of how these improvements will *collectively* handle the increased truck traffic from *all three* projects**, and whether they will prevent **cumulative congestion and safety hazards** on main residential streets like Bake Parkway, Commercecenter Drive, and Dimension Drive, as specifically raised by Eric Zhou (Scoping Summary Memorandum, April 6, 2024, page 17).
64. The DEIR relies on trip generation rates from the Institute of Transportation Engineers Trip Generation Manual and SCAQMD's Warehouse Truck Trip Study Data Results (Draft EIR, Section 4.17 Transportation, page 4-142; Draft EIR, Section 4.3 Air Quality, page 4-26). Given the user's specific concern about the unknown nature of manufacturing activities [User Query, 67], the cumulative analysis needs to **transparently justify how these generalized trip rates adequately capture the *worst-case scenario* for truck traffic from *all three* projects, especially if "Last Mile delivery hubs" are involved** (Tim Liu, Scoping Summary Memorandum, April 18, 2024, page 39), which could significantly alter traffic patterns and intensity.

O-1-17 cont.

65. The DEIR mentions that the City of Irvine, an adjacent city, is awaiting the EIR to understand how impacts to its residents and businesses will be mitigated (City of Irvine letter, Attachment to Scoping Summary Memorandum, April 18, 2024, page 1). This indicates a **regional expectation for a comprehensive and detailed cumulative transportation analysis that extends beyond Lake Forest's immediate boundaries**, which the current DEIR's general conclusions on cumulative impacts may not fully satisfy.
66. Caltrans, a commenting agency, requested a Vehicle Miles Traveled (VMT) based Traffic Impact Study and urged discussion on "potentially improving multimodal transportation (walking, biking, and transit) opportunities" (Caltrans letter, Attachment to Scoping Summary Memorandum, April 18, 2024, page 2). While the DEIR acknowledges the VMT impact is significant and unavoidable (Draft EIR, Section 6.1.1 Transportation and Traffic (Project-Specific Vehicle Miles Traveled Impact), page 6-1), the **cumulative analysis should provide a more detailed strategy and quantification of multimodal improvements and their *combined effectiveness* across *all three* projects** to genuinely reduce cumulative transportation impacts.

Q. Utilities and Service Systems

67. The DEIR states that "No comments related to utilities and service systems were received during the public scoping period" (Draft EIR, Section 4.19 Utilities and Service Systems, page 4-159). The cumulative impact analysis concludes "less than significant impact" based on projects being consistent with General Plan growth projections and individual CEQA compliance (Draft EIR, Section 4.19 Utilities and Service Systems, page 4-168). This **general statement of compliance fails to provide a comprehensive, detailed assessment of the *cumulative demand* on water, wastewater, and solid waste systems from *three* large industrial facilities**, particularly if the "future tenant" and their specific operations are unknown for the IPT project.

O-1-18

68. The proposed project is estimated to demand "approximately 107,410 gallons per day (gpd) or 120 afy of water" (Draft EIR, Section 4.19 Utilities and Service Systems, page 4-166). The cumulative analysis should **quantify the *combined* water demand, wastewater generation, and solid waste generation from *all three* projects**, and explicitly demonstrate that existing utility capacities are **sufficient to accommodate this cumulative demand** without requiring new or expanded facilities, which could have their own environmental impacts.
69. The DEIR states that the Frank R. Bowerman Landfill has "enough projected capacity to serve residents and businesses until approximately 2053" (Draft EIR, Section 4.19 Utilities and Service Systems, page 4-165). While true, the cumulative analysis should **quantify the *total cumulative increase* in solid waste generation from demolition and operation of *all three* projects** and ensure this is explicitly accounted for in the landfill's capacity projections.

R. Wildfire

70. The DEIR states that "Two comment letters included comments related to wildfire" concerning "increased fire risk and fire hazards" (Draft EIR, Section 4.20 Wildfire, page 4-169; Alex Wang, Scoping Summary Memorandum, April 18, 2024, page 36). The cumulative impact analysis concludes "less than significant impact" based on individual project compliance with regulations and adherence to codes (Draft EIR, Section 4.20 Wildfire, page 4-173). This **general statement of compliance is insufficient for a comprehensive, detailed assessment of the *cumulative increase***

O-1-19

in fire risk **from *three* large industrial facilities operating simultaneously or sequentially**, especially those potentially handling hazardous materials, in proximity to residential areas and within 1 mile of a Very High Fire Hazard Severity Zone (VHFHSZ) (Draft EIR, Section 4.20 Wildfire, page 4-171).

71. The DEIR states the project site is within 1 mile of a VHFHSZ (Draft EIR, Section 4.20 Wildfire, page 4-172). The cumulative analysis should specifically address how the **combined activities of all three projects (construction and operation), particularly those involving heavy machinery, welding, or manufacturing processes, will *cumulatively* increase ignition risk** in such an environment.
72. The DEIR states that "all structures and internal circulation paths within the project site would be developed in accordance with the City and OCFA emergency access standards" (Draft EIR, Section 4.20 Wildfire, page 4-172). The cumulative analysis should provide a **detailed explanation of how the *combined traffic and operations* of all three projects will ensure unimpeded emergency vehicle access and egress for both the industrial sites and the adjacent residential communities**, particularly during a wildfire evacuation scenario, especially given the already identified significant and unavoidable VMT impacts (Draft EIR, Section 6.1.1 Transportation and Traffic (Project-Specific Vehicle Miles Traveled Impact), page 6-1).

O-1-19 cont.

S. Call to Action: Do What Is Right for Lake Forest

This list presents over 100 distinct comments and areas of concern, with a primary focus on the **lack of meaningful cumulative impact analysis**, the **proximity of the project to sensitive residential receptors**, and the **absence of critical project-specific and tenant-specific details**. Under the **California Environmental Quality Act (CEQA)**, the lead agency has a legal obligation to conduct a thorough and good-faith assessment of all potential environmental impacts—including cumulative impacts—and to ensure full transparency for both decision-makers and the public (Public Resources Code § 21000 et seq.).

O-1-20

We respectfully and urgently call on the **City of Lake Forest** and all responsible agencies to review these comments with the seriousness they warrant, and to take **appropriate, lawful, and community-centered actions** to protect our **environment**, our **neighborhoods**, and the **health and well-being of current and future residents**.

We the Meadows, Harrison Jiang, President

Letter Code: O-1
Date: July 30, 2025

Response to Comment O-1-1

This comment is introductory and provides a summary of the organization's concerns regarding the proposed Project and the adequacy of the Draft EIR, including opinions related to the following topics: cumulative impact analysis; analysis of feasible alternatives; adequacy and feasibility of mitigation measures; long-term impacts on sensitive receptors; potential for air quality, noise, and human health risks to be classified as significant and unavoidable impacts; and potential for light pollution and quality of life issues to result insignificant impacts to the broader community. In addition, this comment provides the organization's position and request to reject the current Draft EIR, comprehensively revise the Draft EIR to address cumulative impacts that could occur due to tenant uncertainty and monitorable mitigations. Additionally, they urge the City to consider alternatives, and prioritize community engagement and the long-term well-being of residents.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns summarized in this comment are described and addressed in further detail in the responses below. No further response is required.

Response to Comment O-1-2

This comment states the opinion that the quantitative evaluation of the combined cumulative impacts for the proposed Project and Western Realco Enterprise Way Industrial Project (Projects 1 and 2) that was prepared for air quality, greenhouse gas and energy and presented in the Draft EIR lacks sufficient detail and specificity to demonstrate that cumulative impacts would be less than significant. This comment further states the opinion that the analysis fails to adequately consider the residential community's proximity to truck routes that would be utilized by the proposed Project, and that the Draft EIR's findings that cumulative impacts would be less than significant because the proposed Project itself would not exceed the established thresholds contradicts its findings of significant and unavoidable Project-level VMT and GHG impacts. This comment therefore claims that all environmental factors should be re-evaluated and that, given the high level of public concern, a more robust and transparent cumulative analysis is needed to meet CEQA objectives.

Refer to Master Response 6 regarding the adequacy of the Draft EIR's cumulative analysis, Master Response 8 regarding the proposed Project's VMT impacts, and Master Response 10 regarding the proposed Project's GHG impacts. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment O-1-3

This comment states the opinion that the Draft EIR's cumulative analysis of aesthetic impacts is inadequate because it does not provide a comprehensive evaluation of the combined visual impacts of nearby industrial warehouse projects in proximity to the residential community or analyze how proposed landscaping would effectively screen views of these developments from the Meadows community. This comment further states the opinion that the Draft EIR's statement that truck docking and loading areas would be located over 200 feet from and oriented away from residences contradicts residents' claims that truck ingress and egress routes would be less than 100 feet from residential properties. The comment also states the opinion that the Draft EIR fails to adequately address cumulative light and glare impacts from the industrial warehouse developments, and that its general reference to compliance with existing regulatory requirements does not constitute a sufficiently detailed analysis of cumulative aesthetic effects of three industrial projects operating at the same time. This comment therefore requests a re-evaluation of cumulative impacts related to the industrial warehouse developments, including noise and light.

Refer to Master Response 6 regarding the adequacy of the Draft EIR's cumulative impact analysis and Master Response 12 regarding the proposed Project's analysis of light and glare, and Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses, including potential visibility of the Project from nearby residences. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

As detailed in Table 4.1.A, starting on page 4.1-19 of Section 4.1, Aesthetics, the proposed Project includes landscaping throughout the site in compliance with all applicable zoning and land use regulations governing scenic quality. This landscaping is designed to screen views of the Project from nearby residences, thereby reducing potential visual impacts. As stated in Section 4.11, Land Use and Planning, and depicted in Figures 3.2 (Project Location) and 3.4 (Conceptual Site Plan), the 23 dock doors would be oriented southeast, away from residential properties, and located approximately 200 feet from the nearest residence. Truck ingress and egress routes would utilize adjacent public roadways. Therefore, the Draft EIR's analysis accurately reflects the Project's design and its distance from nearby residences, as is proposed in the Project application.

Impacts found to be significant and unavoidable for a specific environmental issue (e.g., GHG or VMT) do not necessarily or directly result in cumulatively considerable impacts for other unrelated issues. For example, a significant and unavoidable GHG impact would not a trigger a cumulative aesthetic impact. As the area considered for cumulative effects varies based on the environmental issue, an issue-specific cumulative discussion, as provided in the Draft EIR is appropriate and wholescale reevaluation of cumulative effects for all environmental factors, as suggested by the commenter, is not warranted.

The Project site and the cumulative projects identified by the commenter are located within the Pacific Commercentre Planned Community, which has a General Plan designation of Light Industrial and is in the LI – Light Industrial zoning district. The City's General Plan EIR identified that General Plan implementation would have potential significant impacts related to adverse effects on scenic vistas and the generation of new sources of light and glare but concluded that implementation of

prescribed General Plan Actions[13] mitigated these potentially significant impacts to a less than significant level; therefore, the aesthetic impacts resulting from implementation of the City's General Plan were determined to be less than cumulatively considerable.

The LI Zoning District is intended to provide for a broad range of industrial uses as specified in City Municipal Code Section 9.72.090 (Non-Residential Land Use Matrix), column "I". Permitted uses include, but are not limited to, a variety of office, manufacturing, and warehouse uses. The Project and the cumulative projects are consistent with uses permitted under the Light Industrial General Plan Designation and the LI zoning district. The Project site and the referenced cumulative projects are located within an urbanized area, previously developed with structures, expansive parking areas, outdoor lighting, and landscaping. The Project and cumulative projects do not result in the development of uses that are substantively different in scale, height, or overall square footage from existing uses; nor do they include components that are inconsistent with surrounding or permitted uses within the Project area. Similar to the Project (refer to DEIR Tables 4.1.A and 4.1.B), it is reasonable that the cumulative projects would be located, sited, developed, and operated consistent with applicable provisions of the City's General Plan, Pacific Commercentre Planned Community Site Development Standards, and Citywide Design Guidelines, ensuring potential aesthetic impacts of each development would be sufficiently evaluated and addressed. Therefore, the cumulative aesthetic effect of the Project would not be significant.

Therefore, the Draft EIR's cumulative analysis of aesthetic impacts, including visual screening, truck operations, and light and glare, is adequate. This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment O-1-4

This comment states that 81 scoping comment letters raised concerns about additional air pollution, impacts to sensitive receptors, the need for additional analysis, mitigation measures, emission reduction strategies, and pollution hotspot identification and identify how these specific concerns are addressed in the cumulative impact analysis. This comment requests re-evaluation of the conclusion that impacts to sensitive receptors would be below SCAQMD thresholds given their proximity to the project sites and states that the Draft EIR should detail how the analyses for air quality impacts, pollution hotspots, and sensitive receptor impacts were conducted for the combined emissions of the surrounding industrial warehouse projects. This comment further requests that combined NOx and VOC emissions for the surrounding industrial warehouse projects be analyzed and compared to SCAQMD thresholds, rather than evaluating each project individually. The comment states the opinion that Mitigation Measure (MM) AQ-3 relies on future consultation instead of providing a definitive cumulative assessment, and requests analysis of a worst-case overlap scenario. In addition, the comment requests that the Draft EIR include an evaluation of NOx and DPM exposure for sensitive receptors, that cumulative total peak emissions be provided in a table and verified, that the Draft EIR detail the justification for the use of CalEEMod instead of a site-

[13] Refer to Section 3.1 (pages 3.1-8 through 3.1-15), *Public Draft Environmental Impact Report for the 2040 Lake Forest General Plan*, De Novo Planning Group, November 2019.

specific concentration study, and include information on material types, toxicity, and hazardous materials associated with cumulative manufacturing activities.

Refer to Master Response 6 regarding the adequacy of the cumulative analysis provided in the Draft EIR, which includes the cumulative industrial warehouse projects, and Master Response 9 regarding the adequacy of the assessment of health risk provided in the Draft EIR. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

Section 4.3.6, starting on page 4.3-22 of Section 4.3, Air Quality, of the Draft EIR provides a detailed analysis of the Project's potential impacts related to air quality, in accordance with Appendix G (Environmental Checklist Form) of the *State CEQA Guidelines*. As required under Appendix G, Section 4.3 analyzes the potential for the Project to conflict with or obstruct implementation of the applicable air quality plan (Threshold 4.3.1), result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non- attainment under an applicable federal or State ambient air quality standard (Threshold 4.3.2), expose sensitive receptors to substantial pollutant concentrations (Threshold 4.3.3), or result in other emissions, such as those leading to odors adversely affecting a substantial number of people (Threshold 4.3.4). Per the Appendix G criteria, the Draft EIR evaluates the Project according to quantitative thresholds established by State, regional, and local agencies with authority to regulate the Project. Therefore, the Draft EIR also analyzed the Project with respect to both regional and localized daily emissions thresholds for construction and operation as established by the South Coast Air Quality Management District (SCAQMD). Additional carbon monoxide (CO) and health-based ambient air quality standards were also analyzed. The analysis presented in the Draft EIR relies upon data presented in the Project-specific Air Quality, Greenhouse Gas, and Energy Impact Report and Health Risk Assessment (both of which are provided in Appendix C to the Draft EIR). Therefore, the analysis presented in the Draft EIR is supported by substantial quantitative evidence prepared by qualified technical experts with specific technical knowledge and credentials relative to air quality. As summarized on Pages 4.3-23 and 4.3-24, the Project would be consistent with SCAQMD's 2022 Air Quality Management Plan (AQMP) and therefore would not conflict with or obstruct implementation of the applicable air quality plan. As summarized on Pages 4.3-27 and 4.3-30 of the Draft EIR, construction and operational emissions associated with the Project would not exceed the significance criteria for VOCs, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$ emissions after mitigation; thus, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project is in nonattainment under an applicable federal or State ambient air quality standard. As summarized on Pages 4.3-34 and 4.3-35 of the Draft EIR, construction and operational emissions associated with the Project would not cause an exceedance of the SCAQMD health risk thresholds and would not result in the exposure of nearby sensitive receptors to substantial pollutant concentrations after mitigation. As summarized on pages 4.3-38 and 4.3-39 of the Draft EIR, construction and operation of the Project would not result in other emissions (such as those leading to odors) affecting a substantial number of people.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment O-1-5

This comment states the opinion that the Draft EIR does not provide a detailed site-specific assessment of the cumulative impacts of the three industrial projects on wildlife movement, foraging habitats, and urban-adapted species. This comment further claims that, even with RCM BIO-1, the Draft EIR does not adequately address how construction of the cumulative projects would collectively impact the currently limited habitat and urban-adapted species beyond temporary disturbance. This comment requests a more detailed cumulative assessment of how the projects could modify conditions for urban wildlife and contribute to impacts on local ecological functions not captured by broader regional studies.

Refer to Master Response 6 regarding the adequacy of the Draft EIR's cumulative impact analysis. Further, Section 4.4.7, Cumulative Impacts, page 4.4-13 of Section 4.4, Biological Resources, addresses cumulative impacts to biological resources. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

The Project site is completely developed; it lacks plant communities, aquatic resources, riparian habitat, wetlands, habitat linkages, wildlife corridors, special status wildlife species, wildlife nursery sites, and there are no local ordinances or regulations protecting biological resources applicable to the Project site. Therefore, the Project would have no impact on sensitive species, plant communities, habitat fragmentation, jurisdictional waters, wildlife movement, migratory corridors, nursery sites, habitat conservation plans, or local regulations protecting biological resources, and therefore could not contribute to cumulatively considerable impacts in these areas.

The commenter does not identify the "urban adapted" species that may be affected by cumulative development and speculates that the Project and nearby warehouse developments may cumulatively affect wildlife. CEQA requires the assessment of potential impacts to species protected under State and federal laws and native resident wildlife (refer to *State CEQA Guidelines*, Appendix G, Threshold IV, Biological Resources). As described in Section 4.4.7, page 4.4-13, of Section 4.4 Biological Resources, of the Draft EIR, during construction, the Project could affect nesting birds if construction occurs during the nesting season and nests are present in existing vegetation. All projects in the cumulative study area are required to comply with the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code. Implementation of RCM BIO-1 ensures potential impacts to nesting birds are reduced to less-than-significant levels for the Project and for the cumulative projects.

The Project site and referenced cumulative sites are located within an urbanized area, previously developed with structures, roadways, utilities features, expansive parking areas, outdoor lighting, and landscaping. The site and cumulative sites referenced contain no native habitat, riparian areas, creeks, or other features that provide suitable foraging, breeding, or sheltering areas for wildlife. The cumulative sites referenced are similarly developed, and do not contain or connect to off-site habitat patches or wildlife corridors that could be affected by the Project. As a result, construction and operation of the Project would not result in the loss, fragmentation, or degradation of habitat for sensitive species, or affect local ecological functions. The commenter states the cumulative effect of cumulative development would impact even urban-adapted species (though the commenter does not identify any particular at-risk species or their presence in the project area.)

RCM BIO-1 addresses the only potential biological resource concern by requiring preconstruction nesting bird surveys and avoidance measures during the breeding season pursuant to the Migratory Bird Treaty Act. Therefore, the Project would not contribute to cumulatively considerable impacts to biological resources, and no additional mitigation measures beyond RCM BIO-1 are necessary.

Based on a review of publicly available aerial imagery (Google Earth, 2025), the majority of the cumulative project sites are developed or have been developed and contain landscaping similar to that on the Project site, it is reasonable that similar regulatory compliance measures (similar to RCM BIO-1 which requires preconstruction bird clearance surveys and buffers around active nests) would be imposed on cumulative projects to ensure compliance with applicable provisions of the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code. The vegetation communities within the Project site include hardscape or landscaping. The landscaping generally consists of non-native, ornamental landscape shrubs and trees typically used in industrial/office parks. No native plant communities or natural communities of special concern on site are located on the Project site. Based on current conditions, stormwater runoff drains to various curb inlets throughout the existing surface parking lot where it is then routed out to the public storm drain system which outfalls to Serrano Creek southwest of the Project site at the end of Prism Place. The Project includes three linear modular wetland systems and three underground detention systems to reduce site discharge volumes and improve water quality. As established in Regulatory Compliance Measure (RCM) WQ-3 (refer to Draft EIR, page 4.10-40), "…BMPs shall be designed and implemented to address 303(d) listed pollutants and retain the project site's minimum design capture volume and hydromodification volume to ensure that post-development storm water runoff volume or time of concentration does not exceed pre-development." While the Project would nominally increase impervious surface area, in the absence of an increase in discharge from the Project site, no significant impacts to native landscape or habitat would occur either on-site or in downstream areas. Therefore, no additional modeling of peak flows in a "downstream impact zone" is required.

The existing landscaping on the Project site and the referenced cumulative sites consists of ornamental and/or non-native species. These areas do not constitute a natural or sensitive vegetative community. As the Project site and cumulative areas are already previously developed and devoid of sensitive species, habitat or natural communities, and because of the absence of connectivity to undisturbed natural areas, the Draft EIR's analysis of biological resources, including cumulative impacts, is adequate and no revisions are required.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment O-1-6

This comment states the opinion that the Draft EIR lacks a comprehensive cumulative analysis of archaeological resource impacts from the industrial warehouse projects, which all involve ground disturbance that could impact contiguous cultural resource areas. It requests that the Draft EIR specify how ground disturbance would be monitored and mitigated for potential impacts to undiscovered cultural resources, clarify how Native American tribal monitoring would be

coordinated across the cumulative projects to protect shared or contiguous resources, and confirm that all NAHC concerns and recommendations have been fully incorporated into the cumulative analysis and mitigation plan.

Refer to Master Response 6 regarding the adequacy of the Draft EIR's cumulative impact analysis and Master Response 4 regarding mitigation requirements under CEQA.

The Project site and referenced cumulative sites are located within an urbanized area, previously developed with structures, roadways, utilities features, expansive parking areas, outdoor lighting, and landscaping, the development and maintenance of which required extensive ground disturbance, including the import and export of native soils. As activity has disturbed sediments beyond depths at which buried cultural resources are likely, the Cultural Resources Assessment, which was prepared by a Registered Professional Archaeologist (RPA), determined that encountering buried cultural resources during Project construction is unlikely.

Nonetheless, cumulative impacts associated with archaeological resources are addressed in Section 4.5.7, Cumulative Impacts, starting on page 4.5-9 of Section 4.5 Cultural Resources, of the Draft EIR. As stated in the Draft EIR, while there are no known archaeological resources or human remains on the Project site, because all industrial warehouse projects in the cumulative study area involve ground disturbance, the Draft EIR identified standard procedures to address the unlikely discovery of previously unidentified resources. Regulatory Compliance Measures (RCMs) CUL-1 and CUL-2 require that if archaeological materials or human remains are encountered during construction, work must cease within 50 feet of the find, a qualified archaeologist must evaluate the discovery, and appropriate treatment must be implemented consistent with *State CEQA Guidelines* Section 15064.5 and California Health and Safety Code §7050.5. These measures ensure that potential effects on undiscovered archaeological resources would be identified, evaluated, and mitigated as required.

All discretionary private and public projects in the cumulative study area would be subject to CEQA and to the same State and local regulations for the protection of archaeological resources. As necessary and appropriate, each cumulative project would be required to implement comparable compliance measures to govern subsequent actions should resources be discovered. Because the Project site is already developed and lacks known or expected archaeological resources, and because the cumulative projects are required to implement equivalent protections, the Project would not contribute to cumulatively considerable impacts on archaeological resources.

As described in Section 4.18.3.1, Sacred Lands File Search, on page 4.18-2 of Section 4.18 Tribal Cultural Resources, of the Draft EIR, the City of Lake Forest conducted a Sacred Lands File (SLF) search through the Native American Heritage Commission (NAHC) to determine whether any recorded sacred sites or tribal cultural resources have been identified within or near the Project site. The NAHC response indicated that the SLF search returned negative results, meaning that no recorded sacred lands or tribal cultural resources are known to occur within the Project site or its immediate vicinity.

In addition to the SLF search, and in accordance with Assembly Bill (AB) 52, the City notified tribes that have requested consultation on projects within the City's jurisdiction. The consultation process

provided each tribe the opportunity to identify any potential tribal cultural resources and to request consultation regarding Project impacts and mitigation. The Gabrieleno Band of Mission Indians – Kizh Nation requested consultation with the City regarding the Project. The City documented the consultation process consistent with the requirements of AB 52 and *State CEQA Guidelines* Section 15064.5. As AB 52 requires tribal notification and consultation with interested tribes for each project, it is reasonable the City will appropriately notify and consult with interested tribes during their respective CEQA process for each cumulative project.

Mitigation Measures (MM) TCR-1 through MM TCR-3 outline how ground-disturbing activities would be monitored and how unanticipated discoveries would be treated. MM TCR-1 requires a qualified Native American monitor to be present during initial grading and excavation activities within native soils; MM TCR-2 establishes procedures for evaluating and protecting any unanticipated tribal cultural resource discoveries; and MM TCR-3 provides requirements for coordination with the County Coroner and the NAHC in the event human remains or associated funerary objects are found. The timing and scope of monitoring would be finalized during the construction contracting phase in coordination with consulting tribes, consistent with AB 52 consultation outcomes.

Because the site contains no known archaeological or tribal cultural resources, and because implementation of RCMs CUL-1 and CUL-2 and MM TCR-1 through MM TCR-3 provide a clear, enforceable framework for discovery, evaluation, and treatment of previously unidentified resources, the Project would not result in or contribute to cumulatively considerable impacts on cultural or tribal cultural resources. As necessary and appropriate, each cumulative project would be required to implement comparable compliance and mitigation measures unique to each site, as determined appropriate through Project specific consultation with interested tribes. Therefore, the cumulative effects to tribal cultural resources would be sufficiently addressed. This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment O-1-7

This comment requests that the Draft EIR include a detailed, quantitative analysis of cumulative energy impacts that considers the combined operational energy demand of the industrial warehouse projects rather than relying on individual regulatory compliance. The comment also requests that the cumulative energy impact determination be explicitly quantified and justified based on simultaneous operation of the industrial warehouse projects, taking into account combined regional energy demand and the identified significant and unavoidable cumulative GHG impact.

Refer to Master Response 6 regarding the adequacy of the Draft EIR's cumulative impact analysis and Master Response 10 regarding the GHG analysis presented in the Draft EIR. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

Cumulative energy impacts are discussed in Section 4.6.7, Cumulative Impacts, starting on page 4.6-11, of Section 4.6, Energy, of the Draft EIR. As described in Section 4.6.7, the analysis evaluates

cumulative energy demand on both a local and regional scale, including overlapping energy use from the Western Realco Enterprise Way Industrial Project (Projects 1 and 2).

SCE's service area includes portions of 15 counties and hundreds of cities and communities in a 50,000-square-mile service area within Central, Coastal and Southern California, including most of Orange County. As discussed in Section 4.19.3.6, page 4.19-4 of Section 4.19 Utilities and Service Systems, of the Draft EIR, total electricity consumption in the SCE service area in 2022 was 85,870 GWh. By 2030, consumption is anticipated to increase by 12,000 GWh for the low-demand scenario and by 22,000 GWh for the high-demand scenario. Total electricity consumption in Orange County in 2022 was 20,243.7 GWh. As stated under Threshold 4.6.1, page 4.6-8, in Section 4.6, Energy, of the Draft EIR, during construction, the proposed 165,803-square-foot industrial building and use would temporarily increase diesel and gasoline consumption in Orange County by 0.1 and 0.01 percent, respectively. The proposed project and the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) would result in an increase of approximately 2,729,760 kWh per year in energy demand that would impact the existing demand for electricity[14]. However, the cumulative increase would be within SCE's system-wide net annual increase in electricity supplies over the 2018 to 2030 period and there are sufficient planned electricity supplies in the region for this estimated net increase in energy demand. Therefore, the effect of energy use during construction and operation is not cumulatively considerable.

As discussed in Section 4.6, page 4.6-10, of the Draft EIR, vehicle trips in Orange County are estimated to consume approximately 157.6 million gallons of diesel and approximately 1,128 million gallons of gasoline in 2027. During Project operation, diesel and gasoline energy usage in Orange County would increase by 0.1 and 0.01 percent, respectively. Similarly, the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) would increase the annual countywide fuel consumption by only 0.01 percent for gasoline and 0.2 percent for diesel fuel usage. Because the referenced cumulative projects are generally similar in size use, cumulative diesel and gasoline usage would increase by 0.3 and 0.01 percent, respectively. This increase is negligible. When compared to the amount of energy used regionally or in the Orange County, this increase in use is not cumulatively considerable.

The analysis determined that even under high-demand conditions, cumulative energy demand would remain well within Southern California Edison's (SCE) existing and planned system capacity. Although the Project and other cumulative projects would increase the demand for fuels and electricity, this increase would not necessitate new or expanded SCE infrastructure that could cause significant environmental impacts. Accordingly, the cumulative energy analysis presented in the Draft EIR is adequate, and no revisions are required.

[14] Refer to the information shown on PDF page 115 in Appendix A and PDF page 296 and 423 in Appendix C, under Section 5.11.1 Unmitigated of the CalEEMod output files, in the *Air Quality, Greenhouse Gas, and Energy Impact Report and Health Risk Assessment* prepared for the Draft EIR (included in Appendix C of the Draft EIR.

Response to Comment O-1-8

This comment states the opinion that the Draft EIR does not adequately evaluate the combined potential for ground shaking, liquefaction, or subsidence associated with operation of the Western Realco Enterprise Way Industrial Project (Projects 1 and 2), given underlying engineering fill soils and bedrock transitions. This comment requests additional discussion of the cumulative soil stability and seismic hazard impacts from future grading and construction activities.

Refer to Master Response 6 regarding the adequacy of the Draft EIR's cumulative impact analysis. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

Cumulative impacts related to geology and soils are discussed in Section 4.7.7, Cumulative Impacts, starting on page 4.7-17 of Section 4.7, Geology and Soils, of the Draft EIR. As described therein, the proposed Project would have no impact related to potential substantial adverse effects from rupture of a known earthquake fault, seismic-related ground failure, liquefaction, landslides, or unstable soils. Therefore, the proposed Project would not contribute to a cumulatively considerable impact in these areas. As discussed under Threshold 4.7.3, on page 4.7-15 of Section 4.7, minor ground subsidence (up to 0.1 feet) may occur during grading and site preparation; however, this level of subsidence is typical and acceptable for areas underlain by engineered fill. Implementation of Mitigation Measure (MM) GEO-1 requires the Project applicant to comply with the most recent California Building Code (CBC), the City's Building Code, and all recommendations of the Project's Geotechnical Investigation. Compliance with these standards ensures that soil stability and seismic hazard risks are minimized during both construction and operation.

As stated in Section 4.7.7, Cumulative Impacts, starting on page 4.7-17 of Section 4.7, Geology and Soils, of the Draft EIR, typically, geology and soils impacts are specific to a particular site and there is little, if any, cumulative relationship between the development of a proposed Project and development within a larger cumulative area. All development, including the referenced cumulative projects, is subject to City of Lake Forest Municipal Code, Chapter 8.02, which adopts the CBC by reference; the CBC identifies requirements for the erection, construction, enlargement, alteration, repair, improvement, removal, conversion, demolition, occupancy, equipment, use, height, area and maintenance of all buildings and structures. Municipal Code Section 8.30.058 requires a soil engineering and engineering geology report for grading projects. The reports are required to include information appropriate for the site including any information required by the City Engineer. Recommendations included in the reports and approved by the City Engineer shall be incorporated in the grading plans or specifications. As adherence to City Municipal Code standard is required for all development projects, it is reasonable to conclude that the cumulative projects referenced would undergo appropriate investigation, evaluation, and review relative to potential geotechnical and soil impacts. As the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) identified in Section 4.4, Cumulative Projects, on page 4-4 of Section 4.0, Existing Setting, Environmental Analysis, Impacts, and Mitigation Measures of the Draft EIR, are required to comply with applicable building and seismic safety regulations and site-specific geotechnical recommendations prior to grading or construction; these mandatory regulatory requirements would reduce potential individual and cumulative impacts relative to soil stability and seismic hazard impacts to less-than-significant levels.

Therefore, the cumulative analysis of geology and soils presented in the Draft EIR adequately evaluates combined potential impacts from ground shaking, liquefaction, and subsidence, and no revisions to the Draft EIR are warranted.

Response to Comment O-1-9

This comment states the opinion that the Draft EIR's finding of a cumulatively considerable GHG impact is inconsistent with the less-than-significant conclusions for other environmental factors. This comment requests that the Draft EIR identify additional feasible mitigation measures beyond bike lanes to reduce VMT impacts, quantify how Project-specific sustainability features would lessen cumulative GHG emissions, and include an assessment of the cumulative GHG emissions, beyond general operational emissions, from the Western Realco Enterprise Way Industrial Project (Projects 1 and 2).

Refer to Master Response 8 regarding the proposed Project's VMT impacts, Master Response 10 regarding the proposed Project's GHG impacts, and Master Response 6 regarding the Draft EIR's cumulative analysis. These Master Responses thoroughly address the topics raised in this comment. In addition, impacts found to be significant and unavoidable for a specific environmental issue (e.g., GHG or VMT) do not necessarily or directly result in cumulatively considerable impacts for other unrelated issues. As the area considered for cumulative effects varies based on the environmental issue, the issue-specific cumulative discussion, as provided in the Draft EIR, is appropriate and wholescale reevaluation of cumulative effects for all environmental factors as requested by the commenter is not warranted.

Response to Comment O-1-10

This comment states the opinion that the Draft EIR's conclusion of less-than-significant cumulative impacts related to hazards and hazardous materials, based on the assumption that cumulative projects would not release hazardous materials at the same time, does not consider that cumulative risks from the potential for incidents resulting from higher volumes of hazardous materials, increased traffic, and greater density of operations, even without simultaneous releases. In addition, this comment states the opinion that the analysis of hazards and hazardous materials for both the individual and cumulative projects is inadequate and speculative without identifying the specific types of materials to be used or stored, and that that the Draft EIR's general reliance on regulatory compliance for emergency response and evacuation is insufficient; this comment requests a detailed quantitative analysis of combined traffic effects on evacuation routes. This comment also requests that the cumulative hazards analysis explicitly address the combined history and future potential for hazardous materials across all three industrial warehouse projects.

Refer to Master Response 6 regarding the adequacy of the Draft EIR's cumulative analysis and Master Response 13 regarding potential hazards and hazardous waste impacts resulting from the proposed Project as well as emergency response and evacuation. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

Hazardous materials are described in Section 4.9, Hazards and Hazardous Materials, starting on page 4.9-1 of the Draft EIR. As described in Section 4.9.6, Project Impacts, starting on page 4.9-9 of the

Draft EIR, construction and operation of the proposed Project would involve limited use and storage of common hazardous materials, all of which are regulated under federal, State, and local programs. The proposed Project would be required to comply with the U.S. Department of Transportation (USDOT) hazardous materials regulations; the Resource Conservation and Recovery Act (RCRA); and applicable CalEPA, Cal/OSHA, and Orange County Health Care Agency Certified Unified Program Agency (CUPA) requirements. The purpose of existing hazardous materials regulations and programs is to ensure that the use, storage, and transport of hazardous materials does not create a significant hazard to the public or the environment.

Cumulative impacts with respect to hazards and hazardous materials would occur when the Project and cumulative projects would collectively result in accidental spills or inadvertent releases of hazardous substances, create an increased wildfire impact, emit hazardous substances within 0.25 mile of a school, or create a public safety hazard related to airport safety. The cumulative assessment for hazards and hazardous materials under Section 4.9.7, Cumulative Impacts, page 4.9-16 of Section 4.9, Hazards and Hazardous Materials, of the Draft EIR, determined that no significant impact related to these issues would result from the construction or operation of the proposed Project or referenced projects.

The Environmental Health Division of the Orange County Health Care Agency is designated as the Certified Uniform Program Agency (CUPA) for the City. California Health and Safety Code requires a Hazardous Materials Business Plan (HMBP) be submitted to the CUPA if hazardous materials are used on-site. HMBPs must include facility information, a Hazardous Materials Inventory Statement, an Emergency Response Plan, and an Emergency Response Training Plan. Facilities handling larger quantities of regulated substances would also be required to prepare a Risk Management Plan (RMP) under the California Accidental Release Prevention (CalARP) program. These plans and programs would ensure that appropriate emergency response, storage, and safety measures are in place prior to Project occupancy. While the commenter speculates on potential future cumulative hazardous materials impacts, the use and/or transport of such materials is no guarantee that an accidental release would occur. It is reasonable to assume that each project (the proposed Project and the referenced cumulative projects) would prepare HMBPs specific to their specific use, as these are required as matter of regulatory compliance. As stated in Section 4.9.7, Cumulative Impacts, starting on page 4.9-16 of the Draft EIR, the Project and the referenced cumulative projects would be required to comply with existing government regulations regarding the routine transport, use, or disposal of hazardous materials or release of hazardous materials into the environment. Adherence to existing regulations would adequately identify and address the cumulative effect of transport, storage, or use of hazardous materials in the Project area.

As stated in *State CEQA Guidelines* Section 15064(d)(3), "An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the Project. A change which is speculative or unlikely to occur is not reasonably foreseeable. Therefore, it would be speculative to consider the type, extent, or nature of a potential cumulative hazardous materials incident as this occurrence would be unlikely given regulatory requirements established to avoid such incidents. It cannot be accurately predicted if or how such events would occur, whether individually or in tandem with other hazardous material release events. Therefore, any potential effects related to cumulative accident conditions are speculative and cannot be considered reasonably foreseeable for the purposes of CEQA.

As described in Section 3.3, Project Characteristics, page 3-9, of Chapter 3.0, Project Description of the Draft EIR, the future tenant of the proposed Project has not yet been identified, and therefore evaluates all potential environmental impacts based on a reasonably foreseeable range of uses consistent with the property's Light Industrial (LI) zoning designation within the Pacific Commercentre Planned Community and Business Park (BP) General Plan land use designation. The Draft EIR includes mitigation measures and regulatory compliance measures that require discretionary permitting associated with future tenancy, ensuring appropriate hazardous materials protection at the time of tenant occupancy.

The commenter incorrectly equates increases in vehicle miles traveled (VMT) with congestion. VMT is a measurement of the amount and distance that a person drives, accounting for the number of passengers within a vehicle. VMT is calculated by multiplying the number of trips generated by a Project by the total distance of each of those trips. Based on the level of service (LOS) analysis provided in the Traffic Impact Analysis (refer to Draft EIR, Appendix J), the intersections in the Project area are to operate at an acceptable LOS during the a.m. and p.m. peak hours both in Existing (2024) and Opening Year (2027) conditions. The Opening Year condition includes the referenced cumulative projects; therefore, traffic operations resulting from all three projects have been considered.

The topic of emergency egress is discussed under Threshold 4.9.6, page 4.9-15, of Section 4.9 Hazards and Hazardous Materials and under threshold 4.20.1, starting on page 4.20-8 in Section 4.20, Wildfire, of the Draft EIR. As stated on page 4.20-9 of the Draft EIR, the City's General Plan Public Safety Element does not officially designate any specific evacuation routes within the City. Similar to during construction, in the event an evacuation of all or part of the City occurs during operation of the Project, the City would implement procedures contained in the Emergency Operations Plan (EOP) to notify residents and business owners of evacuation orders in affected areas and law enforcement would identify the appropriate routes and assist employees and residents leaving the City in accordance with the City's recently adopted Local Hazard Mitigation Plan (LHMP).

As stated on Page 4.9-15 of the Draft EIR, the proposed Project's compliance with the California Manual on Uniform Traffic Control Devices would ensure that temporary lane closures during construction of the proposed Project do not impair evacuation routes from the Project site or adjacent land uses. The TIA prepared for the proposed Project concluded that the proposed Project would not result in substantial traffic queuing along Enterprise Way or Dimension Drive, which are anticipated to be used for evacuation of the Project site and adjacent land uses. It is reasonable the City would require similar measures during construction of the cumulative projects. The TIA, prepared by a qualified professional and reviewed by the City, provides substantial evidence supporting a conclusion that the proposed Project would not substantially inhibit evacuation procedures from the Project site or adjacent land uses, including the Meadows community. With the maintenance of acceptable traffic operations at the studied intersections, the cumulative projects would not significantly affect emergency response and evacuation in the Project area. Therefore, modeling of emergency ingress and egress times and routing for surrounding land uses is not required. The analysis of emergency evacuation presented in the Draft EIR remains valid, and no revisions are necessary.

The Draft EIR adequately evaluates cumulative impacts related to hazards and hazardous materials, including potential accident conditions associated with increased traffic from the proposed and cumulative projects; uncertainties regarding the specific types and quantities of hazardous materials that may be used during future operations; and existing and future conditions associated with hazardous materials handling across the Project and the Western Realco Enterprise Way Industrial Project (Projects 1 and 2). No further response is necessary.

Response to Comment O-1-11

This comment states the opinion that the Draft EIR's cumulative hydrology and water quality analysis is inadequate because it relies on individual Project implementation of BMPs rather than providing a comprehensive assessment of how the combined increase in impervious surfaces and runoff from the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) could affect Serrano Creek. This comment requests that the Draft EIR quantify the total increase in impervious surface area and runoff, include a detailed hydrological model demonstrating that downstream systems would not experience cumulatively considerable impacts, and explain how water detention systems would be collectively implemented and maintained to manage extreme weather events. This comment also requests that the Draft EIR address the cumulative risk of hazardous material spills and contamination of local water bodies, considering unknown future tenants, and that RCM WQ-4 include more detail on how agencies will ensure cumulative stormwater and water quality impacts do not exceed regional system capacity or adversely affect Serrano Creek.

Refer to Master Response 6 regarding the adequacy of the Draft EIR's cumulative analysis. Cumulative impacts associated with hydrology and water quality described in Section 4.10.7, Cumulative Impacts, starting on page 4.10-37, of Section 4.10 Hydrology and Water Quality, of the Draft EIR. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

The Project site and the referenced cumulative projects are located within an urbanized area, previously developed with structures, expansive parking areas, outdoor lighting, landscaping, and utility and drainage infrastructure. Based on current conditions, stormwater runoff drains to various curb inlets throughout the existing surface parking lot where it is then routed out to the public storm drain system, which outfalls to Serrano Creek southwest of the Project site at the end of Prism Place. Similar to the proposed project, due to the developed condition of the cumulative project sites, drainage would flow through existing surface parking lots to storm drain facilities in adjacent streets or driveways, ultimately discharging to Serrano Creek. Development in the Project area is subject to provisions of the North Orange County MS4 Permit requirements, as detailed in RCM WQ-3 and RCM WQ-4.

New development and redevelopment can result in increased stormwater runoff and increased urban pollutants in stormwater runoff from project site. Each project must include applicable BMPs to reduce impacts to water quality and hydrology in compliance with local ordinances and plans adopted to comply with requirements of the various NPDES permits including the CGP, the North Orange County MS4 Permit, and the City of Lake Forest Municipal Code. The preparation and approval of a SWPPP, erosion and sediment control plans (for construction), and a WQMP (for operation) would be required for each cumulative project to determine appropriate BMPs to

minimize the volume and rate of stormwater flow so as not to exceed the capacity of the stormwater system and impacts to water quality.

As described in Section 4.10.7, starting on page 4.10-37, of Section 4.10 Hydrology and Water Quality, the cumulative development projects are required to comply with the same regulatory framework that governs stormwater management and water quality protection. These regulations are designed and enforced at the watershed scale to collectively control pollutant loading, peak flow, and runoff volume across all development in the region. Accordingly, compliance is not limited to individual projects but functions as a cumulative control mechanism for hydrology and water quality impacts within the broader drainage basin. Therefore, quantifying total impervious surface area or combined drainage conditions for the cumulative industrial projects is not required under CEQA because requiring project compliance with existing regulatory requirements provides substantial evidence to demonstrate that uniform regulatory compliance. As stated in Section 4.10, Hydrology and Water Quality, pages 4.7-14 and 4.7-19, of the Draft EIR, Regulatory Compliance Measures (RCMs) WQ-1 through WQ-4 would prevent exceedance of hydrologic design capacity or water quality objectives established in the regional water quality control plans. Similarly, the preparation and approval of a SWPPP, erosion and sediment control plans (for construction), and a WQMP (for operation) would be required for each cumulative project to determine appropriate BMPs to minimize water quality impacts. As required, the preparation and approval of a hydrology study would be required to determine the hydrologic control required to minimize increases in runoff from each cumulative project. Additionally, regulations governing hazardous materials spills would also function on the regional level to prevent cumulative impacts on water quality. No further response or revision is required.

Response to Comment O-1-12

This comment states the opinion that the Draft EIR does not adequately address residents' concerns about their cumulative perception of the Project's land use incompatibility and change in community character, regardless of individual Project compliance with land use regulations. This comment requests that the cumulative land use and planning analysis explicitly consider community concerns related to quality of life, community harmony, and consistency with the original vision for the residential area, including potential effects on property values. This comment also requests a more robust assessment of how combined buffers and transitional areas would ensure compatibility between the industrial warehouse projects and adjacent residential uses. In addition, this comment claims that the absence of identified future tenants limits the credibility of the cumulative land use analysis and may undermine CEQA objectives for informed decision-making, and requests that the Draft EIR discuss how the City's long-term planning accounts for the combined effects of the cumulative industrial warehouse projects on community balance and sustainable development considering public preferences for alternative land uses.

Refer to Master Response 6 regarding the adequacy of the cumulative impacts analysis prepared for the proposed Project and Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses. In addition, refer to Response to Comment O-1-10 regarding tenant uncertainty associated with the proposed Project. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

The land use designation and zoning for the Project and cumulative sites is the same as that considered in the City's most recent General Plan. As stated in the General Plan EIR (Section 3.1, page 3.10-12):

> *Subsequent development and infrastructure projects would be required to be consistent with all applicable policies, standards, and regulations, including those land use plans, policies, and regulations adopted to mitigate environmental effects by the City as well as those adopted by agencies with jurisdiction over components of future development projects.*

The General Plan EIR determined the land uses allowed under the General Plan would not result in cumulatively considerable impacts. The Project and the cumulative projects are consistent with uses permitted under the Light Industrial General Plan Designation and the LI zoning district.

State CEQA Guidelines Section 15131(a) states "Economic or social effects of a project shall not be treated as significant effects on the environment…The focus on the analysis [in the EIR] shall be on the physical changes." Therefore, the EIR is not the appropriate venue to address the commenter's concerns regarding property values and quality of life issues.

Response to Comment O-1-13

This comment requests that the Draft EIR provide additional cumulative noise analysis that quantifies the combined noise levels from all industrial warehouse projects, with attention to sensitive receptors. It requests quantification of the cumulative 24-hour noise impacts on residential sleep patterns and quality of life, as well as analysis of overlapping construction schedules that could result in greater noise increases than identified for the individual Project. In addition, this comment requests that the cumulative noise analysis include modeled results showing combined noise levels at the nearest sensitive receptors, and that noise modeling account for specific receptor locations to evaluate effects on residential quality of life.

Refer to Master Response 6 regarding the adequacy of the cumulative impacts analysis prepared for the Project and Master Response 11 regarding the noise analysis conducted for the Project. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

To be considered on a cumulative basis, the cumulative project noise sources would have to be immediately adjacent or in close proximity to one another in order for the generated noise to intermingle. Further, the sensitive receptor or receptors would also have to be adjacent to or in close proximity to the noise generators. There is no certainty if, how, or when multiple projects would be under construction. As detailed in Section 4.13.7, Cumulative Impacts, starting on page 4.13-21 in Section 4.13 Noise, of the Draft EIR, construction noise levels from the Project and Western Realco Enterprise Way Industrial Project (Projects 1 and 2 - the referenced cumulative projects) would be 71 dBA L_{eq} and 68 dBA L_{eq}, respectively, at the sensitive receptor. The cumulative construction noise levels would be 72.8 dBA L_{eq} at the sensitive receptor, which is below the construction noise level threshold of 80 dBA $L_{eq.}$ Therefore, implementation of the proposed Project and the cumulative projects would not contribute to cumulatively considerable construction-related

noise impacts in excess of standards established in the City's General Plan or noise ordinance. Furthermore, the City's nighttime noise standards take into account the sensitivity of the nighttime hours when most people sleep. Therefore, the analysis also considers this time of day which could be seen as potentially more impacted by industrial operations. The noise assessment was prepared by qualified technical experts with specific technical knowledge and credentials related to this subject area.

Construction noise levels are **logarithmic, not linearly additive**, when expressed in decibels (dB). This means that simply adding the decibel values of individual noise sources will not produce the correct total noise level. Again, Section 4.13.7, Cumulative Impacts, starting on page 4.13-21 of Section 4.13, Noise, of the Draft EIR includes a discussion of the cumulative noise from the Project and the referenced cumulative projects. As detailed in Tables Q and R of the Noise and Vibration Analysis in the Draft EIR (Appendix H), the daytime and nighttime noise levels during operation of the Project and the referenced cumulative projects would be 52.8 and 50.0 dBA L_{eq}, respectively. These levels are below or equal to the daytime and nighttime noise standards (55.0 and 50.0 dBA L_{eq}, respectively); therefore, the cumulative noise from the Project and the referenced cumulative projects would not exceed City noise thresholds and would not cause a cumulatively significant operational stationary noise impact.

Table 4.13.H on page 4.13-19 of the Draft EIR clearly identifies traffic noise that would occur under Opening Year conditions with "Cumulative Projects." The cumulative noise condition at sensitive receptors would increase by up to 1.0 dBA along Enterprise Way. Noise level increases below 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, the cumulative noise condition would not exceed standards established in the City's General Plan or Noise Ordinance.

The effect of the Project or cumulative condition on residential sleep patterns is a social issue that is not required to be analyzed under CEQA (refer to *State CEQA Guidelines* Section 21082.2[c]), which limits evaluation of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment. As stated above, the cumulative noise condition during construction and operation of the Project would not exceed the noise regulations established by the City.

The Project and cumulative noise analysis detailed in the Draft EIR is supported by long-term measurement of the existing ambient noise environment, review of Project characteristics including construction and operational equipment, both mobile and stationary, to determine operational noise levels; and traffic noise modeling (using the FHWA Traffic Noise Predication Model). The results of this analysis, prepared by qualified technical experts with specific technical knowledge and credentials related to this subject area, was weighed against existing City General Plan policies and applicable provisions of the City's Municipal Code. The claim that the noise and vibration analysis requires more detail to account for "real world" scenarios is non-specific. The commenter does not provide substantial evidence to indicate an inadequacy or inaccuracy in either the environmental analysis or its supporting technical analysis. No revision of the Draft EIR is warranted.

Response to Comment O-1-14

This comment claims the Draft EIR's cumulative population and housing analysis does not address community concerns regarding perceived population loss and reduced property values resulting from cumulative industrialization of the area. This comment requests that the analysis quantify the total number of jobs generated by all three cumulative industrial warehouse projects and provide stronger support for the less-than-significant cumulative conclusion. This comment also requests that the Draft EIR evaluate how the combined presence of these projects may affect the desirability of nearby residential areas for future population and housing growth, including potential impacts on quality of life.

Refer to Master Response 6 regarding the adequacy of the cumulative impact analysis prepared for the proposed Project and Response to Comment O-1-12 regarding property values.

Refer to Master Response 3 regarding speculation without substantial evidence. CEQA is not required to address speculative conditions. Cumulative population and housing impacts are addressed in Section 4.14.7, Cumulative Impacts, starting on page 4.14-8 of Section 4.14, Population and Housing, of the Draft EIR.

While the existing buildings occupying the Project site and referenced cumulative project sites are currently vacant, they are consistent with the LI zoning designation. Therefore, it is reasonable that the potential employment associated with use of the existing buildings has been appropriately considered in local and regional planning forecasts. Owing to their similar size and intended uses, the referenced cumulative projects combined would be expected to have a generally similar potential for employment as the Project. As SCAG forecasts are based in part on local government input and because the cumulative projects are consistent with existing zoning, the increase (if any) of population resulting from cumulative development is in-line with existing growth forecasts.

Therefore, because population and housing forecasts used in the Draft EIR are based on these adopted regional growth models, the cumulative population and housing analysis remains valid and supported by substantial evidence.

Desirability of residential areas and perceived population loss are not an impact on the environment required to be analyzed as part of the environmental review process pursuant to CEQA, as *State CEQA Guidelines* Section 21082.2(c) limits evaluation of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment. Therefore, the portion of the comment related to perceived population growth and residential desirability does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. No further response is required.

Response to Comment O-1-15

This comment states the opinion that the Draft EIR's cumulative public services analysis relies on a general statement of regulatory compliance and does not adequately address concerns regarding the need for heightened security for adjacent residential areas or the combined demand on police, fire, and other services from the cumulative industrial warehouse projects operating simultaneously

or sequentially. This comment requests that the analysis quantify the cumulative increase in demand for police services, fire, and other public services considering increased hazardous materials storage and truck traffic and demonstrate how this demand would be met. This comment also requests that the Draft EIR include updated or coordinated consultation with Orange County Fire Authority (OCFA) to evaluate the combined risk and service demand associated with the cumulative industrial warehouse projects. The commenter cites non-specific unquantified increased demand for Project services that would result from development of the Project and referenced cumulative projects.

Refer to Master Response 6 regarding the adequacy of the cumulative impacts analysis prepared for the proposed Project and Master Response 13 and Response to Comment O-1-10 regarding hazards and hazardous materials associated with the proposed Project. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

Cumulative impacts related to public services are discussed in Section 4.15.7, Cumulative Impacts, starting on page 4.15-16 of Section 4.15, Public Services, of the Draft EIR. While cumulative development could incrementally increase the overall demand for police, fire and other public services, planned development is both within the scope of population and employment growth assumptions already accounted for in the City's General Plan and the SCAG RTP/SCS and the capacity of existing and planned services and facilities. As detailed in Section 4.15.7, starting on page 4.15-16 of the Draft EIR, all discretionary private development and public works projects within the cumulative study area are required to comply with applicable regulations and standards, including CAL/OSHA requirements, the California Fire Code, and OCFA design and access standards, which ensure adequate fire protection service levels. Likewise, adherence to Orange County Sheriff's Department (OCSD) requirements would ensure that law enforcement service demands remain within existing operational capacity.

The Project site is located in a substantially urbanized area in which public services are routinely provided. Though currently vacant, the structures on the Project site and the referenced cumulative sites have been previously developed. Therefore, it is reasonable that public service demands required for development of the sites have been previously considered by the City and utility providers[15]. As stated in the City's 2040 General Plan EIR (refer to page 4.0-18), relative to the provision of public services, impacts resulting from cumulative development in the City would be less than cumulatively considerable. As previously stated, the existing site and the referenced cumulative projects include buildings that are consistent with permitted uses within the Pacific Commercentre Planned Community, which maintains the General Plan's Light Industrial designation and the LI – Light Industrial zoning district.

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15 "Implementation and buildout of the General Plan would not result in the need to construct or expand water supply and treatment facilities that have not already been described and accounted for in the Districts' relevant water master plans, which include the IRWD Water Master Plan and the ETWD Master." Refer to Section 3.15, page 3.15-13, *Public Draft Environmental Impact Report for the 2040 Lake Forest General Plan*, De Novo Planning Group, November 2019.)

"…projected wastewater generation volumes associated with General Plan buildout would not exceed the projected wastewater generation volumes described in the IRWD Master Plan and ETWD Master Plan." (Refer to General Plan EIR, Section 3.15, page 3.15-21.)

Therefore, cumulative risk and service demand has been adequately addressed in the Draft EIR, and no further analysis is required.

Response to Comment O-1-16

This comment claims that the Draft EIR does not adequately consider the qualitative impact on the enjoyment of existing recreational facilities and green spaces due to increased noise, air pollution, and traffic from the cumulative industrial warehouse projects in the Project vicinity.

Refer to Response to Comment O-1-14 regarding CEQA assessment of social or economic impacts. The analysis of potential impacts to recreational facilities presented in the Draft EIR is consistent with that required by CEQA and is limited to a) physical impacts associated with the provision of new or physically altered governmental facilities, b) increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, and c) inclusion of recreational facilities or requiring the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Refer to Master Response 8 regarding the transportation assessment, safety analysis, and VMT methodology provided in the Draft EIR. Additionally, refer to Master Response 11 regarding noise impacts to sensitive uses that may result from on-site activities. Refer further to Master Response 6 regarding the adequacy of the cumulative impacts analysis prepared for the proposed Project. Potential impacts of the Project with respect to transportation, air quality, and noise are provided in Section 4.17.6, Project Impacts, starting on page 4.17-7 of Section 4.17, Transportation and Traffic; Section 4.3.6, Project Impacts, starting on page 4.3-22 of Section 4.3, Air Quality; and Section 4.13.6, Project Impacts, starting on page 4.13-17 of Section 4.13, Noise, of the Draft EIR, respectively. These analyses consider direct and reasonably foreseeable indirect impacts of the Project to sensitive receptors, which include park and recreational facilities. Therefore, the Draft EIR adequately analyzes potential indirect transportation, air quality, and noise impacts to nearby parks and recreational facilities, and no revisions are necessary. No further response is required.

Response to Comment O-1-17

This comment states the opinion that the Draft EIR's finding of a significant and unavoidable VMT impact indicates that the transportation analysis does not fully mitigate impacts and requests a more detailed cumulative evaluation of how the cumulative industrial warehouse projects contribute to regional VMT and congestion. This comment also claims that the cumulative transportation analysis does not adequately address the combined localized effects of truck traffic on residential streets and sensitive receptors, citing concerns about noise and quality of life. This comment requests a quantitative assessment of how off-site traffic improvements will collectively accommodate increased truck traffic and mitigate congestion and safety hazards, and that the Draft EIR justify the use of ITE and SCAQMD trip generation rates to represent a worst-case truck traffic scenario, including "last mile delivery hubs." This comment also states the opinion that the cumulative transportation analysis may not meet the regional expectation for a comprehensive, detailed assessment extending beyond Lake Forest's boundaries and requests inclusion of a detailed

strategy quantifying multimodal improvements and their cumulative effectiveness across the three industrial warehouse projects, as recommended by Caltrans.

As stated in Section 4.17.7, Cumulative Impacts, starting on page 4.17-16 of Section 4.17, Transportation and Traffic, of the Draft EIR, the Project would result in a significant and unavoidable transportation impact related to VMT. The referenced cumulative projects are located within the same Traffic Analysis Zone (TAZ) as the Project, which is above the countywide threshold for VMT; therefore, all projects within this TAZ zone, regardless of the size and type of project, would contribute to higher VMT rates within the TAZ zone. The Project would have a significant Project-specific impact on VMT. When considered with the other cumulative projects, particularly those within the same TAZ, the Project would have a cumulatively considerable impact on VMT.

CEQA requires that mitigation measures must be roughly proportional to the impacts of the Project and be supported by substantial evidence demonstrating a "nexus" between the mitigation and the impact it is intended to address (*State CEQA Guidelines* Section 15126.4(a)(4)(A-B)). To fully mitigate a significant VMT impact, an individual project would likely need to develop local or regional transit infrastructure, which on an individual project basis, would be economically prohibitive. Refer to Master Response 8 regarding the VMT analysis conducted for the Project and the consideration of a variety of mitigation measures, Master Response 6 regarding the adequacy of the cumulative impacts analysis prepared for the Project, including traffic and VMT impacts, and Master Response 4 regarding the requirements for mitigation under CEQA. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

The Draft EIR includes an assessment of traffic operations in future years with development of the Project and the referenced cumulative projects (refer to Draft EIR, Appendix J, Table B). As stated in Section 4.17.6, Project Impacts, page 4.17-10, of Section 4.17, Transportation and Traffic, of the Draft EIR, the study-area intersections are forecast to operate at an acceptable LOS during the a.m. and p.m. peak hours both in Existing (2024) with Project and Opening Year (2027) with "Cumulative Projects with Project" traffic conditions. The evaluation of the study area intersection LOS shows that the addition of Project traffic would not cause an intersection operation to deteriorate below the City's performance threshold.

The trip generation rates were derived from data presented in the ITE Trip Generation Manual (11th Edition), which is an accepted industry standard used by traffic engineering professionals in the development of traffic and VMT analyses. As established in the Project-specific Traffic Impact Analysis (Draft EIR, Appendix J), the trip generation rates for manufacturing, warehousing, and General Office Building uses were used to develop trip data. To estimate cumulative conditions, an ambient growth factor of 3 percent was applied to the existing traffic volumes. Finally, the traffic generated by the cumulative projects and the proposed Project were added to the study area intersections. The process ensures the cumulative project traffic was appropriately incorporated into the TIA and Draft EIR analyses. Lastly, the methodology and analyses included in the TIA was prepared by professional transportation engineers, and reviewed and approved by City engineering staff; thereby ensuring the analyses fully satisfied the requirements detailed in the City traffic study guidelines.

Refer to Master Response 3 regarding speculation without substantial evidence. CEQA does not require analysis of speculative or "worst-case" scenarios. As stated in *State CEQA Guidelines* Section 15144, when preparing an EIR, "an agency must use its best efforts to forecast, disclosing all that it reasonably can, even though predicting the unforeseeable is not possible." Similarly, Section 15145 provides that "…if, after thorough investigation, a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact." Consistent with these provisions, an EIR is required to evaluate reasonably foreseeable environmental effects using the best available information—not to speculate about extreme or unlikely events. Therefore, analysis of a "worst-case" condition suggested by the commenter is not required under CEQA.

Response to Comment O-1-18

This comment states the opinion that the Draft EIR's cumulative analysis of utilities and service systems is inadequate because it does not provide a detailed, quantified evaluation of the combined water, wastewater, and solid waste demand from the cumulative industrial warehouse projects or address how tenant uncertainty may affect these demands. This comment requests that the Draft EIR quantify total cumulative water use, wastewater generation, and solid waste generation, and demonstrate that existing utility systems and the Frank R. Bowerman Landfill have sufficient capacity to accommodate the combined cumulative demand from all projects.

Refer to Master Response 6 regarding the adequacy of the cumulative impact analysis prepared for the Project and Response to Comment O-1-10 regarding tenant uncertainty associated with the Project. Cumulative impacts related to utilities and service systems associated with the Project are discussed in Section 4.19.7, Cumulative Impacts, starting on page 4.17-16 of Section 4.17, Utilities and Service Systems, of the Draft EIR. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

The Project site and the referenced cumulative projects are located within an urbanized area. Though currently vacant, the uses on these sites have been previously developed with structures, expansive parking areas, outdoor lighting, landscaping, and utility and drainage infrastructure. Therefore, the cumulative demand for public services is accounted for in utility planning efforts. Cumulative impacts with regard to utilities and service systems are unique in the sense that utilities and service systems within the City are sized based on growth projections provided in the City's General Plan. The Project and the cumulative projects included in the Draft EIR (refer to Table 4.A starting on page 4-5), are consistent with applicable General Plan land use designations and zoning designations and therefore have been considered in the projections used to plan for utilities and service system demands in the City (e.g. in IRWD Urban Water Management Plan, IRWD Sewer System Management Plan). Therefore, as the cumulative projects are consistent with the uses forecast in utility planning documents, and because sufficient capacity has been identified to meet forecast utility demand, development of the cumulative projects that are consistent with site zoning and applicable land use designations would be sufficiently accommodated by existing utilities and service systems and would not require new or expanded services. Additionally, all discretionary private development and public works projects within the cumulative study area would be required to comply with CEQA, at which point a quantitative analysis would be conducted, and potential impacts on utilities and service systems would be evaluated and mitigated to less than significant by

each individual private development or public works project. The analysis and conclusions of the Draft EIR regarding evaluation of cumulative water, water, wastewater, and solid waste solid waste demand remain valid.

Response to Comment O-1-19

This comment states the opinion that the Draft EIR's cumulative wildfire analysis is insufficient because its reliance on general regulatory compliance does not provide a comprehensive assessment of the combined increase in fire risk from the cumulative industrial warehouse projects operating simultaneously or sequentially, particularly those handling hazardous materials near residential areas and within 1 mile of a Very High Fire Hazard Severity Zone (VHFHSZ). This comment requests that the analysis address how activities such as heavy machinery use, welding, and manufacturing could increase ignition risk in proximity to the VHFHSZ and that it include a detailed evaluation of how combined Project traffic and operations will maintain emergency vehicle access and egress for both project sites and nearby residential communities, considering wildfire evacuation scenarios in light of the significant and unavoidable VMT impacts.

The topic of wildfire hazards is addressed in Section 4.20, Wildfire, of the Draft EIR. As stated in Section 4.1.3.1, page 4.1-12 of the Draft EIR, the Project site is located in an urbanized area and has been previously developed with building and surface parking areas and is not located within a wildland urban interface. Due to the absence of wildland areas in the immediate Project area, the Project would not increase the threat of wildfires. The Project site is not located along a wildfire evacuation route and would not result in a significant increase in congestion, nor would it add a significant number of vehicles to local roadways. It is reasonable that operations within the Project site and the referenced cumulative industrial warehouse projects would take appropriate care and caution to avoid any manner of ignition, including adherence to applicable and regulations regarding the use of equipment and fuel sources. Refer to Master Response 6 regarding the adequacy of the cumulative impact analysis prepared for the Project, Master Response 8 regarding the Project's VMT impacts, and Response to Comment O-1-10 regarding hazardous materials, tenant uncertainty, and emergency evacuation. Cumulative wildfire impacts are discussed in Section 4.20.7, Cumulative Impacts, starting on page 4.20-12 of Section 4.20, Wildfire, of the Draft EIR. As described therein, cumulative projects are required to comply with applicable fire prevention and protection requirements under the California Fire Code and the Orange County Fire Authority (OCFA), including defensible space standards, on-site fire suppression systems, and emergency access requirements, which collectively minimize ignition risk and ensure adequate fire protection capacity. Therefore, the Draft EIR adequately addresses cumulative wildfire risk and no further response is necessary.

Response to Comment O-1-20

This comment concludes the letter, restates the primary concerns addressed in the letter, and urges the City to review and address the comments.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the comments above. No further response is required.

Weiss, Jennifer

From: Patricia [redacted]
Sent: Friday, August 15, 2025 12:17 PM
To: EnterpriseProjects
Subject: IPT Enterprise Business Center LLC Project Draft Environmental Impact Report
Attachments: Lake Forest IPT Enterprise Business Center.docx

O-2-1 Dear Ms. Stonich,
Please see the attached.

Thank you,

Patricia Martz
President
California Cultural resources Preservation Alliance, Inc.

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C.C.R.P.A.
Preserving The Past For The Future

California Cultural Resource Preservation Alliance, Inc.

P.O. Box 54132
Irvine, CA 92619-4132

An alliance of American Indian and scientific communities working for the preservation of archaeological sites and other cultural resources.

August 15, 2025

Amy Stonich, Assistant Director of Community Development
City of Lake Forest
100 Civic Center Drive
Lake Forest, California 92630

Via Email

Re: Draft Environmental Impact Report for the IPT Enterprise Business Center LLC Project

Dear Ms. Stonich:

O-2-2 Thank you for the opportunity to comment on the Draft Environmental Report for the Proposed Business Center. I concur with Cultural Resources Threshold 4.5.2 Regulatory compliance Measure Cul-1 Unknown Archaeological Resources and Threshold 4.5.3 Regulatory compliance Cul-2 Human remains.

Sincerely,

Patricia Martz, Ph.D.
President

California Cultural Resources Preservation Alliance, Inc., Patricia Martz, President

Letter Code: O-2
Date: August 15, 2025

Response to Comment O-2-1

This comment is introductory and requests review of the attached letter.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment O-2-2

This comment concurs with RCM CUL-1 and RCM CUL-2 as presented in the Draft EIR.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: Merritt, Thy
Sent: Wednesday, September 10, 2025 12:24 PM
To: Lorrie J. LeLe; Ackerman, Gayle; Planning; City Clerk; Stonich, Amy; EnterpriseProjects
Cc: Sheila M. Sannadan; Lafuente, Marc
Subject: RE: Request for Immediate Access to Documents Referenced in the Draft Environmental Impact Report - IPT Enterprise Business Center LLC Project (8021)

Lorrie,

Received. Thank you.

THY MERRITT
Acting City Clerk
City Clerk Department
(949) 461-3423
tmerritt@lakeforestca.gov
100 Civic Center Drive
Lake Forest, CA 92630
www.lakeforestca.gov

From: Lorrie J. LeLe <ljlele@adamsbroadwell.com>
Sent: Wednesday, September 10, 2025 12:19 PM
To: Ackerman, Gayle <GAckerman@lakeforestca.gov>; Planning <Planning@lakeforestca.gov>; City Clerk <CityClerk@lakeforestca.gov>; Stonich, Amy <AStonich@lakeforestca.gov>; EnterpriseProjects <EnterpriseProjects@lakeforestca.gov>
Cc: Sheila M. Sannadan <ssannadan@adamsbroadwell.com>
Subject: Request for Immediate Access to Documents Referenced in the Draft Environmental Impact Report - IPT Enterprise Business Center LLC Project (8021)

On behalf of Californians Allied for a Responsible Economy, we submit the attached request for immediate access to documents referenced in the Draft EIR regarding the IPT Enterprise Business Center LLC project.

O-3-1 Please respond to Sheila Sannadan – ssannadan@adamsbroadwell.com

Thank you,

Lorrie J. Lele
Legal Assistant
Adams Broadwell Joseph & Cardozo
520 Capitol Mall, Suite 350
Sacramento, CA 95814
ljlele@adamsbroadwell.com | Phone: 916.444.6201 Ext. 10 | Fax: 916.444.6209|

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Californians Allied for a Responsible Economy, Lorrie Lele, Legal Assistant for Adams Broadwell Joseph & Cardozo

Letter Code: O-3
Date: September 10, 2025

Response to Comment O-3-1

This comment requests that the commenter, Californians Allied for a Responsible Economy, receive access to the documents referenced in the Draft EIR. The request was withdrawn by the organization on September 15, 2025.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: Emily Le <leem@irwd.com>
Sent: Thursday, September 11, 2025 5:42 PM
To: EnterpriseProjects
Cc: Fiona Nye; Eric Akiyoshi
Subject: EIR IPT Enterprise Business Center LLC Project - IRWD Comment Letter
Attachments: IPT Enterprise Business Center LLC Project - IRWD Comment Letter.pdf

Hello Ms. Stonich,

O-4-1 Please see attached comment letter in response to the City of Lake Forest's Notice of Availability for the Draft Environmental Impact Report for the IPT Enterprise Business Center LLC Project. Thank you for the opportunity to comment.

Regards,

Emily Le
Environmental Compliance Analyst

Irvine Ranch Water District
leem@IRWD.com
O: (949) 453-5384
M: (949) 231-2121
15600 Sand Canyon Avenue
Irvine, CA 92618
IRWD.com

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Irvine Ranch
Water District

September 11, 2025

Amy Stonich
Assistant Director of Community Development
City of Lake Forest
100 Civic Center Drive
Lake Forest, CA 92630

Via email: EnterpriseProjects@lakeforestca.gov

Re: Notice of Availability of the Draft Environmental Impact Report for the Proposed IPT Enterprise Business Center LLC Project

Irvine Ranch Water District (IRWD) has received and reviewed the draft Environmental Impact Report (DEIR) for the proposed IPT Enterprise Business Center LLC. IRWD offers the following comments.

The DEIR states the proposed IPT Enterprise Business Center LLC (Project) will be at 26200 Enterprise Way in the city of Lake Forest. The proposed Project will consist of the demolition of an existing 144,906-square-foot (sq ft), two-story office/industrial building and redevelopment of a 35-foot tall, 165,803 sq ft industrial building. Additionally, the proposed Project's facility would include a gated truck loading area, truck and auto parking spaces, and new landscaping throughout the site. IRWD can confirm that the proposed project's location is within IRWD's service area. Accordingly, the water and sewer services for this proposed project would be served from IRWD.

O-4-2 The DEIR states that the proposed Project would require connections to an existing domestic water main in Enterprise Way utilizing existing 6-inch and 8-inch water lines on the Project site. The DEIR also indicates that the Project would reuse an existing on-site sewer service lateral connecting to the sewer main in Enterprise Way. Since the project proposes to connect to existing IRWD facilities (domestic and sewer pipelines), coordination with IRWD will be required. Water demand and sewage generation estimates for existing, and future conditions will need to be coordinated with IRWD. An evaluation of potential impacts to the potable water and sanitary sewer systems associated with the proposed Project may be required. Please contact Eric Akiyoshi, Engineering Manager, at (949) 453-5552 to further discuss these requirements.

IRWD appreciates the opportunity to review and comment on the DEIR. If you have any questions or require additional information, please contact me at (949) 453-5325 or Emily Le, Environmental Compliance Specialist, at (949) 453-5384.

Sincerely,

Fiona Nye
Director of Water Resources

cc: Eric Akiyoshi, IRWD
Emily Le, IRWD

Irvine Ranch Water District, Emily Le, Environmental Compliance Analyst

Letter Code: O-4
Date: September 11, 2025

Response to Comment O-4-1

This comment is introductory and formally submits Irvine Ranch Water District's comments on the Draft EIR.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment O-4-2

This comment provides a summary of the proposed Project, including a summary of domestic water and sewer connections and states that, since the Project proposes to connect to existing IRWD facilities, coordination with IRWD would be required. In addition, the comment states that water demand and sewage generation estimates for existing, and future conditions would need to be coordinated with IRWD and an evaluation of potential impacts to the potable water and sanitary sewer systems associated with the Project may be required. The comment requests the City contact IRWD to discuss requirements.

Water demand and wastewater estimates related to the proposed Project are discussed in Section 4.19.6, Project Impacts, starting on page 4.19-12, of Section 4.19, Utilities and Service Systems, of the Draft EIR. The analysis provided in this section of the Draft EIR found that IRWD would have adequate capacity to serve the water demand of the proposed Project and that Michelson Water Recycling Plant (MWRP – owned and operated by IRWD) would have sufficient capacity to serve the proposed Project related to wastewater. Therefore, the Project would have a less than significant impact on the demand for both water and wastewater services. Furthermore, as part of the development process, the applicant will be required to obtain applicable permits from IRWD related to water and sewer service to the building, prior to the City's issuance of grading and/or building permits.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: Merritt, Thy
Sent: Friday, September 12, 2025 3:57 PM
To: Sheila M. Sannadan
Cc: Lorrie J. LeLe; Ackerman, Gayle; Planning; City Clerk; Stonich, Amy; EnterpriseProjects
Subject: RE: Request for Mailed Notice of Actions and Hearings – IPT Enterprise Business Center LLC Project (8021)

Hi Sheila,

I will double check for you, but I believe you have. Once I hear back from the Community Development Department I will update you.

THY MERRITT
Acting City Clerk
City Clerk Department
(949) 461-3423
tmerritt@lakeforestca.gov
100 Civic Center Drive
Lake Forest, CA 92630
www.lakeforestca.gov

From: Sheila M. Sannadan <ssannadan@adamsbroadwell.com>
Sent: Friday, September 12, 2025 3:50 PM
To: Merritt, Thy <tmerritt@lakeforestca.gov>
Cc: Lorrie J. LeLe <ljlele@adamsbroadwell.com>; Ackerman, Gayle <GAckerman@lakeforestca.gov>; Planning <Planning@lakeforestca.gov>; City Clerk <CityClerk@lakeforestca.gov>; Stonich, Amy <AStonich@lakeforestca.gov>; EnterpriseProjects <EnterpriseProjects@lakeforestca.gov>
Subject: RE: Request for Mailed Notice of Actions and Hearings – IPT Enterprise Business Center LLC Project (8021)

Good Afternoon Thy,

Could you please confirm if I have been added to the interested parties list to receive notices regarding the IPT Enterprise Business Center LLC Project? O-5-1

Thank you for your assistance.

Regards,
Sheila

Sheila Sannadan
Legal Assistant
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000

South San Francisco, CA 94080
Phone (650) 589-1660
Fax (650) 589-5062
ssannadan@adamsbroadwell.com

From: Merritt, Thy <tmerritt@lakeforestca.gov>
Sent: Thursday, September 11, 2025 3:14 PM
To: Lorrie J. LeLe <ljlele@adamsbroadwell.com>; Ackerman, Gayle <GAckerman@lakeforestca.gov>; Planning <Planning@lakeforestca.gov>; City Clerk <CityClerk@lakeforestca.gov>; Stonich, Amy <AStonich@lakeforestca.gov>; EnterpriseProjects <EnterpriseProjects@lakeforestca.gov>
Cc: Sheila M. Sannadan <ssannadan@adamsbroadwell.com>
Subject: RE: Request for Mailed Notice of Actions and Hearings – IPT Enterprise Business Center LLC Project (8021)

Lorrie,

Thank you, received.

THY MERRITT
Acting City Clerk
City Clerk Department
(949) 461-3423
tmerritt@lakeforestca.gov
100 Civic Center Drive
Lake Forest, CA 92630
www.lakeforestca.gov

From: Lorrie J. LeLe <ljlele@adamsbroadwell.com>
Sent: Thursday, September 11, 2025 2:39 PM
To: Ackerman, Gayle <GAckerman@lakeforestca.gov>; Planning <Planning@lakeforestca.gov>; City Clerk <CityClerk@lakeforestca.gov>; Stonich, Amy <AStonich@lakeforestca.gov>; EnterpriseProjects <EnterpriseProjects@lakeforestca.gov>
Cc: Sheila M. Sannadan <ssannadan@adamsbroadwell.com>
Subject: Request for Mailed Notice of Actions and Hearings – IPT Enterprise Business Center LLC Project (8021)

Please find attached our request for mailed notice of actions and hearings regarding the IPT Enterprise Business Center LLC project.

Please add only Sheila Sannadan – ssannadan@adamsbroadwell.com

Thank you,

Lorrie LeLe
Legal Assistant
Adams Broadwell Joseph & Cardozo
520 Capitol Mall, Suite 350
Sacramento, CA 95814
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Californians Allied for a Responsible Economy, Shiela Sannadan, Legal Assistant for Adams Broadwell Joseph & Cardozo

Letter Code: O-5
Date: September 12, 2025

Response to Comment O-5-1

This comment requests that Californians Allied for a Responsible Economy be added to the interested parties list to receive notices regarding the proposed Project.

This organization has been added to the City's list of interested parties for future notices regarding the proposed Project. This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: Michelle Black <mnb@cbcearthlaw.com>
Sent: Monday, September 15, 2025 11:33 AM
To: EnterpriseProjects
Subject: IPT Enterprise Project DEIR (We the Meadows)
Attachments: IPT DEIR Final.pdf

Good morning, Ms. Stonich -

O-6-1 On behalf of We the Meadows, we submit the attached comments on the Draft Environmental Impact Report (DEIR) prepared for the IPT Enterprise Business Center Project ("Project") (SCH No. 2024030755).

Please let me know if you have any difficulties with the attachment.

Thank you for your consideration,

Michelle N. Black

CARSTENS, BLACK & MINTEER LLP

700 North Pacific Coast Highway, Suite 200
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*Please note new address

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September 15, 2025

Amy Stonich
Assistant Director of Community Development
City of Lake Forest
100 Civic Center Drive
Lake Forest, CA 92630
Email: *EnterpriseProjects@lakeforestca.gov*

Re: Comments on Draft Environmental Impact Report (DEIR) for the IPT Enterprise Business Center Project (SCH No. 2024030755).

Dear Ms. Stonich,

On behalf of We the Meadows, we hereby submit our public comments on the Draft Environmental Impact Report (DEIR) for the IPT Enterprise Business Center Project ("Project") (SCH No. 2024030755).

This Project would establish a warehouse and industrial facility within 82 feet of homes. We ask that you reject the project outright because its extensive, unacceptable impacts cannot and should not be overridden.

O-6-2

The current Project -- along with other warehouse conversion projects nearby -- are completely out of place within residential areas. Alternative, environmentally-superior (quieter and less polluting) uses such as an office park should be seriously considered instead.

If the City wishes to continue processing approval of the proposed Project, it must revise the DEIR, remedy its numerous, serious deficiencies, develop adequate and enforceable mitigation measures and environmentally superior alternatives, and recirculate the revised DEIR for public and public agency review and comment. Proceeding on the basis of the currently available EIR draft would violate the California Environmental Quality Act (CEQA).

As the City's Notice of Availability states:

> The proposed project involves the demolition of the existing 144,906 sq ft, two-story building. In its place, a new 35-foot tall, 165,803 sq ft, tilt-up concrete industrial building will be constructed and operated. The project includes a gated truck loading area, parking spaces, and new landscaping. At this time, the future tenant remains undetermined. Although the tenant has not been determined yet, the proposed project maximizes a mix of office, manufacturing, and warehouse space. Approximately 10,000 sq ft could serve as office space and the interior space may be demised for up to 50,803 sq ft of warehouse use plus up to 105,000 sq ft of manufacturing use. A maximum of eight usable dock high doors, a gated truck loading area, and up to 301 parking spaces for passenger vehicles would be provided.

(City Notice of Availability.)

O-6-3 However, the EIR fails to sufficiently identify and address the cumulative impacts of several nearby and contemporaneous warehouse projects.

The EIR contains numerous areas of concern that point to a broader pattern of:

1. Insufficient cumulative impact analysis;
2. Understated or misclassified environmental effects;
3. Failure to evaluate feasible alternatives;
4. Inadequate and unenforceable mitigation measures; and
5. Disregard for long-term impacts on nearby sensitive residential neighborhoods

The EIR fails to adequately analyze and mitigate the Project's potential impacts with regard to air quality and human health, greenhouse gas emissions, traffic and circulation, adjacent communities, noise, and light pollution. These EIR deficiencies are detailed below.

I. The DEIR Fails to Disclose, Analyze, and Mitigate the Adverse Impacts of the Warehouse Project.

The California Environmental Quality Act (CEQA) was enacted to promote decision making that protects the environment through information gathering and public accountability.

> The CEQA process is intended to be a careful examination, fully open to the public, of the environmental consequences of a given project, covering the entire project, from start to finish. … The EIR is intended to furnish both the road map and the environmental price tag for a project, so that the decision maker and the public both know, before the journey begins, just where the journey will lead, and how much they -- and the environment -- will have to give up in order to take that journey.

O-6-4

(*Natural Resources Defense Council v. City of Los Angeles* (2002) 103 Cal.App.4th 268, 271.) CEQA requires a "mandatory finding of significance" if a project has the potential to "substantially degrade the quality of the environment. ..." (Guidelines §15065(a)(1).)

The DEIR already concedes that the project will result in "Significant and Unavoidable" impacts to: (1) Greenhouse Gas Emissions and (2) Vehicle Miles Traveled (VMT) / Transportation & Traffic. Based on the information contained in the DEIR, and the review of this information by experts, it is clear that the Project's air quality, noise, and human health risks should also be classified as "Significant and Unavoidable." This is especially true when accounting for the combined impacts of ***three contemporaneous warehouse projects***, during construction and operational phases. The DEIR further fails to account for unknown future tenants, truck trip volumes, and 24/7 operations—factors that directly influence environmental health and safety outcomes, and the type and intensity of mitigation needed.

A. The DEIR Insufficiently Analyzes and Mitigates Air Quality Impacts.

O-6-5

An EIR must correlate a project's significant impacts to the health effects that would be caused to people. (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 520-

521 ("*Sierra Club-Friant Ranch*").) In *Sierra Club-Friant Ranch*, the court considered whether an EIR's discussion of air quality effects was adequate in the context of a program EIR for a planned development community. (*Id*. at 507.) The EIR disclosed ozone concentrations in parts per million that triggered health symptoms in people and noted them as a significant impact (*id.* at 517), but the EIR notably did not describe the quantity of ozone generated by the project in parts per million (*id.* at 520). The Supreme Court held, "Because the EIR as written makes it impossible for the public to translate the bare numbers provided into adverse health impacts… the EIR's discussion of air quality impacts in this case was inadequate." (*Id*. at 521.)

As explained by air quality expert Ray Kapahi in the attached expert report (Attachment 1), the EIR fails to calculate air pollution concentrations and instead relies on calculations of emissions rates to conclude that air pollution impacts will be insignificant.

O-6-5 cont.

Specifically, the EIR:

- failed to recognize that national and state ambient air quality standards (AAQS) represent thresholds of significance. The EIR must evaluate potential violations of the AAQS
- failed to quantify peak (1-hour) construction emissions
- failed to evaluate the formation of secondary pollutants from the conversion of NOx and VOC into PM2.5
- did not recognize the project would violate the 1-hour NOx standards during the construction phase

The EIR's failure to evaluate or analyze the Project's impacts with regard to certain ambient air quality standards or phases of construction means that the EIR was unable to provide mitigation for air pollution known to harm human and environmental health. The other warehouse projects proposed nearby will likely present similar health and air quality concerns, with cumulative impacts the EIR fails to address. The EIR therefore fails as an informational document and must be revised.

B. **The DEIR Insufficiently Analyzes and Mitigates GHG Impacts.**

Curiously, the EIR concludes the Project's operational impacts would not exceed South Coast Air Quality Management District thresholds of significance because emissions would not exceed 2,884.5 MT carbon dioxide equivalent emissions. Accordingly, the EIR finds the impact not to be significant and requires zero mitigation for the Project's contributions to climate change. However, as this amount is barely below the reference threshold of 3,000 MT (DEIR p. 4.8-16), and because the Project would involve warehouse uses with twenty-three loading bays that could be accessed 24 hours per day, the EIR's conclusions are suspect.

The EIR admits the Project would conflict with the scoping plan by exceeding the City's VMT thresholds. (DEIR p. 4.8-18.) And, here, in the greenhouse gas analysis, the EIR admits its traffic mitigation is ineffective:

O-6-6

> The proposed project would be required to implement Traffic Demand Management (TDM) measures including the installation of bike lanes along Commercentre Drive between Alton Parkway and Dimension Drive as specified in Mitigation Measure (MM) TRA-1, to promote alternative transportation within the intent of reducing VMT. According to the California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (December 2021) (CAPCOA Handbook), the addition of bike lanes (T-20 Expand Bikeway Network) can provide a maximum VMT reduction of 0.5 percent. Assuming that this TDM measure could achieve the maximum 0.5 percent VMT reduction, the reduction achieved would not reduce the project's VMT impact to below the City's VMT threshold. Therefore, even with implementation of the TDM measure (addition of bike lanes), the project's VMT impact would be significant and unavoidable.

This significance conclusion requires the EIR to adopt all feasible mitigation. However, as traffic engineer, Tom Brohard, determined the EIR failed to do this. The EIR must be recirculated after revision to include a robust analysis and adoption of measures to reduce vehicle miles travelled or otherwise reduce the Project's contributions to GHG emissions.

Instead, the EIR proposes MM GHG-1 Electric Vehicle Charging. This measure provides:

> Provisions shall be made at the project site for emerging electric truck technology. Prior to the issuance of a shell building permit, the City shall verify that the site plan identifies an on-site location for future electric truck charging stations, with space available for a minimum of four (4) trucks to simultaneously charge when charging stations are installed in the future. The conduit trenching shall be installed to that location for future conduit pull as a requirement of the shell building permit. In conjunction with the approval of tenant improvement plans and permits, the applicant shall install electric truck charging stations on the site for a minimum of four (4) electric truck to simultaneously charge

O-6-6 cont.

There are several problems with this measure. First, there is no reason it cannot be installed with the Project. Electric vehicles, including trucks, exist now and are in wide use in Southern California and at Southern California ports and other logistics facilities. Second, the measure merely requires that the Project identify a location for electric truck charging. There is no requirement that the Project be built with the electrical capacity to utilize the truck charging. Nor is there a requirement for when the charging must be installed outside of "in conjunction with the approval of tenant improvement plans and permits." Are these future improvements? The measure must be tightened so it is clear that the provision of electric truck charging is required before Project operation begins. Mitigation must be enforceable. (Pub. Res. Code 21081.6(b); *Lincoln Place Tenants Ass'n v. City of Los Angeles* (2007) 155 Cal. App. 4th 425, 445 ["mitigation measures must be feasible and enforceable"]). Otherwise, the measure is speculative and cannot be relied on to mitigate the Project's greenhouse gas emissions.

The EIR further fails to analyze the cumulative impacts of additional warehouses proposed nearby.

C. **The DEIR Insufficiently Analyzes and Mitigates Traffic and Circulation Impacts**.

O-6-7

The DEIR also fails to adequately analyze and mitigate the Project's traffic and circulation impacts, as discussed further in the expert comments prepared by traffic

engineer, Tom Brohard (Attachment 3.) The Traffic Impact Analysis upon which the DEIR is based fails to comply with the City's adopted Transportation Analysis Guidelines. For example, the DEIR concludes that the Project's excessive vehicle miles travelled will be addressed by the installation of bike lanes. MM-TRA-1, the required mitigation measure, would address only 0.5% of Project traffic generation. The DEIR fails to evaluate or adopt the many, many, available traffic mitigation options, without any evidence that such mitigation was fully investigated or evaluated. Without demonstration of such exhaustion, the City cannot make the required findings that additional mitigation measures are infeasible. The DEIR must be revised and recirculated once a more thorough evaluation of Project traffic generation and mitigation is completed.

O-6-7 cont.

D. **The EIR Fails to Adequately Disclose, Analyze, or Mitigate the Project's Impacts to Nearby Communities.**

The Project would construct industrial warehouses immediately adjacent to established residential neighborhoods to the north and east including The Meadows at Lake Forest and Baker Ranch. (DEIR p. 4.11-2.)

As the California Department of Justice has found:

> [I]mprudent warehouse development can harm local communities and the environment. Among other pollutants, diesel trucks visiting warehouses emit nitrogen oxide (NOx)—a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation—and diesel particulate matter (a subset of fine particular matter that is smaller than 2.5 micrometers)—a contributor to cancer, heart disease, respiratory illnesses, and premature death. Trucks and on-site loading activities can also be loud, bringing disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure. The hundreds, and sometimes thousands, of daily truck and passenger car trips that warehouses generate contribute to traffic jams, deterioration of road surfaces, and traffic accidents.

O-6-8

(Attachment 2, p. 2, Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act, California Department of Justice, September 2022.)

Project proximity to residential neighborhoods will:

1. Introduce heavy diesel truck traffic within 100 feet of family homes and schools;

2. Exacerbate cancer and respiratory health risks, particularly among vulnerable populations (children, seniors, and low-income residents);

3. Increase air, noise, and light pollution in a currently surrounding quiet residential zone; and

4. Undermine the long-term livability, safety, and environmental integrity of the City of Lake Forest.

O-6-8 cont.

The Attorney General has found:

> The most important consideration when planning a logistics facility is its location. Warehouses located in residential neighborhoods or near sensitive receptors expose community residents and those using or visiting sensitive receptor sites to the air pollution, noise, traffic, and other environmental impacts they generate. Therefore, placing facilities away from sensitive receptors significantly reduces their environmental and quality of life harms on local communities.

(Attachment 2, p. 5.) To protect human health, the Attorney General and California Air Resources Board recommend siting warehouse facilities "so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive receptors." (*Ibid* p. 6; see also Attachment 4, CARB Air Quality and Land Use Handbook; Attachment 5, CARB, Concept Paper for the Freight Handbook.)

The EIR both fails to acknowledge these realities and to mitigate their impacts by designating as the preferred Project a less damaging alternative. Moreover, by introducing and exacerbating risks to residents and sensitive populations, the Project

demonstrates fundamental incompatibility with surrounding land uses, thereby violating the intent of the City's 2040 General Plan. CEQA requires an EIR to discuss any inconsistencies between the proposed project and all applicable general, specific, and regional plans. (CEQA Guidelines § 15125(d).) In partial recognition of this fact, the EIR adopts Threshold of Significance 4.11.2, which would require a finding of significance if the Project would "Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect."

O-6-8 cont.

Despite Project proximity to homes, EIR fails to disclose inconsistencies with the following Lake Forest General Plan 2024 Goals and Policies, finding instead that the master planned nature of the area and a landscape buffer would prevent impacts (DEIR p. 4.11-8 through 25):

- **Policy LU-1.1 Land Use Pattern:** Promote an appropriate land use plan that fosters and enhances community livability and public health; supports economic development; promotes efficient development and multiple transportation options; reduces pollution, greenhouse gas emissions, and the expenditure of energy and other resources; and ensures compatibility between uses.

The Project would damage community livability and public health, increase pollution, generate greenhouse gas emissions, and harm compatibility between uses.

O-6-9

- **Policy LU-2.1 Physical Characteristic Compatibility**: Ensure that new development fits within the existing community setting and is compatible with surrounding land uses and public infrastructure availability; and

- **Policy LU-2.4 Scale and Character**: Ensure that the scale and character of new development is appropriate to the setting and intended use.

The Project is located within 100 feet of residential uses to the north and east.

- **Policy LU-2.7 Interface with Residential Areas**: Promote compatibility of adjacent land uses along the interface of different residential density and non-

residential intensity categories by paying special attention to buffers and transitional areas.

As this industrial and warehouse Project would operate within 100 feet of homes, it cannot comply with the intent of this policy.

- **Action LU-2a**: As part of the City's development review process, ensure that commercial projects are designed to be compatible with residential uses, including appropriate building massing and scale and minimization of impacts related to the operation of the use. Review of employment-generating projects should ensure that the following design concepts are addressed in projects that abut residential areas:

    - Appropriate building scale and/or siting;
    - Site design and noise-attenuating features to avoid exposure to excessive noise due to long hours of operation or inappropriate location of accessory structures;
    - Site and structure design to avoid excessive glare or excessive impacts from light sources onto adjacent properties; and
    - Site design to avoid unnecessary loss of community and environmental resources (archaeological, historical, ecological, recreational, etc.).

O-6-9 cont.

The Project could operate 24 hours per day, seven days per week, with twenty-three loading docks and roadways within 100 feet of residential uses, without measures designed to ensure noise attenuation, light pollution, or excessive glare. It is incompatible with this General Plan Action.

The EIR must be revised to clearly disclose these inconsistencies with General Plan policies enacted to promote neighborhood health, livability, and use compatibility. After revision, the EIR must incorporate enforceable mitigation measures to offset these impacts and be recirculated to the public and decisionmakers, including those in the residential communities located directly north and east of the proposed Project site.

E. **The DEIR Insufficiently Analyzes and Mitigates Noise Pollution Impacts.**

Warehouse noise affects neighborhood livability and human health, requiring adequate analysis and mitigation absent here. The California Attorney General has found:

> The noise associated with logistics facilities can be among their most intrusive impacts to nearby sensitive receptors. Various sources, such as unloading activity, diesel truck movement, and rooftop air conditioning units, can contribute substantial noise pollution. These impacts are exacerbated by logistics facilities' typical 24-hour, seven-days-per-week operation.

(Attachment 2, p. 10.)

O-6-10

According to the U.S. Environmental Protection Agency, exposure to high noise levels presents a "health risk in that noise may contribute to the development and aggravation of stress related conditions such as high blood pressure, coronary disease, ulcers, colitis, and migraine headaches…Growing evidence suggests a link between noise and cardiovascular problems. There is also evidence suggesting that noise may be related to birth defects and low birth-weight babies. There are also some indications that noise exposure can increase susceptibility to viral infection and toxic substances."[1]

Potentially deadly cardiovascular impacts can be triggered by long-term average exposure to noise levels as low as 55 decibels.[2] Exposure to even moderately high levels of noise during a single 8-hour period triggers the body's stress response. In turn, the body increases cortisol production, which stimulates vasoconstriction of blood vessels that results in a five- to ten-point increase in blood pressure. Over time, this noise-

[1] EPA Noise Effects Handbook, http://www.nonoise.org/library/handbook/handbook.htm, incorporated by reference; see also EPA *Noise: A Health Problem* http://www.nonoise.org/library/epahlth/epahlth.htm#heart%20disease, incorporated by reference.

[2] World Health Organization Media Centre, http://www.euro.who.int/eprise/main/WHO/MediaCentre/PR/2009/20091008_1?language [elevated blood pressure and heart attacks], incorporated by reference; http://whqlibdoc.who.int/hq/1999/a68672.pdf [finding demonstrated cardiovascular impacts, including ischemic heart disease and hypertension after long-term exposure to 24 hour average noise values of 65-70 dBA], incorporated by reference.

induced stress can result in hypertension and coronary artery disease, both of which increase the risk of heart attack death.[3] Studies on the use of tranquilizers, sleeping pills, psychotropic drugs, and mental hospital admission rates suggest that high noise levels cause adverse impacts on mental health.[4]

High noise levels also have dramatic developmental impacts on small children, many of which reside near the Project. Children who are exposed to higher average noise levels have heightened sympathetic arousal, expressed by increased stress hormone levels, and elevated resting blood pressure. As proposed, the Project would expose community members to levels of noise that are unsafe for cardiovascular health, mental health, societal well-being, and child development.

O-6-10 cont.

The DEIR recognizes that the nearest residence to the site is a mere 82 feet from the Project. (DEIR p. 4.13-5.) Even so, it concludes the Project would not have significant construction impacts (DEIR p. 4.13-17) or operational impacts. As to construction, the DEIR states that construction noise would average 71 dBA at the nearest home, which is less than the City's threshold of 80 dBA. However, the EIR does not disclose the impact of impulsive noise (hammers, jackhammers, etc.) and inconsistent noise, which is far more disturbing and aggravating than a consistent 71 dBA. Additionally, a daily exposure of 80 dBA is a threshold of significance established for occupational exposure – not residential. It is intended to prevent hearing loss and does nothing to prevent disturbance, the inability to work for those who work from home, interference with speech, or interference with sleep or education. At these levels, a workplace is also required to provide hearing protection. Residents are accorded no such care by the EIR.

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[3] World Health Organization, Guidelines for Community Noise, p. x and pp. 47-48. The report is available in its entirety online at http://whqlibdoc.who.int/hq/1999/a68672.pdf; *see also*, Maschke C (2003). "Stress Hormone Changes in Persons exposed to Simulated Night Noise". Noise Health 5 (17): 35–45. PMID 12537833, http://www.noiseandhealth.org/article.asp?issn=1463-1741;year=2002;volume=5;issue=17;spage=35;epage=45;aulast=Maschke, incorporated by reference; Franssen EA, van Wiechen CM, Nagelkerke NJ, Lebret E (2004). "Aircraft noise around a large international airport and its impact on general health and medication use". Occup Environ Med 61 (5): 405–13. doi:10.1136/oem.2002.005488. PMID 15090660.

[4] World Health Organization, p. x. and pp. 48-49.

The Attorney General recommends reducing community noise impacts from warehouses by:

- Constructing physical, structural, or vegetative noise barriers on and/or off the project site.
- Planning and enforcing truck routes that avoid passing sensitive receptors.
- Locating or parking all stationary construction equipment as far from sensitive receptors as possible, and directing emitted noise away from sensitive receptors.
- Verifying that construction equipment has properly operating and maintained mufflers.
- Requiring all combustion-powered construction equipment to be surrounded by a noise protection barrier
- Limiting operation hours to daytime hours on weekdays.
- Paving roads where truck traffic is anticipated with low noise asphalt.
- Orienting any public address systems onsite away from sensitive receptors and setting system volume at a level not readily audible past the property line.

O-6-10 cont.

(*Ibid* p. 11.) While the EIR assumes some of these measures in the Project design, the Project contains zero enforceable mitigation measures. The EIR should be revised to incorporate concrete and enforceable noise mitigation to account for its currently undisclosed impacts to adjacent residents.

F. **The DEIR Insufficiently Analyzes and Mitigates Light Pollution Impacts.**

O-6-11

The Project would allow warehouse and industrial uses within 82 feet of homes, 24 hours per day, seven days per week. The City's General Plan requires Projects be designed to minimize light and glare through Action LU-2b. The City's municipal code further requires all lights be designed and installed so that lighting is confined to the site and adjacent properties are protected from glare. (Lake Forest Municipal Code Section 9.72.085.) The EIR includes Threshold 4.1.4, which provides a Project would have an

adverse impact if it would "Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area."

O-6-11 cont.

Unfortunately, the EIR's analysis of cumulative impacts incorrectly claims that a Project must have a significant impact to have a cumulative impact. However, the very reason cumulative impacts analysis is required because the impacts of cumulative development are lost when projects are analyzed individually. This is one of three warehouse projects in close proximity. The EIR fails to address whether the parking lighting, solar panels, security lighting, or other aspects of the combined projects would have an effect with regard to glare.

II. Environmentally Superior Alternatives Are Available and Must Be Adopted.

The City must fully consider alternative land uses that are economically viable and more compatible with nearby residential communities—such as mixed-use developments (e.g., small business + residential condos), business office complexes, research, medical, or clean-tech non-industrial facilities. It is inconceivable that there is not some sort of reduced-intensity alternative that would be feasible on the Project site.

O-6-12

An EIR is intended to identify the adverse environmental impacts of a project, mitigation measures for those impacts, and alternatives that could avoid the impacts altogether. The alternatives section has been identified by the California Supreme Court as the "core" of the EIR (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564), and an adequate EIR must describe a reasonable range of alternatives. (*Laurel Heights Improvement Association v. Regents of the University of California* (1993) 47 Cal.3d 376.) The Guidelines make clear that alternatives must be considered that do not meet all project objectives. The Guidelines say that alternatives should satisfy most of the basic objectives of the project, not all objectives. (Guidelines §15126.6 subd. (a).) In reality, it "is virtually a given that the alternatives to a project will not attain all of the project's objectives." (*Watsonville Pilots Ass'n v. City of Watsonville* (2010) 183 Cal.App.4th 1059, 1087.)

At first glance, the EIR's seven objectives appear relatively broad:

1. Provide a permitted land use that is consistent with the General Plan land use and zoning designation and that helps fulfill the demands of businesses and residents in the City of Lake Forest;
2. Re-envision an existing underutilized office/industrial property to build a new financially and environmentally sustainable building;
3. Re-envision an existing underutilized office/industrial property to provide a building type that is flexible and accommodating to a variety of permitted land uses to extend the useful life of the building;
4. Provide industrial development that is attractive and minimizes conflicts with the surrounding existing land uses;
5. Provide employment opportunities and facilitate job-creation for the residents of Lake Forest and surrounding communities to reduce the need for members of the local workforce to commute outside the area for employment;
6. Redevelop an underutilized site for improvement and enhanced contribution to the City of Lake Forest's fiscal benefits; and
7. Cluster land uses in proximity to other similar industrial/commercial uses and close to access points of the State highway system, such as State Route 241, to reduce traffic congestion on surface streets and reduce local air pollution emissions from vehicle sources

O-6-12 cont.

(DEIR p. 5-2.) In summary, the City seeks to reimagine an underused site in a way that is economically beneficial, provides jobs, and is consistent with City land use plans. Many types of developments would meet these goals, including less-intensive or smaller versions of the same Project.

Even so, the EIR rejects smaller alternatives for failing to meet Project objectives. The Reduced Daily Trip Alternative was rejected from consideration in the EIR because development of smaller buildings would allegedly "yield a very low land coverage that would not justify the relation between land value, building construction costs, and potential revenue, resulting in an unfeasible project." (DEIR p. 5-5.) The EIR provides no evidence supporting this conclusion.

The EIR rejects Alternative 2, continued use of the site as office space, for failing to meet 4 objectives. (DEIR p. 5-21.) However, three of these objectives (2, 3, 6) mean essentially the same thing – "revitalize" the site. Characterizing the Project's objectives such that a failure to reimagine the site triggers failure of half of the objectives violates CEQA. It is impermissible for the lead agency to frame the alternatives considered in the EIR too narrowly, and thereby slant the analysis in favor of the proposed project. (*We Advocate Through Environmental Review v. County of Siskiyou* (2022) 78 Cal.App.5th 683, 692 ("WATER") ["If the principal project objective is simply pursuing the proposed project, then no alternative other than the proposed project would do"]; see, also, *In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1163 ["a lead agency may not give a project's purpose an artificially narrow definition."].) Such limitations on alternatives deprive the public of adequate information, and prejudice informed decision making. (*WATER, supra*, 78 Cal.App.5th at 693.)

O-6-12 cont.

Finally, the EIR rejects the Reduced Project Alternative. This alternative proposes a 25% smaller version of the Project that would entail a new, 35-ft-tall, 124,352.25 square-foot tilt-up concrete industrial building with 7,500 square feet of office space, 48,750 square feet of manufacturing space, and 68,102.25 square feet of warehouse space. (DEIR p. 5-21 and 5-22.) The EIR admits this alternative would reduce impacts related to aesthetics, air quality, energy, utilities and service systems, and noise. (DEIR p. 5-30.) It would be the environmentally superior alternative. DEIR p. 5-32.) The EIR also admits this alternative would meet all 7 objectives, even if to a slightly lesser degree than the preferred Project. (DEIR p. 5-31.) However, based on its failure to perfectly achieve the applicant's goals, it is not presented as the preferred Alternative.

CEQA requires a robust alternatives analysis with of a range of reasonable less impactful alternatives. (Guidelines, §15126.6, subd. (a).) "Meaningful analysis of alternatives in an EIR requires an analysis of meaningful alternatives." (*Save Our Capitol!*, *supra*, 87 Cal.App.5th at p. 704.) The purpose of an EIR "is not to identify alleged alternatives that meet few if any of the project's objectives so that these alleged alternatives may be readily eliminated.... [T]he key to the selection of the range of alternatives is to identify alternatives that meet most of the project's objectives but have a reduced level of environmental impacts." (*Watsonville Pilots Assn. v. City of Watsonville*

(2010) 183 Cal.App.4th 1059, 1089.) The range of alternatives analyzed must include a no project alternative.

O-6-12 cont.

Because feasible, environmentally superior alternatives exist in the form of Alternative 3, the Project may not be approved as proposed. (Pub. Resources Code § 21081; *City of Marina v. Board of Trustees of the California State University* (2006) 39 Cal. 4th 341, 368.)

III. CEQA Prohibits Approval of the Proposed Project Because the City Cannot Support Findings Required for a Statement of Overriding Considerations.

CEQA prohibits approval of projects with significant adverse environmental impacts such as the proposed Project if there are feasible alternatives or mitigation measures that would reduce or eliminate those impacts. (Pub. Resources Code § 21002; Guidelines § 15021(a)(2).) When an agency seeks to approve a project despite its significant unmitigated impacts on the environment, the agency must adopt a statement of overriding considerations. (Pub. Resources Code § 21081.) A statement of overriding considerations must include two specific findings, supported by substantial evidence. The first finding that must be made is that "There is no feasible way to lessen or avoid the significant effect..." of the project. (Guidelines §§ 15043, 15093(b).) The second finding is that the project's benefits outweigh its significant adverse environmental impacts. (Guidelines § 15093(a).) These findings must both be supported by substantial evidence. (Guidelines § 15093(a)-(b).)

O-6-13

"CEQA does not authorize an agency to proceed with a project that will have significant, unmitigated effects on the environment…unless the measures necessary to mitigate those effects are *truly* infeasible." (*City of Marina v. Board of Trustees of the California State University* (2006) 39 Cal. 4th 341, 368 ("*City of Marina*") emphasis added.) "[I]f the project can be economically successful with mitigation, then CEQA requires that mitigation…" (*Uphold our Heritage v. Town of Woodside* (2007) 147 Cal. App. 4th at 600.)

CEQA requires there be substantial evidence in the record to support the claimed benefits of the Project that justify proceeding with a project notwithstanding its adverse impacts. (Public Resources Code § 21081; CEQA Guidelines § 15093(b).) "[A]n

agency's unsupported claim that the project will confer general benefits" is insufficient to override a project's significant impacts. (*Woodward Park Homeowners Ass'n, Inc. v. City of Fresno* (2007) 149 Cal.App.4th 892, 717.)

O-6-13 cont.

Rejecting alternatives and mitigation measures and substantiating project benefits requires justification to comply with CEQA (Guidelines § 15091(b)) and provide a basis for a Statement of Overriding Considerations. (Guidelines § 15093(b).) A project alternative may be rejected on the basis of legal infeasibility, but the City must make a finding supported by substantial evidence that such an alternative is legally infeasible. Since Alternative 3 is legally feasible, the City cannot make the findings required to reject its adoption.

Approval of the Project, as proposed, would violate CEQA.

IV. Conclusion.

O-6-14

We urge the City to reject the current DEIR and require a comprehensive revision that addresses cumulative impacts and feasible and enforceable mitigation measures that address the industrial Project's proximity to neighborhoods. The City must fully consider alternative land uses that are both economically viable and compatible with nearby residential communities—such as mixed-use developments (e.g., small business + residential condos), business office complexes, research, medical, or clean-tech non-industrial facilities. The City should prioritize community engagement and the long-term well-being of residents over short-term industrial gains, as envisioned in its 2040 General Plan.

Sincerely,

Michelle Black
Douglas P. Carstens

Attachments

1. Expert Comments of Ray Kapahi, Environmental Permitting Specialists, dated September 10, 2025
2. Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act, California Department of Justice, September 2022, accessed at https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf
3. Expert Comments of Traffic Engineer, Tom Brohard, dated September 4, 2025
4. CARB, Air Quality and Land Use Handbook: A Community Health Perspective, accessed at https://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf
5. CARB, Concept Paper for the Freight Handbook (December 2019), accessed at https://ww2.arb.ca.gov/sites/default/files/2020-03/2019.12.12%20-%20Concept%20Paper%20for%20the%20Freight%20Handbook_1.pdf

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ENVIRONMENTAL PERMITTING SPECIALISTS
Air Quality • Permitting • OHSA • RMP/PSM

TECHNICAL MEMORANDUM

To: Doug Carstens
Carstens, Black & Minteer, LLP

Date: September 10, 2025

From: Ray Kapahi RK
Tel: 916.806.8333
E-Mail: ray.kapahi@gmail.com

Subject: Review of Air Quality Impacts from proposed IPT Enterprise Business Center, LLC
City of Lake Forest, California

INTRODUCTION AND SUMMARY

Environmental Permitting Specialists (EPS) has reviewed the Draft Environmental Impact Report (DEIR) for the proposed IPT Enterprise Business Center LLC (Project) in Lake Forest (Orange County), California. The proposed project would involve demolition of office and industrial buildings and redevelopment of a 165,803 square feet industrial building.

The project is located at 26200 Enterprise Way in the north-central part of Lake Forest. (Figures 1 and 2). The site is assessable by State Route 241 which is located approximately 0.7 mile North of the project location and Interstate 5 which is located 3.75 miles Southwest of the project location.

The focus of our review was impacts from release of various air pollutants. Specifically, Section 4.3 (Air Quality) of the DEIR was reviewed. Impacts from both the construction and operational (occupancy) phases were reviewed and analyzed.

EPS review identified several deficiencies in the DEIR. These are noted on the following pages.

1. **Not All Thresholds of Significance Were Identified**

   Section 4.3.3.2 of the DEIR identified various air pollutants, their sources and their health effects. The section also identified state and federal ambient air quality standards (AAQS) and the prevailing air quality as measured at nearby air quality monitoring stations.

   The DEIR failed to recognize that the concentrations of various air pollutants that appear in the AAQS also represent thresholds of significance. The concentration of various air pollutants in Table 4.3.B defines what we mean by clean or unhealthy air and therefore, project emissions need to be evaluated to identify potential violations of the AAQS that appear in this table.

   This omission also appears in the SCAQMD CEQA Guidelines. In their April 18, 2024 Notice of Preparation the District references the Thresholds of Significance in the Guidelines, but these Guidelines omit the fact that the AAQS also represent a threshold of significance.

2. **Peak Construction Emissions not Evaluated**

   The DEIR failed to quantify peak (1-hour) construction emissions. Many air pollutants, such as NOx, SO_2 and CO have 1-hour AAQS. Without adequately determining peak construction emissions, it is not possible to determine maximum hourly impacts from these pollutants during the construction or operational phases.

3. **Impacts from Secondary Pollutant Formation Ignored**

   The DEIR failed to evaluate the formation of secondary pollutants from the conversion of NOx and VOC into PM2.5. The amount of PM2.5 formed through secondary conversion of NOx can range from 4% to 34% and 11% to 41% through secondary conversion of volatile organic compounds (VOCs).

4. **Violation of Air Quality Standard for NOx During Construction**

   The project would violate the 1-hour NOx standards during the construction phase. This is a critical oversight as the Orange County has been designated as "Extreme" non-attainment for the 8-hour ozone (smog) standard. The NOx violations directly impact the ozone concentration.

5. **Unsupported Conclusions Related to Impacts**

   The DEIR identified Threshold 4.3.1 that states the project would not conflict with or obstruct implementation of the applicable air quality plan. How can this be possible then the project will create new violations of 1-hour NOx standard that directly exacerbated the regions ozone concentration. Similarly, Threshold 4.3.3 asserts that the project would not expose any sensitive receptors to substantial pollutant concentrations when such concentrations were never quantified.

Since CEQA requires complete and full disclosure (Sierra Club v. County of Fresno (Friant Ranch LP) (2018) 6 Cal. 5th 502, 514-515) of all impacts, the above issues are critical omissions. These issues are discussed in this Memorandum.

NOT ALL THRESHOLDS OF SIGNIFICANCE IDENTIFIED

The DEIR identified (Section 4.3.3) the various air pollutants, their sources and their health effects. The section also identifies state and federal ambient air quality standards (AAQS) and the prevailing air quality as measured at nearby air quality monitoring stations.

The DEIR failed to recognize that the concentrations of various air pollutants that appear in the AAQS also represent thresholds of significance. The concentration of various air pollutants in Table 4.3.B defines what we mean by clean or unhealthy air. These standards are based on health studies and are designed to protect the most vulnerable segment of the population.

Periodically, these standards are reviewed in light of new information and are revised accordingly. For example, the ozone standard was originally set to 0.08 parts per million (ppm) in 1971 was revised to 0.12 in 1979 and then revised to 0.075 ppm in 2008 and then revised again to 0.07 ppm in 2015. These changes reflect new data on health impacts to the population from exposure to ozone.

The DEIR quantified the emission rates of several air pollutants listed in Table 4.3-B; however, it failed to translate these emissions to concentrations. Specifically, Table 4.3-J, 4.3-K and 4.3-O summarize the daily emission rate in pounds per day for both the construction and operational phases. However, these emission rates were not translated into concentrations. The harm to the public is from exposure to concentrations (parts per million, micrograms per cubic meter) that is related to emission rates but also is related to other factors discussed later in this Memorandum.

PEAK CONSTRUCTION EMISSIONS NOT EVALUATE

The DEIR failed to quantify peak (1-hour) construction emissions. Many air pollutants, such as NOx and CO have 1-hour AAQS. Without adequately determining peak construction emissions, it is not possible to determine NOx, SO_2 and CO impacts during the construction phase. Since the project involves demolition of existing buildings, peak hourly emissions are likely to be significant.

The DEIR provided daily emissions (lbs/day) in Tables 4.3-J, 4.3-K and 4.3.O. However, peak one-hour emissions were not calculated. Without this information, it is not possible to determine short-term impacts.

IMPACTS FROM SECONDARY POLLUTANT FORMATION

The DEIR failed to evaluate the formation of secondary pollutants from the conversion of NOx and VOC into PM2.5[1]. The amount of PM2.5 formed through secondary conversion of NOx can range from 4% to 34% and 11% to 41% through secondary conversion of VOCs.

[1] USEPA: MACTEC Evaluating the Contribution of PM2.5 Precursor Gases. Available at: https://www3.epa.gov/ttnchie1/conference/ei13/mobile/hodan.pdf

The omission of secondary pollutants is a critical omission since the South Coast Region is designated as "Extreme" non-attainment[2] for ozone and non-attainment for PM2.5.

VIOLATION OF 1-HOUR NOx STANDARDS DURING CONSTRUCTION

EPS analysis determined that NOx emissions during the construction phase as reported in Table 4.3.O (84.3 lbs/day or 10.54 lbs/hr over an 8-hour workday) would violate the federal and state 1-hour ambient air quality standards. The EPS analysis shows that maximum project level 1-hour NOx impacts would be 1,500 ug/m3. This is more than 8 times the federal standard. See Table 1.

When added to existing background concentration the cumulative 1-hour NOx impacts is estimated to equal 1,596 ug/m3.

The fact that both project level and cumulative impacts are significant is especially troubling as the region has been classified as "Extreme" non-attainment for the 8-hour ozone standard. NOx emissions are a precursor to regional ozone formation. High concentrations of ozone lead to increased levels of asthma and other respiratory diseases. The very young and the elderly are most at risk from exposure to these air pollutants.

Table 1

	Project Level and Cumulative Air Quality Concentrations Caused by Project Emissions			
	Background (2023)	Project Level	Cumulative	Standard
1-Hr NOx (NO_2)	96 ug/m3 (0.051 ppm)	1,500 ug/m3	1,596 ug/m^3	State 339 ug/m^3 Federal 188 ug/m^3

Background NOx data from DEIR Table 4.3.D

Threshold 4.3.1 in Section 4.3.3 asserted that the project would not conflict with or obstruct implementation of the applicable air quality plan. How can this be possible when the project creates new violations of the 1-hour NOx standards.

Threshold 4.3.3 presented in Section 4.3.6 of the DEIR concludes that the project would not expose sensitive receptors to substantial pollutant concentrations These conclusions are not substantiated since the project level NOx concentrations were never calculated in the DEIR.

Methodology for Calculating 1-Hour NOx Impacts

EPS used the following methodology to determine the concentrations of 1-hour NOx based on the reported construction emissions. Electronic copies of the modeling files are attached.

[2] Information available at:. https://ww2.arb.ca.gov/capp/cst/tch/ambient-air-quality-standards-designation-tool

Dispersion Model and Model Options Used
AERMOD Version 24142 was used. The following options were used:

- Use of Flat and Terrain
- Use of Urban
- No Exponential Decay

Modeling Grid and Coordinate System
NOx concentrations were calculated using a rectangular (x-y) Cartesian coordinate system. A region 1,975 meters x 1,975 meters was used. The modeling region divided into 25 meter square cells for a total of 6,400 individual receptors in the vicinity of the project area. See Figure 4 for a layout of the modeling grid.

Meteorological Data
5 years (2017-2021) of hourly meteorological data from Mission Viejo as processes by the South Coast Air Quality Management District (SCAQMD) were used. The station elevation as 168 meters.

Construction Emissions
Maximum daily emissions of NOx reported in Table 4.3.O the DEIR (84.3 pounds per day or 10.5 pounds per hour over an eight-hour day. Since peak hourly emissions were not calculated in the DEIR, the actual hourly NOx emissions are likely higher than 10.5 lbs/hr.

RESULTS
The results of this analysis indicate that NOx emissions during the construction phase of the Project would result in ambient concentrations that would violate both the Federal and California's 1-hour ambient air quality standard for NOx emissions. These findings are summarized in Table 1.

Table 2
Summary of Project Level NOx Impacts

Pollutant	Maximum Construction Related Impact (ug/m3)	State or Federal Ambient Air Quality Standard[3] (ug/m3)
NOx (1-hour)	1,500	Federal: 188 State: 339

The spatial distribution of NOx is provided in Figures 5 and 6. Area within the contour marked "188" exceed the federal 1-hour NOx standard. These results indicate that the construction phase of this project would lead to significant NOx related air quality impacts, which have not been disclosed in the DEIR. This is a critical omission as the Orange County suffers from the

[3] Copy of ambient air quality standards available at: https://ww2.arb.ca.gov/sites/default/files/2020-07/aaqs2.pdf, incorporated herein by this reference. The City should print out and include with this letter this referenced material.

worst air quality in the Country. NOx emissions are one of the main precursors that cause ozone (smog). Electronic copies of the modeling files are attached to verify EPS modeling results.

CONCLUSIONS

EPS review has identified numerous deficiencies and omissions related to air quality impacts associated with the proposed project. These are summarized below:

1. Not all thresholds were included in the DEIR. Had this been done, significant impacts would have been identified.
2. Peak construction emissions were not evaluated
3. Impacts from secondary pollutants from conversion of NOx and VOCs into fine particulate were not calculated
4. Violation of the federal and state 1-hour NOx standard
5. Unsupported conclusions on the severity of the air quality impacts

Figures

and

Attachments

Figure 1

Project Location

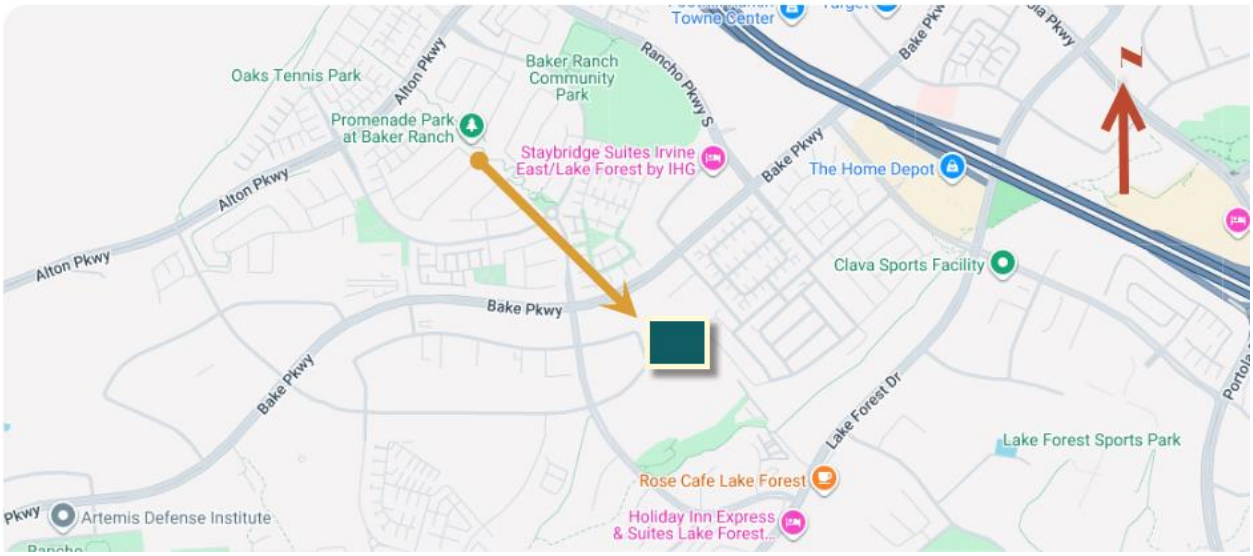


Figure 2

Project Site Map

Source: IPT Enterprise Business Center LLC Project DEIR (July 2025)



Figure 3

Source Location

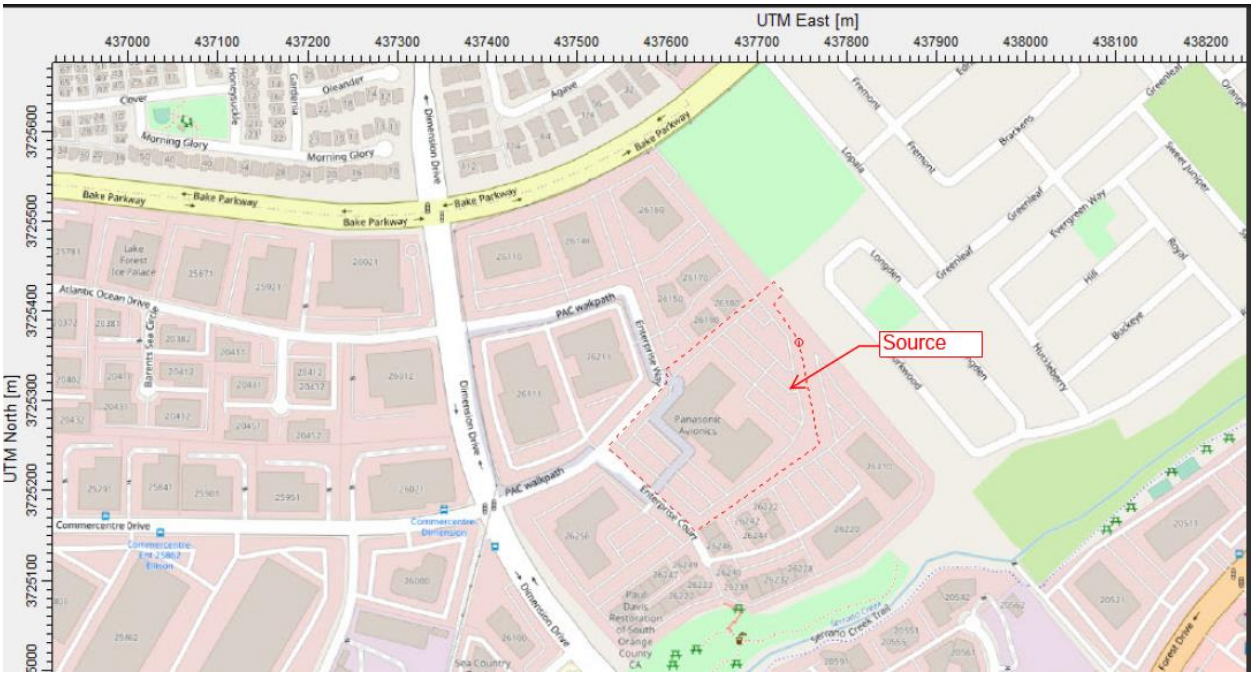
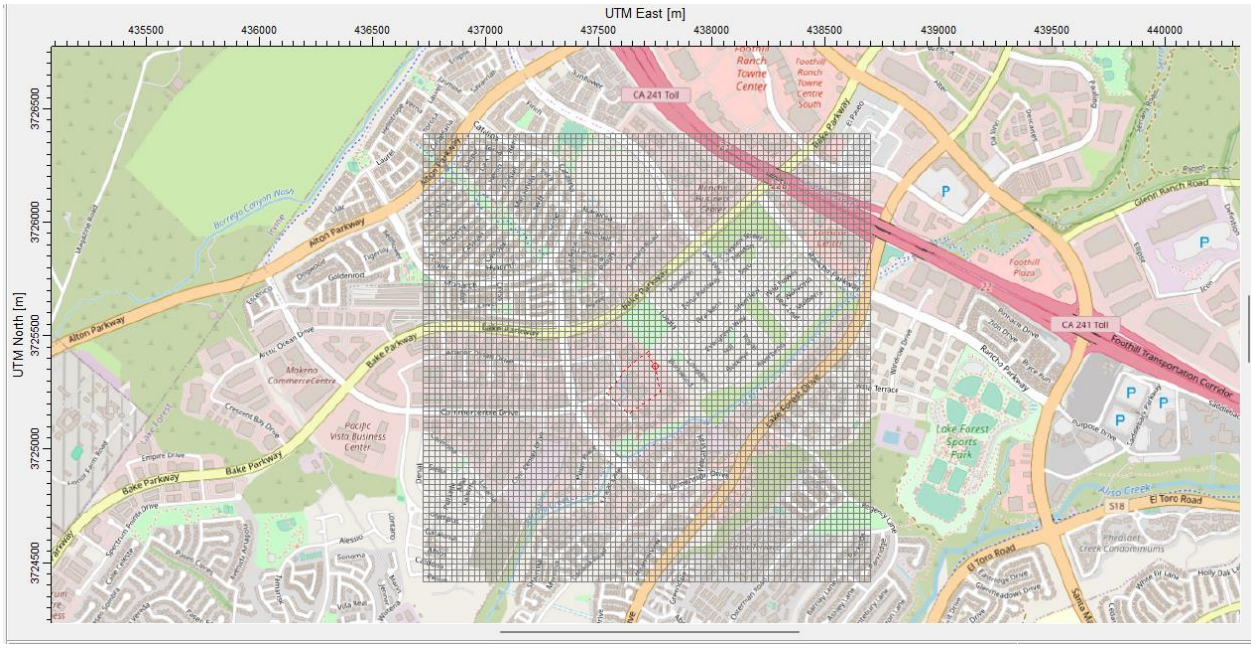


Figure 4

Layout of Modeling Grid

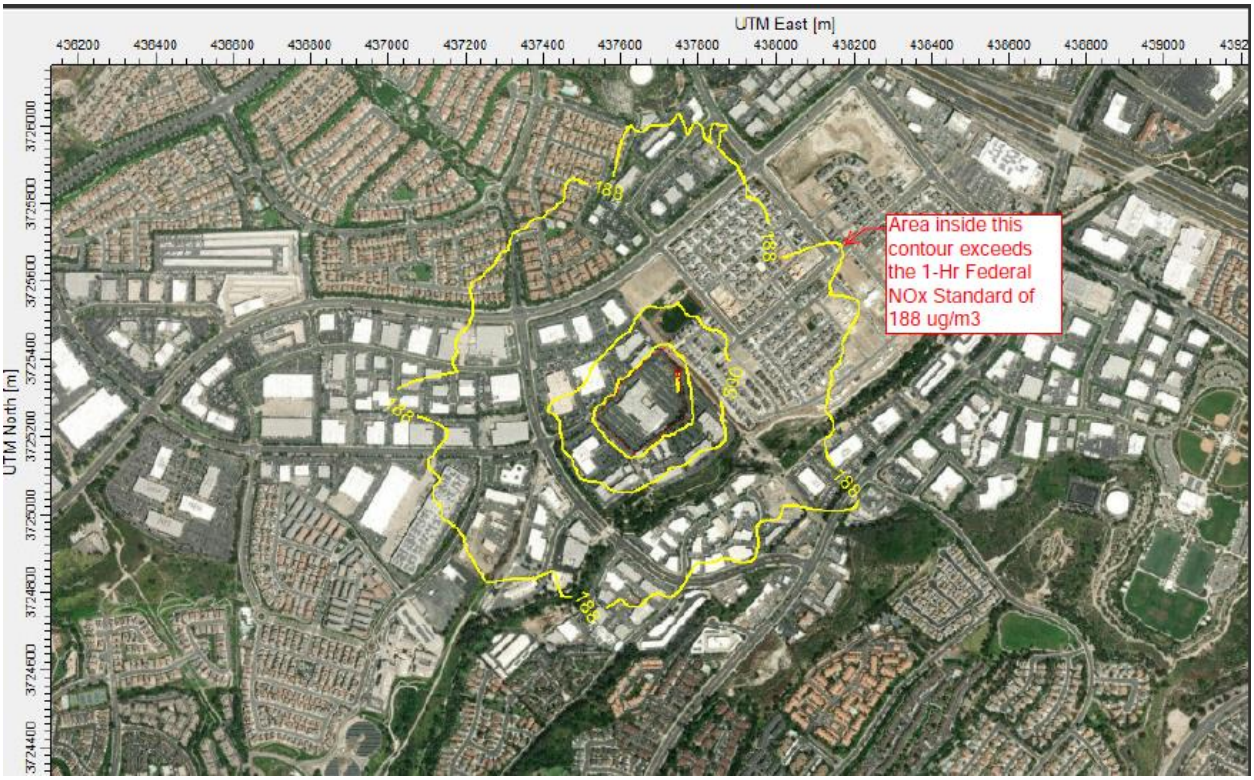


Note: Each square is 25 meters x 25 meters

Figure 5

Spatial Distribution of 1-Hour NOx Concentration

(micrograms per cubic meter)



Note: Area inside the contour labeled "188" exceeds the federal 1-hour NOx standard

Only concentrations outside the project site are subject to ambient air quality standards

Figure 6

1 Hour NOx Concentration Close-Up of Numerical Values

(in micrograms per cubic meter)



Note: Only concentrations outside the project site are subject to ambient air quality standards

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ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE

Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act

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In carrying out its duty to enforce laws across California, the California Attorney General's Bureau of Environmental Justice (Bureau)[1] regularly reviews proposed warehouse projects for compliance with the California Environmental Quality Act (CEQA) and other laws. When necessary, the Bureau submits comment letters to lead agencies regarding warehouse projects, and in rare cases the Bureau has filed litigation to enforce CEQA.[2] This document builds upon the Bureau's work on warehouse projects, collecting information gained from the Bureau's review of hundreds of warehouse projects across the state.[3] It is meant to help lead agencies pursue CEQA compliance and promote environmentally-just development as they confront warehouse project proposals.[4] While CEQA analysis is necessarily project-specific, this document provides information on feasible best practices and mitigation measures, nearly all of which have been adapted from actual warehouse projects in California.

I. Background

In recent years, the proliferation of e-commerce and rising consumer expectations of rapid shipping have contributed to a boom in warehouse development.[5] California, with its ports, population centers, and transportation network, has found itself at the center of this trend. In 2020, the Ports of Los Angeles, Long Beach, and Oakland collectively accounted for over 34% of all United States international container trade.[6] The Ports of Los Angeles and Long Beach alone generate about 35,000 container truck trips every day.[7] Accordingly, the South Coast Air Basin now contains approximately 3,000 warehouses of over 100,000 square feet each, with a total warehouse capacity of approximately 700 million square feet, an increase of 20 percent over the last five years.[8] This trend has only accelerated, with e-commerce growing to

[1] https://oag.ca.gov/environment/justice.
[2] https://oag.ca.gov/environment/ceqa; *People of the State of California v. City of Fontana* (Super. Ct. San Bernardino County, No. CIVSB2121829); *South Central Neighbors United et al. v. City of Fresno et al.* (Super. Ct. Fresno County, No. 18CECG00690).
[3] This September 2022 version revises and replaces the prior March 2021 version of this document.
[4] Anyone reviewing this document to determine CEQA compliance responsibilities should consult their own attorney for legal advice.
[5] As used in this document, "warehouse" or "logistics facility" is defined as a facility consisting of one or more buildings that stores cargo, goods, or products on a short- or long-term basis for later distribution to businesses and/or retail customers.
[6] Data from the Bureau of Transportation Statistics, Container TEUs (Twenty-foot Equivalent Units) (2020), https://data.bts.gov/stories/s/Container-TEU/x3fb-aeda/ (Ports of Los Angeles, Long Beach, and Oakland combined for 14.157 million TEUs, 34% of 41.24 million TEUs total nationwide) (last accessed September 18, 2022).
[7] U.S. Dept. of Transportation, Federal Highway Administration, *FHWA Operations Support – Port Peak Pricing Program Evaluation* (2020), available at https://ops.fhwa.dot.gov/publications/fhwahop09014/sect2.htm (last accessed September 18, 2022).
[8] South Coast Air Qual. Mgmt. Dist., *Final Socioeconomic Assessment for Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program and Proposed Rule 316 – Fees for Rule 2305*, at 7-8, 41 (May 2021).

13% of all retail sales and 2021 being a second consecutive record year for new warehouse space leased.[9] The latest data and forecasts predict that the next wave of warehouse development will be in the Central Valley.[10]

When done properly, these activities can contribute to the economy and consumer welfare. However, imprudent warehouse development can harm local communities and the environment. Among other pollutants, diesel trucks visiting warehouses emit nitrogen oxide (NO_x)—a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation—and diesel particulate matter (a subset of fine particular matter that is smaller than 2.5 micrometers)—a contributor to cancer, heart disease, respiratory illnesses, and premature death.[11] Trucks and on-site loading activities can also be loud, bringing disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure.[12] The hundreds, and sometimes thousands, of daily truck and passenger car trips that warehouses generate contribute to traffic jams, deterioration of road surfaces, and traffic accidents.

These environmental impacts also tend to be concentrated in neighborhoods already suffering from disproportionate health impacts and systemic vulnerability. For example, a comprehensive study by the South Coast Air Quality Management District found that communities located near large warehouses scored far higher on California's environmental justice screening tool, which measures overall pollution and demographic vulnerability.[13] That

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[9] U.S. Census Bureau News, Quarterly Retail E-Commerce Sales 4th Quarter 2021 (February 22, 2022), https://www.census.gov/retail/mrts/www/data/pdf/ec_current.pdf (last accessed September 18, 2022); CBRE Research, *2022 North America Industrial Big Box Report: Review and Outlook*, at 2-3 (March 2022), *available at* https://www.cbre.com/insights/reports/2022-north-america-industrial-big-box#download-report (last accessed September 18, 2022).

[10] CBRE Research, *supra note* 9, at 4, 36; New York Times, *Warehouses Are Headed to the Central Valley, Too* (Jul. 22, 2020), *available* at https://www.nytimes.com/2020/07/22/us/coronavirus-ca-warehouse-workers.html.

[11] California Air Resources Board, Nitrogen Dioxide & Health, https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health (last accessed September 18, 2022) (NOx); California Air Resources Board, Summary: Diesel Particular Matter Health Impacts, https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts (last accessed September 18, 2022); Office of Environmental Health Hazard Assessment and American Lung Association of California, Health Effects of Diesel Exhaust, https://oehha.ca.gov/media/downloads/calenviroscreen/indicators/diesel4-02.pdf (last accessed September 18, 2022) (DPM).

[12] Noise Sources and Their Effects, https://www.chem.purdue.edu/chemsafety/Training/PPETrain/dblevels.htm (last accessed September 18, 2022) (a diesel truck moving 40 miles per hour, 50 feet away, produces 84 decibels of sound).

[13] South Coast Air Quality Management District, "Final Socioeconomic Assessment for Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program and Proposed Rule 316 – Fees for Rule 2305" (May 2021), at 4-5.

study concluded that, compared to the South Coast Air Basin averages, communities in the South Coast Air Basin near large warehouses had a substantially higher proportion of people of color; were exposed to more diesel particulate matter; had higher rates of asthma, cardiovascular disease, and low birth weights; and had higher poverty and unemployment rates.[14] Each area has its own unique history, but many of these impacts and vulnerabilities reflect historic redlining practices in these communities, which devalued land and concentrated poverty, racial outgroups, and pollution into designated areas.[15]

II. Proactive Planning: General Plans, Local Ordinances, and Good Neighbor Policies

To systematically guide warehouse development, we encourage local governing bodies to proactively plan for logistics projects in their jurisdictions. Proactive planning allows jurisdictions to prevent land use conflicts before they materialize and direct sustainable development. Benefits also include providing a predictable business environment, protecting residents from environmental harm, and setting consistent expectations jurisdiction-wide.

Proactive planning can take many forms. Land use designation and zoning decisions should channel development into appropriate areas. For example, establishing industrial districts near major highway and rail corridors but away from sensitive receptors[16] can help attract investment while avoiding conflicts between warehouse facilities and residential communities. Transition zones with lighter industrial and commercial land uses may also help minimize conflicts between residential and industrial uses.

In addition, general plan policies, local ordinances, and good neighbor policies should set minimum standards for logistics projects. General plan policies can be incorporated into existing economic development, land use, circulation, or other related general plan elements. Many jurisdictions alternatively choose to consolidate policies in a separate environmental justice element. Adopting general plan policies to guide warehouse development may also help

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[14] *Id*. at 5-7.

[15] Beginning in the 1930s, federal housing policy directed investment away from Black, immigrant, and working-class communities by color-coding neighborhoods according to the purported "riskiness" of loaning to their residents. In California cities where such "redlining" maps were drawn, nearly all of the communities where warehouses are now concentrated were formerly coded "red," signifying the least desirable areas where investment was to be avoided. *See* University of Richmond Digital Scholarship Lab, Mapping Inequality, https://dsl.richmond.edu/panorama/redlining/#loc=12/33.748/-118.272&city=los-angeles-ca (Los Angeles), https://dsl.richmond.edu/panorama/redlining/#loc=13/32.685/-117.132&city=san-diego-ca (San Diego), https://dsl.richmond.edu/panorama/redlining/#loc=11/37.81/-122.38&city=oakland-ca (Oakland), https://dsl.richmond.edu/panorama/redlining/#loc=13/37.956/-121.326&city=stockton-ca (Stockton), https://dsl.richmond.edu/panorama/redlining/#loc=12/36.751/-119.86&city=fresno-ca (Fresno) (all last accessed September 18, 2022).

[16] In this document, "sensitive receptors" refers to residences, schools, public recreation facilities, health care facilities, places of worship, daycare facilities, community centers, or incarceration facilities.

jurisdictions comply with their obligations under SB 1000, which requires local government general plans to identify objectives and policies to reduce health risks in disadvantaged communities, promote civil engagement in the public decision making process, and prioritize improvements and programs that address the needs of disadvantaged communities.[17]

Local ordinances and good neighbor policies that set development standards for all warehouses in the jurisdiction are a critical and increasingly common tool that serve several goals. When well-designed, these ordinances direct investment to local improvements, provide predictability for developers, conserve government resources by streamlining project review processes, and reduce the environmental impacts of industrial development. While many jurisdictions have adopted warehouse-specific development standards, an ordinance in the City of Fontana provides an example to review and build upon.[18] Good neighbor policies in Riverside County and by the Western Riverside Council of Government include additional measures worth consideration.[19]

The Bureau encourages jurisdictions to adopt their own local ordinances that combine the strongest policies from those models with measures discussed in the remainder of this document.

III. Community Engagement

Early and consistent community engagement is central to establishing good relationships between communities, lead agencies, and warehouse developers and tenants. Robust community engagement can give lead agencies access to community residents' on-the-ground knowledge and information about their concerns, build community support for projects, and develop creative solutions to ensure new logistics facilities are mutually beneficial. Examples of best practices for community engagement include:

- Holding a series of community meetings at times and locations convenient to members of the affected community and incorporating suggestions into the project design.
- Posting information in hard copy in public gathering spaces and on a website about the project. The information should include a complete, accurate project description, maps and drawings of the project design, and information about how the public can provide input and be involved in the project approval process. The

[17] For more information about SB 1000, *see* https://oag.ca.gov/environment/sb1000.
[18] https://oag.ca.gov/system/files/attachments/press-docs/Final%20Signed%20Fontana%20Ordinance.pdf (last accessed September 18, 2022).
[19] For example, the Riverside County policy requires community benefits agreements and supplemental funding contributions toward additional pollution offsets, and the Western Riverside Council of Governments policy sets a minimum buffer zone of 300 meters between warehouses and sensitive receptors. https://www.rivcocob.org/wp-content/uploads/2020/01/Good-Neighbor-Policy-F-3-Final-Adopted.pdf (last accessed September 18, 2022) (Riverside County); http://www.wrcog.cog.ca.us/DocumentCenter/View/318/Good-Neighbor-Guidelines-for-Siting-Warehouse-Distribution-Facilities-PDF?bidId= (last accessed September 18, 2022) (Western Riverside Council of Governments).

information should be in a format that is easy to navigate and understand for members of the affected community.

- Providing notice by mail to residents and schools within a certain radius of the project and along transportation corridors to be used by vehicles visiting the project, and by posting a prominent sign on the project site. The notice should include a brief project description and directions for accessing complete information about the project and for providing input on the project.
- Providing translation or interpretation in residents' native language, where appropriate.
- For public meetings broadcast online or otherwise held remotely, providing for access and public comment by telephone and supplying instructions for access and public comment with ample lead time prior to the meeting.
- Partnering with local community-based organizations to solicit feedback, leverage local networks, co-host meetings, and build support.
- Considering adoption of a community benefits agreement, negotiated with input from affected residents and businesses, by which the developer provides benefits to the affected community.
- Creating a community advisory board made up of local residents to review and provide feedback on project proposals in early planning stages.
- Identifying a person to act as a community liaison concerning on-site construction activity and operations, and providing contact information for the community liaison to the surrounding community.
- Requiring signage in public view at warehouse facilities with contact information for a local designated representative for the facility operator who can receive community complaints, and requiring any complaints to be answered by the facility operator within 48 hours of receipt.

IV. Warehouse Siting and Design Considerations

The most important consideration when planning a logistics facility is its location. Warehouses located in residential neighborhoods or near sensitive receptors expose community residents and those using or visiting sensitive receptor sites to the air pollution, noise, traffic, and other environmental impacts they generate. Therefore, placing facilities away from sensitive receptors significantly reduces their environmental and quality of life harms on local communities. The suggested best practices for siting and design of warehouse facilities does not relieve lead agencies' responsibility under CEQA to conduct a project-specific analysis of the project's impacts and evaluation of feasible mitigation measures and alternatives; lead agencies' incorporation of the best practices must be part of the impact, mitigation and alternatives analyses to meet the requirements of CEQA. Examples of best practices when siting and designing warehouse facilities include:

- Per California Air Resources Board (CARB) guidance, siting warehouse facilities so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive receptors.[20]
- Providing adequate amounts of on-site parking to prevent trucks and other vehicles from parking or idling on public streets and to reduce demand for off-site truck yards.
- Establishing setbacks from the property line of the nearest sensitive receptor to warehouse dock doors, loading areas, and truck drive aisles, and locating warehouse dock doors, loading areas, and truck drive aisles on the opposite side of the building from the nearest sensitive receptors—e.g., placing dock doors on the north side of the facility if sensitive receptors are near the south side of the facility.
- Placing facility entry and exit points from the public street away from sensitive receptors—e.g., placing these points on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Ensuring heavy duty trucks abide by the on-site circulation plans by constructing physical barriers to block those trucks from using areas of the project site restricted to light duty vehicles or emergency vehicles only.
- Preventing truck queuing spillover onto surrounding streets by positioning entry gates after a minimum of 140 feet of space for queuing, and increasing the distance by 70 feet for every 20 loading docks beyond 50 docks.
- Locating facility entry and exit points on streets of higher commercial classification that are designed to accommodate heavy duty truck usage.
- Screening the warehouse site perimeter and onsite areas with significant truck traffic (e.g., dock doors and drive aisles) by creating physical, structural, and/or vegetative buffers that prevent or substantially reduce pollutant and noise dispersion from the facility to sensitive receptors.
- Planting exclusively 36-inch box evergreen trees to ensure faster maturity and four-season foliage.
- Requiring all property owners and successors in interest to maintain onsite trees and vegetation for the duration of ownership, including replacing any dead or unhealthy trees and vegetation.
- Posting signs clearly showing the designated entry and exit points from the public street for trucks and service vehicles.
- Including signs and drive aisle pavement markings that clearly identify onsite circulation patterns to minimize unnecessary onsite vehicle travel.
- Posting signs indicating that all parking and maintenance of trucks must be conducted within designated on-site areas and not within the surrounding community or public streets.

[20] CARB, Air Quality and Land Use Handbook: A Community Health Perspective (April 2005), at ES-1. CARB staff has released draft updates to this siting and design guidance which suggests a greater distance may be warranted in some scenarios. CARB, Concept Paper for the Freight Handbook (December 2019), *available at* https://ww2.arb.ca.gov/sites/default/files/2020-03/2019.12.12%20-%20Concept%20Paper%20for%20the%20Freight%20Handbook_1.pdf (last accessed September 18, 2022).

V. Air Quality and Greenhouse Gas Emissions Analysis and Mitigation

Emissions of air pollutants and greenhouse gases are often among the most substantial environmental impacts from new warehouse facilities. CEQA compliance demands a proper accounting of the full air quality and greenhouse gas impacts of logistics facilities and adoption of all feasible mitigation of significant impacts. Although efforts by CARB and other authorities to regulate the heavy-duty truck and off-road diesel fleets have made excellent progress in reducing the air quality impacts of logistics facilities, the opportunity remains for local jurisdictions to further mitigate these impacts at the project level. Lead agencies and developers should also consider designing projects with their long-term viability in mind. Constructing the necessary infrastructure to prepare for the zero-emission future of goods movement not only reduces a facility's emissions and local impact now, but it can also save money as demand for zero-emission infrastructure grows. In planning new logistics facilities, the Bureau strongly encourages developers to consider the local, statewide, and global impacts of their projects' emissions.

Examples of best practices when studying air quality and greenhouse gas impacts include:

- Fully analyzing all reasonably foreseeable project impacts, including cumulative impacts. In general, new warehouse developments are not ministerial under CEQA because they involve public officials' personal judgment as to the wisdom or manner of carrying out the project, even when warehouses are permitted by a site's applicable zoning and/or general plan land use designation.[21]
- When analyzing cumulative impacts, thoroughly considering the project's incremental impact in combination with past, present, and reasonably foreseeable future projects, even if the project's individual impacts alone do not exceed the applicable significance thresholds.
- Preparing a quantitative air quality study in accordance with local air district guidelines.
- Preparing a quantitative health risk assessment in accordance with California Office of Environmental Health Hazard Assessment and local air district guidelines.
- Refraining from labeling compliance with CARB or air district regulations as a mitigation measure—compliance with applicable regulations is required regardless of CEQA.
- Disclosing air pollution from the entire expected length of truck trips. CEQA requires full public disclosure of a project's anticipated truck trips, which entails calculating truck trip length based on likely truck trip destinations, rather than the distance from the facility to the edge of the air basin, local jurisdiction, or other truncated endpoint. All air pollution associated with the project must be considered, regardless of where those impacts occur.

[21] CEQA Guidelines § 15369.

- Accounting for all reasonably foreseeable greenhouse gas emissions from the project, without discounting projected emissions based on participation in California's Cap-and-Trade Program.

Examples of measures to mitigate air quality and greenhouse gas impacts from construction are below. To ensure mitigation measures are enforceable and effective, they should be imposed as permit conditions on the project where applicable.

- Requiring off-road construction equipment to be hybrid electric-diesel or zero-emission, where available, and all diesel-fueled off-road construction equipment to be equipped with CARB Tier IV-compliant engines or better, and including this requirement in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.
- Prohibiting off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day.
- Using electric-powered hand tools, forklifts, and pressure washers, and providing electrical hook ups to the power grid rather than use of diesel-fueled generators to supply their power.
- Designating an area in the construction site where electric-powered construction vehicles and equipment can charge.
- Limiting the amount of daily grading disturbance area.
- Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.
- Forbidding idling of heavy equipment for more than three minutes.
- Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.
- Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.
- Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.
- Providing information on transit and ridesharing programs and services to construction employees.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees.

Examples of measures to mitigate air quality and greenhouse gas impacts from operation include:

- Requiring all heavy-duty vehicles engaged in drayage[22] to or from the project site to be zero-emission beginning in 2030.

[22] "Drayage" refers generally to transport of cargo to or from a seaport or intermodal railyard.

- Requiring all on-site motorized operational equipment, such as forklifts and yard trucks, to be zero-emission with the necessary charging or fueling stations provided.
- Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.
- Forbidding trucks from idling for more than three minutes and requiring operators to turn off engines when not in use.
- Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the local air district, and the building manager.
- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity that is equal to or greater than the building's projected energy needs, including all electrical chargers.
- Designing all project building roofs to accommodate the maximum future coverage of solar panels and installing the maximum solar power generation capacity feasible.
- Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project.
- Running conduit to designated locations for future electric truck charging stations.
- Unless the owner of the facility records a covenant on the title of the underlying property ensuring that the property cannot be used to provide refrigerated warehouse space, constructing electric plugs for electric transport refrigeration units at every dock door and requiring truck operators with transport refrigeration units to use the electric plugs when at loading docks.
- Oversizing electrical rooms by 25 percent or providing a secondary electrical room to accommodate future expansion of electric vehicle charging capability.
- Constructing and maintaining electric light-duty vehicle charging stations proportional to the number of employee parking spaces (for example, requiring at least 10% of all employee parking spaces to be equipped with electric vehicle charging stations of at least Level 2 charging performance)
- Running conduit to an additional proportion of employee parking spaces for a future increase in the number of electric light-duty charging stations.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel.
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of

trucks.

- Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.
- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.
- Designing to LEED green building certification standards.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations.
- Posting signs at every truck exit driveway providing directional information to the truck route.
- Improving and maintaining vegetation and tree canopy for residents in and around the project area.
- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.
- Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants who own, operate, or hire trucking carriers with more than 100 trucks to use carriers that are SmartWay carriers.
- Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.

VI. Noise Impacts Analysis and Mitigation

The noise associated with logistics facilities can be among their most intrusive impacts to nearby sensitive receptors. Various sources, such as unloading activity, diesel truck movement, and rooftop air conditioning units, can contribute substantial noise pollution. These impacts are exacerbated by logistics facilities' typical 24-hour, seven-days-per-week operation. Construction noise is often even greater than operational noise, so if a project site is near sensitive receptors, developers and lead agencies should adopt measures to reduce the noise generated by both construction and operation activities.

Examples of best practices when studying noise impacts include:

- Preparing a noise impact analysis that considers all reasonably foreseeable project noise impacts, including to nearby sensitive receptors. All reasonably foreseeable project noise impacts encompasses noise from both construction and operations, including stationary, on-site, and off-site noise sources.
- Adopting a lower significance threshold for incremental noise increases when baseline noise already exceeds total noise significance thresholds, to account for the cumulative impact of additional noise and the fact that, as noise moves up the decibel scale, each decibel increase is a progressively greater increase in sound

pressure than the last. For example, 70 dBA is ten times more sound pressure than 60 dBA.

- Disclosing and considering the significance of short-term noise levels associated with all aspects of project operation (i.e. both on-site noise generation and off-site truck noise). Considering only average noise levels may mask noise impacts sensitive receptors would consider significant—for example, the repeated but short-lived passing of individual trucks or loading activities at night.

Examples of measures to mitigate noise impacts include:

- Constructing physical, structural, or vegetative noise barriers on and/or off the project site.
- Planning and enforcing truck routes that avoid passing sensitive receptors.
- Locating or parking all stationary construction equipment as far from sensitive receptors as possible, and directing emitted noise away from sensitive receptors.
- Verifying that construction equipment has properly operating and maintained mufflers.
- Requiring all combustion-powered construction equipment to be surrounded by a noise protection barrier
- Limiting operation hours to daytime hours on weekdays.
- Paving roads where truck traffic is anticipated with low noise asphalt.
- Orienting any public address systems onsite away from sensitive receptors and setting system volume at a level not readily audible past the property line.

VII. Traffic Impacts Analysis and Mitigation

Warehouse facilities inevitably bring truck and passenger car traffic. Truck traffic can present substantial safety issues. Collisions with heavy-duty trucks are especially dangerous for passenger cars, motorcycles, bicycles, and pedestrians. These concerns can be even greater if truck traffic passes through residential areas, school zones, or other places where pedestrians are common and extra caution is warranted.

Examples of measures to mitigate traffic impacts include:

- Designing, clearly marking, and enforcing truck routes that keep trucks out of residential neighborhoods and away from other sensitive receptors.
- Installing signs in residential areas noting that truck and employee parking is prohibited.
- Requiring preparation and approval of a truck routing plan describing the facility's hours of operation, types of items to be stored, and truck routing to and from the facility to designated truck routes that avoids passing sensitive receptors. The plan should include measures for preventing truck queuing, circling, stopping, and parking on public streets, such as signage, pavement markings, and queuing analysis and enforcement. The plan should hold facility operators responsible for violations of the truck routing plan, and a revised plan should be required from any new tenant that occupies the property before a business license

is issued. The approving agency should retain discretion to determine if changes to the plan are necessary, including any additional measures to alleviate truck routing and parking issues that may arise during the life of the facility.
- Constructing new or improved transit stops, sidewalks, bicycle lanes, and crosswalks, with special attention to ensuring safe routes to schools.
- Consulting with the local public transit agency and securing increased public transit service to the project area.
- Designating areas for employee pickup and drop-off.
- Implementing traffic control and safety measures, such as speed bumps, speed limits, or new traffic signs or signals.
- Placing facility entry and exit points on major streets that do not have adjacent sensitive receptors.
- Restricting the turns trucks can make entering and exiting the facility to route trucks away from sensitive receptors.
- Constructing roadway improvements to improve traffic flow.
- Preparing a construction traffic control plan prior to grading, detailing the locations of equipment staging areas, material stockpiles, proposed road closures, and hours of construction operations, and designing the plan to minimize impacts to roads frequented by passenger cars, pedestrians, bicyclists, and other non-truck traffic.

VIII. Other Significant Environmental Impacts Analysis and Mitigation

Warehouse projects may result in significant environmental impacts to other resources, such as to aesthetics, cultural resources, energy, geology, or hazardous materials. All significant adverse environmental impacts must be evaluated, disclosed and mitigated to the extent feasible under CEQA. Examples of best practices and mitigation measures to reduce environmental impacts that do not fall under any of the above categories include:

- Appointing a compliance officer who is responsible for implementing all mitigation measures, and providing contact information for the compliance officer to the lead agency, to be updated annually.
- Creating a fund to mitigate impacts on affected residents, schools, places of worship, and other community institutions by retrofitting their property. For example, retaining a contractor to retrofit/install HVAC and/or air filtration systems, doors, dual-paned windows, and sound- and vibration-deadening insulation and curtains.
- Sweeping surrounding streets on a daily basis during construction to remove any construction-related debris and dirt.
- Directing all lighting at the facility into the interior of the site.
- Using full cut-off light shields and/or anti-glare lighting.
- Requiring submission of a property maintenance program for agency review and approval providing for the regular maintenance of all building structures, landscaping, and paved surfaces.
- Using cool pavement to reduce heat island effects.

- Planting trees in parking areas to provide at least 35% shade cover of parking areas within fifteen years to reduce heat island impacts.
- Using light colored roofing materials with a solar reflective index of 78 or greater.
- Including on-site amenities, such as a truck operator lounge with restrooms, vending machines, and air conditioning, to reduce the need for truck operators to idle or travel offsite.
- Designing skylights to provide natural light to interior worker areas.
- Installing climate control and air filtration in the warehouse facility to promote worker well-being.

IX. Conclusion

California's world-class economy, ports, and transportation network position it at the center of the e-commerce and logistics industry boom. At the same time, California is a global leader in environmental protection and environmentally just development. The guidance in this document furthers these dual strengths, ensuring that all can access the benefits of economic development. The Bureau will continue to monitor proposed projects for compliance with CEQA and other laws. Lead agencies, developers, community advocates, and other interested parties should feel free to reach out to us as they consider how to guide warehouse development in their area.

Please do not hesitate to contact the Environmental Justice Bureau at ej@doj.ca.gov if you have any questions.

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September 4, 2025

Tom Brohard and Associates

Mr. Doug Carstens
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Redondo Beach, CA 90277-2147

SUBJECT: Review of the Draft EIR for the IPT Business Center Project in the City of Lake Forest – Traffic and Transportation Issues

Dear Mr. Carstens:

As requested and authorized, I, Tom Brohard, P.E., have reviewed the July 2025 Draft Environmental Impact Report (Draft EIR) for the IPT Business Center Project proposed at 26200 Enterprise Way in the City of Lake Forest. My review focused on Chapter 4.17, the Transportation and Traffic Section of the Draft EIR, as well as the May 2025 Traffic Impact Analysis (TIA), Appendix J of the Draft EIR. I have also reviewed the July 21, 2020 City of Lake Forest Transportation Analysis Guidelines which are also known as Appendix 2 to Appendix A, the City of Lake Forest CEQA Significance Thresholds Guide, published November 20, 2001 and revised May 6, 2025.

Primary Finding

Based upon my review of these documents and as explained in detail in this letter, the Draft EIR and the TIA fail to comply with the requirements set forth in the City's Transportation Analysis Guidelines (TA Guidelines). For proposed mitigation of the excessive VMT that will be generated by the warehouse, the analysis only evaluates the installation of bicycle lanes on Commercecentre Drive. This mitigation measure, MM TRA-1, only addresses a small fraction (only 0.5 percent) of the Project's VMT overage that will be generated. The Draft EIR and the TIA fail to study and evaluate the numerous other mitigation opportunities available. Furthermore, no evidence is provided that the "...project applicant has worked with the City and has exhausted all mitigation opportunities..." as required on Page 12 of the City's TA Guidelines. Without such an effort that must include alterations to the project description and together without City concurrence, a Statement of Overriding Consideration cannot be considered according to the City's TA Guidelines.

Education and Experience

Since receiving a Bachelor of Science in Engineering from Duke University in Durham, North Carolina in 1969, I have gained over 55 years of professional engineering experience focused on traffic engineering and transportation planning. I am licensed as a Professional Civil Engineer both in California and

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Hawaii and as a Professional Traffic Engineer in California. I have served as the City Traffic Engineer and as Transportation Planner for 16 cities in Southern California and formed Tom Brohard and Associates in 2000. During my career in both the public and private sectors, I have also reviewed numerous environmental documents and traffic studies for various projects.

Project Description

Page 1-2 of the Draft EIR describes the Proposed Project as follows:

> "The proposed project involves the demolition of the existing 144,906-square-foot (sq ft), two-story office/industrial building and redevelopment, construction and operation of a 35-foot (ft) tall,165,803 sq ft tilt-up concrete industrial building. The project includes a gated truck loading area, truck and auto parking spaces, and new landscaping throughout the site."

Traffic and Transportation Issues

Based on my reviews of various documents, the IPT Business Center Project in the City of Lake Forest at 26200 Enterprise Way will have significant traffic and transportation impacts that must be evaluated further, together with additional study plus mitigation measures conditioned to address these issues:

1) Vehicle Miles Travelled (VMT) Analysis Is Incomplete – The California Environmental Quality Act (CEQA) requires calculation and consideration of vehicle miles traveled to and from land development projects. For this project, the City of Lake Forest requires a reduction of 4.1 VMT, 20 percent below what is estimated in Table 4.17.B on Page 4.17-12 of the Draft EIR. For mitigation, the Draft EIR calls for the installation of bicycle lanes in both directions on Commercecentre Drive between Alton Parkway and Dimension Drive. These proposed bicycle lanes do not connect directly to the Proposed Project on Enterprise Way. If maximum credit for VMT reduction is achieved, then the proposed bicycle lanes would only reduce the VMT by 0.5 percent, significantly below the required 20 percent VMT reduction that is necessary to totally offset the VMT increase. By themselves, the proposed bicycle lanes are insufficient as they provide only nominal benefit.

   The City's TA Guidelines for VMT reductions cite a number of strategies to reduce VMT. A total of 24 VMT reducing mitigation measures are listed in Table 5 on enclosed Pages 11 and 12 of the City's TA Guidelines. Additionally, the City's TA Guidelines refer to the California Air Pollution Control Officers Association (CAPCOA) publication entitled "Quantifying Greenhouse Gas Mitigation Measures – A Resource for Local Government to

Assess Emission Reductions from Greenhouse Gas Mitigation Measures" (see enclosed listing of potential VMT mitigation measures.) According to the City's own TA Guidelines, more mitigation measures to reduce VMT must be evaluated.

Other than the proposed bicycle lanes, the TIA and the Draft EIR fail to develop any additional mitigation measures, calling excess VMT a significant and unavoidable impact. As indicated earlier in this letter, no evidence is provided that the "...project applicant has worked with the City and has exhausted all mitigation opportunities..." as is mandated on Page 12 of the City's TA Guidelines. Without this, without considering alterations to the project description, and without City concurrence, a Statement of Overriding Consideration cannot be considered. The minimal effort to mitigate the excessive VMT cannot be accepted as there are many other mitigation measures from the City's TA Guidelines and from CAPCOA's resource publication beyond the bicycle lanes that must be evaluated and then imposed on the Proposed Project by the City.

2) Commercecentre Drive Is Too Narrow To Safely Provide Bicycle Lanes - Mitigation Measure MM-TR-1 proposes installing striped bicycle lanes on Commercecentre Drive between Alton Parkway and Dimension Drive. The proposed project which is located on Enterprise Way does not directly connect to the proposed bicycle lanes on Commercecentre Drive, with the proposed project 700' and more separated from Dimension Drive. Bicycle lanes should connect to the proposed project to be counted as credits for reducing a project's VMT.

   From current Google Earth aerial photography, Commercecentre Drive is striped for two through vehicle travel lanes in each direction separated by a painted median that includes left turn lanes at crossing and intersecting streets. Commercecentre Drive is 64' between curbs and has a posted 45 MPH speed limit. Accepted traffic engineering practice indicates that the design speed is at least 10 miles per hour higher than the posted speed limit. For the necessary and appropriate design speed of 55 miles per hour, vehicle travel lane widths of at least 11' are needed as well as bicycle lanes of at least 4' plus the concrete gutter width of 2', total of 6'. The required minimum width to retain two through lanes in each direction, retain the painted median with left turn lanes, and add a striped bicycle lane in each direction is 66' which is 2' more than the existing roadway width provides.

   Striping bicycle lanes on both sides of Commercecentre Drive requires that all existing striping be removed and that the painted median and the four through travel lanes be reduced to 10' wide lanes. These resulting traffic lane widths are too narrow to support the 55 miles per hour design speed together with the roadway's rolling profile. Additionally, the volume of truck traffic that will

be generated by the Proposed Project and the other two similar adjacent warehouse projects now being considered together with existing truck traffic volumes require vehicle travel lanes that are at least 11' wide. The minimum width for each bicycle lane must be at least 4' wide exclusive of the concrete gutter.

3) Stopping Sight Distance Is Incorrectly Calculated – Page 4.17-14 of the Draft EIR states the posted speed limit on Enterprise Way is 25 miles per hour, and then erroneously concludes that the speed limit is the same as the design speed. Stopping sight distance is based upon the design speed of the particular roadway being evaluated, and accepted traffic engineering practice indicates that the design speed must be at least 10 miles per hour higher than the posted speed limit. The Draft EIR and the TIA incorrectly and inaccurately state that the speed limit and the design speed are the same technical parameters. On the contrary, the design speed is always at least 10 miles per hour higher than the speed limit.

   To provide traffic safety, vehicles entering Enterprise Way from either of the project's access driveways must be able to see vehicles approaching from the left as well as from the right at 35 miles per hour. The required stopping sight distance at 35 miles per hour is 250' as shown in enclosed Table 3-1 on Page 3-4 of the 7th Edition of "A Policy on Geometric Design of Highways and Streets" published in 2018 by AASHTO, the American Association of State Highway and Transportation Officials. This same table is also the source of the recommended stopping sight distance of 150' for a design speed of 25 miles per hour as suggested in the Draft EIR and as shown in Figure 13 on Page 34 of the TIA.

   The proper design speed of 35 miles per hour must be evaluated to provide appropriate sight distances. These distances are achieved by providing clear zones free of all obstructions and limitations on both sides of each access driveway to ensure adequate stopping sight distance for safe traffic movements. The required stopping sight distance must be increased from 150' in both directions to 250' in both directions on both sides of each of the two access driveways. The areas inside the sight distance triangles must be kept free and clear of all obstacles and obstructions to maintain the clear zones needed to provide the required stopping sight distance.

4) Enterprise Way Improvements Needed – Enterprise Way is identified as a private street on the site plan in Figure 2 on Page 4 in the TIA. In California, traffic laws generally do not apply to private roads. However, local authorities can also extend the application of specific traffic laws to privately owned and maintained roads under certain conditions as set forth in California Vehicle Code Section 21107.6. For this to occur, the City Council may declare by resolution or ordinance that certain privately owned and maintained streets

are generally to be held open for the use of the public for purposes of vehicular traffic and parking. Additionally, the owner of the private road must post specific signing at each entrance to the private road that such facility is subject to public traffic regulations and control. If the City desires this, then the traffic control devices including signing and pavement markings must conform to the requirements set forth in the "California Manual on Uniform Traffic Control Devices."

Based upon my review, the following issues need to be addressed for this to occur:

a) New Sidewalk - Enterprise Way has sidewalk on the inside of the circular roadway, but there is no sidewalk on the outside of this loop roadway where the proposed project fronts Enterprise Way. Construction of sidewalk should be conditioned across the frontage of the Proposed Project as well as down to Dimension Drive.

b) Conforming Pavement Markings and Signing - Google Earth aerial photos show pavement markings on Enterprise Way which do not conform to the California Manual on Uniform Traffic Control Devices including "Down Slow" (upside down as you drive over it and not an authorized marking) together with marked ladder crosswalks within knuckle 90-degree turns without any advance signing or pavement markings. A traffic study should be conducted to determine if these pavement markings should be removed or if appropriate pavement markings should be installed and warning signs should be posted in advance of the marked crossings.

c) Enforceable Speed Limit - The posted 25 MPH speed limit on Enterprise Way most probably was not established by an engineering and traffic survey. The east/west portion of Enterprise Way is 42' between curbs and that cannot be established as prima facie 25 MPH speed limit as the width exceeds 40'. An engineering and traffic survey must be conducted to establish an appropriate and an enforceable speed limit.

d) Clear Zones/Sight Distance - On Page 33 of the TIA and in Figure 13 on Page 34, the sight distance analysis for design speed of 25 miles per hour is inappropriate. A design speed of 35 miles per hour is required with corresponding stopping sight distance of 250'. As previously discussed in this letter, the design speed on Enterprise Way is at least 10 MPH higher. For a design speed of 35 MPH, the stopping sight distance on both sides of each access driveway increases from 150' to 250' in both directions, and clear zone line-of-sight triangles must be clear of all obstructions.

e) Prohibit Trucks From Using The Third Access To Reach Bake Parkway – A parking aisle extends from the northeast corner of the site across and through the adjacent property parking lot. This aisle has perpendicular parking along the east side out to a right turn only driveway access onto Bake Parkway. Trucks must be prohibited from using this connection to and from Bake Parkway as they cannot negotiate the back-to-back 90-degree reverse jogs in the parking lot aisle.

f) Require Trucks to Use Only Enterprise Way To Dimension Drive - Circulation by trucks to and from the Proposed Project driveways must be required to use only the 42' wide portion of the Enterprise Way loop road back and forth directly to Dimension Drive. Trucks cannot safely navigate the 30' wide balance of the Enterprise Way loop road as it is too narrow to provide parking on the west side and two-way traffic flow. All trucks must be prohibited from using the 30' wide portion of Enterprise Way to access the Proposed Project.

g) Enterprise Way May Not Be Structurally Adequate For Heavy Trucks - The TIA and the Draft EIR must address the adequacy of the existing Enterprise Way and the Dimension Drive pavements to sustain increased heavy truck traffic. Traffic index calculations including the mix of all multi-axle trucks for the Proposed Project and the redevelopment of two adjacent office to warehouse projects must be made to evaluate the existing roadways and their condition.

   Each roadways' structural section includes the thickness of the asphalt pavement and the aggregate base as well as the soil conditions under the roadway. Each of the roadways' components must be evaluated with the increased heavy truck trips since there were very few heavy trucks previously serving the office buildings in the Proposed Project as well as the two adjacent similar redevelopment projects. Each project must be conditioned to mitigate their fair share of all of the additional heavy truck load impacts on Enterprise Way as well as on Dimension Drive.

Until the various issues and concerns in this letter are fully addressed, there is substantial evidence that the IPT Business Center Project at 26200 Enterprise Way Project will have adverse traffic impacts that have not been properly analyzed and mitigated.

The recommendations in this letter must be considered. In addition, the various flaws and deficiencies outlined above in the Draft EIR must be addressed through further analysis before the IPT Business Center Project receives further consideration. If you have questions regarding these comments, please call me at your convenience.

Mr. Doug Carstens
Draft EIR for IPT Business Center Project – Traffic/Transportation Issues
September 4, 2025

Respectfully submitted,

Tom Brohard and Associates





Tom Brohard, PE
Principal

Enclosures
- Resume
- City of Lake Forest Transportation Analysis Guidelines, Revised May 6, 2025
- CAPCOA Quantifying Greenhouse Gas Mitigation Measures, August 2010
- AASHTO "A Policy on Geometric Design of Highways and Streets," 7th Edition, 2018, Stopping Sight Distance on Level Roadways

Tom Brohard, PE

Licenses: 1975 / Professional Engineer / California – Civil, No. 24577
1977 / Professional Engineer / California – Traffic, No. 724
2006 / Professional Engineer / Hawaii – Civil, No. 12321

Education: 1969 / BSE / Civil Engineering / Duke University

Experience: 55+ Years

Memberships: 1977 / Institute of Transportation Engineers – Fellow, Life
1978 / Orange County Traffic Engineers Council - Chair 1982-1983
1981 / American Public Works Association – Life Member

Tom is a recognized expert in the field of traffic engineering and transportation planning. His background also includes responsibility for leading and managing the delivery of various contract services to numerous cities in Southern California.

Tom has extensive experience in providing transportation planning and traffic engineering services to public agencies. In addition to conducting traffic engineering investigations for Los Angeles County from 1972 to 1978, he has previously served as City Traffic Engineer in the following communities:

- Bellflower ..... 1997 - 1998
- Bell Gardens ..... 1982 - 1995
- Big Bear Lake..... 2006 - 2015
- Indio..... 2005 - 2019
- Huntington Beach ..... 1998 - 2004
- Lawndale..... 1973 - 1978
- Los Alamitos ..... 1981 - 1982
- Oceanside..... 1981 - 1982
- Paramount ..... 1982 - 1988
- Rancho Palos Verdes ..... 1973 - 1978
- Rolling Hills ..... 1973 - 1978, 1985 - 1993
- Rolling Hills Estates ..... 1973 - 1978, 1984 - 1991
- San Fernando..... 2004 - Present
- San Marcos..... 1981
- Santa Ana ..... 1978 - 1981
- Westlake Village ..... 1983 - 1994

During these assignments, Tom has supervised City staff and directed other consultants including traffic engineers and transportation planners, traffic signal and street lighting personnel, and signing, striping, and marking crews. He has secured over $10 million in grant funding for various improvements. He has managed and directed many traffic and transportation studies and projects. While serving these communities, he has personally conducted investigations of hundreds of citizen requests for various traffic control devices. Tom has also successfully presented numerous engineering reports at City Council, Planning Commission, and Traffic Commission meetings in these and other municipalities.

In his 14 years of service to the City of Indio, Tom accomplished the following:

- Oversaw preparation and adoption of the 2008 Circulation Element Update of the General Plan including development of Year 2035 buildout traffic volumes, revised and simplified arterial roadway cross sections, and reduction in acceptable Level of Service criteria under certain conditions.

- Oversaw preparation of fact sheets/design exceptions to reduce shoulder widths on Jackson Street and on Monroe Street over I-10 as well as justifications for protected-permissive left turn phasing at I-10 on-ramps, the first such installations in Caltrans District 8 in Riverside County; reviewed plans and provided assistance during construction of both $2 million projects to install traffic signals and widen three of four ramps at these two interchanges under Caltrans encroachment permits.

- Reviewed traffic signal, signing, striping, and work area traffic control plans for the County's $45 million I-10 Interchange Improvement Project at Jefferson Street.

- Reviewed traffic impact analyses for Project Study Reports evaluating different alternatives for buildout improvements of the I-10 Interchanges at Jefferson Street, Monroe Street, Jackson Street and Golf Center Parkway.

- Oversaw preparation of plans, specifications, and contract documents and provided construction assistance for over 70 traffic signal installations and modifications.

- Reviewed and approved over 2,000 work area traffic control plans as well as signing and striping plans for all City and developer funded roadway improvement projects.

- Oversaw preparation of a City-wide traffic safety study of conditions at all schools.

- Obtained $47,000 grant from the California Office of Traffic Safety and implemented the City's Traffic Collision Database System. Annually reviews "Top 25" collision locations and provides traffic engineering recommendations to reduce collisions.

- Prepared over 1,500 work orders directing City forces to install, modify, and/or remove traffic signs, pavement and curb markings, and roadway striping.

- Oversaw preparation of engineering and traffic surveys to establish enforceable speed limits on over 500 street segments.

- Reviewed and approved traffic impact studies for more than 35 major projects and special events including the annual Coachella and Stagecoach Music Festivals.

- Developed and implemented the City's Golf Cart Transportation Program.

Since forming Tom Brohard and Associates in 2000, Tom has reviewed many traffic impact reports and environmental documents for various development projects. He has provided expert witness services and also prepared traffic studies for public agencies and private sector clients.

APPENDIX A

CITY OF LAKE FOREST
CEQA SIGNIFICANCE THRESHOLDS GUIDE

Published November 20, 2001
Revised May 6, 2025

Table 5 lists the potential mitigation measures and the maximum VMT reduction per CAPCOA. Note that although a measure has the potential to provide a maximum VMT percentage reduction, the maximum VMT reductions by area type (previously referenced **Table 4**) would apply.

For example, a mixed-use project in the suburban setting may show evidence that the project meets the criteria for "Increase Density" (maximum VMT reduction of 30%), "Improve Destination Accessibility" (maximum VMT reduction of 20%), Limit Parking Supply (maximum VMT reduction of 12.5%) and Traffic Calming Measures (maximum VMT reduction of 1%). However, if the proposed project is located in a suburban setting, the maximum VMT reductions from land use measures combined with parking and traffic calming measures is 15%. Therefore, the project can take credit for a 15% VMT reduction.

Table 5 VMT Reducing Mitigation Measures

Land Use	CAPCOA Code	Measurement	VMT Reduction
Increase Density[1]	LUT-1	Dwelling Units/acre and Jobs/Job acre	Max 30%
Increase Diversity[2]	LUT-3	Applicable to mixed-use developments only	Max 65%/30%/10% Urban/Infill/Suburban
Improve Walkability Design	LUT-9	Intersections/Square Miles	Max 21.3%
Improve Destination Accessibility	LUT-4	Distance to Downtown/Job Center (Miles)	Max 20%
Increase Transit Accessibility	LUT-5	Distance to Transit Station (Miles)	Max 30%
Integrate Below Market Rate Housing[3]	LUT-6	s% Dwelling Units Below Market Rate	Max 4%
Neighborhood Enhancements			
Improve Pedestrian Network	SDT-1	Project Site or Connecting Off-Site	Max 2%
Provide Traffic Calming Measures	SDT-2	% Streets with Improvement % Intersections with Improvement	Max 1%
Implement NEV Network	SDT-3	Number of NEVs per household	Max 12.7%
Parking Policy/Pricing			
Limit Parking Supply	PDT-1	% Reduction in Spaces[4]	Max 12.5%
Unbundle Parking Costs	PDT-2	Monthly Parking Cost ($)	Max 20%
On-Street Market Pricing	PDT-3	% Increase in Price	Max 5.5%
Transit Improvement			
Expand Transit Network	TST-3	% Increase Transit Coverage	Max 8.2%
Increase Transit Frequency	TST-4	Level of Implementation <50%, >=50% % Reduction in Headways	Max 2.5%
Commute Trip			
Implement Trip Reduction Program	TRT-1, TRT-2	% employee eligible Program Type (Required/Voluntary)	Max 21%
Transit Subsidy	TRT-4	% employee eligible Daily Transit Subsidy Amount ($)	Max 20%
Implement Employee Parking "Cash-out"	TRT-15	% employee eligible	Max 7.7%
Workplace Parking Charge	TRT-14	% employee eligible Daily Parking Charge ($)	Max 19.7%
Encourage Telecommuting and Alternative Work Schedules	TRT-6	% employee work 9/80 % employee work 4/40 % employee telecommute 1.5 days	Max 5.5%
Market Commute Trip Reduction Option	TRT-7	% employee eligible	Max 4.0%
Employee Vanpool/Shuttle	TRT-11	% employee eligible % vanpool mode share	Max 13.4%
Provide Ride Sharing Program[5]	TRT-3	% employee eligible	Max 15%
School Trip			
Implement School Bus Program	TRT-13	% family using	Max 63%

Source: CAPCOA
[1] Density relative to a typical ITE development: "Default densities are based on the typical suburban densities in North America which reflects the characteristics of the ITE Trip Generation Manual data used in the baseline estimates." (Source: CAPCOA Land Use Transportation-1 (LUT-1))
[2] An increase in diversity is defined as "at least three of the following on site and/or off site within a quarter-mile: Residential Development, Retail Development, Park, Open Space, or Office." (Source CAPCOA LUT-3)
[3] In order to qualify for VMT reductions, "Residential development projects of five or more dwelling units must provide a deed restricted low-income housing component on-site" CAPCOA utilizes a formula to determine the VMT reductions in relation to percentage below market rate. At a low range, 1% below market rate housing equals to .04% VMT reductions. At a At a high range, 30% below market rate housing equals to 1.2% VMT reductions. (Source: CAPCOA LUT-6)
[4] Percentage reduction in conventional parking provision rates (per ITE rates) should serve as a typical ceiling for the reduction calculation. ITE rates are used as baseline conditions to measure the effectiveness of this strategy. (Source CAPCOA PDT-1)
[5] Measure would need to be in place for the life of the Project. CAPCOA states that "the project will include a ride-sharing program as well as a permanent transportation management association membership and funding requirement. Funding may be provided by Community Facilities, District, or County Service Area, or other non-revocable funding mechanism." (Source: CAPCOA TRT-3)

4.5 Level 2 VMT Mitigation Measures

Mitigation Exchange or Mitigation Bank -TBD

4.6 Unmitigated Projects

If a project applicant has worked with the City and has exhausted all mitigation opportunities, the City will work with the applicant to determine if a Statement of Overriding Consideration is appropriate. However, all feasible mitigation measures must be exhausted, including alterations to the project description, if applicable.

5. LOS Transportation Analysis

A proposed project may be required to prepare a LOS Transportation Analysis per 2040 General Plan Policy M-8.1 for the purposes of planning and designing street improvements as well as supporting implementation of the County CMP.

City staff will scope the LOS Transportation Analysis with the applicant or the applicant's consultant. The scope of the LOS analysis may include, but not be limited to:

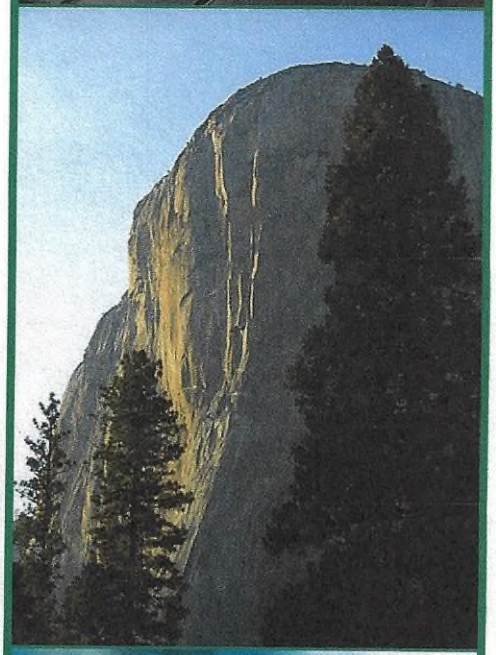
- Collection of existing intersection and mid-block vehicle count data
- Evaluation of intersections utilizing the intersection capacity utilization (ICU) methodology
- Evaluation of multiple existing, near-term or long-term scenarios
- Identification of proposed and potential roadway improvements
- Calculation of fair-share cost contributions for implementation of improvements that improve LOS

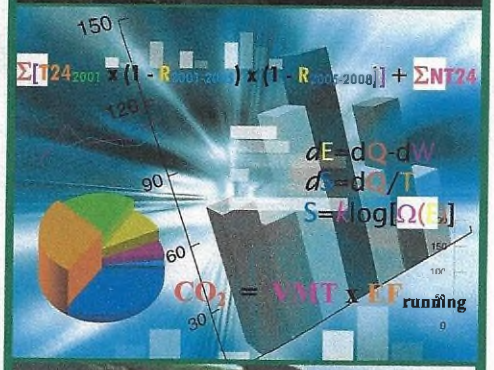
The City's methodology for evaluating intersection performance is generally consistent with the County CMP. The City utilizes a performance standard of LOS D or better and the County CMP utilizes LOS E or better. The performance criteria utilized by the City for a LOS analysis is summarized in **Table 6**.

CAPCOA

CALIFORNIA AIR POLLUTION CONTROL OFFICERS ASSOCIATION









Quantifying Greenhouse Gas Mitigation Measures

A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures

August, 2010

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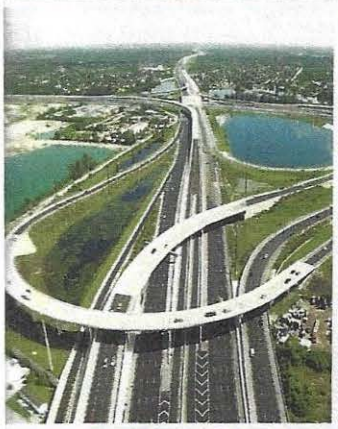
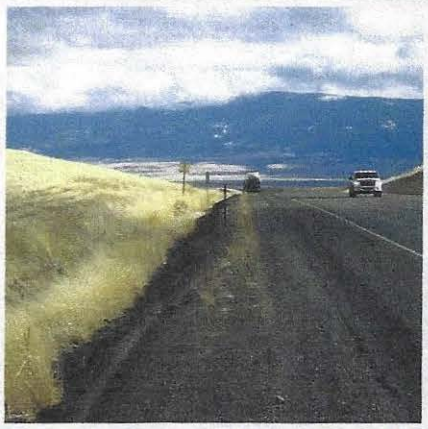
American Association of State Highway and Transportation Officials
AASHTO

A Policy on Geometric Design of Highways and Streets

2018
7th Edition






U.S. Customary	Metric
$d_B = 1.075 \frac{V^2}{a}$	$d_B = 0.039 \frac{V^2}{a}$
where:	where:
d_B = braking distance, ft	d_B = braking distance, m
V = design speed, mph	V = design speed, km/h
a = deceleration rate, ft/s²	a = deceleration rate, m/s²

(3-1)

Studies documented in the literature (*19*) show that most drivers decelerate at a rate greater than 14.8 ft/s² [4.5 m/s²] when confronted with the need to stop for an unexpected object in the roadway. Approximately 90 percent of all drivers decelerate at rates greater than 11.2 ft/s² [3.4 m/s²]. Such decelerations are within the driver's capability to stay within his or her lane and maintain steering control during the braking maneuver on wet surfaces. Therefore, 11.2 ft/s² [3.4 m/s²] (a comfortable deceleration for most drivers) is recommended as the deceleration threshold for determining stopping sight distance. Implicit in the choice of this deceleration threshold is the assessment that most vehicle braking systems and the tire-pavement friction levels of most roadways are capable of providing a deceleration rate of at least 11.2 ft/s² [3.4 m/s²]. The friction available on most wet pavement surfaces and the capabilities of most vehicle braking systems can provide braking friction that exceeds this deceleration rate.

Table 3-1. Stopping Sight Distance on Level Roadways

U.S. Customary					Metric				
Design Speed (mph)	Brake Reaction Distance (ft)	Braking Distance on Level (ft)	Stopping Sight Distance		Design Speed (km/h)	Brake Reaction Distance (m)	Braking Distance on Level (m)	Stopping Sight Distance	
			Calculated (ft)	Design (ft)				Calculated (m)	Design (m)
15	55.1	21.6	76.7	80	20	13.9	4.6	18.5	20
20	73.5	38.4	111.9	115	30	20.9	10.3	31.2	35
25	91.9	60.0	151.9	155	40	27.8	18.4	46.2	50
30	110.3	86.4	196.7	200	50	34.8	28.7	63.5	65
35	128.6	117.6	246.2	250	60	41.7	41.3	83.0	85
40	147.0	153.6	300.6	305	70	48.7	56.2	104.9	105
45	165.4	194.4	359.8	360	80	55.6	73.4	129.0	130
50	183.8	240.0	423.8	425	90	62.6	92.9	155.5	160
55	202.1	290.3	492.4	495	100	69.5	114.7	184.2	185
60	220.5	345.5	566.0	570	110	76.5	138.8	215.3	220
65	238.9	405.5	644.4	645	120	83.4	165.2	248.6	250
70	257.3	470.3	727.6	730	130	90.4	193.8	284.2	285
75	275.6	539.9	815.5	820	140	97.3	224.8	322.1	325
80	294.0	614.3	908.3	910					
85	313.5	693.5	1007.0	1010					

Note: Brake reaction distance predicated on a time of 2.5 s; deceleration rate of 11.2 ft/s² [3.4 m/s²] used to determine calculated sight distance.

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AIR QUALITY AND LAND USE HANDBOOK: A COMMUNITY HEALTH PERSPECTIVE



April 2005

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California Air Resources Board

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To My Local Government Colleagues....

I am pleased to introduce this informational guide to air quality and land use issues focused on community health. As a former county supervisor, I know from experience the complexity of local land use decisions. There are multiple factors to consider and balance. This document provides important public health information that we hope will be considered along with housing needs, economic development priorities, and other quality of life issues.

An important focus of this document is prevention. We hope the air quality information provided will help inform decision-makers about the benefits of avoiding certain siting situations. The overarching goal is to avoid placing people in harm's way. Recent studies have shown that public exposure to air pollution can be substantially elevated near freeways and certain other facilities. What is encouraging is that the health risk is greatly reduced with distance. For that reason, we have provided some general recommendations aimed at keeping appropriate distances between sources of air pollution and land uses such as residences.

Land use decisions are a local government responsibility. The Air Resources Board's role is advisory and these recommendations do not establish regulatory standards of any kind. However, we hope that the information in this document will be seriously considered by local elected officials and land use agencies. We also hope that this document will promote enhanced communication between land use agencies and local air pollution control agencies. We developed this document in close coordination with the California Air Pollution Control Officers Association with that goal in mind.

I hope you find this document both informative and useful.

Barbara Riordan

Mrs. Barbara Riordian
Interim Chairman
California Air Resources Board

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Acknowledgments

The ARB staff would like to acknowledge the exceptional contributions made to this document by members of the ARB Environmental Justice Stakeholders Group. Since 2001, ARB staff has consistently relied on this group to provide critical and constructive input on implementing the specifics of ARB's environmental justice policies and actions. The Stakeholders Group is convened by the ARB, and comprised of representatives from local land use and air agencies, community interest groups, environmental justice organizations, academia, and business. Their assistance and suggestions throughout the development of this Handbook have been invaluable.

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Executive Summary

The Air Resources Board's (ARB) primary goal in developing this document is to provide information that will help keep California's children and other vulnerable populations out of harm's way with respect to nearby sources of air pollution. Recent air pollution studies have shown an association between respiratory and other non-cancer health effects and proximity to high traffic roadways. Other studies have shown that diesel exhaust and other cancer-causing chemicals emitted from cars and trucks are responsible for much of the overall cancer risk from airborne toxics in California. Also, ARB community health risk assessments and regulatory programs have produced important air quality information about certain types of facilities that should be considered when siting new residences, schools, day care centers, playgrounds, and medical facilities (i.e., sensitive land uses). Sensitive land uses deserve special attention because children, pregnant women, the elderly, and those with existing health problems are especially vulnerable to the non-cancer effects of air pollution. There is also substantial evidence that children are more sensitive to cancer-causing chemicals.

Focusing attention on these siting situations is an important preventative action. ARB and local air districts have comprehensive efforts underway to address new and existing air pollution sources under their respective jurisdictions. The issue of siting is a local government function. As more data on the connection between proximity and health risk from air pollution become available, it is essential that air agencies share what we know with land use agencies. We hope this document will serve that purpose.

The first section provides ARB recommendations regarding the siting of new sensitive land uses near freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities. This list consists of the air pollution sources that we have evaluated from the standpoint of the proximity issue. It is based on available information and reflects ARB's primary areas of jurisdiction – mobile sources and toxic air contaminants. A key air pollutant common to many of these sources is particulate matter from diesel engines. Diesel particulate matter (diesel PM) is a carcinogen identified by ARB as a toxic air contaminant and contributes to particulate pollution statewide.

Reducing diesel particulate emissions is one of ARB's highest public health priorities and the focus of a comprehensive statewide control program that is reducing diesel PM emissions each year. ARB's long-term goal is to reduce diesel PM emissions 85% by 2020. However, cleaning up diesel engines will take time as new engine standards phase in and programs to accelerate fleet turnover or retrofit existing engines are implemented. Also, these efforts are reducing diesel particulate emissions on a statewide basis, but do not yet capture every site where diesel vehicles and engines may congregate. Because living or going to school too close to such air pollution sources may increase both cancer and non-cancer health risks, we are recommending that proximity be considered in the siting of new sensitive land uses.

There are also other key toxic air contaminants associated with specific types of facilities. Most of these are subject to stringent state and local air district regulations. However, what we know today indicates that keeping new homes and other sensitive land uses from siting too close to such facilities would provide additional health protection. Chrome platers are a prime example of facilities that should not be located near vulnerable communities because of the cancer health risks from exposure to the toxic material used during their operations.

In addition to source specific recommendations, we also encourage land use agencies to use their planning processes to ensure the appropriate separation of industrial facilities and sensitive land uses. While we provide some suggestions, how to best achieve that goal is a local issue. In the development of these guidelines, we received valuable input from local government about the spectrum of issues that must be considered in the land use planning process. This includes addressing housing and transportation needs, the benefits of urban infill, community economic development priorities, and other quality of life issues. All of these factors are important considerations. The recommendations in the Handbook need to be balanced with other State and local policies.

Our purpose with this document is to highlight the potential health impacts associated with proximity to air pollution sources so planners explicitly consider this issue in planning processes. We believe that with careful evaluation, infill development, mixed use, higher density, transit-oriented development, and other concepts that benefit regional air quality can be compatible with protecting the health of individuals at the neighborhood level. One suggestion for achieving this goal is more communication between air agencies and land use planners. Local air districts are an important resource that should be consulted regarding sources of air pollution in their jurisdictions. ARB staff will also continue to provide updated technical information as it becomes available.

Our recommendations are as specific as possible given the nature of the available data. In some cases, like refineries, we suggest that the siting of new sensitive land uses should be avoided immediately downwind. However, we leave definition of the size of this area to local agencies based on facility specific considerations. Also, project design that would reduce air pollution exposure may be part of the picture and we encourage consultation with air agencies on this subject.

In developing the recommendations, our first consideration was the adequacy of the data available for an air pollution source category. Using that data, we assessed whether we could reasonably characterize the relative exposure and health risk from a proximity standpoint. That screening provided the list of air pollution sources that we were able to address with specific recommendations. We also considered the practical implications of making hard and fast recommendations where the potential impact area is large, emissions will be reduced with time, and air agencies are in the process of looking at options for additional emission control. In the end, we tailored our recommendations to minimize the highest exposures for each source category independently. Due to the large variability in relative risk in the source categories, we chose not to apply

a uniform, quantified risk threshold as is typically done in air quality permitting programs. Instead, because these guidelines are not regulatory or binding on local agencies, we took a more qualitative approach in developing the distance-based recommendations.

Where possible, we recommend a minimum separation between a new sensitive land use and known air pollution risks. In other cases, we acknowledge that the existing health risk is too high in a relatively large area, that air agencies are working to reduce that risk, and that in the meantime, we recommend keeping new sensitive land uses out of the highest exposure areas. However, it is critical to note that our implied identification of the high exposure areas for these sources does not mean that the risk in the remaining impact area is insignificant. Rather, we hope this document will bring further attention to the potential health risk throughout the impact area and help garner support for our ongoing efforts to reduce health risk associated with air pollution sources. Areas downwind of major ports, rail yards, and other inter-modal transportation facilities are prime examples.

We developed these recommendations as a means to share important public health information. The underlying data are publicly available and referenced in this document. We also describe our rationale and the factors considered in developing each recommendation, including data limitations and uncertainties. These recommendations are advisory and should not be interpreted as defined "buffer zones." We recognize the opportunity for more detailed site-specific analyses always exists, and that there is no "one size fits all" solution to land use planning.

As California continues to grow, we collectively have the opportunity to use all the information at hand to avoid siting scenarios that may pose a health risk. As part of ARB's focus on communities and children's health, we encourage land use agencies to apply these recommendations and work more closely with air agencies. We also hope that this document will help educate a wider audience about the value of preventative action to reduce environmental exposures to air pollution.

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1. ARB Recommendations on Siting New Sensitive Land Uses

Protecting California's communities and our children from the health effects of air pollution is one of the most fundamental goals of state and local air pollution control programs. Our focus on children reflects their special vulnerability to the health impacts of air pollution. Other vulnerable populations include the elderly, pregnant women, and those with serious health problems affected by air pollution. With this document, we hope to more effectively engage local land use agencies as partners in our efforts to reduce health risk from air pollution in all California communities.

Later sections emphasize the need to strengthen the connection between air quality and land use in both planning and permitting processes. Because the siting process for many, but not all air pollution sources involves permitting by local air districts, there is an opportunity for interagency coordination where the proposed location might pose a problem. To enhance the evaluation process from a land use perspective, section 4 includes recommended project related questions to help screen for potential proximity related issues.

Unlike industrial and other stationary sources of air pollution, the siting of new homes or day care centers does not require an air quality permit. Because these situations fall outside the air quality permitting process, it is especially important that land use agencies be aware of potential air pollution impacts.

The following recommendations address the issue of siting "sensitive land uses" near specific sources of air pollution; namely:

- High traffic freeways and roads
- Distribution centers
- Rail yards
- Ports
- Refineries
- Chrome plating facilities
- Dry cleaners
- Large gas dispensing facilities

The recommendations for each category include a summary of key information and guidance on what to avoid from a public health perspective.

Sensitive individuals refer to those segments of the population most susceptible to poor air quality (i.e., children, the elderly, and those with pre-existing serious health problems affected by air quality). Land uses where sensitive individuals are most likely to spend time include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities (sensitive sites or sensitive land uses).

We are characterizing sensitive land uses as simply as we can by using the example of residences, schools, day care centers, playgrounds, and medical facilities. However, a variety of facilities are encompassed. For example, residences can include houses, apartments, and senior living complexes. Medical facilities can include hospitals, convalescent homes, and health clinics. Playgrounds could be play areas associated with parks or community centers.

In developing these recommendations, ARB first considered the adequacy of the data available for each air pollution source category. We assessed whether we could generally characterize the relative exposure and health risk from a proximity standpoint. The documented non-cancer health risks include triggering of asthma attacks, heart attacks, and increases in daily mortality and hospitalization for heart and respiratory diseases. These health impacts are well documented in epidemiological studies, but less easy to quantify from a particular air pollution source. Therefore, the cancer health impacts are used in this document to provide a picture of relative risk. This screening process provided the list of source categories we were able to address with specific recommendations. In evaluating the available information, we also considered the practical implications of making hard and fast recommendations where the potential impact area is large, emissions will be reduced with time, and air agencies are in the process of looking at options for additional emission control. Due to the large variability in relative risk between the source categories, we chose not to apply a uniform, quantified risk threshold as is typically done in regulatory programs. Therefore, in the end, we tailored our recommendations to minimize the highest exposures for each source category independently. Additionally, because this guidance is not regulatory or binding on local agencies, we took a more qualitative approach to developing distance based recommendations.

Where possible, we recommend a minimum separation between new sensitive land uses and existing sources. However, this is not always possible, particularly where there is an elevated health risk over large geographical areas. Areas downwind of ports and rail yards are prime examples. In such cases, we recommend doing everything possible to avoid locating sensitive receptors within the highest risk zones. Concurrently, air agencies and others will be working to reduce the overall risk through controls and measures within their scope of authority.

The recommendations were developed from the standpoint of siting new sensitive land uses. Project-specific data for new and existing air pollution sources are available as part of the air quality permitting process. Where such information is available, it should be used. Our recommendations are designed to fill a gap where information about existing facilities may not be readily available. These recommendations are only guidelines and are not designed to substitute for more specific information if it exists.

A summary of our recommendations is shown in Table 1-1. The basis and references[1] supporting each of these recommendations, including health studies, air quality modeling and monitoring studies is discussed below beginning with freeways and summarized in Table 1-2. As new information becomes available, it will be included on ARB's community health web page.

[1]Detailed information on these references are available on ARB's website at: http://www.ARB.ca.gov/ch/landuse.htm.

Table 1-1

Recommendations on Siting New Sensitive Land Uses Such As Residences, Schools, Daycare Centers, Playgrounds, or Medical Facilities*

Source Category	Advisory Recommendations
Freeways and High-Traffic Roads	• Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.
Distribution Centers	• Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week). • Take into account the configuration of existing distribution centers and avoid locating residences and other new sensitive land uses near entry and exit points.
Rail Yards	• Avoid siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard. • Within one mile of a rail yard, consider possible siting limitations and mitigation approaches.
Ports	• Avoid siting of new sensitive land uses immediately downwind of ports in the most heavily impacted zones. Consult local air districts or the ARB on the status of pending analyses of health risks.
Refineries	• Avoid siting new sensitive land uses immediately downwind of petroleum refineries. Consult with local air districts and other local agencies to determine an appropriate separation.
Chrome Platers	• Avoid siting new sensitive land uses within 1,000 feet of a chrome plater.
Dry Cleaners Using Perchloro-ethylene	• Avoid siting new sensitive land uses within 300 feet of any dry cleaning operation. For operations with two or more machines, provide 500 feet. For operations with 3 or more machines, consult with the local air district. • Do not site new sensitive land uses in the same building with perc dry cleaning operations.
Gasoline Dispensing Facilities	• Avoid siting new sensitive land uses within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater). A 50 foot separation is recommended for typical gas dispensing facilities.

*Notes:

- These recommendations are advisory. Land use agencies have to balance other considerations, including housing and transportation needs, economic development priorities, and other quality of life issues.

- Recommendations are based primarily on data showing that the air pollution exposures addressed here (i.e., localized) can be reduced as much as 80% with the recommended separation.
- The relative risk for these categories varies greatly (see Table 1-2). To determine the actual risk near a particular facility, a site-specific analysis would be required. Risk from diesel PM will decrease over time as cleaner technology phases in.
- These recommendations are designed to fill a gap where information about existing facilities may not be readily available and are not designed to substitute for more specific information if it exists. The recommended distances take into account other factors in addition to available health risk data (see individual category descriptions).
- Site-specific project design improvements may help reduce air pollution exposures and should also be considered when siting new sensitive land uses.
- This table does not imply that mixed residential and commercial development in general is incompatible. Rather it focuses on known problems like dry cleaners using perchloroethylene that can be addressed with reasonable preventative actions.
- A summary of the basis for the distance recommendations can be found in Table 1-2.

Table 1-2

Summary of Basis for Advisory Recommendations

Source Category	Range of Relative Cancer Risk[1,2]	Summary of Basis for Advisory Recommendations
Freeways and High-Traffic Roads	300 – 1,700	• In traffic-related studies, the additional non-cancer health risk attributable to proximity was seen within 1,000 feet and was strongest within 300 feet. California freeway studies show about a 70% drop off in particulate pollution levels at 500 feet.
Distribution Centers[3]	Up to 500	• Because ARB regulations will restrict truck idling at distribution centers, transport refrigeration unit (TRU) operations are the largest onsite diesel PM emission source followed by truck travel in and out of distribution centers. • Based on ARB and South Coast District emissions and modeling analyses, we estimate an 80 percent drop-off in pollutant concentrations at approximately 1,000 feet from a distribution center.
Rail Yards	Up to 500	• The air quality modeling conducted for the Roseville Rail Yard Study predicted the highest impact is within 1,000 feet of the Yard, and is associated with service and maintenance activities. The next highest impact is between a half to one mile of the Yard, depending on wind direction and intensity.
Ports	Studies underway	• ARB will evaluate the impacts of ports and develop a new comprehensive plan that will describe the steps needed to reduce public health impacts from port and rail activities in California. In the interim, a general advisory is appropriate based on the magnitude of diesel PM emissions associated with ports.
Refineries	Under 10	• Risk assessments conducted at California refineries show risks from air toxics to be under 10 chances of cancer per million.[4] • Distance recommendations were based on the amount and potentially hazardous nature of many of the pollutants released as part of the refinery process, particularly during non-routine emissions releases.
Chrome Platers	10-100	• ARB modeling and monitoring studies show localized risk of hexavalent chromium diminishing significantly at 300 feet. There are data limitations in both the modeling and monitoring studies. These include variability of plating activities and uncertainty of emissions such as fugitive dust. Hexavalent chromium is one of the most potent toxic air contaminants. Considering these factors, a distance of 1,000 feet was used as a precautionary measure.
Dry Cleaners Using Perchloro-ethylene (perc)	15-150	• Local air district studies indicate that individual cancer risk can be reduced by as much as 75 percent by establishing a 300 foot separation between a sensitive land use and a one-machine perc dry cleaning operation. For larger operations (2 machines or more), a separation of 500 feet can reduce risk by over 85 percent.

Source Category	Range of Relative Cancer Risk[1,2]	Summary of Basis for Advisory Recommendations
Gasoline Dispensing Facilities (GDF)[5]	Typical GDF: Less than 10 Large GDF: Between Less than 10 and 120	• Based on the CAPCOA Gasoline Service Station Industry-wide Risk Assessment Guidelines, most typical GDFs (less than 3.6 million gallons per year) have a risk of less than 10 at 50 feet under urban air dispersion conditions. Over the last few years, there has been a growing number of extremely large GDFs with sales over 3.6 and as high as 19 million gallons per year. Under rural air dispersion conditions, these large GDFs can pose a larger risk at a greater distance.

[1]For cancer health effects, risk is expressed as an estimate of the increased chances of getting cancer due to facility emissions over a 70-year lifetime. This increase in risk is expressed as chances in a million (e.g., 10 chances in a million).

[2]The estimated cancer risks are a function of the proximity to the specific category and were calculated independent of the regional health risk from air pollution. For example, the estimated regional cancer risk from air toxics in the Los Angeles region (South Coast Air Basin) is approximately 1,000 in a million.

[3]Analysis based on refrigerator trucks.

[4]Although risk assessments performed by refineries indicate they represent a low cancer risk, there is limited data on non-cancer effects of pollutants that are emitted from these facilities. Refineries are also a source of non-routine emissions and odors.

[5]A typical GDF in California dispenses under 3.6 million gallons of gasoline per year. The cancer risk for this size facility is likely to be less than 10 in a million at the fence line under urban air dispersion conditions.

A large GDF has fuel throughputs that can range from 3.6 to 19 million gallons of gasoline per year. The upper end of the risk range (i.e., 120 in a million) represents a hypothetical worst case scenario for an extremely large GDF under rural air dispersion conditions.

Freeways and High Traffic Roads

Air pollution studies indicate that living close to high traffic and the associated emissions may lead to adverse health effects beyond those associated with regional air pollution in urban areas. Many of these epidemiological studies have focused on children. A number of studies identify an association between adverse non-cancer health effects and living or attending school near heavily traveled roadways (see findings below). These studies have reported associations between residential proximity to high traffic roadways and a variety of respiratory symptoms, asthma exacerbations, and decreases in lung function in children.

One such study that found an association between traffic and respiratory symptoms in children was conducted in the San Francisco Bay Area. Measurements of traffic-related pollutants showed concentrations within 300 meters (approximately 1,000 feet) downwind of freeways were higher than regional values. Most other studies have assessed exposure based on proximity factors such as distance to freeways or traffic density.

These studies linking traffic emissions with health impacts build on a wealth of data on the adverse health effects of ambient air pollution. The data on the effects of proximity to traffic-related emissions provides additional information that can be used in land use siting and regulatory actions by air agencies. The key observation in these studies is that close proximity increases both exposure and the potential for adverse health effects. Other effects associated with traffic emissions include premature death in elderly individuals with heart disease.

Key Health Findings

- Reduced lung function in children was associated with traffic density, especially trucks, within 1,000 feet and the association was strongest within 300 feet. (Brunekreef, 1997)
- Increased asthma hospitalizations were associated with living within 650 feet of heavy traffic and heavy truck volume. (Lin, 2000)
- Asthma symptoms increased with proximity to roadways and the risk was greatest within 300 feet. (Venn, 2001)
- Asthma and bronchitis symptoms in children were associated with proximity to high traffic in a San Francisco Bay Area community with good overall regional air quality. (Kim, 2004)
- A San Diego study found increased medical visits in children living within 550 feet of heavy traffic. (English, 1999)

In these and other proximity studies, the distance from the roadway and truck traffic densities were key factors affecting the strength of the association with adverse health effects. In the above health studies, the association of traffic-related emissions with adverse health effects was seen within 1,000 feet and was

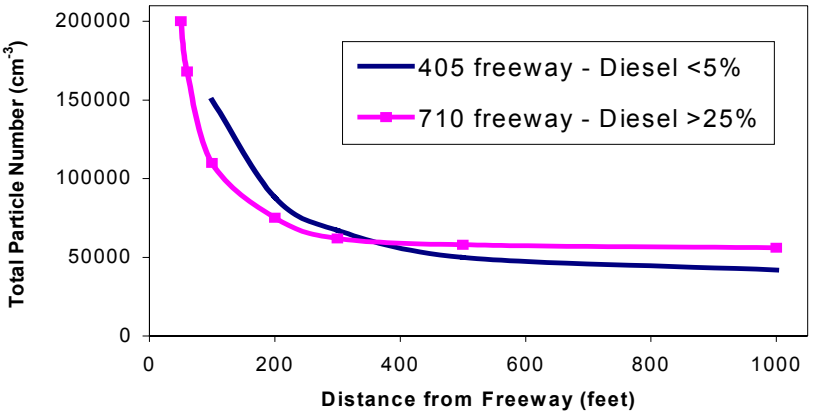
strongest within 300 feet. This demonstrates that the adverse effects diminished with distance.

In addition to the respiratory health effects in children, proximity to freeways increases potential cancer risk and contributes to total particulate matter exposure. There are three carcinogenic toxic air contaminants that constitute the majority of the known health risk from motor vehicle traffic – diesel particulate matter (diesel PM) from trucks, and benzene and 1,3-butadiene from passenger vehicles. On a typical urban freeway (truck traffic of 10,000-20,000/day), diesel PM represents about 70 percent of the potential cancer risk from the vehicle traffic. Diesel particulate emissions are also of special concern because health studies show an association between particulate matter and premature mortality in those with existing cardiovascular disease.

Distance Related Findings

A southern California study (Zhu, 2002) showed measured concentrations of vehicle-related pollutants, including ultra-fine particles, decreased dramatically within approximately 300 feet of the 710 and 405 freeways. Another study looked at the validity of using distance from a roadway as a measure of exposure

Figure 1-1
Decrease In Concentration of Freeway Diesel PM Emissions With Distance



to traffic related air pollution (Knape, 1999). This study showed that concentrations of traffic related pollutants declined with distance from the road, primarily in the first 500 feet.

These findings are consistent with air quality modeling and risk analyses done by ARB staff that show an estimated range of potential cancer risk that decreases with distance from freeways. The estimated risk varies with the local meteorology, including wind pattern. As an example, at 300 feet downwind from a freeway (Interstate 80) with truck traffic of 10,000 trucks per day, the potential cancer risk was as high as 100 in one million (ARB Roseville Rail Yard Study). The cancer health risk at 300 feet on the upwind side of the freeway was much

less. The risk at that distance for other freeways will vary based on local conditions – it may be higher or lower. However, in all these analyses the relative exposure and health risk dropped substantially within the first 300 feet. This phenomenon is illustrated in Figure 1-1.

State law restricts the siting of new schools within 500 feet of a freeway, urban roadways with 100,000 vehicles/day, or rural roadways with 50,000 vehicles with some exceptions.[2] However, no such requirements apply to the siting of residences, day care centers, playgrounds, or medical facilities. The available data show that exposure is greatly reduced at approximately 300 feet. In the traffic-related studies the additional health risk attributable to the proximity effect was strongest within 1,000 feet.

The combination of the children's health studies and the distance related findings suggests that it is important to avoid exposing children to elevated air pollution levels immediately downwind of freeways and high traffic roadways. These studies suggest a substantial benefit to a 500-foot separation.

The impact of traffic emissions is on a gradient that at some point becomes indistinguishable from the regional air pollution problem. As air agencies work to reduce the underlying regional health risk from diesel PM and other pollutants, the impact of proximity will also be reduced. In the meantime, as a preventative measure, we hope to avoid exposing more children and other vulnerable individuals to the highest concentrations of traffic-related emissions.

Recommendation

- Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.

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[2] Section 17213 of the California Education Code and section 21151.8 of the California Public Resources Code. See also Appendix E for a description of special processes that apply to school siting.

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Distribution Centers

Distribution centers or warehouses are facilities that serve as a distribution point for the transfer of goods. Such facilities include cold storage warehouses, goods transfer facilities, and inter-modal facilities such as ports. These operations involve trucks, trailers, shipping containers, and other equipment with diesel engines. A distribution center can be comprised of multiple centers or warehouses within an area. The size can range from several to hundreds of acres, involving a number of different transfer operations and long waiting periods. A distribution center can accommodate hundreds of diesel trucks a day that deliver, load, and/or unload goods up to seven days a week. To the extent that these trucks are transporting perishable goods, they are equipped with diesel-powered transport refrigeration units (TRUs) or TRU generator sets.

The activities associated with delivering, storing, and loading freight produces diesel PM emissions. Although TRUs have relatively small diesel-powered engines, in the normal course of business, their emissions can pose a significant health risk to those nearby. In addition to onsite emissions, truck travel in and out of distribution centers contributes to the local pollution impact.

ARB is working to reduce diesel PM emissions through regulations, financial incentives, and enforcement programs. In 2004, ARB adopted two airborne toxic control measures that will reduce diesel PM emissions associated with distribution centers. The first will limit nonessential (or unnecessary) idling of diesel-fueled commercial vehicles, including those entering from other states or countries. This statewide measure, effective in 2005, prohibits idling of a vehicle more than five minutes at any one location.[3] The elimination of unnecessary idling will reduce the localized impacts caused by diesel PM and other air toxics

[3] For further information on the Anti-Idling ATCM, please click on: http://www.arb.ca.gov/toxics/idling/outreach/factsheet.pdf

in diesel vehicle exhaust. This should be a very effective new strategy for reducing diesel PM emissions at distribution centers as well as other locations.

The second measure requires that TRUs operating in California become cleaner over time. The measure establishes in-use performance standards for existing TRU engines that operate in California, including out-of-state TRUs. The requirements are phased-in beginning in 2008, and extend to 2019.[4]

ARB also operates a smoke inspection program for heavy-duty diesel trucks that focuses on reducing truck emissions in California communities. Areas with large numbers of distribution centers are a high priority.

Key Health Findings

Diesel PM has been identified by ARB as a toxic air contaminant and represents 70 percent of the known potential cancer risk from air toxics in California. Diesel PM is an important contributor to particulate matter air pollution. Particulate matter exposure is associated with premature mortality and health effects such as asthma exacerbation and hospitalization due to aggravating heart and lung disease.

Distance Related Findings

Although distribution centers are located throughout the state, they are usually clustered near transportation corridors, and are often located in or near population centers. Diesel PM emissions from associated delivery truck traffic and TRUs at these facilities may result in elevated diesel PM concentrations in neighborhoods surrounding those sites. Because ARB regulations will restrict truck idling at distribution centers, the largest continuing onsite diesel PM emission source is the operation of TRUs. Truck travel in and out of distribution centers also contributes to localized exposures, but specific travel patterns and truck volumes would be needed to identify the exact locations of the highest concentrations.

As part of the development of ARB's regulation for TRUs, ARB staff performed air quality modeling to estimate exposure and the associated potential cancer risk of onsite TRUs for a typical distribution center. For an individual person, cancer risk estimates for air pollution are commonly expressed as a probability of developing cancer from a lifetime (i.e., 70 years) of exposure. These risks were calculated independent of regional risk. For example, the estimated regional cancer risk from air toxics in the Los Angeles region (South Coast Air Basin) is approximately 1,000 additional cancer cases per one million population.

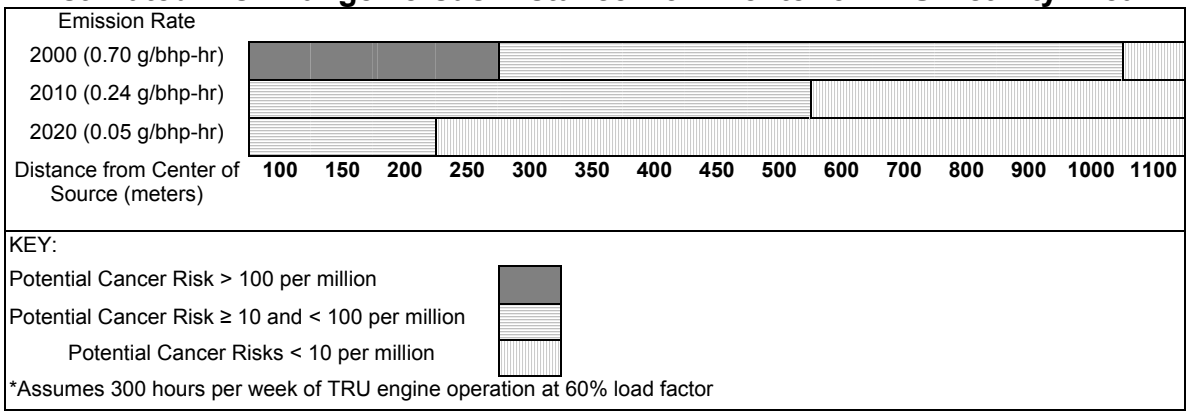
[4] For further information on the Transport Refrigeration Unit ATCM, please click on: http://www.arb.ca.gov/diesel/documents/trufaq.pdf

The diesel PM emissions from a facility are dependent on the size (horsepower), age, and number of engines, emission rates, the number of hours the truck engines and/or TRUs operate, distance, and meteorological conditions at the site. This assessment assumes a total on-site operating time for all TRUs of 300 hours per week. This would be the equivalent of 40 TRU-equipped trucks a day, each loading or unloading on-site for one hour, 12 hours a day and seven days a week.

As shown in Figure 1-2 below, at this estimated level of activity and assuming a current fleet diesel PM emission rate, the potential cancer risk would be over 100 in a million at 800 feet from the center of the TRU activity. The estimated potential cancer risk would be in the 10 to 100 per million range between 800 to 3,300 feet and fall off to less than 10 per million at approximately 3,600 feet. However with the implementation of ARB's regulation on TRUs, the risk will be significantly reduced.[5] We have not conducted a risk assessment for distribution centers based on truck traffic alone, but on an emissions basis, we would expect similar risks for a facility with truck volumes in the range of 100 per day.

Figure 1-2

Estimated Risk Range versus Distance from Center of TRU Activity Area*

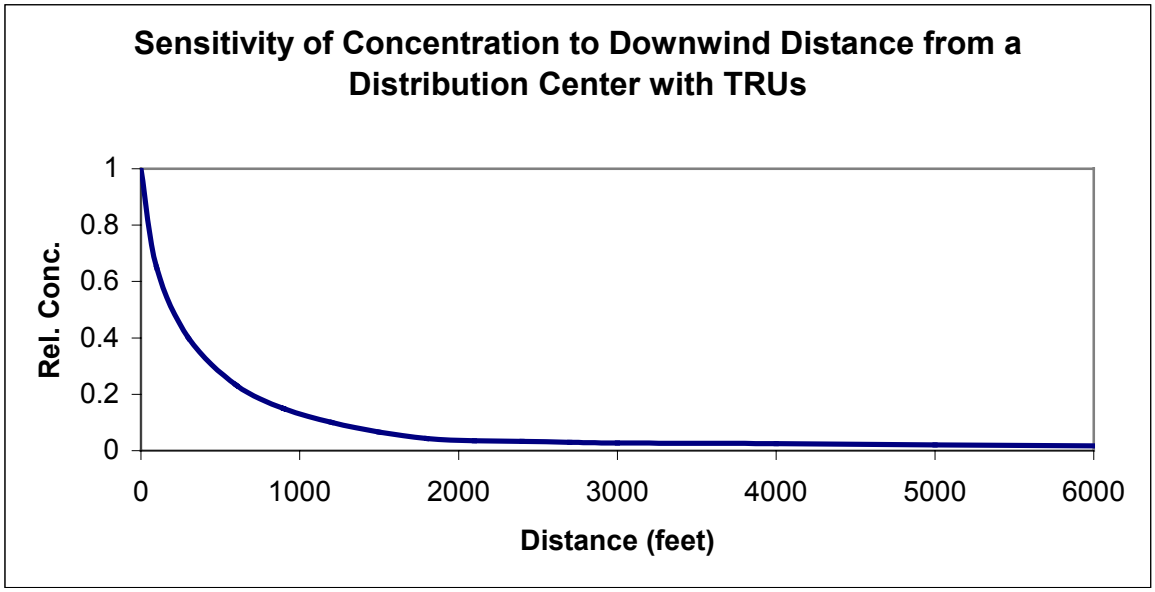


The estimated potential cancer risk level in Figure 1-2 is based on a number of assumptions that may not reflect actual conditions for a specific site. For example, increasing or decreasing the hours of diesel engine operations would change the potential risk levels. Meteorological and other facility specific parameters can also impact the results. Therefore, the results presented here are not directly applicable to any particular facility or operation. Rather, this information is intended to provide an indication as to the potential relative levels of risk that may be observed from operations at distribution centers. As shown in Figure 1-2, the estimated risk levels will decrease over time as lower-emitting diesel engines are used.

[5] These risk values assume an exposure duration of 70 years for a nearby resident and uses the methodology specified in the 2003 OEHHA health risk assessment guidelines.

Another air modeling analysis, performed by the South Coast Air Quality Management District (South Coast AQMD), evaluated the impact of diesel PM emissions from distribution center operations in the community of Mira Loma in southern California. Based on dispersion of diesel PM emissions from a large distribution center, Figure 1-3 shows the relative pollution concentrations at varying distances downwind. As Figure 1-3 shows, there is about an 80 percent drop off in concentration at approximately 1,000 feet.

Figure 1-3
Decrease In Relative Concentration of Risk
With Distance



Both the ARB and the South Coast AQMD analyses indicate that providing a separation of 1,000 feet would substantially reduce diesel PM concentrations and public exposure downwind of a distribution center. While these analyses do not provide specific risk estimates for distribution centers, they provide an indication of the range of risk and the benefits of providing a separation. ARB recommends a separation of 1,000 feet based on the combination of risk analysis done for TRUs and the decrease in exposure predicted with the South Coast AQMD modeling. However, ARB staff plans to provide further information on distribution centers as we collect more data and implement the TRU control measure.

Taking into account the configuration of distribution centers can also reduce population exposure and risk. For example, locating new sensitive land uses away from the main entry and exit points helps to reduce cancer risk and other health impacts.

Recommendations

- Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating TRUs per day, or where TRU unit operations exceed 300 hours per week).

- Take into account the configuration of existing distribution centers and avoid locating residences and other new sensitive land uses near entry and exit points.

References

- *Airborne Toxic Control Measure To Limit Diesel-Fueled Commercial Motor Vehicle Idling.* ARB (August 20, 2004). Rule effectiveness date awaiting submittal of regulation to the Office of Administration Law. http://www.arb.ca.gov/regact/idling/idling.htm

- *Revised Staff Report: Initial Statement of Reasons for Proposed Rulemaking. Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets, and Facilities Where TRUs Operate.* ARB (October 28, 2003). http://www.arb.ca.gov/regact/trude03/revisor.doc

- *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis.* SCAQMD (August 2003) http://www.aqmd.gov/ceqa/handbook/diesel_analysis.doc

- *"Mira Loma Study: Analysis of the Impact of Diesel Particulate Emissions from Warehouse/Distribution Center Operations",* PowerPoint presentation. SCAQMD (July 31, 2002)

Rail Yards

Rail yards are a major source of diesel particulate air pollution. They are usually located near inter-modal facilities, which attract heavy truck traffic, and are often sited in mixed industrial and residential areas. ARB, working with the Placer County air district and Union Pacific Railroad, recently completed a study[6] of the Roseville Rail Yard (Yard) in northern California that focused on the health risk from diesel particulate. A comprehensive emissions analysis and air quality modeling were conducted to characterize the estimated potential cancer risk associated with the facility.

[6] To review the study, please click on: http://www.arb.ca.gov/diesel/documents/rrstudy.htm

The Yard encompasses about 950 acres on a one-quarter mile wide by four-mile long strip of land that parallels Interstate 80. It is surrounded by commercial, industrial, and residential properties. The Yard is one of the largest service and maintenance rail yards in the West with over 30,000 locomotives visiting annually.

Using data provided by Union Pacific Railroad, the ARB determined the number and type of locomotives visiting the Yard annually and what those locomotives were doing - moving, idling, or undergoing maintenance testing. Union Pacific provided the annual, monthly, daily, and hourly locomotive activity in the yard including locomotive movements; routes for arrival, departure, and through trains; and locomotive service and testing. This information was used to estimate the emissions of particulate matter from the locomotives, which was then used to model the potential impacts on the surrounding community.

The key findings of the study are:

- Diesel PM emissions in 2000 from locomotive operations at the Roseville Yard were estimated at about 25 tons per year.

- Of the total diesel PM in the Yard, moving locomotives accounted for about 50 percent, idling locomotives about 45 percent, and locomotive testing about five percent.

- Air quality modeling predicts potential cancer risks greater than 500 in a million (based on 70 years of exposure) in a 10-40 acre area immediately adjacent to the Yard's maintenance operations.

- The risk assessment also showed elevated cancer risk impacting a larger area covering about a 10 by 10 mile area around the Yard.

The elevated concentrations of diesel PM found in the study contribute to an increased risk of cancer and premature death due to cardiovascular disease, and non-cancer health effects such as asthma and other respiratory illnesses. The magnitude of the risk, the general location, and the size of the impacted area depended on the meteorological data used to characterize conditions at the Yard, the dispersion characteristics, and exposure assumptions. In addition to these variables, the nature of locomotive activity will influence a risk characterization at a particular rail yard. For these reasons, the quantified risk estimates in the Roseville Rail Yard Study cannot be directly applied to other rail yards. However, the study does indicate the health risk due to diesel PM from rail yards needs to be addressed. ARB, in conjunction with the U.S. Environmental Protection Agency (U.S. EPA), and local air districts, is working with the rail industry to identify and implement short term, mid-term and long-term mitigation strategies. ARB also intends to conduct a second rail study in southern California to increase its understanding of rail yard operations and the associated public health impacts.

Key Health Findings

Diesel PM has been identified by ARB as a toxic air contaminant and represents 70 percent of the known potential cancer risk from air toxics in California. Diesel PM is an important contributor to particulate matter air pollution. Particulate matter exposure is associated with premature mortality and health effects such as asthma exacerbation and hospitalization due to aggravating heart and lung disease.

Distance Related Findings

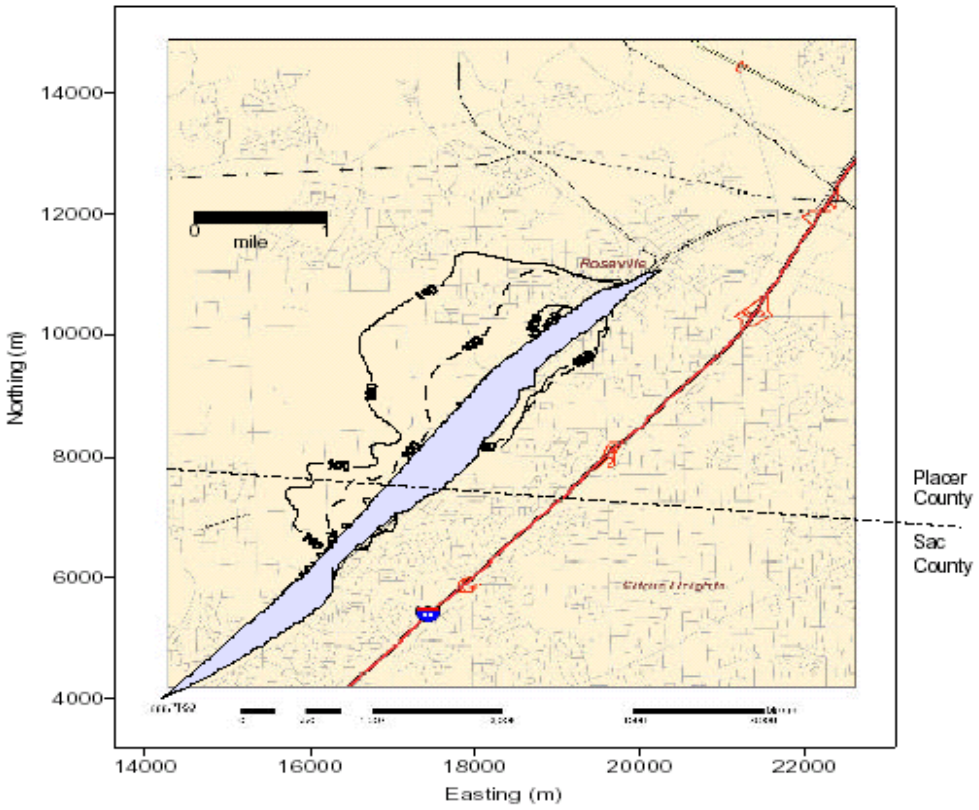
Two sets of meteorological data were used in the Roseville study because of technical limitations in the data. The size of the impact area was highly dependent on the meteorological data set used. The predicted highest impact area ranged from 10 - 40 acres with the two different meteorological data sets. This area, with risks estimated above 500 in a million, is adjacent to an area that includes a maintenance shop (see Figure 1-4). The high concentration of diesel PM emissions is due to the number of locomotives and nature of activities in this area, particularly idling locomotives.

The area of highest impact is within 1,000 feet of the Yard. The next highest impact zone as defined in the report had a predicted risk between 500 and 100 in one million and extends out between a half to one mile in some spots, depending on which meteorological conditions were assumed. The impact areas are irregular in shape making it difficult to generalize about the impact of distance at a particular location. However, the Roseville Rail Yard Study clearly indicates that the localized health risk is high, the impact area is large, and mitigation of the locomotive diesel PM emissions is needed.

For facilities like rail yards and ports, the potential impact area is so large that the real solution is to substantially reduce facility emissions. However, land use planners can avoid encroaching upon existing rail facilities and those scheduled for expansion. We also recommend that while air agencies tackle this problem, land use planners try not to add new sensitive individuals into the highest exposure areas. Finally, we recommend that land use agencies consider the potential health impacts of rail yards in their planning and permitting processes. Additional limitations and mitigation may be feasible to further reduce exposure on a site-specific basis.

Figure 1-4

Estimated Cancer Risk from the Yard
(100 and 500 in a million risk isopleths)



Notes: 100/Million Contours: Solid Line – Roseville Met Data; Dashed Line-McClellan Met Data, Urban Dispersion Coefficients, 80th Percentile Breathing Rate, All Locomotives' Activities (23 TPY), 70-Year Exposure

Recommendation

- Avoid siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard[7].
- Within one mile of a rail yard, consider possible siting limitations and mitigation approaches.

References

- *Roseville Rail Yard Study.* ARB (2004)

[7] The rail yard risk analysis was conducted for the Union Pacific rail yard in Roseville, California. This rail yard is one of the largest in the state. There are other rail yards in California with comparable levels of activity that should be considered "major" for purposes of this Handbook.

Ports

Air pollution from maritime port activities is a growing concern for regional air quality as well as air quality in nearby communities. The primary air pollutant associated with port operations is directly emitted diesel particulate. Port-related activities also result in emissions that form ozone and secondary particulate in the atmosphere. The emission sources associated with ports include diesel engine-powered ocean-going ships, harbor craft, cargo handling equipment, trucks, and locomotives. The size and concentration of these diesel engines makes ports one of the biggest sources of diesel PM in the state. For that reason, ARB has made it a top priority to reduce diesel PM emissions at the ports, in surrounding communities, and throughout California.

International, national, state, and local government collaboration is critical to reducing port emissions based on both legal and practical considerations. For example, the International Maritime Organization (IMO) and the U.S. EPA establish emission standards for ocean-going vessels and U.S.-flagged harbor craft, respectively. ARB is pursuing further federal actions to tighten these standards. In addition, ARB and local air districts are reducing emissions from ports through a variety of approaches. These include: incentive programs to fund cleaner engines, enhanced enforcement of smoke emissions from ships and trucks, use of dockside electricity instead of diesel engines, cleaner fuels for ships, harbor craft, locomotives, and reduced engine idling. The two ATCMs that limit truck idling and reduce emissions from TRUs (discussed under “Distribution Centers”) also apply to ports.

ARB is also developing several other regulations that will reduce port-related emissions. One rule would require ocean-going ships to use a cleaner marine diesel fuel to power auxiliary engines while in California coastal waters and at dock. Ships that frequently visit California ports would also be required to further reduce their emissions. ARB has adopted a rule that would require harbor craft to use the same cleaner diesel fuel used by on-road trucks in California. In 2005, ARB will consider a rule that would require additional controls for in-use harbor craft, such as the use of add-on emission controls and accelerated turnover of older engines.

Key Health Findings

Port activities are a major source of diesel PM. Diesel PM has been identified by ARB as a toxic air contaminant and represents 70 percent of the known potential cancer risk from air toxics in California. Diesel PM is an important contributor to particulate matter air pollution. Particulate matter exposure is associated with premature mortality and health effects such as asthma exacerbation and hospitalization due to aggravating heart and lung disease.

Distance Related Findings

The Ports of Los Angeles and Long Beach provide an example of the emissions impact of port operations. A comprehensive emissions inventory was completed in June 2004. These ports combined are one of the world's largest and busiest seaports. Located in San Pedro Bay, about 20 miles south of downtown Los Angeles, the port complex occupies approximately 16 square miles of land and water. Port activities include five source categories that produce diesel emissions. These are ocean-going vessels, harbor craft, cargo handling equipment, railroad locomotives, and heavy-duty trucks.

The baseline emission inventory provides emission estimates for all major air pollutants. This analysis focuses on diesel PM from in-port activity because these emissions have the most potential health impact on the areas adjacent to the port. Ocean vessels are the largest overall source of diesel PM related to the ports, but these emissions occur primarily outside of the port in coastal waters, making the impact more regional in nature.

The overall in-port emission inventory for diesel particulate for the ports of Los Angeles and Long Beach is estimated to be 550 tons per year. The emissions fall in the following major categories: ocean-going vessels (17%), harbor craft (25%), cargo handling (47%), railroad locomotive (3%), and heavy duty vehicles (8%). In addition to in-port emissions, ship, rail, and trucking activities also contribute to regional emissions and increase emissions in nearby neighborhoods. Off-port emissions associated with related ship, rail, and trucking activities contribute an additional 680 tons per year of diesel particulate at the Port of Los Angeles alone.

To put this in perspective, the diesel PM emissions estimated for the Roseville Yard in ARB's 2004 study are 25 tons per year. The potential cancer risk associated with these emissions is 100 in one million at a distance of one mile, or one half mile, depending on the data set used. This rail yard covers one and a half square miles. The Los Angeles and Long Beach ports have combined diesel PM emissions of 550 tons per year emitted from a facility that covers a much larger area - 16 miles. The ports have about twice the emission density of the rail yard - 34 tons per year per square mile compared to 16 tons per year per square mile. However, while this general comparison is illustrative of the overall size of the complex, a detailed air quality modeling analysis would be needed to assess the potential health impact on specific downwind areas near the ports.

ARB is in the process of evaluating the various port-related emission sources from the standpoint of existing emissions, growth forecasts, new control options, regional air quality impacts, and localized health risk. A number of public processes - both state and local - are underway to address various aspects of these issues. Until more of these analyses are complete, there is little basis for recommending a specific separation between new sensitive land uses and ports.

For example, the type of data we have showing the relationship between air pollutant concentrations and distance from freeways is not yet available.

Also, the complexity of the port facilities makes a site-specific analysis critical. Ports are a concentration of multiple emission sources with differing dispersion and other characteristics. In the case of the Roseville rail yard, we found a high, very localized impact associated with a particular activity, service and maintenance. By contrast, the location, size, and nature of impact areas can be expected to vary substantially for different port activities. For instance, ground level emissions from dockside activities would behave differently from ship stack level emissions.

Nonetheless, on an emissions basis alone, we expect locations downwind of ports to be substantially impacted. For that reason, we recommend that land use agencies track the current assessment efforts, and consider limitations on the siting of new sensitive land uses in areas immediately downwind of ports.

Recommendations

Avoid siting new sensitive land uses immediately downwind of ports in the most heavily impacted zones. Consult local air districts or the ARB on the status of pending analyses of health risks.

References

- *Roseville Rail Yard Study.* ARB (2004)
- Final Draft, "*Port-Wide Baseline Air Emissions Inventory."* Port of Los Angeles (June 2004)
- Final Draft, "*2002 Baseline Air Emissions Inventory."* Port of Long Beach (February 2004)

Petroleum Refineries

A petroleum refinery is a complex facility where crude oil is converted into petroleum products (primarily gasoline, diesel fuel, and jet fuel), which are then transported through a system of pipelines and storage tanks for final distribution by delivery truck to fueling facilities throughout the state. In California, most crude oil is delivered either by ship from Alaska or foreign sources, or is delivered via pipeline from oil production fields within the state. The crude oil then undergoes many complex chemical and physical reactions, which include distillation, catalytic cracking, reforming, and finishing. These refining processes have the potential to emit air contaminants, and are subject to extensive emission controls by district regulations.

As a result of these regulations covering the production, marketing, and use of gasoline and other oil by-products, California has seen significant regional air quality benefits both in terms of cleaner fuels and cleaner operating facilities. In

the 1990s, California refineries underwent significant modifications and modernization to produce cleaner fuels in response to changes in state law. Nevertheless, while residual emissions are small when compared to the total emissions controlled from these major sources, refineries are so large that even small amounts of fugitive, uncontrollable emissions and associated odors from the operations, can be significant. This is particularly the case for communities that may be directly downwind of the refinery. Odors can cause health symptoms such as nausea and headache. Also, because of the size, complexity, and vast numbers of refinery processes onsite, the occasional refinery upset or malfunction can potentially result in acute or short-term health effects to exposed individuals.

Key Health Findings

Petroleum refineries are large single sources of emissions. For volatile organic compounds (VOCs), eight of the ten largest stationary sources in California are petroleum refineries. For oxides of nitrogen (NOx), four of the ten largest stationary sources in California are petroleum refineries. Both of these compounds react in the presence of sunlight to form ozone. Ozone impacts lung function by irritating and damaging the respiratory system. Petroleum refineries are also large stationary sources of both particulate matter under 10 microns in size (PM_{10}) and particulate matter under 2.5 microns in size ($PM_{2.5}$). Exposure to particulate matter aggravates a number of respiratory illnesses, including asthma, and is associated with premature mortality in people with existing cardiac and respiratory disease. Both long-term and short-term exposure can have adverse health impacts. Finer particles pose an increased health risk because they can deposit deep in the lung and contain substances that are particularly harmful to human health. NOx are also significant contributors to the secondary formation of $PM_{2.5}$.

Petroleum refineries also emit a variety of toxic air pollutants. These air toxics vary by facility and process operation but may include: acetaldehyde, arsenic, antimony, benzene, beryllium, 1,3-butadiene, cadmium compounds, carbonyl sulfide, carbon disulfide, chlorine, dibenzofurans, diesel particulate matter, formaldehyde, hexane, hydrogen chloride, lead compounds, mercury compounds, nickel compounds, phenol, 2,3,7,8 tetrachlorodibenzo-p-dioxin, toluene, and xylenes (mixed) among others. The potential health effects associated with these air toxics can include cancer, respiratory irritation, and damage to the central nervous system, depending on exposure levels.

Distance Related Findings

Health risk assessments for petroleum refineries have shown risks from toxic air pollutants that have quantifiable health risk values to be around 10 potential cancer cases per million. Routine air monitoring and several air monitoring studies conducted in the San Francisco Bay Area (Crockett) and the South Coast Air Basin (Wilmington) have not identified significant health risks specifically

associated with refineries. However, these studies did not measure diesel PM as no accepted method currently exists, and there are many toxic air pollutants that do not have quantifiable health risk values.

In 2002, ARB published a report on the results of the state and local air district air monitoring done near oil refineries. The purpose of this evaluation was to try to determine how refinery-related emissions might impact nearby communities. This inventory of air monitoring activities included 10 ambient air monitoring stations located near refineries in Crockett and four stations near refineries in Wilmington. These monitoring results did not identify significant increased health risks associated with the petroleum refineries. In 2002-2003, ARB conducted additional monitoring studies in communities downwind of refineries in Crockett and Wilmington. These monitoring results also did not indicate significant increased health risks from the petroleum refineries.

Consequently, there are no air quality modeling or air monitoring data that provides a quantifiable basis for recommending a specific separation between refineries and new sensitive land uses. However, in view of the amount and potentially hazardous nature of many of the pollutants released as part of the refinery process, we believe the siting of new sensitive land uses immediately downwind should be avoided. Land use agencies should consult with the local air district when considering how to define an appropriate separation for refineries within their jurisdiction.

Recommendations

- Avoid siting new sensitive land uses immediately downwind of petroleum refineries. Consult with local air districts and other local agencies to determine an appropriate separation.

References

- *Review of Current Ambient Air Monitoring Activities Related to California Bay Area and South Coast Refineries. ARB (March 2002)* http://www.arb.ca.gov/aaqm/qmosqual/special/mldrefinery.pdf
- *Community Air Quality Monitoring: Special Studies – Crockett. ARB (September 2004)* http://www.arb.ca.gov/ch/communities/studies/crockett/crockett.htm
- *Wilmington Study - Air Monitoring Results. ARB (2003)* http://www.arb.ca.gov/ch/communities/studies/wilmington/wilmington.htm

Chrome Plating Operations

Chrome plating operations rely on the use of the toxic metal hexavalent chromium, and have been subject to ARB and local air district control programs for many years. Regulation of chrome plating operations has reduced statewide emissions substantially. However, due to the nature of chrome plating

operations and the highly toxic nature of hexavalent chromium, the remaining health risk to nearby residents is a continuing concern.

Chrome plating operations convert hexavalent chromium in solution to a chromium metal layer by electroplating, and are categorized based upon the thickness of the chromium metal layer applied. In “decorative plating”, a layer of nickel is first plated over a metal substrate. Following this step, a thin layer of chromium is deposited over the nickel layer to provide a decorative and protective finish, for example, on faucets and automotive wheels. “Hard chrome plating” is a process in which a thicker layer of chromium metal is deposited directly on metal substrates such as engine parts, industrial machinery, and tools to provide greater protection against corrosion and wear.

Hexavalent chromium is emitted into the air when an electric current is applied to the plating bath. Emissions are dependent upon the amount of electroplating done per year and the control requirements. A unit of production referred to as an ampere-hour represents the amount of electroplating produced. Small facilities have an annual production rate of 100,000 – 500,000 ampere-hours, while medium-size facilities may have a production rate of 500,000 to about 3 million ampere-hours. The remaining larger facilities have a range of production rates that can be as high as 80 million ampere-hours.

The control requirements, which reduce emissions from the plating tanks, vary according to the size and type of the operation. Facilities either install add-on pollution control equipment, such as filters and scrubbers, or in-tank controls, such as fume suppressants and polyballs. With this combination of controls, the overall hexavalent chromium emissions have been reduced by over 90 percent. Larger facilities typically have better controls that can achieve efficiencies greater than 99 percent. However, even with stringent controls, the lack of maintenance and good housekeeping practices can lead to problems. And, since the material itself is inherently dangerous, any lapse in compliance poses a significant risk to nearby residents.

A 2002 ARB study in the San Diego community of Barrio Logan measured unexpectedly high concentrations of hexavalent chromium near chrome platers. The facilities were located in a mixed-use area with residences nearby. The study found that fugitive dust laden with hexavalent chromium was an important source of emissions that likely contributed to the elevated cancer risk. Largely as a result of this study, ARB is in the process of updating the current requirements to further reduce the emissions from these facilities.

In December 2004, the ARB adopted an ATCM to reduce emissions of hexavalent chromium and nickel from thermal spraying operations through the installation of best available control technology. The ATCM requires all existing facilities to comply with its requirements by January 1, 2006. New and modified thermal spraying operations must comply upon initial startup. An existing thermal spraying facility may be exempt from the minimum control efficiency

requirements of the ATCM if it is located at least 1,640 feet from the nearest sensitive receptor and emits no more than 0.5 pound per year of hexavalent chromium.[8]

Key Health Findings

Hexavalent chromium is one of the most toxic air pollutants regulated by the State of California. Hexavalent chromium is a carcinogen and has been identified in worker health studies as causing lung cancer. Exposure to even very low levels of hexavalent chromium should be avoided.

The California Office of Environmental Health Hazard Assessment has found that: 1) many epidemiological studies show a strong association between hexavalent chromium exposure in the work place and respiratory cancer; and 2) all short-term assays reported show that hexavalent chromium compounds can cause damage to human DNA.

Hexavalent chromium when inhaled over a period of many years can cause a variety of non-cancer health effects. These health effects include damage to the nose, blood disorders, lung disease, and kidney damage. The non-cancer health impacts occur with exposures considerably higher than exposures causing significant cancer risks. It is less likely that the public would be exposed to hexavalent chromium at levels high enough to cause these non-cancer health effects. Non-cancer health effects, unlike cancer health effects, have a threshold or exposure level below which non-cancer health effects would not be expected.

Distance Related Findings

ARB's 2002 Barrio Logan Study measured concentrations of hexavalent chromium in the air near two chrome plating facilities. The study was conducted from December 2001 to May 2002. There were two chrome platers on the street - one decorative and one hard plater. The purpose of the study was to better understand the near source impact of hexavalent chromium emissions. Air monitors were placed at residences next to the platers and at varying distances down the street. The monitors were moved periodically to look at the spatial distribution of the impact. Source testing and facility inspections identified one of the facilities as the likely source.

The first two weeks of monitoring results showed unexpectedly high levels of hexavalent chromium at a number of the monitoring sites. The high concentrations were intermittent. The concentrations ranged from 1 to 22 ng/m3 compared to the statewide average of 0.1 ng/m3. If these levels were to continue for 70 years, the potential cancer risk would be 150 in one million. The highest value was found at an air monitor behind a house adjacent to one of the

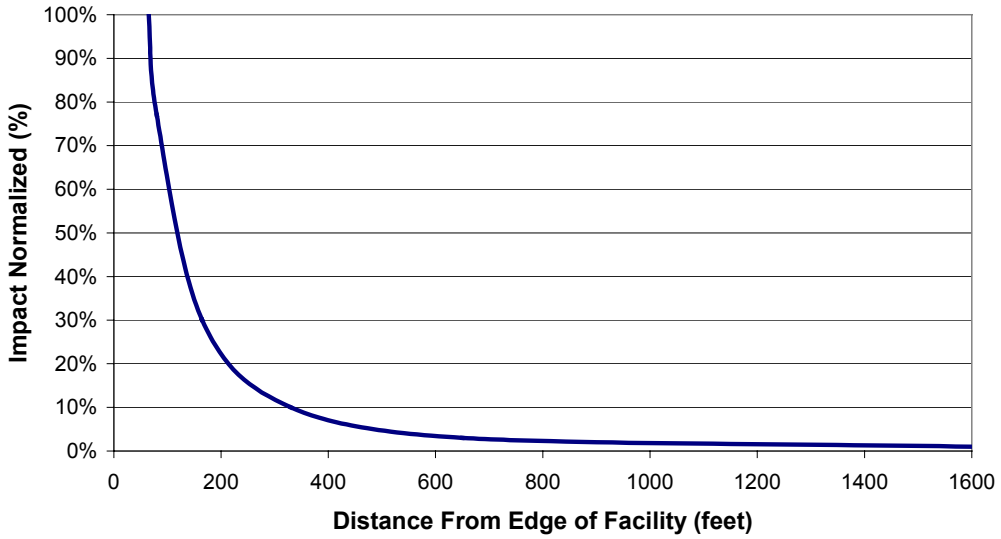
[8] For further information on the ATCM, please refer to: http://www.arb.ca.gov/regact/thermspr/thermalspr.htm

plating facilities–approximately 30 feet from the back entrance. Lower, but significant concentrations were found at an ambient air monitor 250 feet away.

The monitoring covered a period when the facility was not operating its plating tank. During this period, one of the highest concentrations was measured at an adjacent house. It appears that chromium-laden dust was responsible for high concentrations at this location since there was no plating activity at the time. Dust samples from the facility were tested and found to contain high levels of hexavalent chromium. On the day the highest concentration was measured at the house next door, a monitor 350 feet away from the plater's entrance showed very little impact. Similar proximity effects are shown in ARB modeling studies.

Figure 1-5 shows how the relative health risk varies as a function of distance from a chrome plater. This analysis is based on a medium-sized chrome plater with an annual production rate of 3 million ampere-hours. As shown in Figure 1- 5, the potential health risk drops off rapidly, with over 90 percent reduction in risk within 300 feet. This modeling was done in 2003 as part of a review of ARB's current air toxic control measure for chrome platers and is based on data from a recent ARB survey of chrome platers in California. The emission

Figure 1-5
Risk vs. Distance From Chrome Plater
(Based on plating tank emissions)



rates are only for plating operations. Because there are insufficient data available to directly quantify the impacts, the analysis does not include fugitive emissions, which the Barrio Logan analysis indicated could be significant.

Both the ARB Barrio Logan monitoring results and ARB's 2003 modeling analysis suggests that the localized emissions impact of a chrome plater diminishes significantly at 300 feet. However, in developing our recommendation, we also considered the following factors:

- some chrome platers will have higher volumes of plating activity,
- potential dust impacts were not modeled,
- we have only one monitoring study looking at the impact of distance, and,
- hexavalent chromium is one of the most potent toxic air contaminants ARB has identified.

Given these limitations in the analysis, we recommend a separation of 1,000 feet as a precautionary measure. For large chrome platers, site specific information should be obtained from the local air district.

Recommendation

- Avoid siting new sensitive land uses within 1,000 feet of a chrome plater.

References

- *Ambient Air Monitoring for Hexavalent Chromium and Metals in Barrio Logan: May 2001 through May 2002.* ARB, Monitoring and Laboratory Division (October 14, 2003)
- *Draft Barrio Logan Report.* ARB, Planning and Technical Support Division (November 2004)
- *Proposed Amendments to the Hexavalent Chromium Control Measure for Decorative and Hard Chrome Plating and Chromic Acid Anodizing Facilities.* ARB (April 1998)
- Murchison, Linda; Suer, Carolyn; Cook, Jeff. *"Neighborhood Scale Monitoring in Barrio Logan," (*AWMA Annual Conference Proceedings, June 2003)

Dry Cleaners Using Perchloroethylene (Perc Dry Cleaners)

Perchloroethylene (perc) is the solvent most commonly used by the dry cleaning industry to clean clothes or other materials. The ARB and other public health agencies have identified perc as a potential cancer-causing compound. Perc persists in the atmosphere long enough to contribute to both regional air pollution and localized exposures. Perc dry cleaners are the major source of perc emissions in California.

Since 1990, the statewide concentrations and health risk from exposure to perc has dropped over 70 percent. This is due to a number of regulatory requirements on perc dry cleaners and other sources, including degreasing operations, brake cleaners, and adhesives. ARB adopted an Airborne Toxic Control Measure (ATCM) for Perc Emissions from Dry Cleaning Operations in 1993. ARB has also prohibited the use of perc in aerosol adhesives and automotive brake cleaners.

Perc dry cleaners statewide are required to comply with ARB and local air district regulations to reduce emissions. However, even with these controls, some emissions continue to occur. Air quality studies indicate that there is still the potential for significant risks even near well-controlled dry cleaners. The South Coast AQMD has adopted a rule requiring that all new dry cleaners use alternatives to perc and that existing dry cleaners phase out the use of perc by December 2020. Over time, transition to non-toxic alternatives should occur. However, while perc continues to be used, a preventative approach should be taken to siting of new sensitive land uses.

Key Health Findings

Inhalation of perc may result in both cancer and non-cancer health effects. An assessment by California's Office of Environmental Health Hazard Assessment (OEHHA) concluded that perc is a potential human carcinogen and can cause non-cancer health effects. In addition to the potential cancer risk, the effects of long-term exposure include dizziness, impaired judgment and perception, and damage to the liver and kidneys. Workers have shown signs of liver toxicity following chronic exposure to perc, as well as kidney dysfunction and neurological effects. Non-cancer health effects occur with higher exposure levels than those associated with significant cancer risks. The public is more likely to be exposed to perchloroethylene at levels causing significant cancer risks than to levels causing non-cancer health effects. Non-cancer health effects, unlike cancer health effects, have a threshold or exposure level below which non-cancer health effects would not be expected. The ARB formally identified perc as a toxic air contaminant in October 1991.

One study has determined that inhalation of perc is the predominant route of exposure to infants living in apartments co-located in the same building with a business operating perc dry cleaning equipment. Results of air sampling within co-residential buildings indicate that dry cleaners can cause a wide range of exposures depending on the type and maintenance of the equipment. For example, a well-maintained state-of-the-art system may have risks in the range of 10 in one million, whereas a badly maintained machine with major leaks can have potential cancer risks of thousands in one million.

The California Air Pollution Control Officers Association (CAPCOA) is developing Industry-wide Risk Assessment Guidelines for Perchloroethylene Dry Cleaners which, when published, will provide detailed information on public health risk from exposure to emissions from this source.

Distance Related Findings

Risk created by perc dry cleaning is dependent on the amount of perc emissions, the type of dry cleaning equipment, proximity to the source, and how the emissions are released and dispersed (e.g., type of ventilation system, stack parameters, and local meteorology). Dry cleaners are often located near

residential areas, and near shopping centers, schools, day-care centers, and restaurants.

The vast majority of dry cleaners in California have one dry cleaning machine per facility. The South Coast AQMD estimates that an average well-controlled dry cleaner uses about 30 to 160 gallons of cleaning solvent per year, with an average of about 100 gallons. Based on these estimates, the South Coast AQMD estimates a potential cancer risk between 25 to 140 in one million at residential locations 75 feet or less from the dry cleaner, with an average of about 80 in one million. The estimate could be as high as 270 in one million for older machines.

CAPCOA's draft industry-wide risk assessment of perc dry cleaning operations indicates that the potential cancer risk for many dry cleaners may be in excess of potential cancer risk levels adopted by the local air districts. The draft document also indicates that, in general, the public's exposure can be reduced by at least 75 percent, by providing a separation distance of about 300 feet from the operation. This assessment is based on a single machine with perc use of about 100 gallons per year. At these distances, the potential cancer risk would be less than 10 potential cases per million for most scenarios.

The risk would be proportionately higher for large, industrial size, dry cleaners. These facilities typically have two or more machines and use 200 gallons or more per year of perc. Therefore, separation distances need to be greater for large dry cleaners. At a distance of 500 feet, the remaining risk for a large plant can be reduced by over 85 percent.

In California, a small number of dry cleaners that are co-located (sharing a common wall, floor, or ceiling) with a residence have the potential to expose the inhabitants of the residence to high levels of perc. However, while special requirements have been imposed on these existing facilities, the potential for exposure still exists. Avoiding these siting situations in the future is an important preventative measure.

Local air districts are a source of information regarding specific dry cleaning operations—particularly for large industrial operations with multiple machines. The 300 foot separation recommended below reflects the most common situation – a dry cleaner with only one machine. While we recommend 500 feet when there are two or more machines, site specific information should be obtained from the local air district for some very large industrial operations. Factors that can impact the risk include the number and type of machines, controls used, source configuration, building dimensions, terrain, and meteorological data.

Recommendation

- Avoid siting new sensitive land uses within 300 feet of any dry cleaning operation. For operations with two or more machines provide 500 feet. For operations with 3 or more machines, consult with the local air district.

- Do not site new sensitive land uses in the same building with perc dry cleaning operations.

References

- *Proposed Amended Rule 1421 – Control of Perchloroethylene Emissions from Dry Cleaning Systems,* Final Staff Report. South Coast AQMD. (October 2002)
- *Air Toxic Control Measure for Emissions of Perchloroethylene from Dry Cleaning Operations.* ARB (1994) (http://www.arb.ca.gov/toxics/atcm/percatcm.htm)
- *"An Assessment of Tetrachloroethylene in Human Breast Milk"*, Judith Schreiber, New York State Department of Health – Bureau of Toxic Substance Assessment, Journal of Exposure Analysis and Environmental Epidemiology, Vol.2, Suppl.2, pp. 15-26, 1992.
- Draft *Air Toxics "Hot Spots" Program Perchloroethylene Dry Cleaner Industry-wide Risk Assessment Guidelines.* (CAPCOA (November 2002)
- *Final Environmental Assessment for Proposed Amended Rule 1421 – Control of Perchloroethylene Emissions from Dry Cleaning Systems.* South Coast AQMD. (October 18, 2002)

Gasoline Dispensing Facilities

Refueling at gasoline dispensing facilities releases benzene into the air. Benzene is a potent carcinogen and is one of the highest risk air pollutants regulated by ARB. Motor vehicles and motor vehicle-related activity account for over 90 percent of benzene emissions in California. While gasoline-dispensing facilities account for a small part of total benzene emissions, near source exposures for large facilities can be significant.

Since 1990, benzene in the air has been reduced by over 75 percent statewide, primarily due to the implementation of emissions controls on motor vehicle vapor recovery equipment at gas stations, and a reduction in benzene levels in gasoline. However, benzene levels are still significant. In urban areas, average benzene exposure is equivalent to about 50 in one million.

Gasoline dispensing facilities tend to be located in areas close to residential and shopping areas. Benzene emissions from the largest gas stations may result in near source health risk beyond the regional background and district health risk thresholds. The emergence of very high gasoline throughput at large retail or

wholesale outlets makes this a concern as these types of outlets are projected to account for an increasing market share in the next few years.

Key Health Findings

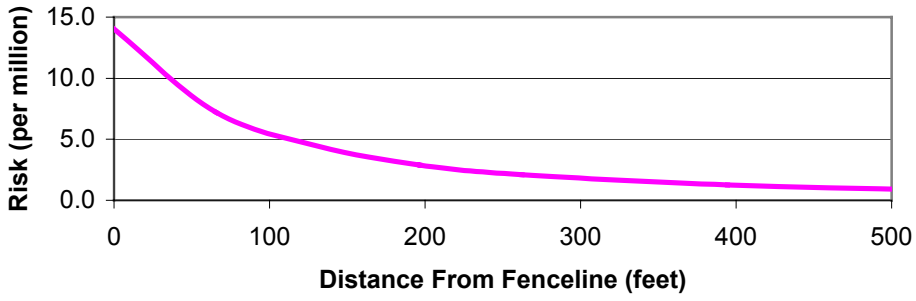
Benzene is a human carcinogen identified by ARB as a toxic air contaminant. Benzene also can cause non-cancer health effects above a certain level of exposure. Brief inhalation exposure to high concentrations can cause central nervous system depression. Acute effects include central nervous system symptoms of nausea, tremors, drowsiness, dizziness, headache, intoxication, and unconsciousness. It is unlikely that the public would be exposed to levels of benzene from gasoline dispensing facilities high enough to cause these non-cancer health effects.

Distance Related Findings

A well-maintained vapor recovery system can decrease emissions of benzene by more than 90% compared with an uncontrolled facility. Almost all facilities have emission control systems. Air quality modeling of the health risks from gasoline dispensing facilities indicate that the impact from the facilities decreases rapidly as the distance from the facility increases.

Statistics reported in the ARB's staff reports on Enhanced Vapor Recovery released in 2000 and 2002, indicated that almost 96 percent of the gasoline dispensing facilities had a throughput less than 2.4 million gallons per year. The remaining four percent, or approximately 450 facilities, had throughputs exceeding 2.4 million gallons per year. For these stations, the average gasoline throughput was 3.6 million gallons per year.

Figure 1-6
Gasoline Dispensing Facility Health Risk
for 3,600,000 gal/yr throughput



As shown in Figure 1-6, the risk levels for a gasoline dispensing facility with a throughput of 3.6 million gallons per year is about 10 in one million at a distance of 50 feet from the fenceline. However, as the throughput increases, the potential risk increases.

As mentioned above, air pollution levels in the immediate vicinity of large gasoline dispensing facilities may be higher than the surrounding area (although tailpipe emissions from motor vehicles dominates the health impacts). Very large gasoline dispensing facilities located at large wholesale and discount centers may dispense nine million gallons of gasoline per year or more. At nine million gallons, the potential risk could be around 25 in one million at 50 feet, dropping to about five in one million at 300 feet. Some facilities have throughputs as high as 19 million gallons.

Recommendation

- Avoid siting new sensitive land uses within 300 feet of a large gasoline dispensing facility (defined as a facility with a throughput of 3.6 million gallons per year or greater). A 50 foot separation is recommended for typical gas dispensing facilities.

References

- *Gasoline Service Station Industry-wide Risk Assessment Guidelines.* California Air Pollution Control Officers Association (December 1997 and revised November 1, 2001)
- *Staff Report on Enhanced Vapor Recovery.* ARB (February 4, 2000)
- *The California Almanac of Emissions and Air Quality.* ARB (2004)
- *Staff Report on Enhanced Vapor Recovery Technology Review.* ARB (October 2002)

Other Facility Types that Emit Air Pollutants of Concern

In addition to source specific recommendations, Table 1-3 includes a list of other industrial sources that could pose a significant health risk to nearby sensitive individuals depending on a number of factors. These factors include the amount of pollutant emitted and its toxicity, the distance to nearby individuals, and the type of emission controls in place. Since these types of facilities are subject to air permits from local air districts, facility specific information should be obtained where there are questions about siting a sensitive land use close to an industrial facility.

Potential Sources of Odor and Dust Complaints

Odors and dust from commercial activities are the most common sources of air pollution complaints and concerns from the public. Land use planning and permitting processes should consider the potential impacts of odor and dust on surrounding land uses, and provide for adequate separation between odor and dust sources. As with other types of air pollution, a number of factors need to be considered when determining an adequate distance or mitigation to avoid odor or

Table 1-3 – Examples of Other Facility Types That Emit[1] Air Pollutants of Concern

Categories	Facility Type	Air Pollutants of Concern
Commercial		
	Autobody Shops	Metals, Solvents
	Furniture Repair	Solvents[2], Methylene Chloride
	Film Processing Services	Solvents, Perchloroethylene
	Distribution Centers	Diesel Particulate Matter
	Printing Shops	Solvents
	Diesel Engines	Diesel Particulate Matter
Industrial		
	Construction	Particulate Matter, Asbestos
	Manufacturers	Solvents, Metals
	Metal Platers, Welders, Metal Spray (flame spray) Operations	Hexavalent Chromium, Nickel, Metals
	Chemical Producers	Solvents, Metals
	Furniture Manufacturers	Solvents
	Shipbuilding and Repair	Hexavalent chromium and other metals, Solvents
	Rock Quarries and Cement Manufacturers	Particulate Matter, Asbestos
	Hazardous Waste Incinerators	Dioxin, Solvents, Metals
	Power Plants	Benzene, Formaldehyde, Particulate Matter
	Research and Development Facilities	Solvents, Metals, etc.
Public		
	Landfills	Benzene, Vinyl Chloride, Diesel Particulate Matter
	Waste Water Treatment Plants	Hydrogen Sulfide
	Medical Waste Incinerators	Dioxin, Benzene, PAH, PCBs, 1,3-Butadiene
	Recycling, Garbage Transfer Stations	Diesel Particulate Matter
	Municipal Incinerators	Dioxin, Benzene, PAH, PCBs, 1,3-Butadiene
Transportation		
	Truck Stops	Diesel Particulate Matter
Agricultural Operations		
	Farming Operations	Diesel Particulate Matter, VOCs, NOx, PM10, CO, SOx, Pesticides
	Livestock and Dairy Operations	Ammonia, VOCs, PM10

[1]Not all facilities will emit pollutants of concern due to process changes or chemical substitution. Consult the local air district regarding specific facilities.
[2]Some solvents may emit toxic air pollutants, but not all solvents are toxic air contaminants.

dust complaints in a specific situation. Local air districts should be consulted for advice when these siting situations arise.

Table 1-4 lists some of the most common sources of odor complaints received by local air districts. Complaints about odors are the responsibility of local air districts and are covered under state law. The types of facilities that can cause odor complaints are varied and can range from small commercial facilities to large industrial facilities, and may include waste disposal and recycling operations. Odors can cause health symptoms such as nausea and headache. Facilities with odors may also be sources of toxic air pollutants (See Table 1-3). Some common sources of odors emitted by facilities are sulfur compounds, organic solvents, and the decomposition/digestion of biological materials. Because of the subjective nature of an individual's sensitivity to a particular type of odor, there is no specific rule for assigning appropriate separations from odor sources. Under the right meteorological conditions, some odors may still be offensive several miles from the source.

Table 1-4
Sources of Odor Complaints

- Sewage Treatment Plants
- Landfills
- Recycling Facilities
- Waste Transfer Stations
- Petroleum Refineries
- Biomass Operations
- Autobody Shops
- Coating Operations
- Fiberglass Manufacturing
- Foundries
- Rendering Plants
- Livestock Operations

Sources of dust are also common sources of air pollution-related complaints. Operations that can result in dust problems are rock crushing, gravel production, stone quarrying, and mining operations. A common source of complaints is the dust and noise associated with blasting that may be part of these operations. Besides the health impacts of dust as particulate matter, thick dust also impairs visibility, aesthetic values, and can soil homes and automobiles. Local air districts typically have rules for regulating dust sources in their jurisdictions, but dust sources can still be a concern. Therefore, separation of these facilities from residential and other new sensitive land uses should be considered.

In some areas of California, asbestos occurs naturally in stone deposits. Asbestos is a potent carcinogenic substance when inhaled. Asbestos-containing dust may be a public health concern in areas where asbestos-containing rock is mined, crushed, processed, or used. Situations where asbestos-containing gravel has been used in road paving materials are also a source of asbestos exposure to the general public. Planners are advised to consult with local air pollution agencies in areas where asbestos-containing gravel or stone products are produced or used.

2. Handbook Development

ARB and local air districts share responsibility for improving statewide air quality. As a result of California's air pollution control programs, air quality has improved and health risk has been reduced statewide. However, state and federal air quality standards are still exceeded in many areas of California and the statewide health risk posed by toxic air contaminants (air toxics) remains too high. Also, some communities experience higher pollution exposures than others - making localized impacts, as well regional or statewide impacts, an important consideration. It is for this reason that this Handbook has been produced - to promote better, more informed decision-making by local land use agencies that will improve air quality and public health in their communities.

Land use policies and practices, including planning, zoning, and siting activities, can play a critical role in air quality and public health at the local level. For instance, even with the best available control technology, some projects that are sited very close to homes, schools, and other public places can result in elevated air pollution exposures. The reverse is also true – siting a new school or home too close to an existing source of air pollution can pose a public health risk. The ARB recommendations in section 1 address this issue.

> *This Handbook is an informational document that we hope will strengthen the relationship between air quality and land use agencies. It highlights the need for land use agencies to address the potential for new projects to result in localized health risk or contribute to cumulative impacts where air pollution sources are concentrated.*

Avoiding these incompatible land uses is a key to reducing localized air pollution exposures that can result in adverse health impacts, especially to sensitive individuals.

Individual siting decisions that result in incompatible land uses are often the result of locating "sensitive" land uses next to polluting sources. These decisions can be of even greater concern when existing air pollution exposures in a community are considered. In general terms, this is often referred to as the issue of "cumulative impacts." ARB is working with local air districts to better define these situations and to make information about existing air pollution levels (e.g., from local businesses, motor vehicles, and other areawide sources) more readily available to land use agencies.

In December 2001, the ARB adopted "Policies and Actions for Environmental Justice" (Policies). These Policies were developed in coordination with a group of stakeholders, representing local government agencies, community interest

groups, environmental justice organizations, academia, and business (Environmental Justice Stakeholders Group).

The Policies included a commitment to work with land use planners, transportation agencies, and local air districts to develop ways to identify, consider, and reduce cumulative air pollution emissions, exposure, and health risks associated with land use planning and decision-making. Developed under the auspices of the ARB's Environmental Justice Stakeholders Group, this Handbook is a first step in meeting that commitment.

ARB has produced this Handbook to help achieve several objectives:

- Provide recommendations on situations to avoid when siting new residences, schools, day care centers, playgrounds, and medical-related facilities (sensitive sites or sensitive land uses);

- Identify approaches that land use agencies can use to prevent or reduce potential air pollution impacts associated with general plan policies, new land use development, siting, and permitting decisions;

- Improve and facilitate access to air quality data and evaluation tools for use in the land use decision-making process;

- Encourage stronger collaboration between land use agencies and local air districts to reduce community exposure to source-specific and cumulative air pollution impacts; and

- Emphasize community outreach approaches that promote active public involvement in the air quality/land use decision-making process.

This Handbook builds upon California's 2003 General Plan Guidelines. These Guidelines, developed by the Governor's Office of Planning and Research (OPR), explain the land use planning process and applicable legal requirements. This Handbook also builds upon a 1997 ARB report, "The Land Use-Air Quality Linkage" ("Linkage Report").[9] The Linkage Report was an outgrowth of the California Clean Air Act which, among other things, called upon local air districts to focus particular attention on reducing emissions from sources that indirectly cause air pollution by attracting vehicle trips. Such indirect sources include, but are not limited to, shopping centers, schools and universities, employment centers, warehousing, airport hubs, medical offices, and sports arenas. The Linkage Report summarizes data as of 1997 on the relationships between land use, transportation, and air quality, and highlights strategies that can help to reduce the use of single occupancy automobile use. Such strategies

[9] To access this report, please refer to ARB's website or click on: http://www.arb.ca.gov/ch/programs/link97.pdf

complement ARB regulatory programs that continue to reduce motor vehicle emissions.

In this Handbook, we identify types of air quality-related information that we recommend land use agencies consider in the land use decision-making processes such as the development of regional, general, and community plans; zoning ordinances; environmental reviews; project siting; and permit issuance. The Handbook provides recommendations on the siting of new sensitive land uses based on current analyses. It also contains information on approaches and methodologies for evaluating new projects from an air pollution perspective.

The Handbook looks at air quality issues associated with emissions from industrial, commercial, and mobile sources of air pollution. Mobile sources continue to be the largest overall contributors to the state's air pollution problems, representing the greatest air pollution health risk to most Californians. Based on current health risk information for air toxics, the most serious pollutants on a statewide basis are diesel PM, benzene, and 1,3-butadiene, all of which are primarily emitted by motor vehicles. From a state perspective, ARB continues to pursue new strategies to further reduce motor vehicle-related emissions in order to meet air quality standards and reduce air toxics risk.

While mobile sources are the largest overall contributors to the state's air pollution problems, industrial and commercial sources can also pose a health risk, particularly to people near the source. For this reason, the issue of incompatible land uses is an important focus of this document.

Handbook Audience

Even though the primary users of the Handbook will likely be agencies responsible for air quality and land use planning, we hope the ideas and technical issues presented in this Handbook will also be useful for:

- public and community organizations and community residents;
- federal, state and regional agencies that fund, review, regulate, oversee, or otherwise influence environmental policies and programs affected by land use policies; and
- private developers.

3. Key Community Focused Issues Land Use Agencies Should Consider

Two key air quality issues that land use agencies should consider in their planning, zoning, and permitting processes are:

1) **Incompatible Land Uses.** Localized air pollution impacts from incompatible land use can occur when polluting sources, such as a heavily trafficked roadway, warehousing facilities, or industrial or commercial facilities, are located near a land use where sensitive individuals are found such as a school, hospital, or homes.

2) **Cumulative Impacts.** Cumulative air pollution impacts can occur from a concentration of multiple sources that individually comply with air pollution control requirements or fall below risk thresholds, but in the aggregate may pose a public health risk to exposed individuals. These sources can be heavy or light-industrial operations, commercial facilities such as autobody shops, large gas dispensing facilities, dry cleaners, and chrome platers, and freeways or other nearby busy transportation corridors.

Incompatible Land Uses

Land use policies and practices can worsen air pollution exposure and adversely affect public health by mixing incompatible land uses. Examples include locating new sensitive land uses, such as housing or schools, next to small metal plating facilities that use a highly toxic form of chromium, or very near large industrial facilities or freeways. Based on recent monitoring and health-based studies, we now know that air quality impacts from incompatible land uses can contribute to increased risk of illness, missed work and school, a lower quality of life, and higher costs for public health and pollution control.[10]

Avoiding incompatible land uses can be a challenge in the context of mixed-use industrial and residential zoning. For a variety of reasons, government agencies and housing advocates have encouraged the proximity of affordable housing to employment centers, shopping areas, and transportation corridors, partially as a means to reduce vehicle trips and their associated emissions. Generally speaking, typical distances in mixed-use communities between businesses and industries and other land uses such as homes and schools, should be adequate to avoid health risks. However, generalizations do not always hold as we addressed in section 1 of this Handbook.

In terms of siting air pollution sources, the proposed location of a project is a major factor in determining whether it will result in localized air quality impacts. Often, the problem can be avoided by providing an adequate distance or setback

[10] For more information, the reader should refer to ARB's website on community health: http://www.arb.ca.gov/ch/ch.htm

between a source of emissions and nearby sensitive land uses. Sometimes, suggesting project design changes or mitigation measures in the project review phase can also reduce or avoid potential impacts. This underscores the importance of addressing potential incompatible land uses as early as possible in the project review process, ideally in the general plan itself.

Cumulative Air Pollution Impacts

The broad concept of cumulative air pollution impacts reflects the combination of regional air pollution levels and any localized impacts. Many factors contribute to air pollution levels experienced in any location. These include urban background air pollution, historic land use patterns, the prevalence of freeways and other transportation corridors, the concentration of industrial and commercial businesses, and local meteorology and terrain.

When considering the potential air quality impacts of polluting sources on individuals, project location and the concentration of emissions from air pollution sources need to be considered in the land use decision-making process. In section 4, the Handbook offers a series of questions that helps land use agencies determine if a project should undergo a more careful analysis. This holds true regardless of whether the project being sited is a polluting source or a sensitive land use project.

Large industrial areas are not the only land uses that may result in public health concerns in mixed-use communities. Cumulative air pollution impacts can also occur if land uses do not adequately provide setbacks or otherwise protect sensitive individuals from potential air pollution impacts associated with nearby light industrial sources. This can occur with activities such as truck idling and traffic congestion, or from indirect sources such as warehousing facilities that are located in a community or neighborhood.

In October 2004, Cal/EPA published its Environmental Justice Action Plan. In February 2005, the Cal/EPA Interagency Working Group approved a working definition of "cumulative impacts" for purposes of initially guiding the pilot projects that are being conducted pursuant to that plan. Cal/EPA is now in the process of developing a Cumulative Impacts Assessment Guidance document. Cal/EPA will revisit the working definition of "cumulative impacts" as the Agency develops that guidance. The following is the working definition:

> *"Cumulative impacts means exposures, public health or environmental effects from the combined emissions and discharges, in a geographic area, including environmental pollution from all sources, whether single or multi-media, routinely, accidentally, or otherwise released. Impacts will take into account sensitive populations and socio-economic factors, where applicable, and to the extent data are available."*

4. Mechanisms for Integrating Localized Air Quality Concerns Into Land Use Processes

Land use agencies should use each of their existing planning, zoning, and permitting authorities to address the potential health risk associated with new projects. Land use-specific mechanisms can go a long way toward addressing both localized and cumulative impacts from new air pollution sources that are not otherwise addressed by environmental regulations. Likewise, close collaboration and communication between land use agencies and local air districts in both the planning and project approval stages can further reduce these impacts. Local agency partnerships can also result in early identification of potential impacts from proposed activities that might otherwise escape environmental review. When this happens, pollution problems can be prevented or reduced before projects are approved, when it is less complex and expensive to mitigate.

The land use entitlement process requires a series of planning decisions. At the highest level, the General Plan sets the policies and direction for the jurisdiction, and includes a number of mandatory elements dealing with issues such as housing, circulation, and health hazards. Zoning is the primary tool for implementing land use policies. Specific or community plans created in conjunction with a specific project also perform many of the same functions as a zoning ordinance. Zoning can be modified by means of variances and conditional use permits. The latter are frequently used to insure compatibility between otherwise conflicting land uses. Finally, new development usually requires the approval of a parcel or tract map before grading and building permits can be issued. These parcel or tract maps must be consistent with the applicable General Plan, zoning and other standards.

Land use agencies can use their planning authority to separate industrial and residential land uses, or to require mitigation where separation is not feasible. By separating incompatible land uses, land use agencies can prevent or reduce both localized and cumulative air pollution impacts without denying what might otherwise be a desirable project.[11] For instance:

- a dry cleaner could open a storefront operation in a community with actual cleaning operations performed at a remote location away from residential areas;
- gas dispensing facilities with lower fuel throughput could be sited in mixed-use areas;
- enhanced building ventilation or filtering systems in schools or senior care centers can reduce ambient air from nearby busy arterials; or
- landscaping and regular watering can be used to reduce fugitive dust at a building construction site near a school yard.

[11] It should be noted that such actions should also be considered as part of the General Plan or Plan element process.

The following general and specific land use approaches can help to reduce potential adverse air pollution impacts that projects may have on public health.

General Plans

The primary purpose of planning, and the source of government authority to engage in planning, is to protect public health, safety, and welfare. In its most basic sense, a local government General Plan expresses the community's development goals and embodies public policy relative to the distribution of future land uses, forming the basis for most land use decisions. Therefore, the most effective mechanism for dealing with the central land use concept of compatibility and its relationship to cumulative air pollution impacts is the General Plan. Well before projects are proposed within a jurisdiction, the General Plan sets the stage for where projects can be sited, and their compatibility with comprehensive community goals, objectives, and policies.

In 2003, OPR revised its General Plan Guidelines, highlighting the importance of incorporating sustainable development and environmental justice policies in the planning process. The OPR General Plan Guidelines provides an effective and long-term approach to reduce cumulative air pollution impacts at the earliest planning stages. In light of these important additions to the Guidelines, land use agencies should consider updating their General Plans or Plan elements to address these revisions.

The General Plan and related Plan elements can be used to avoid incompatible land uses by incorporating air quality considerations into these documents. For instance, a General Plan safety element with an air quality component could be used to incorporate policies or objectives that are intended to protect the public from the potential for facility breakdowns that may result in a dangerous release of air toxics. Likewise, an air quality component to the transportation circulation element of the General Plan could include policies or standards to prevent or reduce local exposure to diesel exhaust from trucks and other vehicles. For instance, the transportation circulation element could encourage the construction of alternative routes away from residential areas for heavy-duty diesel trucks. By considering the relationship between air quality and transportation, the circulation element could also include air quality policies to prevent or reduce trips and travel, and thus vehicle emissions. Policies in the land use element of the General Plan could identify areas appropriate for future industrial, commercial, and residential uses. Such policies could also introduce design and distance parameters that reduce emissions, exposure, and risk from industrial and some commercial land uses (e.g., dry cleaners) that are in close proximity to residential areas or schools.

Land use agencies should also consider updating or creating an air quality element in the jurisdiction's General Plan. In the air quality element, local decision-makers could develop long-term, effective plans and policies to address

air quality issues, including cumulative impacts. The air quality element can also provide a general reference guide that informs local land use planners about regional and community level air quality, regulatory air pollution control requirements and guidelines, and references emissions and pollution source data bases and assessment and modeling tools. As is further described in Appendix C of the Handbook, new assessment tools that ARB is developing can be included into the air quality element by reference. For instance, ARB's statewide risk maps could be referenced in the air quality element as a resource that could be consulted by developers or land use agencies

Zoning

The purpose of "zoning" is to separate different land uses. Zoning ordinances establish development controls to ensure that private development takes place within a given area in a manner in which:

- All uses are compatible (e.g., an industrial plant is not permitted in a residential area);
- Common development standards are used (e.g., all homes in a given area are set back the same minimum distance from the street); and,
- Each development does not unreasonably impose a burden upon its neighbors (e.g., parking is required on site so as not to create neighborhood parking problems).

To do this, use districts called "zones" are established and standards are developed for these zones. The four basic zones are residential, commercial, industrial and institutional.

Land use agencies may wish to consider how zoning ordinances, particularly those for mixed-use areas, can be used to avoid exacerbating poor land use practices of the past or contributing to localized and cumulative air pollution impacts in the community.

Sometimes, especially in mixed-use zones, there is a potential for certain categories of existing businesses or industrial operations to result in cumulative air pollution impacts to new development projects. For example:

- An assisted living project is proposed for a mixed-use zone adjacent to an existing chrome plating facility, or several dry cleaners;
- Multiple industrial sources regulated by a local air district are located directly upwind of a new apartment complex;
- A new housing development is sited in a mixed-use zone that is downwind or adjacent to a distribution center that attracts diesel-fueled delivery trucks and TRUs; or
- A new housing development or sensitive land use is sited without adequate setbacks from an existing major transportation corridor or rail yard.

As part of the public process for making zoning changes, local land use agencies could work with community planning groups, local businesses, and community residents to determine how best to address existing incompatible land uses.

Land Use Permitting Processes

■ Questions to Consider When Reviewing New Projects

Very often, just knowing what questions to ask can yield critical information about the potential air pollution impacts of proposed projects – both from the perspective of a specific project as well as in the nature of existing air pollution sources in the same impact area. Available land use information can reveal the proximity of air pollution sources to sensitive individuals, the potential for incompatible land uses, and the location and nature of nearby air pollution sources. Air quality data, available from the ARB and local air districts, can provide information about the types and amounts of air pollution emitted in an area, regional air quality concentrations, and health risk estimates for specific sources.

General Plans and zoning maps are an excellent starting point in reviewing project proposals for their potential air pollution impacts. These documents contain information about existing or proposed land uses for a specific location as well as the surrounding area. Often, just looking at a map of the proposed location for a facility and its surrounding area will help to identify a potential adjacent incompatible land use.

The following pages are a “pull-out” list of questions to consider along with cross-references to pertinent information in the Handbook. These questions are intended to assist land use agencies in evaluating potential air quality-related concerns associated with new project proposals.

The first group of questions contains project-related queries designed to help identify the potential for localized project impacts, particularly associated with incompatible land uses. The second group of questions focuses on the issue of potential cumulative impacts by including questions about existing emissions and air quality in the community, and community feedback. Depending on the answers to these questions, a land use agency may decide a more detailed review of the proposal is warranted.

The California Department of Education has already developed a detailed process for school siting which is outlined in Appendix E. However, school districts may also find this section helpful when evaluating the most appropriate site for new schools in their area. At a minimum, using these questions may encourage school districts to engage throughout their siting process with land use agencies and local air districts. The combined expertise of these entities can be useful in devising relevant design standards and mitigation measures that can

reduce exposure to cumulative emissions, exposure, and health risk to students and school workers.

As indicated throughout the Handbook, we strongly encourage land use agencies to consult early and often with local air districts. Local air districts have the expertise, many of the analytical tools, and a working knowledge of the sources they regulate. It is also critical to fully involve the public and businesses that could be affected by the siting decision. The questions provided in the chart below do not imply any particular action should be taken by land use agencies. Rather the questions are intended to improve the assessment process and facilitate informed decision-making.

- **Project-Related Questions**

This section includes project-related questions that, in conjunction with the questions in the next section, can be used to tailor the project evaluation. These questions are designed to help identify the potential for incompatible land uses from localized project impacts.

Questions to Consider When Reviewing New Projects

Project-Related Questions	Cross-Reference to Relevant Handbook Sections
1. Is the proposed project: ▲ A business or commercial license renewal ▲ A new or modified commercial project ▲ A new or modified industrial project ▲ A new or modified public facility project ▲ A new or modified transportation project ▲ A housing or other development in which sensitive individuals may live or play	See Appendix A for typical land use classifications and associated project categories that could emit air pollutants.
2. Does the proposed project: ▲ Conform to the zoning designation? ▲ Require a variance to the zoning designation? ▲ Include plans to expand operations over the life of the business such that additional emissions may increase the pollution burden in the community (e.g., from additional truck operations, new industrial operations or process lines, increased hours of operation, build-out to the property line, etc.)?	See Appendix F for a general explanation of land use processes. In addition, Section 3 contains a discussion of how land use planning, zoning, and permitting practices can result in incompatible land uses or cumulative air pollution impacts.
3. Has the local air district provided comments or information to assist in the analysis?	See Section 5 and Appendix C for a description of air quality-related tools that the ARB and local air districts use to provide information on potential air pollution impacts.
4. Have public meetings been scheduled with the affected community to solicit their involvement in the decision-making process for the proposed project?	See Section 7 for a discussion of public participation, information and outreach tools.
5. If the proposed project will be subject to local air district regulations: ▲ Has the project received a permit from the local air district? ▲ Would it comply with applicable local air district requirements? ▲ Is the local air district contemplating new regulations that would reduce emissions from the source over time? ▲ Will potential emissions from the project	See Appendix C for a description of local air district programs.

Project-Related Questions	Cross-Reference to Relevant Handbook Sections
trigger the local air district's new source review for criteria pollutants or air toxics emissions? ▲ Is the local air district expected to ask the proposed project to perform a risk assessment? ▲ Is there sufficient new information or public concern to call for a more thorough environmental analysis of the proposed project? ▲ Are there plans to expand operations over time? ▲ Are there land-use based air quality significance thresholds or design standards that could be applied to this project in addition to applicable air district requirements?	
6. If the proposed project will release air pollution emissions, either directly or indirectly, but is not regulated by the local air district: ▲ Is the local air district informed of the project? ▲ Does the local air district believe that there could be potential air pollution impacts associated with this project category because of the proximity of the project to sensitive individuals? ▲ If the project is one in which individuals live or play (e.g., a home, playground, convalescent home, etc.), does the local air district believe that the project's proximity to nearby sources could pose potential air pollution impacts? ▲ Are there indirect emissions that could be associated with the project (e.g., truck traffic or idling, transport refrigeration unit operations, stationary diesel engine operations, etc.) that will be in close proximity to sensitive individuals? ▲ Will the proposed project increase or serve as a magnet for diesel traffic? ▲ Are there land-use based air quality significance thresholds or design standards that could be applied to this project in addition to applicable air district requirements? ▲ Is there sufficient new information or public concern to call for a more thorough environmental analysis of the proposed project? ▲ Should the site approval process include identification and mitigation of potential	See Section 1 for recommendations on situations to avoid when siting projects where sensitive individuals would be located (sensitive sites).

Project-Related Questions	Cross-Reference to Relevant Handbook Sections
direct or indirect emissions associated with the potential project?	
7. Does the local air district or land use agency have pertinent information on the source, such as: ▲ Available permit and enforcement data, including for the owner or operator of the proposed source that may have other sources in the State. ▲ Proximity of the proposed project to sensitive individuals. ▲ Number of potentially exposed individuals from the proposed project. ▲ Potential for the proposed project to expose sensitive individuals to odor or other air pollution nuisances. ▲ Meteorology or the prevailing wind patterns between the proposed project and the nearest receptor, or between the proposed sensitive receptor project and sources that could pose a localized or cumulative air pollution impact.	See Appendix C for a description of local air district programs. See Appendix B for a listing of useful information that land use agencies should have on hand or have accessible when reviewing proposed projects for potential air pollution impacts. Also, do not hesitate to contact your local air district regarding answers to any of these questions that might not be available at the land use agency. See Section 1 for recommendations on situations to avoid when siting projects where sensitive individuals would be located (sensitive sites).
8. Based upon the project application, its location, and the nature of the source, could the proposed project: ▲ Be a polluting source that is located in proximity to, or otherwise upwind, of a location where sensitive individuals live or play? ▲ Attract sensitive individuals and be located in proximity to or otherwise downwind, of a source or multiple sources of pollution, including polluting facilities or transportation-related sources that contribute emissions either directly or indirectly? ▲ Result in health risk to the surrounding community?	See Section 3 for a discussion of what is an incompatible land use and the potential cumulative air pollution impacts. See Section 1 for recommendations on situations to avoid when siting projects where sensitive individuals would be located (sensitive sites).
9. If a CEQA categorical exemption is proposed, were the following questions considered: ▲ Is the project site environmentally sensitive as defined by the project's location? (A project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant.) ▲ Would the project and successive future projects of the same type in the approximate location potentially result in cumulative impacts? ▲ Are there "unusual circumstances" creating the possibility of significant effects?	See CEQA Guidelines section 15300, and Public Resources Code, section 21084. See Section 1 for recommendations on situations to avoid when siting projects where sensitive individuals would be located (sensitive sites). See also Section 5 and Appendix C for a description of air quality-related tools that the ARB and local air districts use to provide information on potential air pollution impacts.

- **Questions Related to Cumulative Impact Assessment**

The following questions can be used to provide the decision-maker with a better understanding of the potential for cumulative air pollution impacts to an affected community. Answers to these questions will help to determine if new projects or activities warrant a more detailed review. It may also help to see potential environmental concerns from the perspective of the affected community. Additionally, responses can provide local decision-makers with information with which to assess the best policy options for addressing neighborhood-scale air pollution concerns.

The questions below can be used to identify whether existing tools and procedures are adequate to address land use-related air pollution issues. This process can also be used to pinpoint project characteristics that may have the greatest impact on community-level emissions, exposure, and risk. Such elements can include: the compliance record of existing sources including those owned or operated by the project proponent; the concentration of emissions from polluting sources within the approximate area of sensitive sites; transportation circulation in proximity to the proposed project; compatibility with the General Plan and General Plan elements; etc.

The local air district can provide useful assistance in the collection and evaluation of air quality-related information for some of the questions and should be consulted early in the process.

Questions Related to Cumulative Impact Assessment

Technical Questions	Cross-Reference to Relevant Handbook Sections
1. Is the community home to industrial facilities?	See Appendix A for typical land use classifications and associated project categories that could emit air pollutants.
2. Do one or more major freeways or high-traffic volume surface streets cut through the community?	See transportation circulation element of your general plan. See also Appendix B for useful information that land use agencies should have on hand or have accessible when reviewing proposed projects for potential air pollution impacts. See Section 1 for recommendations on situations to avoid when siting projects where sensitive individuals would be located (sensitive sites).
3. Is the area classified for mixed-use zoning?	See your general plan and zoning ordinances.
4. Is there an available list of air pollution sources in the community?	Contact your local air district.
5. Has a walk-through of the community been conducted to gather the following information:	See Appendix B for a listing of useful information that land use agencies

Technical Questions	Cross-Reference to Relevant Handbook Sections
▲ Corroborate available information on land use activities in the area (e.g., businesses, housing developments, sensitive individuals, etc.)? ▲ Determine the proximity of existing and anticipated future projects to residential areas or sensitive individuals? ▲ Determine the concentration of emission sources (including anticipated future projects) to residential areas or sensitive individuals?	should have on hand or have accessible when reviewing proposed projects for potential air pollution impacts. Also contact your local air district.
6. Has the local air district been contacted to obtain information on sources in the community?	See Section 7 for a discussion of public participation, information and outreach tools.
7. What categories of commercial establishments are currently located in the area and does the local air district have these sources on file as being regulated or permitted?	See Appendix A for typical land use classifications and associated project categories that could emit air pollutants. Also contact your local air district.
8. What categories of indirect sources such as distribution centers or warehouses are currently located in the area?	See Appendix A for typical land use classifications and associated project categories that emit air pollutants.
9. What air quality monitoring data are available?	Contact your local air district.
10. Have any risk assessments been performed on emission sources in the area?	Contact your local air district.
11. Does the land use agency have the capability of applying a GIS spatial mapping tool that can overlay zoning, sub-development information, and other neighborhood characteristics, with air pollution and transportation data?	See Appendix B for a listing of useful information that land use agencies should have on hand or have accessible when reviewing proposed projects for potential air pollution impacts. Also contact your local air district for tools that can be used to supplement available land use agency tools.
12. Based on available information, is it possible to determine if the affected community or neighborhood experiences elevated health risk due to a concentration of air pollution sources in close proximity, and if not, can the necessary information be obtained?	Contact your local air district. Also see Section 1 for recommendations on situations to avoid when siting projects where sensitive individuals would be located (sensitive sites).
13. Does the community have a history of chronic complaints about air quality?	See Section 7 for a discussion of public participation, information and outreach tools. Also contact your local air district.
14. Is the affected community included in the public participation process for the agency's decision?	See Section 7 for a discussion of public participation, information and outreach tools.
15. Have community leaders or groups been contacted about any pre-existing or chronic community air quality concerns?	See Section 7 for a discussion of public participation, information and outreach tools. Also contact your local air district.

- **Mitigation Approaches**

In addition to considering the suitability of the project location, opportunities for mitigation of air pollution impacts should be considered. Sometimes, a land use agency may find that selection of a different project location to avoid a health risk is not feasible. When that happens, land use agencies should consider design improvements or other strategies that would reduce the risk. Such strategies could include performance or design standards, consultation with local air districts and other agencies on appropriate actions that these agencies should, or plan to, undertake, and consultation and outreach in the affected community. Potential mitigation measures should be feasible, cost-effective solutions within the available resources and authority of implementing agencies to enforce.[12]

- **Conditional Use Permits and Performance Standards**

Some types of land uses are only allowed upon approval of a conditional use permit (also called a CUP or special use permit). A conditional use permit does not re-zone the land but specifies conditions under which a particular land use will be permitted. Such land uses could be those with potentially significant environmental impacts. Local zoning ordinances specify the uses for which a conditional use permit is required, the zones they may be allowed in, and public hearing procedures. The conditional use permit imposes special requirements to ensure that the use will not be detrimental to its surroundings.

In the context of land use planning, performance standards are requirements imposed on projects or project categories through conditional use permits to ensure compliance with general plan policies and local ordinances. These standards could apply to such project categories as distribution centers, very large gas dispensing facilities, autobody shops, dry cleaners, and metal platers. Land use agencies may wish to consider adding land use-based performance standards to zoning ordinances in existing mixed-use communities for certain air pollution project categories. Such standards would provide certainty and equitable treatment to all projects of a similar nature, and reserve the more resource intensive conditional or special use permits to projects that require a more detailed analysis. In developing project design or performance standards, land use agencies should consult with the local air district. Early and regular consultation can avoid duplication or inconsistency with local air district control requirements when considering the site-specific design and operation of a project.

[12] A land use agency has the authority to condition or deny a project based upon information collected and evaluated through the land use decision-making process. However, any denial would need to be based upon identifiable, generally applicable, articulated standards set forth in the local government's General Plan and zoning codes. One way of averting this is to conduct early and regular outreach to the community and the local air district so that community and environmental concerns can be addressed and accommodated into the project proposal.

Examples of land use-based air quality-specific performance standards include the following:

- Placing a process vent away from the direction of the local playground that is nearby or increasing the stack height so that emissions are dispersed to reduce the emissions impact on surrounding homes or schools.
- Setbacks between the project fence line and the population center.
- Limiting the hours of operation of a facility to avoid excess emissions exposure or foul odors to nearby individuals.
- An ordinance that requires fleet operators to use cleaner vehicles before project approval (if a new business), or when expanding the fleet (if an existing business); and
- Providing alternate routes for truck operations that discourage detours into residential neighborhoods.

Outreach to Other Agencies

When questions arise regarding the air quality impacts of projects, including potential cumulative impacts, land use agencies should consult the local air district. Land use agencies should also consider the following suggestions to avoid creating new incompatible land uses:

- Consult with the local air district to help determine if emissions from a particular project will adversely impact sensitive individuals in the area, if existing or future effective regulations or permit requirements will affect the proposed project or other sources in the vicinity of the proposed project, or if additional inspections should be required.
- Check with ARB for new information and modeling tools that can help evaluate projects seeking to site within your jurisdiction.
- Become familiar with ARB's Land Use-Air Quality Linkage Report to determine whether approaches and evaluation tools contained in the Report can be used to reduce transportation-related impacts on communities.
- Contact and collaborate with other state agencies that play a role in the land use decision-making process, e.g., the State Department of Education, the California Energy Commission, and Caltrans. These agencies have information on mitigation measures and mapping tools that could be useful in addressing local problems.

- **Information Clearinghouse**

  - Land use agencies can refer to the ARB statewide electronic information clearinghouse for information on what measures other jurisdictions are using to address comparable issues or sources.[13]

[13] This information can be accessed from ARB's website by going to: http://www.arb.ca.gov/ch/clearinghouse.htm

The next section addresses available air quality assessment tools that land use agencies can use to evaluate the potential for localized or cumulative impacts in their communities.

5. Available Tools to Evaluate Cumulative Air Pollution Emissions and Risk

Until recently, California has traditionally approached air pollution control from the perspective of assessing whether the pollution was regional, category-specific, or from new or existing sources. This methodology has been generally effective in reducing statewide and regional air pollution impacts and risk levels. However, such an incremental, category-by-category, source-by-source approach may not always address community health impacts from multiple sources - including mobile, industrial, and commercial facilities.

As a result of air toxics and children's health concerns over the past several years, ARB and local air districts have begun to develop new tools to evaluate and inform the public about cumulative air pollution impacts at the community level. One aspect of ARB's programs now underway is to consolidate and make accessible air toxics emissions and monitoring data by region, using modeling tools and other analytical techniques to take a preliminary look at emissions, exposure, and health risk in communities.

ARB has developed multiple tools to assist local air districts perform assessments of cumulative emissions, exposure, and risk on a neighborhood scale. These tools include:

- Regional risk maps that show trends in potential cancer risk from toxic air pollutants in southern and central California between 1990 and 2010. These maps are based on the U.S. EPA's ASPEN model. These maps provide an estimate of background levels of toxic air pollutant risk but are not detailed enough to assess individual neighborhoods or facilities.[14]

- The Community Health Air Pollution Information System (CHAPIS) is a user-friendly, Internet-based system for displaying information on emissions from sources of air pollution in an easy to use mapping format. CHAPIS contains information on air pollution emissions from selected large facilities and small businesses that emit criteria and toxic air pollutants. It also contains information on air pollution emissions from motor vehicles. When released in 2004, CHAPIS did not contain information on every source of air pollution or every air pollutant. However, ARB continues to work with local air districts to include all of the largest air pollution sources and those with the highest documented air pollution risk. Additional facilities will be added to CHAPIS as more data become available.[15]

[14] For further information on these maps, please visit ARB's website at: http://www.arb.ca.gov/toxics/cti/hlthrisk/hlthrisk.htm

[15] For further information on CHAPIS, please click on: http://www.arb.ca.gov/ch/chapis1/chapis1.htm

- The Hot Spots Analysis and Reporting Program (HARP) is a software database package that evaluates emissions from one or more facilities to determine the overall health risk posed by the facility(-ies) on the surrounding community. Proper use of HARP ensures that the risk assessment meets the latest risk assessment guidelines published by the State Office of Environmental Health Hazard Assessment (OEHHA). HARP is designed with air quality professionals in mind and is available from the ARB.

- The Urban Emissions Model (URBEMIS) is a computer program that can be used to estimate emissions associated with land development projects in California such as residential neighborhoods, shopping centers, office buildings, and construction projects. URBEMIS uses emission factors available from the ARB to estimate vehicle emissions associated with new land uses.

Local air districts, and others can use these tools to assess a new project, or plan revision. For example, these tools can be used to:

- Identify if there are multiple sources of air pollution in the community;
- Identify the major sources of air pollution in the area under consideration;
- Identify the background potential cancer risk from toxic air pollution in the area under consideration;
- Estimate the risk from a new facility and how it adds to the overall risk from other nearby facilities; and
- Provide information to decision-makers and key stakeholders on whether there may be significant issues related to cumulative emissions, exposure, and health risk due to a permitting or land use decision.

If an air agency wishes to perform a cumulative air pollution impact analysis using any of these tools, it should consult with the ARB and/or the local air district to obtain information or assistance on the data inputs and procedures necessary to operate the program. In addition, land use agencies could consult with local air districts to determine the availability of land use and air pollution data for entry into an electronic Geographical Information System (GIS) format. GIS is an easier mapping tool than the more sophisticated models described in Appendix C. GIS mapping makes it possible to superimpose land use with air pollution information so that the spatial relationship between air pollution sources, sensitive receptors, and air quality can be visually represented. Appendix C provides a general description of the impact assessment process and micro-scale, or community level modeling tools that are available to evaluate potential cumulative air pollution impacts. Modeling protocols will be accessible on ARB's website as they become available. The ARB will also provide land use agencies and local air districts with statewide regional modeling results and information regarding micro-scale modeling.

6. ARB Programs to Reduce Air Pollution in Communities

ARB's regulatory programs reduce air pollutant emissions through statewide strategies that improve public health in all California communities. ARB's overall program addresses motor vehicles, consumer products, air toxics, air-quality planning, research, education, enforcement, and air monitoring. Community health and environmental justice concerns are a consideration in all these programs. ARB's programs are statewide but recognize that extra efforts may be needed in some communities due to historical mixed land-use patterns, limited participation in public processes in the past, and a greater concentration of air pollution sources in some communities.

ARB's strategies are intended to result in better air quality and reduced health risk to residents throughout California. The ARB's priority is to prevent or reduce the public's exposure to air pollution, including from toxic air contaminants that pose the greatest risk, particularly to infants and children who are more vulnerable to air pollution.

In October 2003, ARB updated its statewide control strategy to reduce emissions from source categories within its regulatory authority. A primary focus of the strategy is to achieve federal and state air quality standards for ozone and particulate matter throughout California, and to reduce health risk from diesel PM. Along with local air districts, ARB will continue to address air toxics emissions from regulated sources (see Table 6-1 for a summary of ARB activities). As indicated earlier, ARB will also provide analytical tools and information to land use agencies and local air districts to help assess and mitigate cumulative air pollution impacts.

The ARB will continue to consider the adoption of or revisions to needed air toxics control measures as part of the state's ongoing air toxics assessment program.[16]

As part of its effort to reduce particulate matter and air toxics emissions from diesel PM, the ARB has developed a Diesel Risk Reduction Program[17] that lays out several strategies in a three-pronged approach to reduce emissions and their associated risk:

- Stringent emission standards for all new diesel-fueled engines;
- Aggressive reductions from in-use engines; and
- Low sulfur fuel that will reduce PM and still provide the quality of diesel fuel needed to control diesel PM.

[16] For continuing information and updates on state measures, the reader can refer to ARB's website at http://www.arb.ca.gov/toxics/toxics.htm.
[17] For a comprehensive description of the program, please refer to ARB's website at http://www.arbB.ca.gov/diesel/dieselrrp.htm.

Table 6-1
ARB ACTIONS TO ADDRESS
CUMULATIVE AIR POLLUTION IMPACTS IN COMMUNITIES

Information Collection

- Improve emission inventories, air monitoring data, and analysis tools that can help to identify areas with high cumulative air pollution impacts
- Conduct studies in coordination with OEHHA on the potential for cancer and non-cancer health effects from air pollutants emitted by specific source categories
- Establish web-based clearinghouse for local land use strategies

Emission Reduction Approaches (2004-2006)*

- Through a public process, consider development and/or amendment of regulations and related guidance to reduce emissions, exposure, and health risk at a statewide and local level for the following sources:
  - Diesel PM sources such as stationary diesel engines, transport refrigeration units, portable diesel engines, on-road public fleets, off-road public fleets, heavy-duty diesel truck idling, harbor craft vessels, waste haulers
  - Other air toxics sources, such as formaldehyde in composite wood products, hexavalent chromium for chrome plating and chromic acid anodizing, thermal spraying, and perchloroethylene dry cleaning
- Develop technical information for the following:*
  - Distribution centers
  - Modeling tools such as HARP and CHAPIS
- Adopt rules and pollution prevention initiatives within legal authority to reduce emissions from mobile sources and fuels, and consumer products
- Develop and maintain Air Quality Handbook as a tool for use by land use agencies and local air districts to address cumulative air pollution impacts

Other Approaches

- Establish guidelines for use of statewide incentive funding for high priority mobile source emission reduction projects

*Because ARB will continue to review the need to adopt or revise statewide measures, the information contained in this chart will be updated on an ongoing basis.

A number of ARB's diesel risk reduction strategies have been adopted. These include measures to reduce emissions from refuse haulers, urban buses, transport refrigeration units, stationary and portable diesel engines, and idling trucks and school buses. These sources are all important from a community perspective.[18]

[18] The reader can refer to ARB's website for information on its mobile source-related programs at: http://www.arb.ca.gov/msprog/msprog.htm, as well as regulations adopted and under consideration as part of the Diesel Risk Reduction Program at: http://www.arb.ca.gov/diesel/dieselrrp.htm

The ARB will continue to evaluate the health effects of air pollutants while implementing programs with local air districts to reduce air pollution in all California communities.

Local air districts also have ambitious programs to reduce criteria pollutants and air toxics from regulated sources in their region. Many of these programs also benefit air quality in local communities as well as in the broader region. For more information on what is being done in your area to reduce cumulative air pollution impacts through air pollution control programs, you should contact your local air district.[19]

[19] Local air district contacts can be found on the inside cover to this Handbook.

7. Ways to Enhance Meaningful Public Participation

Community involvement is an important part of the land use process. The public is entitled to the best possible information about the air they breathe and what is being done to prevent or reduce unhealthful air pollution in their communities. In particular, information on how land use decisions can affect air pollution and public health should be made accessible to all communities, including low-income and minority communities.

Effective community participation consistently relies on a two-way flow of information – from public agencies to community members about opportunities, constraints, and impacts, and from community members back to public officials about needs, priorities, and preferences. The outreach process needed to build understanding and local neighborhood involvement requires data, methodologies, and formats tailored to the needs of the specific community. More importantly, it requires the strong collaboration of local government agencies that review and approve projects and land uses to improve the physical and environmental surroundings of the local community.

Many land use agencies, especially those in major metropolitan areas, are familiar with, and have a long-established public review process. Nevertheless, public outreach can often be improved. Active public involvement requires engaging the public in ways that do not require their previous interest in or knowledge of the land use or air pollution control requirements, and a commitment to taking action where appropriate to address the concerns that are raised.

■ Direct Community Outreach

In conjunction with local air districts, land use agencies should consider designing an outreach program for community groups, other stakeholders, and local government agency staffs that address the problem of cumulative air pollution impacts, and the public and government role in reducing them. Such a program could consider analytical tools that assist in the preparation and presentation of information in a way that supports sensible decision-making and public involvement. Table 7-1 contains some general outreach approaches that might be considered.

Table 7-1
Public Participation Approaches

- Staff and community leadership awareness training on environmental justice programs and community-based issues
- Surveys to identify the website information needs of interested community-based organizations and other stakeholders
- Information materials on local land use and air district authorities
- Community-based councils to facilitate and invite resident participation in the planning process
- Neighborhood CEQA scoping sessions that allows for community input prior to technical analysis
- Public information materials on siting issues are under review including materials written for the affected community, and in different media that widens accessibility
- Public meetings
- Identify other opportunities to include community-based organizations in the process

To improve outreach, local land use agencies should consider the following activities:

- Hold meetings in communities affected by agency programs, policies, and projects at times and in places that encourage public participation, such as evenings and weekends at centrally located community meeting rooms, libraries, and schools.
- Assess the need for and provide translation services at public meetings.
- Hold community meetings to update residents on the results of any special air monitoring programs conducted in their neighborhood.
- Hold community meetings to discuss and evaluate the various options to address cumulative impacts in their community.
- In coordination with local air districts, make staff available to attend meetings of community organizations and neighborhood groups to listen to and, where appropriate, act upon community concerns.
- Establish a specific contact person for environmental justice issues.
- Increase student and community awareness of local government land use activities and policies through outreach opportunities.
- Make air quality and land use information available to communities in an easily understood and useful format, including fact sheets, mailings, brochures, public service announcements, and web pages, in English and other languages.
- On the local government web-site, dedicate a page or section to what the land use program is doing regarding environmental justice and cumulative environmental impacts, and, as applicable, activities conducted with local air districts such as neighborhood air monitoring studies, pollution prevention, air pollution sources in neighborhoods, and risk reduction.

- Allow, encourage, and promote community access to land use activities, including public meetings, General Plan or Community Plan updates, zoning changes, special studies, CEQA reviews, variances, etc.
- Distribute information in multiple languages, as needed, on how to contact the land use agency or local air district to obtain information and assistance regarding environmental justice programs, including how to participate in public processes.
- Create and distribute a simple, easy-to-read, and understandable public participation handbook, which may be based on the "Public Participation Guidebook" developed by ARB.

- **Other Opportunities for Meaningful Public Outreach**

  - Community-Based Planning Committees

  Neighborhood-based or community planning advisory councils could be established to invite and facilitate direct resident participation into the planning process. With the right training and technical assistance, such councils can provide valuable input and a forum for the review of proposed amendments to plans, zone changes, land use permits, and suggestions as to how best to prevent or reduce cumulative air pollution impacts in their community.

  - Regional Partnerships

  Consider creating regional coalitions of key growth-related organizations from both the private and public sectors, with corporations, communities, other jurisdictions, and government agencies. Such partnerships could facilitate agreement on common goals and win-win solutions tailored specifically for the region. With this kind of dialogue, shared vision, and collaboration, barriers can be overcome and locally acceptable sustainable solutions implemented. Over the long term, such strategies will help to bring about clean air in communities as well as regionally.

LAND USE CLASSIFICATIONS AND ASSOCIATED FACILITY CATEGORIES THAT COULD EMIT AIR POLLUTANTS

(1) Land Use Classifications – by Activity[i]	(2) Facility or Project Examples	(3) Key Pollutants[ii,iii]	(4) Air Pollution Permits[iv]
COMMERCIAL/ LIGHT INDUSTRIAL: SHOPPING, BUSINESS, AND COMMERCIAL			
▲ Primarily retail shops and stores, office, commercial activities, and light industrial or small business	Dry cleaners; drive-through restaurants; gas dispensing facilities; auto body shops; metal plating shops; photographic processing shops; textiles; apparel and furniture upholstery; leather and leather products; appliance repair shops; mechanical assembly cleaning; printing shops	VOCs, air toxics, including diesel PM, NOx, CO, SOx	Limited; Rules for applicable equipment
▲ Goods storage or handling activities, characterized by loading and unloading goods at warehouses, large storage structures, movement of goods, shipping, and trucking.	Warehousing; freight-forwarding centers; drop-off and loading areas; distribution centers	VOCs, air toxics, including diesel PM, NOx, CO, SOx	No[v]
LIGHT INDUSTRIAL: RESEARCH AND DEVELOPMENT			
▲ Medical waste at research hospitals and labs	Incineration; surgical and medical instrument manufacturers, pharmaceutical manufacturing, biotech research facilities	Air toxics, NOx, CO, SOx	Yes
▲ Electronics, electrical apparatus, components, and accessories	Computer manufacturer; integrated circuit board manufacturer; semi-conductor production	Air toxics, VOCs	Yes
▲ College or university lab or research center	Medical waste incinerators; lab chemicals handling, storage and disposal	Air toxics, NOx, CO, SOx, PM10	Yes
▲ Research and development labs	Satellite manufacturer; fiber-optics manufacturer; defense contractors; space research and technology; new vehicle and fuel testing labs	Air toxics, VOCs	Yes
▲ Commercial testing labs	Consumer products; chemical handling, storage and disposal	Air toxics, VOCs	Yes

(1) Land Use Classifications – by Activity[i]	(2) Facility or Project Examples	(3) Key Pollutants[ii,iii]	(4) Air Pollution Permits[iv]
INDUSTRIAL: NON-ENERGY-RELATED			
▲ Assembly plants, manufacturing facilities, industrial machinery	Adhesives; chemical; textiles; apparel and furniture upholstery; clay, glass, and stone products production; asphalt materials; cement manufacturers, wood products; paperboard containers and boxes; metal plating; metal and canned food product fabrication; auto manufacturing; food processing; printing and publishing; drug, vitamins, and pharmaceuticals; dyes; paints; pesticides; photographic chemicals; polish and wax; consumer products; metal and mineral smelters and foundries; fiberboard; floor tile and cover; wood and metal furniture and fixtures; leather and leather products; general industrial and metalworking machinery; musical instruments; office supplies; rubber products and plastics production; saw mills; solvent recycling; shingle and siding; surface coatings	VOCs, air toxics, including diesel PM, NOx, PM, CO, SOx	Yes
INDUSTRIAL: ENERGY AND UTILITIES			
▲ Water and sewer operations	Pumping stations; air vents; treatment	VOCs, air toxics, NOx, CO, SOx, PM10	Yes
▲ Power generation and distribution	Power plant boilers and heaters; portable diesel engines; gas turbine engines	NOx, diesel PM, NOx, CO, SOx, PM10, VOCs	Yes
▲ Refinery operations	Refinery boilers and heaters; coke cracking units; valves and flanges; flares	VOCs, air toxics, including diesel PM, NOx, CO, SOx, PM10	Yes
▲ Oil and gas extraction	Oil recovery systems; uncovered wells	NOx, diesel PM, VOCs, CO, SOx, PM10	Yes
▲ Gasoline storage, transmission, and marketing	Above and below ground storage tanks; floating roof tanks; tank farms; pipelines	VOCs, air toxics, including diesel PM, NOx, CO, SOx, PM10	Yes
▲ Solid and hazardous waste treatment, storage, and disposal activities.	Landfills; methane digester systems; process recycling facility for concrete and asphalt materials	VOCs, air toxics, NOx, CO, SOx, PM10	Yes
CONSTRUCTION (NON-TRANSPORTATION)			
	Building construction; demolition sites	PM (re-entrained road dust), asbestos, diesel PM, NOx, CO, SOx, PM10, VOCs	Limited; state and federal off-road equipment standards

(1) Land Use Classifications – by Activity[i]	(2) Facility or Project Examples	(3) Key Pollutants[ii,iii]	(4) Air Pollution Permits[iv]
DEFENSE			
	Ordnance and explosives demolition; range and testing activities; chemical production; degreasing; surface coatings; vehicle refueling; vehicle and engine operations and maintenance	VOCs, air toxics, including diesel PM, NOx, CO, SOx, PM10	Limited; prescribed burning; equipment and solvent rules
TRANSPORTATION			
▲ Vehicular movement	Residential area circulation systems; parking and idling at parking structures; drive-through establishments; car washes; special events; schools; shopping malls, etc.	VOCs, NOx, PM (re-entrained road dust) air toxics e.g., benzene, diesel PM, formaldehyde, acetaldehyde, 1,3 butadiene, CO, SOx, PM10	No
▲ Road construction and surfacing	Street paving and repair; new highway construction and expansion	VOCs, air toxics, including diesel PM, NOx, CO, SOx, PM10	No
▲ Trains	Railroads; switch yards; maintenance yards	VOCs, NOx, CO, SOx, PM10, air toxics, including diesel PM	Limited; Applicable state and federal MV standards, and possible equipment rules
▲ Marine and port activities	Recreational sailing; commercial marine operations; hotelling operations; loading and un-loading; servicing; shipping operations; port or marina expansion; truck idling		
▲ Aircraft	Takeoff, landing, and taxiing; aircraft maintenance; ground support activities		
▲ Mass transit and school buses	Bus repair and maintenance		
NATURAL RESOURCES			
▲ Farming operations	Agricultural burning; diesel operated engines and heaters; small food processors; pesticide application; agricultural off-road equipment	Diesel PM, VOCs, NOx, PM10, CO, SOx, pesticides	Limited[vi]; Agricultural burning requirements, applicable state and federal mobile source standards; pesticide rules
▲ Livestock and dairy operations	Dairies and feed lots	Ammonia, VOCs, PM10	Yes[vii]
▲ Logging	Off-road equipment e.g., diesel fueled chippers, brush hackers, etc.	Diesel PM, NOx, CO, SOx, PM10, VOCs	Limited; Applicable state/federal mobile source standards
▲ Mining operations	Quarrying or stone cutting; mining; drilling or dredging	PM10, CO, SOx, VOCs, NOx, and asbestos in some geographical areas	Applicable equipment rules and dust controls

(1) Land Use Classifications – by Activity[i]	(2) Facility or Project Examples	(3) Key Pollutants[ii,iii]	(4) Air Pollution Permits[iv]
RESIDENTIAL			
Housing	Housing developments; retirement developments; affordable housing	Fireplace emissions (PM10, NOx, VOCs, CO, air toxics); Water heater combustion (NOx, VOCs, CO)	No[vii]
ACADEMIC AND INSTITUTIONAL			
▲ Schools, including school-related recreational activities	Schools; school yards; vocational training labs/classrooms such as auto repair/painting and aviation mechanics	Air toxics	Yes/No[viii]
▲ Medical waste	Incineration	Air toxics, NOx, CO, PM10	Yes
▲ Clinics, hospitals, convalescent homes		Air toxics	Yes

[i] These classifications were adapted from the American Planning Association's "Land Based Classification Standards." The Standards provide a consistent model for classifying land uses based on their characteristics. The model classifies land uses by refining traditional categories into multiple dimensions, such as activities, functions, building types, site development character, and ownership constraints. Each dimension has its own set of categories and subcategories. These multiple dimensions allow users to have precise control over land-use classifications. For more information, the reader should refer to the Association's website at http://www.planning.org/LBCS/GeneralInfo/.

[ii] This column includes key criteria pollutants and air toxic contaminants that are most typically associated with the identified source categories.

Additional information on specific air toxics that are attributed to facility categories can be found in ARB's Emission Inventory Criteria and Guidelines Report for the Air Toxics Hot Spots Program (May 15, 1997). This information can be viewed at ARB's web site at http://www.arb.ca.gov/ab2588/final96/guide96.pdf.

Criteria air pollutants are those air pollutants for which acceptable levels of exposure can be determined and for which an ambient air quality standard has been set. Criteria pollutants include ozone (formed by the reaction of volatile organic compounds and nitrogen oxides in the presence of sunlight), particulate matter, nitrogen dioxide, sulfur dioxide, carbon monoxide, and lead.

Volatile organic compounds (VOCs) combine with nitrogen oxides to form ozone, as well as particulate matter. VOC emissions result primarily from incomplete fuel combustion and the evaporation of chemical solvents and fuels. On-road mobile sources are the largest contributors to statewide VOC emissions. Stationary sources of VOC emissions include processes that use solvents (such as dry-cleaning, degreasing, and coating operations) and petroleum-related processes (such as petroleum refining, gasoline marketing and dispensing, and oil and gas extraction). Areawide VOC sources include consumer products, pesticides, aerosols and paints, asphalt paving and roofing, and other evaporative emissions.

Nitrogen oxides (NOx) are a group of gaseous compounds of nitrogen and oxygen, many of which contribute to the formation of ozone and particulate matter. Most NOx emissions are produced by the combustion of fuels. Mobile sources make up about 80 percent of the total statewide NOx emissions. Mobile sources include on-road vehicles and trucks, aircraft, trains, ships, recreational boats, industrial and construction equipment, farm

equipment, off-road recreational vehicles, and other equipment. Stationary sources of NOx include both internal and external combustion processes in industries such as manufacturing, food processing, electric utilities, and petroleum refining. Areawide source, which include residential fuel combustion, waste burning, and fires, contribute only a small portion of the total statewide NOx emissions, but depending on the community, may contribute to a cumulative air pollution impact.

Particulate matter (PM) refers to particles small enough to be breathed into the lungs (under 10 microns in size). It is not a single substance, but a mixture of a number of highly diverse types of particles and liquid droplets. It can be formed directly, primarily as dust from vehicle travel on paved and unpaved roads, agricultural operations, construction and demolition.

Carbon monoxide (CO) is a colorless and odorless gas that is directly emitted as a by-product of combustion. The highest concentrations are generally associated with cold stagnant weather conditions that occur during winter. CO problems tend to be localized.

An Air Toxic Contaminant (air toxic) is defined as an air pollutant that may cause or contribute to an increase in mortality or in serous illness, or which may pose a present or potential hazard to human health. Similar to criteria pollutants, air toxics are emitted from stationary, areawide, and mobile sources. They contribute to elevated regional and localized risks near industrial and commercial facilities and busy roadways. The ten compounds that pose the greatest statewide risk are: acetaldehyde; benzene; 1,3-butadiene; carbon tetrachloride; diesel particulate matter (diesel PM); formaldehyde; hexavalent chromium; methylene chloride; para-dichlorobenzene; and perchloroethylene. The risk from diesel PM is by far the largest, representing about 70 percent of the known statewide cancer risk from outdoor air toxics. The exhaust from diesel-fueled engines is a complex mixture of gases, vapors, and particles, many of which are known human carcinogens. Diesel PM is emitted from both mobile and stationary sources. In California, on-road diesel-fueled vehicles contribute about 26 percent of statewide diesel PM emissions, with an additional 72 percent attributed to other mobile sources such as construction and mining equipment, agricultural equipment, and other equipment. Stationary engines in shipyards, warehouses, heavy equipment repair yards, and oil and gas production operations contribute about two percent of statewide emissions. However, when this number is disaggregated to a sub-regional scale such as neighborhoods, the risk factor can be far greater.

[iii] The level of pollution emitted is a major determinant of the significance of the impact.

[iv] Indicates whether facility activities listed in column 4 are generally subject to local air district permits to operate. This does not include regulated products such as solvents and degreasers that may be used by sources that may not require an operating permit per se, e.g., a gas station or dry cleaner.

[v] Generally speaking, warehousing or distribution centers are not subject to local air district permits. However, depending on the district, motor vehicle fleet rules may apply to trucks or off-road vehicles operated and maintained by the facility operator. Additionally, emergency generators or internal combustion engines operated on the site may require an operating permit.

[vi] Authorized by recent legislation SB700.

[vii] Local air districts do not require permits for woodburning fireplaces inside private homes. However, some local air districts and land use agencies do have rules or ordinances that require new housing developments or home re-sales to install U.S. EPA –certified stoves. Some local air districts also ban residential woodburning during weather inversions that concentrate smoke in residential areas. Likewise, home water heaters are not subject to permits; however, new heaters could be subject to emission limits that are imposed by federal or local agency regulations.

[viii] Technical training schools that conduct activities normally permitted by a local air district could be subject to an air permit.

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LAND USE-BASED REFERENCE TOOLS TO EVALUATE NEW PROJECTS FOR POTENTIAL AIR POLLUTION IMPACTS

Land use agencies generally have a variety of tools and approaches at hand, or accessible from local air districts that can be useful in performing an analysis of potential air pollution impacts associated with new projects. These tools and approaches include:

- Base map of the city or county planning area and terrain elevations.
- General Plan designations of land use (existing and proposed).
- Zoning maps.
- Land use maps that identify existing land uses, including the location of facilities that are permitted or otherwise regulated by the local air district. Land use agencies should consult with their local air district for information on regulated facilities.
- Demographic data, e.g., population location and density, distribution of population by income, distribution of population by ethnicity, and distribution of population by age. The use of population data is a normal part of the planning process. However, from an air quality perspective, socioeconomic data is useful to identify potential community health and environmental justice issues.
- Emissions, monitoring, and risk-based maps created by the ARB or local air districts that show air pollution-related health risk by community across the state.
- Location of public facilities that enhance community quality of life, including parks, community centers, and open space.
- Location of industrial and commercial facilities and other land uses that use hazardous materials, or emit air pollutants. These include chemical storage facilities, hazardous waste disposal sites, dry cleaners, large gas dispensing facilities, auto body shops, and metal plating and finishing shops.
- Location of sources or facility types that result in diesel on-road and off-road emissions, e.g., stationary diesel power generators, forklifts, cranes, construction equipment, on-road vehicle idling, and operation of transportation refrigeration units. Distribution centers, marine terminals and ports, rail yards, large industrial facilities, and facilities that handle bulk goods are all examples of complex facilities where these types of emission sources are frequently concentrated.[1] Very large facilities, such as ports, marine terminals, and airports, could be analyzed regardless of proximity to a receptor if they are within the modeling area.
- Location and zoning designations for existing and proposed schools, buildings, or outdoor areas where sensitive individuals may live or play.
- Location and density of existing and proposed residential development.
- Zoning requirements, property setbacks, traffic flow requirements, and idling restrictions for trucks, trains, yard hostlers[2], construction equipment, or school buses.
- Traffic counts (including diesel truck traffic counts), within a community to validate or augment existing regional motor vehicle trip and speed data.

[1] The ARB is currently evaluating the types of facilities that may act as complex point sources and developing methods to identify them.

[2] Yard hostler means a tractor less than 300 horsepower that is used to transfer semi-truck or tractor-trailer containers in and around storage, transfer, or distribution yards or areas and is often equipped with a hydraulic lifting fifth wheel for connection to trailer containers.

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ARB AND LOCAL AIR DISTRICT INFORMATION AND TOOLS CONCERNING CUMULATIVE AIR POLLUTION IMPACTS

It is the ARB's policy to support research and data collection activities toward the goal of reducing cumulative air pollution impacts. These efforts include updating and improving the air toxics emissions inventory, performing special air monitoring studies in specific communities, and conducting a more complete assessment of non-cancer health effects associated with air toxics and criteria pollutants.[1] This information is important because it helps us better understand links between air pollution and the health of sensitive individuals -- children, the elderly, and those with pre-existing serious health problems affected by air quality.

ARB is working with CAPCOA and OEHHA to improve air pollutant data and evaluation tools to determine when and where cumulative air pollution impacts may be a problem. The following provides additional information on this effort.

How are emissions assessed?

Detailed information about the sources of air pollution in an area is collected and maintained by local air districts and the ARB in what is called an emission inventory. Emission inventories contain information about the nature of the business, the location, type and amount of air pollution emitted, the air pollution-producing processes, the type of air pollution control equipment, operating hours, and seasonal variations in activity. Local districts collect emission inventory data for most stationary source categories.

Local air districts collect air pollution emission information directly from facilities and businesses that are required to obtain an air pollution operating permit. Local air districts use this information to compile an emission inventory for areas within their jurisdiction. The ARB compiles a statewide emission inventory based on the information collected by the ARB and local air districts. Local air districts provide most of the stationary source emission data, and ARB provides mobile source emissions as well as some areawide emission sources such as consumer products and paints. ARB is also developing map-based tools that will display information on air pollution sources.

Criteria pollutant data have been collected since the early 1970's, and toxic pollutant inventories began to be developed in the mid-1980's.

[1] A criteria pollutant is any air pollutant for which EPA has established a National Ambient Air Quality Standard or for which California has established a State Ambient Air Quality Standard, including: carbon monoxide, lead, nitrogen oxides, ozone, particulates and sulfur oxides. Criteria pollutants are measured in each of California's air basins to determine whether the area meets or does not meet specific federal or state air quality standards. Air toxics or air toxic contaminants are listed pollutants recognized by California or EPA as posing a potential risk to health.

How is the toxic emission inventory developed?

Emissions data for toxic air pollutants is a high priority for communities because of concerns about potential health effects. Most of ARB's air toxics data is collected through the toxic "Hot Spots" program. Local air districts collect emissions data from industrial and commercial facilities. Facilities that exceed health-based thresholds are required to report their air toxics emissions as part of the toxic "Hot Spots" program and update their emissions data every four years. Facilities are required to report their air toxics emissions data if there is an increase that would trigger the reporting threshold of the hotspots program. Air toxics emissions from motor vehicles and consumer products are estimated by the ARB. These estimates are generally regional in nature, reflecting traffic and population.

The ARB also maintains chemical speciation profiles that can be used to estimate toxics emissions when no toxic emissions data is available.

What additional toxic emissions information is needed?

In order to assess cumulative air pollution impacts, updated information from individual facilities is needed. Even for sources where emissions data are available, additional information such as the location of emissions release points is often needed to better model cumulative impacts. In terms of motor vehicles, emissions data are currently based on traffic models that only contain major roads and freeways. Local traffic data are needed so that traffic emissions can be more accurately assigned to specific streets and roads. Local information is also needed for off-road emission sources, such as ships, trains, and construction equipment. In addition, hourly maximum emissions data are needed for assessing acute air pollution impacts.

What work is underway?

ARB is working with CAPCOA to improve toxic emissions data, developing a community health air pollution information system to improve access to emission information, conducting neighborhood assessment studies to better understand toxic emission sources, and conducting surveys of sources of toxic pollutants.

How is air pollution monitored?

While emissions data identify how much air pollution is going into the air, the state's air quality monitoring network measures air pollutant levels in outdoor air. The statewide air monitoring network is primarily designed to measure regional exposure to air pollutants, and consists of more than 250 air monitoring sites.

The air toxics monitoring network consists of approximately 20 permanent sites. These sites are supplemented by special monitoring studies conducted by ARB and local air districts. These sites measure approximately sixty toxic air pollutants. Diesel PM, which is the major driver of urban air toxic risk, is not monitored directly. Ten of the

60 toxic pollutants, not including diesel, account for most of the remaining potential cancer risk in California urban areas.

What additional monitoring has been done?

Recently, additional monitoring has been done to look at air quality at the community level. ARB's community monitoring was conducted in six communities located throughout the state. Most sites were in low-income, minority communities located near major sources of air pollution, such as refineries or freeways. The monitoring took place for a year or more in each community, and included measurements of both criteria and toxic pollutants.

What is being learned from community monitoring?

In some cases, the ARB or local air districts have performed air quality monitoring or modeling studies covering a particular region of the state. When available, these studies can give information about regional air pollution exposures.

The preliminary results of ARB's community monitoring are providing insights into air pollution at the community level. Urban background levels are a major contributor to the overall risk from air toxics in urban areas, and this urban background tends to mask the differences between communities. When localized elevated air pollutant levels were measured, they were usually associated with local ground-level sources of toxic pollutants. The most common source of this type was busy streets and freeways. The impact these ground-level sources had on local air quality decreased rapidly with distance from the source. Pollutant levels usually returned to urban background levels within a few hundred meters of the source.

These results indicate that tools to assess cumulative impacts must be able to account for both localized, near-source impacts, as well as regional background air pollution. The tools that ARB is developing for this purpose are air quality models.

How can air quality modeling be used?

While air monitoring can directly measure cumulative exposure to air pollution, it is limited because all locations cannot be monitored. To address this, air quality modeling provides the capability to estimate exposure when air monitoring is not feasible. Air quality modeling can be refined to assess local exposure, identify locations of potential hot spots, and identify the relative contribution of emission sources to exposure at specific locations. The ARB has used this type of information to develop regional cumulative risk maps that estimate the cumulative cancer air pollution risk for most of California. While these maps only show one air pollution-related health risk, it does provide a useful starting point.

What is needed for community modeling?

Air quality models have been developed to assess near-source impacts, but they have very exacting data requirements. These near-source models estimate the impact of local sources, but do not routinely include the contribution from regional air pollution background. To estimate cumulative air pollution exposure at a neighborhood scale, a modeling approach needs to combine features of both micro-scale and regional models.

In addition, improved methods are needed to assess near-source impacts under light and variable wind conditions, when high local concentrations are more likely to occur. A method for modeling long-term exposure to air pollutants near freeways and other high traffic areas is also needed.

What modeling work has ARB developed?

A key component of ARB's Community Health Program is the Neighborhood Assessment Program (NAP). As described later in this section, the NAP studies are being conducted to better understand pollution impacts at the community level. Through two such studies conducted in Barrio Logan (San Diego) and Wilmington (Los Angeles), ARB is refining community-level modeling methodologies. Regional air toxics modeling is also being performed to better understand regional air pollution background levels.

In a parallel effort, ARB is developing modeling protocols for estimating cumulative emissions, exposure, and risk from air pollution. The protocols will cover modeling approaches and uncertainties, procedures for running the models, the development of statewide risk maps, and methods for estimating health risks. The protocols are subject to an extensive peer review process prior to release.

How are air pollution impacts on community health assessed?

On a statewide basis, ARB's toxic air contaminant program identifies and reduces public exposure to air toxics. The focus of the program has been on reducing potential cancer risk, because monitoring results show potential urban cancer risk levels are too high. ARB has also looked for potential non-cancer risks based on health reference levels provided by OEHHA. On a regional basis, the pollutants measured in ARB's toxic monitoring network are generally below the OEHHA non-cancer reference exposure levels.

As part of its community health program, the ARB is looking at potential cancer and non-cancer risk. This could include chronic or acute health effects. If the assessment work shows elevated exposures on a localized basis, ARB will work with OEHHA to assess the health impacts.

What tools has ARB developed to assess cumulative air pollution impacts?

ARB has developed the following tools and reports to assist land use agencies and local air districts assess and reduce cumulative emissions, exposure, and risk on a neighborhood scale.

Statewide Risk Maps

ARB has produced regional risk maps that show the statewide trends for Southern and Central California in estimated potential cancer risk from air toxics between 1990 and 2010.[2] These maps will supplement U.S. EPA's ASPEN model and are available on the ARB's Internet site. These maps are best used to obtain an estimate of the regional background air pollution health risk and are not detailed enough to estimate the exact risk at a specific location.

ARB also has maps that focus in more detail on smaller areas that fall within the Southern and Central California regions for these same modeled years. The finest visual resolution available in the maps on this web site is two by two kilometers. These maps are not detailed enough to assess individual neighborhoods or facilities.

Community Health Air Pollution Information System (CHAPIS)

CHAPIS is an Internet-based procedure for displaying information on emissions from sources of air pollution in an easy to use mapping format. CHAPIS uses Geographical Information System (GIS) software to deliver interactive maps over the Internet. CHAPIS relies on emission estimates reported to the ARB's emission inventory database - California Emissions Inventory Development and Reporting System, or CEIDARS.

Through CHAPIS, air district staff can quickly and easily identify pollutant sources and emissions within a specified area. CHAPIS contains information on air pollution emissions from selected large facilities and small businesses that emit criteria and toxic air pollutants. It also contains information on air pollution emissions from motor vehicle and areawide emissions. CHAPIS does not contain information on every source of air pollution or every air pollutant. It is a major long-term objective of CHAPIS to include all of the largest air pollution sources and those with the highest documented air pollution risk. CHAPIS will be updated on a periodic basis and additional facilities will be added to CHAPIS as more data becomes available.

CHAPIS is being developed in stages to assure data quality. The initial release of CHAPIS will include facilities emitting 10 or more tons per year of nitrogen oxides, sulfur dioxide, carbon monoxide, PM10, or reactive organic gases; air toxics from refineries and power plants of 50 megawatts or more; and facilities that conducted health risk

[2]ARB maintains state trends and local potential cancer risk maps that show statewide trends in potential inhalable cancer risk from air toxics between 1990 and 2010. This information can be viewed at ARB's web site at http://www.arb.ca.gov/toxics/cti/hlthrisk/hlthrisk.htm)

assessments under the California Air Toxics "Hot Spots" Information and Assessment Program.[3]

CHAPIS can be used to identify the emission contributions from mobile, area, and point sources on that community.

"Hot Spots" Analysis and Reporting Program (HARP)

HARP[4] is a software package available from the ARB and is designed with air quality professionals in mind. It models emissions and release data from one or more facilities to estimate the potential health risk posed by the selected facilities on the neighboring community. HARP uses the latest risk assessment guidelines published by OEHHA.

With HARP, a user can perform the following tasks:

- Create and manage facility databases;
- Perform air dispersion modeling;
- Conduct health risk analyses;
- Output data reports; and
- Output results to GIS mapping software.

HARP can model downwind concentrations of air toxics based on the calculated emissions dispersion at a single facility. HARP also has the capability of assessing the risk from multiple facilities, and for multiple locations of concern near those facilities. While HARP has the capability to assess multiple source impacts, there had been limited application of the multiple facility assessment function in the field at the time of HARP's debut in 2003. HARP can also evaluate multi-pathway, non-inhalation health risk resulting from air pollution exposure, including skin and soil exposure, and ingestion of meat and vegetables contaminated with air toxics, and other toxics that have accumulated in a mother's breast milk.

Neighborhood Assessment Program (NAP)

The NAP[5] has been a key component of ARB's Community Health Program. It includes the development of tools that can be used to perform assessments of cumulative air pollution impacts on a neighborhood scale. The NAP studies have been done to better understand how air pollution affects individuals at the neighborhood level. Thus far, ARB has conducted neighborhood scale assessments in Barrio Logan and Wilmington.

As part of these studies, ARB is collecting data and developing a modeling protocol that can be used to conduct cumulative air pollution impact assessments. Initially these

[3] California Health & Safety Code section 44300, et seq.
[4] More detailed information can be found on ARB's website at: http://www.arb.ca.gov/toxics/harp/harp.htm
[5] For more information on the Program, please refer to: http://www.arb.ca.gov/ch/programs/nap/nap.htm

assessments will focus on cumulative inhalation cancer health risk and chronic non-cancer impacts. The major challenge is developing modeling methods that can combine both regional and localized air pollution impacts, and identifying the critical data necessary to support these models. The objective is to develop methods and tools from these studies that can ultimately be applied to other areas of the state. In addition, the ARB plans to use these methods to replace the ASPEN regional risk maps currently posted on the ARB Internet site.

Urban Emissions Model (URBEMIS)

URBEMIS[6] is a computer program that can be used to estimate emissions associated with land development projects in California such as residential neighborhoods, shopping centers, office buildings, and construction projects. URBEMIS uses emission factors available from the ARB to estimate vehicle emissions associated with new land uses. URBEMIS estimates sulfur dioxide emissions from motor vehicles in addition to reactive organic gases, nitrogen oxides, carbon monoxide, and PM10.

Land-Use Air Quality Linkage Report[7]

This report summarizes data currently available on the relationships between land use, transportation and air quality. It also highlights strategies that can help to reduce the use of the private automobile. It also briefly summarizes two ARB-funded research projects. The first project analyzes the travel patterns of residents living in five higher density, mixed use neighborhoods in California, and compares them to travel in more auto-oriented areas. The second study correlates the relationship between travel behavior and community characteristics, such as density, mixed land uses, transit service, and accessibility for pedestrians.

[6] For more information on this model, please refer to ARB's website at http://www.arb.ca.gov/html/soft.htm.

[7] To access this report, please refer to ARB's website or click on: http://www.arb.ca.gov/ch/programs/link97.pdf

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LAND USE AND AIR QUALITY AGENCY ROLES IN THE LAND USE PROCESS

A wide variety of federal, state, and local government agencies are responsible for regulatory, planning, and siting decisions that can have an impact on air pollution. They include local land use agencies, regional councils of government, school districts, local air districts, ARB, the California Department of Transportation (Caltrans), and the Governor's Office of Planning and Research (OPR) to name a few. This Section will focus on the roles and responsibilities of local and state agencies. The role of school districts will be discussed in Appendix E.

Local Land Use Agencies

Under the State Constitution, land use agencies have the primary authority to plan and control land use.[1] Each of California's incorporated cities and counties are required to adopt a comprehensive, long-term General Plan.[2]

The General Plan's long-term goals are implemented through zoning ordinances. These are local laws adopted by counties and cities that describe for specific areas the kinds of development that will be allowed within their boundaries.

Land use agencies are also the lead for doing environmental assessments under CEQA for new projects that may pose a significant environmental impact, or for new or revised General Plans.

Local Agency Formation Commissions (LAFCOs)

Operating in each of California's 58 counties, LAFCOs are composed of local elected officials and public members who are responsible for coordinating changes in local governmental boundaries, conducting special studies that review ways to reorganize, simplify, and streamline governmental structures, and preparing a sphere of influence for each city and special district within each county. Each Commission's efforts are directed toward seeing that local government services are provided efficiently and economically while agricultural and open-space lands are protected. LAFCO decisions strive to balance the competing needs in California for efficient services, affordable housing, economic opportunity, and conservation of natural resources.

[1] The legal basis for planning and land use regulation is the "police power" of the city or county to protect the public's health, safety and welfare. The California Constitution gives cities and counties the power to make and enforce all local police, sanitary and other ordinances and regulations not in conflict with general laws. State law reference: California Constitution, Article XI §7.

[2] OPR General Plan Guidelines, 2003: http://www.opr.ca.gov/planning/PDFs/General_Plan_Guidelines_2003.pdf

Councils of Government (COG)

COGs are organizations composed of local counties and cities that serve as a focus for the development of sound regional planning, including plans for transportation, growth management, hazardous waste management, and air quality. They can also function as the metropolitan planning organization for coordinating the region's transportation programs. COGs also prepare regional housing need allocations for updates of General Plan housing elements.

Local Air Districts

Under state law, air pollution control districts or air quality management districts (local air districts) are the local government agencies responsible for improving air quality and are generally the first point of contact for resolving local air pollution issues or complaints. There are 35 local air districts in California[3] that have authority and primary responsibility for regional clean air planning. Local air districts regulate stationary sources of air pollutants within their jurisdiction including but not limited to industrial and commercial facilities, power plants, construction activities, outdoor burning, and other non-mobile sources of air pollution. Some local air districts also regulate public and private motor vehicle fleet operators such as public bus systems, private shuttle and taxi services, and commercial truck depots.

- **Regional Clean Air Plans**

Local air districts are responsible for the development and adoption of clean air plans that protect the public from the harmful effects of air pollution. These plans incorporate strategies that are necessary to attain ambient air quality standards. Also included in these regional air plans are ARB and local district measures to reduce statewide emissions from mobile sources, consumer products, and industrial sources.

- **Facility-Specific Considerations**

Permitting. In addition to the planning function, local air districts adopt and enforce regulations, issue permits, and evaluate the potential environmental impacts of projects.

Pollution is regulated through permits and technology-based rules that limit emissions from operating units within a facility or set standards that vehicle fleet operators must meet. Permits to construct and permits to operate contain very specific requirements and conditions that tell each regulated source what it must do to limit its air pollution in compliance with local air district rules, regulations, and state law. Prior to receiving a permit, new facilities must go through a New Source Review (NSR) process that establishes air pollution control requirements for the facility. Permit conditions are typically contained in the permit to operate and specify requirements that businesses must follow; these may include limits on the amount of pollution that can be emitted, the

[3] Contact information for local air districts in California is listed in the front of this Handbook.

type of pollution control equipment that must be installed and maintained, and various record-keeping requirements.

Local air districts also notify the public about new permit applications for major new facilities, or major modifications to existing facilities that seek to locate within 1,000 feet of a school.

Local air districts can also regulate other types of sources to reduce emissions. These include regulations to reduce emissions from the following sources:

- hazardous materials in products used by industry such as paints, solvents, and de-greasers;
- agricultural and residential burning;
- leaking gasoline nozzles at service stations;
- public fleet vehicles such as sanitation trucks and school buses; and
- fugitive or uncontrolled dust at construction sites.

However, while emissions from industrial and commercial sources are typically subject to the permit authority of the local air district, sensitive sites such as a day care center, convalescent home, or playground are not ordinarily subject to an air permit. Local air district permits address the air pollutant emissions of a project but not its location.

Under the state's air toxics program, local air districts regulate air toxic emissions by adopting ARB air toxic control measures, or more stringent district-specific requirements, and by requiring individual facilities to perform a health risk assessment if emissions at the source exceed district-specific health risk thresholds[4], [5] (See the section on ARB programs for a more detailed summary of this program).

One approach by which local air districts regulate air toxics emissions is through the "Hot Spots" program.[6] The risk assessments submitted by the facilities under this

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[4] Cal/EPA's Office of Environmental Health Hazard Assessment has published "A Guide to Health Risk Assessment" for lay people involved in environmental health issues, including policymakers, businesspeople, members of community groups, and others with an interest in the potential health effects of toxic chemicals. To access this information, please refer to http://www.oehha.ca.gov/pdf/HRSguide2001.pdf

[5] Section 44306 of the California Health & Safety Code defines a health risk assessment as a detailed comprehensive analysis that a polluting facility uses to evaluate and predict the dispersion of hazardous substances in the environment and the potential for exposure of human populations, and to assess and quantify both the individual and population-wide health risks associated with those levels of exposure.

[6] AB-2588 (the Air Toxics "Hot Spots" Information and Assessment Act) requires local air districts to prioritize facilities by high, intermediate, and low priority categories to determine which must perform a health risk assessment. Each district is responsible for establishing the prioritization score threshold at which facilities are required to prepare a health risk assessment. In establishing priorities for each facility, local air districts must consider the potency, toxicity, quantity, and volume of hazardous materials released from the facility, the proximity of the facility to potential receptors, and any other factors that the district determines may indicate that the facility may pose a significant risk. All facilities within the highest category must prepare a health risk assessment. In addition, each district may require facilities in the intermediate and low priority categories to also submit a health risk assessment.

Table D-1
Local Sources of Air Pollution, Responsible Agencies, and Associated Regulatory Programs

Source	Examples	Primary Agency	Applicable Regulations
Large Stationary	Refineries, power plants, chemical facilities, certain manufacturing plants	Local air districts	Operating permit rules Air Toxics "Hot Spots" Law (AB 2588) Local district rules Air Toxic Control Measures (ATCMs)* New Source Review rules Title V permit rules
Small Stationary	Dry cleaners, auto body shops, welders, chrome plating facilities, service stations, certain manufacturing plants	Local air districts	Operating permit conditions, Air Toxics "Hot Spots" Law (AB 2588) Local district rules ATCMs* New Source Review rules
Mobile (non-fleet)	Cars, trucks, buses	ARB	Emission standards Cleaner-burning fuels (e.g., unleaded gasoline, low-sulfur diesel) Inspection and repair programs (e.g., Smog Check)
Mobile Equipment	Construction equipment	ARB, U.S. EPA	ARB rules U.S. EPA rules
Mobile (fleet)	Truck depots, school buses, taxi services	Local air districts, ARB	Local air district rules ARB urban bus fleet rule
Areawide	Paints and consumer products such as hair spray and spray paint	Local air district, ARB	ARB rules Local air district rules

*ARB adopts ATCMs, but local air districts have the responsibility to implement and enforce these measures or more stringent ones.

program are reviewed by OEHHA and approved by the local air district. Risk assessments are available by contacting the local air district.

Enforcement. Local air districts also take enforcement action to ensure compliance with air quality requirements. They enforce air toxic control measures, agricultural and residential burning programs, gasoline vapor control regulations, laws that prohibit air pollution nuisances, visible emission limits, and many other requirements designed to

clean the air. Local districts use a variety of enforcement tools to ensure compliance. These include notices of violation, monetary penalties, and abatement orders. Under some circumstances, a permit may be revoked.

- **Environmental Review**

As required by the California Environmental Quality Act (CEQA), local air districts also review and comment on proposed land use plans and development projects that can have a significant effect on the environment or public health.[7]

California Air Resources Board

The ARB is the air pollution control agency at the state level that is responsible for the preparation of air plans required by state and federal law. In this regard, it coordinates the activities of all local air districts to ensure all statutory requirements are met and to reduce air pollution emissions for sources under its jurisdiction.

Motor vehicles are the single largest emissions source category under ARB's jurisdiction as well as the largest overall emissions source statewide. ARB also regulates emissions from other mobile equipment and engines as well as emissions from consumer products such as hair sprays, perfumes, cleaners, and aerosol paints.

Air Toxics Program

Under state law, the ARB has a critical role to play in the identification, prioritization, and control of air toxic emissions. The ARB statewide comprehensive air toxics program was established in the early 1980's. The Toxic Air Contaminant Identification and Control Act of 1983 (AB 1807, Tanner 1983) created California's program to reduce exposure to air toxics.[8] The Air Toxics "Hot Spots" Information and Assessment Act (Hot Spots program) supplements the AB 1807 program, by requiring a statewide air toxics inventory, notification of people exposed to a significant health risk, and facility plans to reduce these risks.

Under AB 1807, the ARB is required to use certain criteria to prioritize the identification and control of air toxics. In selecting substances for review, the ARB must consider criteria relating to emissions, exposure, and health risk, as well as persistence in the atmosphere, and ambient concentrations in the community. AB 1807 also requires the ARB to use available information gathered from the Hot Spots program when prioritizing compounds.

The ARB identifies pollutants as toxic air contaminants and adopts statewide air toxic control measures (ATCMs). Once ARB adopts an ATCM, local air districts must

[7] Section 4 of this Handbook contains more information on the CEQA process.
[8] For a general background on California's air toxics program, the reader should refer to ARB's website at http://www.arb.ca.gov/toxics/tac/appendxb.htm.

implement the measure, or adopt and implement district-specific measures that are at least as stringent as the state standard. Taken in the aggregate, these ARB programs will continue to further reduce emissions, exposure, and health risk statewide.

With regard to the land use decision-making process, ARB, in conjunction with local air districts, plays an advisory role by providing technical information on land use-related air issues.

Other Agencies

Governor's Office of Planning and Research (OPR)

In addition to serving as the Governor's advisor on land use planning, research, and liaison with local government, OPR develops and implements the state's policy on land use planning and coordinates the state's environmental justice programs. OPR updated its General Plan Guidelines in 2003 to highlight the importance of sustainable development and environmental justice policies in the planning process. OPR also advises project proponents and government agencies on CEQA provisions and operates the State Clearinghouse for environmental and federal grant documents.

California Department of Housing and Community Development

The Department of Housing and Community Development (HCD) administers a variety of state laws, programs and policies to preserve and expand housing opportunities, including the development of affordable housing. All local jurisdictions must update their housing elements according to a staggered statutory schedule, and are subject to certification by HCD. In their housing elements, cities and counties are required to include a land inventory which identifies and zones sites for future residential development to accommodate a mix of housing types, and to remove barriers to the development of housing.

An objective of state housing element law is to increase the overall supply and affordability of housing. Other fundamental goals include conserving existing affordable housing, improving the condition of the existing housing stock, removing regulatory barriers to housing production, expanding equal housing opportunities, and addressing the special housing needs of the state's most vulnerable residents (frail elderly, disabled, large families with children, farmworkers, and the homeless).

Transportation Agencies

Transportation agencies can also influence mobile source-related emissions in the land use decision-making process. Local transportation agencies work with land use agencies to develop a transportation (circulation) element for the General Plan. These local government agencies then work with other transportation-related agencies, such as the Congestion Management Agency (CMA), Metropolitan Planning Organization

(MPO), Regional Transportation Planning Agency (RTPA), and Caltrans to develop long and short range transportation plans and projects.

Caltrans is the agency responsible for setting state transportation goals and for state transportation planning, design, construction, operations and maintenance activities. Caltrans is also responsible for delivering California's multibillion-dollar state Transportation Improvement Program, a list of transportation projects that are approved for funding by the California Transportation Commission in a 4-year cycle.

When safety hazards or traffic circulation problems are identified in the existing road system, or when land use changes are proposed such as a new residential subdivision, shopping mall or manufacturing center, Caltrans and/or the local transportation agency ensure the projects meet applicable state, regional, and local goals and objectives.

Caltrans also evaluates transportation-related projects for regional air quality impacts, from the perspective of travel-related emissions as well as road congestion and increases in road capacity (new lanes).

California Energy Commission (CEC)

The CEC is the state's CEQA lead agency for permitting large thermal power plants (50 megawatts or greater). The CEC works closely with local air districts and other federal, state and local agencies to ensure compliance with applicable laws, ordinances, regulations and standards in the permitting, construction, operation and closure of such plants. The CEC uses an open and public review process that provides communities with outreach and multiple opportunities to participate and be heard. In addition to its comprehensive environmental impact and engineering design assessment process, the CEC also conducts an environmental justice evaluation. This evaluation involves an initial demographic screening to determine if a qualifying minority or low-income population exists in the vicinity of the proposed project. If such a population is present, staff considers possible environmental justice impacts including from associated project emissions in its technical assessments.[9]

Department of Pesticides Regulation (DPR)

Pesticides are industrial chemicals produced specifically for their toxicity to a target pest. They must be released into the environment to do their job. Therefore, regulation of pesticides focuses on using toxicity and other information to ensure that when pesticides are used according to their label directions, potential for harm to people and the environment is minimized. DPR imposes strict controls on use, beginning before pesticide products can be sold in California, with an extensive scientific program to ensure they can be used safely. DPR and county enforcement staff tracks the use of pesticides to ensure that pesticides are used properly. DPR collects periodic

[9] See California Energy Commission, "Environmental Performance Report," July 2001 at http://www.energy.ca.gov/reports/2001-11-20_700-01-001.PDF

measurements of any remaining amounts of pesticides in water, air, and on fresh produce. If unsafe levels are found, DPR requires changes in how pesticides are used, to reduce the possibility of harm. If this cannot be done - that is, if a pesticide cannot be used safely - use of the pesticide will be banned in California.[10]

Federal Agencies

Federal agencies have permit authority over activities on federal lands and certain resources, which have been the subject of congressional legislation, such as air, water quality, wildlife, and navigable waters. The U.S. Environmental Protection Agency generally oversees implementation of the federal Clean Air Act, and has broad authority for regulating certain activities such as mobile sources, air toxics sources, the disposal of toxic wastes, and the use of pesticides. The responsibility for implementing some federal regulatory programs such as those for air and water quality and toxics is delegated by management to specific state and local agencies. Although federal agencies are not subject to CEQA they must follow their own environmental process established under the National Environmental Policy Act (NEPA).

[10] For more information, the reader is encouraged to visit the Department of Pesticide Regulation web site at www.cdpr.ca.gov/docs/empm/pubs/tacmenu.htm.

SPECIAL PROCESSES THAT APPLY TO SCHOOL SITING

The California Education Code and the California Public Resources Code place primary authority for siting public schools with the local school district, which is the 'lead agency' for purposes of CEQA. The California Education Code requires public school districts to notify the local planning agency about siting a new public school or expanding an existing school. The planning agency then reports back to the school district regarding a project's conformity with the adopted General Plan. However, school districts can overrule local zoning and land use designations for schools if they follow specified procedures. In addition, all school districts must evaluate new school sites using site selection standards established in Section 14010 of Title 5 of the California Code of Regulations. Districts seeking state funding for school site acquisition must also obtain site approval from the California Department of Education.

Before making a final decision on a school site acquisition, a school district must comply with CEQA and evaluate the proposed site acquisition/new school project for air emissions and health risks by preparing and certifying an environmental impact report or negative declaration. Both the California Education Code section 17213 and the California Public Resources Code section 21151.8 require school districts to consult with administering agencies and local air districts when preparing the environmental assessment. Such consultation is required to identify both permitted and non-permitted "facilities" that might significantly affect health at the new site. These facilities include, but are not limited to, freeways and other busy traffic corridors, large agricultural operations, and rail yards that are within one-quarter mile of the proposed school site, and that might emit hazardous air emissions, or handle hazardous or acutely hazardous materials, substances, or waste.

As part of the CEQA process and before approving a school site, the school district must make a finding that either it found none of the facilities or significant air pollution sources, or alternatively, if the school district finds that there are such facilities or sources, it must determine either that they pose no significant health risks, or that corrective actions by another governmental entity would be taken so that there would be no actual or potential endangerment to students or school workers.

In addition, if the proposed school site boundary is within 500 feet of the edge of the closest traffic lane of a freeway or traffic corridor that has specified minimum average daily traffic counts, the school district is required to determine through specified risk assessment and air dispersion modeling that neither short-term nor long term exposure poses significant heath risks to pupils.

State law changes effective January 1, 2004 (SB352, Escutia 2003, amending Education Code section 17213 and Public Resources Code section 21151.8) also provides for cases in which the school district cannot make either of those two findings and cannot find a suitable alternative site. When this occurs, the school district must adopt a statement of over-riding considerations, as part of an environmental impact

report, that the project should be approved based on the ultimate balancing of the merits.

Some school districts use a standardized assessment process to determine the environmental impacts of a proposed school site. In the assessment process, school districts can use maps and other available information to evaluate risk, including a local air district's database of permitted source emissions. School districts can also perform field surveys and record searches to identify and calculate emissions from non-permitted sources within one-quarter mile radius of a proposed site. Traffic count data and vehicular emissions data can also be obtained from Caltrans for major roadways and freeways in proximity to the proposed site to model potential emissions impacts to students and school employees. This information is available from the local COG, Caltrans, or local cities and counties for non-state maintained roads.

GENERAL PROCESSES USED BY LAND USE AGENCIES TO ADDRESS AIR POLLUTION IMPACTS

There are several separate but related processes for addressing the air pollution impacts of land use projects. One takes place as part of the planning and zoning function. This consists of preparing and implementing goals and policies contained in county or city General Plans, community or area plans, and specific plans governing land uses such as residential, educational, commercial, industrial, and recreational activities. It also includes recommending locations for thoroughfares, parks and other public improvements.

Land use agencies also have a permitting function that includes performing environmental reviews and mitigation when projects may pose a significant environmental impact. They conduct inspections for zoning permits issued, enforce the zoning regulations and issue violations as necessary, issue zoning certificates of compliance, and check compliance when approving certificates of occupancy.

Planning

- **General Plan**[1]

The General Plan is a local government "blueprint" of existing and future anticipated land uses for long-term future development. It is composed of the goals, policies, and general elements upon which land use decisions are based. Because the General Plan is the foundation for all local planning and development, it is an important tool for implementing policies and programs beneficial to air quality. Local governments may choose to adopt a separate air quality element into their General Plan or to integrate air quality-beneficial objectives, policies, and strategies in other elements of the Plan, such as the land use, circulation, conservation, and community design elements.

More information on General Plan elements is contained in Appendix D.

- **Community Plans**

Community or area plans are terms for plans that focus on a particular region or community within the overall general plan area. It refines the policies of the general plan as they apply to a smaller geographic area and is implemented by ordinances and other discretionary actions, such as zoning.

[1] In October 2003, OPR revised its General Plan Guidelines. An entire chapter is now devoted to a discussion of how sustainable development and environmental justice goals can be incorporated into the land use planning process. For further information, the reader is encouraged to obtain a copy of OPR's General Plan Guidelines, or refer to their website at: http://www.opr.ca.gov/planning/PDFs/General_Plan_Guidelines_2003.pdf

- **Specific Plan**

A specific plan is a hybrid that can combine policies with development regulations or zoning requirements. It is often used to address the development requirements for a single project such as urban infill or a planned community. As a result, its emphasis is on concrete standards and development criteria.

- **Zoning**

Zoning is the public regulation of the use of land. It involves the adoption of ordinances that divide a community into various districts or zones. For instance, zoning ordinances designate what projects and activities can be sited in particular locations. Each zone designates allowable uses of land within that zone, such as residential, commercial, or industrial. Zoning ordinances can address building development standards, e.g., minimum lot size, maximum building height, minimum building setback, parking, signage, density, and other allowable uses.

Land Use Permitting

In addition to the planning and zoning function, land use agencies issue building and business permits, and evaluate the potential environmental impacts of projects. To be approved, projects must be located in a designated zone and comply with applicable ordinances and zoning requirements.

Even if a project is sited properly in a designated zone, a land use agency may require a new source to mitigate potential localized environmental impacts to the surrounding community below what would be required by the local air district. In this case, the land use agency could condition the permit by limiting or prescribing allowable uses including operating hour restrictions, building standards and codes, property setbacks between the business property and the street or other structures, vehicle idling restrictions, or traffic diversion.

Land use agencies also evaluate the environmental impacts of proposed land use projects or activities. If a project or activity falls under CEQA, the land use agency requires an environmental review before issuing a permit to determine if there is the potential for a significant impact, and if so, to mitigate the impact or possibly deny the project.

- **Land Use Permitting Process**

In California, the authority to regulate land use is delegated to city and county governments. The local land use planning agency is the local government administrative body that typically provides information and coordinates the review of development project applications. Conditional Use Permits (CUP) typically fall within a land use agency's discretionary authority and therefore are subject to CEQA. CUPs are

intended to provide an opportunity to review the location, design, and manner of development of land uses prior to project approval. A traditional purpose of the CUP is to enable a municipality to control certain uses that could have detrimental environmental effects on the community.

The process for permitting new discretionary projects is quite elaborate, but can be broken down into five fundamental components:

- Project application
- Environmental assessment
- Consultation
- Public comment
- Public hearing and decision

Project Application

The permit process begins when the land use agency receives a project application, with a detailed project description, and support documentation. During this phase, the agency reviews the submitted application for completeness. When the agency deems the application to be complete, the permit process moves into the environmental review phase.

Environmental Assessment

If the project is discretionary and the application is accepted as complete, the project proposal or activity must undergo an environmental clearance process under CEQA and the CEQA Guidelines adopted by the California Resources Agency.[2] The purpose of the CEQA process is to inform decision-makers and the public of the potential significant environmental impacts of a project or activity, to identify measures to minimize or eliminate those impacts to the point they are no longer significant, and to discuss alternatives that will accomplish the project goals and objectives in a less environmentally harmful manner.

What is a "Lead Agency"?

A lead agency is the public agency that has the principal responsibility for carrying out or approving a project that is subject to CEQA. In general, the land use agency is the preferred public agency serving as lead agency because it has jurisdiction over general land uses. The lead agency is responsible for determining the appropriate environmental document, as well as its preparation.

What is a "Responsible Agency"?

A responsible agency is a public agency with discretionary approval authority over a portion of a CEQA project (e.g., projects requiring a permit). As a responsible agency, the agency is available to the lead agency and project proponent for early consultation on a project to apprise them of applicable rules and regulations, potential adverse impacts, alternatives, and mitigation measures, and provide guidance as needed on applicable methodologies or other related issues.

What is a "Commenting Agency"?

A commenting agency is any public agency that comments on a CEQA document, but is neither a lead agency nor a responsible agency. For example, a local air district, as the agency with the responsibility for comprehensive air pollution control, could review and comment on an air quality analysis in a CEQA document for a proposed distribution center, even though the project was not subject to a permit or other pollution control requirements.

[2] Projects and activities that may have a significant adverse impact on the environment are evaluated under CEQA Guidelines set forth in title 14 of the California Code of Regulations, sections 15000 et seq.

To assist the lead agency in determining whether the project or activity may have a significant effect that would require the preparation of an EIR, the land use agency may consider criteria, or thresholds of significance, to assess the potential impacts of the project, including its air quality impacts. The land use agency must consider any credible evidence in addition to the thresholds, however, in determining whether the project or activity may have a significant effect that would trigger the preparation of an EIR.

The screening criteria to determine significance is based on a variety of factors, including local, state, and federal regulations, administrative practices of other public agencies, and commonly accepted professional standards. However, the final determination of significance for individual projects is the responsibility of the lead agency. In the case of land use projects, the lead agency would be the City Council or County Board of Supervisors.

A new land use plan or project can also trigger an environmental assessment under CEQA if, among other things, it will expose sensitive sites such as schools, day care centers, hospitals, retirement homes, convalescence facilities, and residences to substantial pollutant concentrations.[3]

CEQA only applies to "discretionary projects." Discretionary means the public agency must exercise judgment and deliberation when deciding to approve or disapprove a particular project or activity, and may append specific conditions to its approval. Examples of discretionary projects include the issuance of a CUP, re-zoning a property, or widening of a public road. Projects that are not subject to the exercise of agency discretion, and can therefore be approved administratively through the application of set standards are referred to as ministerial projects. CEQA does not apply to ministerial projects.[4] Examples of typical ministerial projects include the issuance of most building permits or a business license.

Once a potential environmental impact associated with a project is identified through an environmental assessment, mitigation must be considered. A land use agency should incorporate mitigation measures that are suggested by the local air district as part of the project review process.

Consultation

Application materials are provided to various departments and agencies that may have an interest in the project (e.g., air pollution, building, police, fire, water agency, Fish and Game, etc.) for consultation and input.

[3] Readers interested in learning more about CEQA should contact OPR or visit their website at http://www.opr.ca.gov/.

[4] See California Public Resources Code section 21080(b)(1).

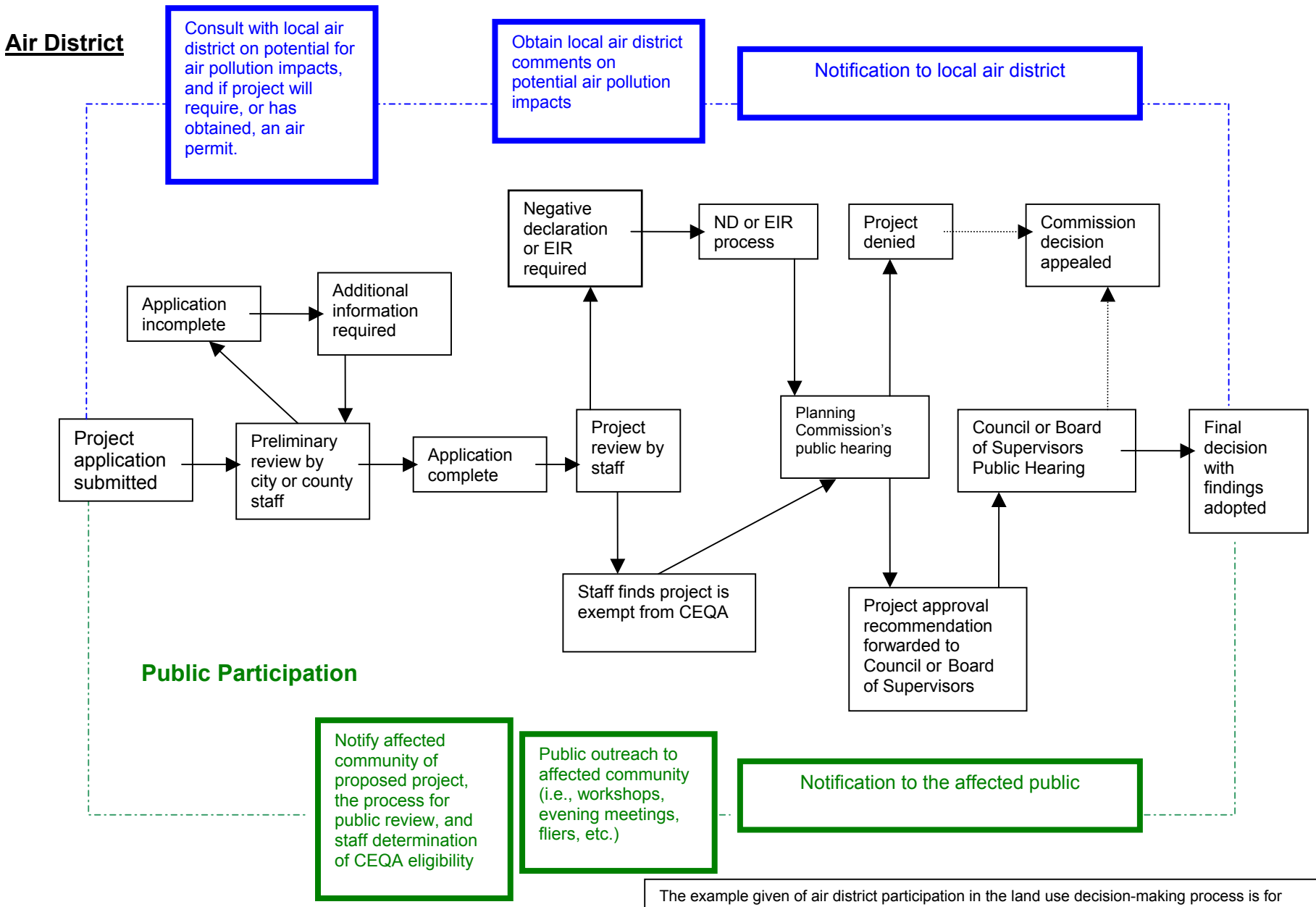
Public Comment

Following the environmental review process, the Planning Commission reviews application along with the staff's report on the project assessment and a public comment period is set and input is solicited.

Public Hearing and Decision

Permit rules vary depending on the particular permit authority in question, but the process generally involves comparing the proposed project with the land use agency standards or policies. The procedure usually leads to a public hearing, which is followed by a written decision by the agency or its designated officer. Typically, a project is approved, denied, or approved subject to specified conditions.

USE PERMIT (DISCRETIONARY ACTION) REVIEW PROCESS*



The example given of air district participation in the land use decision-making process is for illustrative purposes only. In reality, the land use siting process involves the ongoing participation of multiple affected agencies and stakeholders throughout the process.

GLOSSARY OF KEY AIR POLLUTION TERMS

Air Pollution Control Board or Air Quality Management Board: Serves as the governing board for local air districts. It consists of appointed or elected members from the public or private sector. It conducts public hearings to adopt local air pollution regulations.

Air Pollution Control Districts or Air Quality Management Districts (local air district): A county or regional agency with authority to regulate stationary and area sources of air pollution within a given county or region. Governed by a district air pollution control board.

Air Pollution Control Officer (APCO): Head of a local air pollution control or air quality management district.

Air Toxic Control Measures (ATCM): A control measure adopted by the ARB (Health and Safety Code section 39666 et seq.), which reduces emissions of toxic air contaminants.

Ambient Air Quality Standards: An air quality standard defines the maximum amount of a pollutant that can be present in the outdoor air during a specific time period without harming the public's health. Only U.S. EPA and the ARB may establish air quality standards. No other state has this authority. Air quality standards are a measure of clean air. More specifically, an air quality standard establishes the concentration at which a pollutant is known to cause adverse health effects to sensitive groups within the population, such as children and the elderly. Federal standards are referred to as National Ambient Air Quality Standards (NAAQS); state standards are referred to as California ambient air quality standards (CAAQS).

Area-wide Sources: Sources of air pollution that individually emit small amounts of pollution, but together add up to significant quantities of pollution. Examples include consumer products, fireplaces, road dust, and farming operations.

Attainment vs. Nonattainment Area: An attainment area is a geographic area that meets the National Ambient Air Quality Standards for the criteria pollutants and a non-attainment area is a geographic area that doesn't meet the NAAQS for criteria pollutants.

Attainment Plan: Attainment plans lay out measures and strategies to attain one or more air quality standards by a specified date.

California Clean Air Act (CCAA): A California law passed in 1988, which provides the basis for air quality planning and regulation independent of federal regulations. A major element of the Act is the requirement that local air districts in violation of the CAAQS

must prepare attainment plans which identify air quality problems, causes, trends, and actions to be taken to attain and maintain California's air quality standards by the earliest practicable date.

California Environmental Quality Act (CEQA): A California law that sets forth a process for public agencies to make informed decisions on discretionary project approvals. The process helps decision-makers determine whether any potential, significant, adverse environmental impacts are associated with a proposed project and to identify alternatives and mitigation measures that will eliminate or reduce such adverse impacts.[1]

California Health and Safety Code: A compilation of California laws, including state air pollution laws, enacted by the Legislature to protect the health and safety of people in California. Government agencies adopt regulations to implement specific provisions of the California Health and Safety Code.

Clean Air Act (CAA): The federal Clean Air Act was adopted by the United States Congress and sets forth standards, procedures, and requirements to be implemented by the U.S. Environmental Protection Agency (U.S. EPA) to protect air quality in the United States.

Councils of Government (COGs): There are 25 COGs in California made up of city and county elected officials. COGs are regional agencies concerned primarily with transportation planning and housing; they do not directly regulate land use.

Criteria Air Pollutant: An air pollutant for which acceptable levels of exposure can be determined and for which an ambient air quality standard has been set. Examples include ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, and PM10 and PM2.5. The term "criteria air pollutants" derives from the requirement that the U.S. EPA and ARB must describe the characteristics and potential health and welfare effects of these pollutants. The U.S. EPA and ARB periodically review new scientific data and may propose revisions to the standards as a result.

District Hearing Board: Hears local air district permit appeals and issues variances and abatement orders. The local air district board appoints the members of the hearing board.

Emission Inventory: An estimate of the amount of pollutants emitted into the atmosphere from mobile, stationary, area-wide, and natural source categories over a specific period of time such as a day or a year.

Environmental Impact Report (EIR): The public document used by a governmental agency to analyze the significant environmental effects of a proposed project, to identify

[1] To track the submittal of CEQA documents to the State Clearinghouse within the Office of Planning and Research, the reader can refer to CEQAnet at http://www.ceqanet.ca.gov.

alternatives, and to disclose possible ways to reduce or avoid the possible negative environmental impacts.

Environmental Justice: California law defines environmental justice as the fair treatment of people of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies (California Government Code sec.65040.12(c)).

General Plans: A statement of policies developed by local governments, including text and diagrams setting forth objectives, principles, standards, and plan proposals for the future physical development of the city or county.

Hazardous Air Pollutants (HAPs): An air pollutant listed under section 112 (b) of the federal Clean Air Act as particularly hazardous to health. U.S. EPA identifies emission sources of hazardous air pollutants, and emission standards are set accordingly. In California, HAPs are referred to as toxic air contaminants.

Land Use Agency: Local government agency that performs functions associated with the review, approval, and enforcement of general plans and plan elements, zoning, and land use permitting. For purposes of this Handbook, a land use agency is typically a local planning department.

Mobile Source: Sources of air pollution such as automobiles, motorcycles, trucks, off-road vehicles, boats, and airplanes.

National Ambient Air Quality Standard (NAAQS): A limit on the level of an outdoor air pollutant established by the US EPA pursuant to the Clean Air Act. There are two types of NAAQS. Primary standards set limits to protect public health and secondary standards set limits to protect public welfare.

Negative Declaration (ND): When the lead agency (the agency responsible for preparing the EIR or ND) under CEQA, finds that there is no substantial evidence that a project may have a significant environmental effect, the agency will prepare a "negative declaration" instead of an EIR.

New Source Review (NSR): A federal Clean Air Act requirement that state implementation plans must include a permit review process, which applies to the construction and operation of new or modified stationary sources in nonattainment areas. Two major elements of NSR to reduce emissions are best available control technology requirements and emission offsets.

Office of Planning and Research (OPR): OPR is part of the Governor's office. OPR has a variety of functions related to local land-use planning and environmental programs. It provides General Plan Guidelines for city and county planners, and coordinates the state clearinghouse for Environmental Impact Reports.

Ordinance: A law adopted by a City Council or County Board of Supervisors. Ordinances usually amend, repeal or supplement the municipal code; provide zoning specifications; or appropriate money for specific purposes.

Overriding Considerations: A ruling made by the lead agency in the CEQA process when the lead agency finds the importance of the project to the community outweighs potential adverse environmental impacts.

Public Comment: An opportunity for the general public to comment on regulations and other proposals made by government agencies. You can submit written or oral comments at the public meeting or send your written comments to the agency.

Public Hearing: A public hearing is an opportunity to testify on a proposed action by a governing board at a public meeting. The public and the media are welcome to attend the hearing and listen to, or participate in, the proceedings.

Public Notice: A public notice identifies the person, business, or local government seeking approval of a specific course of action (such as a regulation). It describes the activity for which approval is being sought, and describes the location where the proposed activity or public meeting will take place.

Public Nuisance: A public nuisance, for the purposes of air pollution regulations, is defined as a discharge from any source whatsoever of such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. (Health and Safety Code section 41700).

Property Setback: In zoning parlance, a setback is the minimum amount of space required between a lot line and a building line.

Risk: For cancer health effects, risk is expressed as an estimate of the increased chances of getting cancer due to facility emissions over a 70-year lifetime. This increase in risk is expressed as chances in a million (e.g.,10 chances in a million).

Sensitive Individuals: Refers to those segments of the population most susceptible to poor air quality (i.e., children, the elderly, and those with pre-existing serious health problems affected by air quality).

Sensitive Sites or Sensitive Land Uses: Land uses where sensitive individuals are most likely to spend time, including schools and schoolyards, parks and playgrounds, day care centers, nursing homes, hospitals, and residential communities.

Setback: An area of land separating one parcel of land from another that acts to soften or mitigate the effects of one land use on the other.

State Implementation Plan (SIP): A plan prepared by state and local agencies and submitted to U.S. EPA describing how each area will attain and maintain national ambient air quality standards. SIPs include the technical information about emission inventories, air quality monitoring, control measures and strategies, and enforcement mechanisms. A SIP is composed of local air quality management plans and state air quality regulations.

Stationary Sources: Non-mobile sources such as power plants, refineries, and manufacturing facilities.

Toxic Air Contaminant (TAC): An air pollutant, identified in regulation by the ARB, which may cause or contribute to an increase in deaths or in serious illness, or which may pose a present or potential hazard to human health. TACs are considered under a different regulatory process (California Health and Safety Code section 39650 et seq.) than pollutants subject to State Ambient Air Quality Standards. Health effects associated with TACs may occur at extremely low levels. It is often difficult to identify safe levels of exposure, which produce no adverse health effects.

Urban Background: The term is used in this Handbook to represent the ubiquitous, elevated, regional air pollution levels observed in large urban areas in California.

Zoning ordinances: City councils and county boards of supervisors adopts zoning ordinances that set forth land use classifications, divides the county or city into land use zones as delineated on the official zoning, maps, and set enforceable standards for future develop

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CALIFORNIA
SUSTAINABLE FREIGHT INITIATIVE

Concept Paper for the Freight Handbook

Release date: December 12, 2019
Comments due: February 28, 2020

CALIFORNIA
AIR RESOURCES BOARD

Disclaimer

This Concept Paper has been prepared by the staff of the California Air Resources Board. Publication does not signify that the contents reflect the views and policies of the California Air Resources Board, nor does mention of trade names or commercial products constitute endorsement or recommendation for use.

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Concept Paper for the Freight Handbook

Document Availability

Electronic copies of this document and related materials can be found at: https://ww2.arb.ca.gov/our-work/programs/sustainable-freight-transport. Alternatively, paper copies may be obtained from our Public Information Office, 1001 I Street, 1st Floor, Visitors and Environmental Services Center, Sacramento, California, 95814, (916) 322-2990.

Versiones en Español de este documento y materiales relacionados estarán disponibles en: https://ww2.arb.ca.gov/our-work/programs/sustainable-freight-transport

Special Accommodation Request

If you need this document in an alternative format (i.e. Braille, large print) or another language, please contact Christopher Garcia at (916) 322-8382, or freight@arb.ca.gov

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Comments

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INTRODUCTION

To support public review, discussion, and feedback, this Concept Paper shares the California Air Resources Board (CARB or Board) staff's preliminary thoughts for the Freight Handbook. CARB is developing a Freight Handbook as an informational resource for community advocates, local decision makers, and freight facility developers, owners, and operators. The document will frame efforts to address air pollution impacts as "practices" which may apply to the siting, design, construction, and operation of freight facilities to minimize health impacts on nearby communities.

In recognition that specific communities in California are heavily impacted by air pollution, the California Legislature passed Assembly Bill 617 (AB 617) to reduce emissions directly from sources contributing to cumulative exposure burdens within and directly surrounding such communities. To implement AB 617, CARB established the Community Air Protection Program. In September 2018, the Board selected a set of initial communities to create Community Emissions Reduction Plans (CERPs), and will annually consider the selection of additional impacted communities. Freight facilities are one of the primary areas of concern in a number of communities currently developing CERPs. New actions proposed by these communities include increased engagement with local land use and transportation agencies to help minimize impacts from freight activities. Many of the actions and ideas summarized in this Concept Paper build off and support these AB 617 activities.

Prior to engaging in the AB 617 process, CARB initiated additional work on freight activities, through increased reviews of California Environmental Quality Act (CEQA) documents for proposed facilities, creation of the Sustainable Freight: Pathways to Zero and Near-Zero Emissions (April 2015) document, and development of the multi-agency California Sustainable Freight Action Plan (July 2016). Also, CARB staff have met frequently with residents and advocates for communities impacted by air pollution from freight operations and heard a consistent request for guidance that identifies possible local actions that could minimize freight facility emissions and related community exposure to air pollution.

The Governor's 2019 Executive Order N-19-19 furthered the State's commitment to transition towards a healthier, sustainable, and more inclusive economy. This includes addressing direct tailpipe emissions from diesel equipment and vehicles through strong public investments. California has prioritized billions of dollars in annual transportation spending for the construction, operation, and maintenance of infrastructure to help reverse the trend of increased fuel consumption and decrease vehicle miles traveled. The State also continues its effort to accelerate zero-emission vehicle sales through incentive programs, grants, and regulatory actions.

This Concept Paper supports the relevant freight-related actions proposed by communities developing CERPs through the Community Air Protection Program, ideas we've heard from communities, the recommendations we've included in our CEQA comment letters on proposed freight facilities, and other existing resources. This Concept Paper is intended to aid and encourage public participation to help shape the Freight Handbook. CARB staff will continue to collaborate with communities,

agencies, industry and other stakeholders through a public process, and will integrate public feedback into the creation a Freight Handbook that will provide a detailed discussion of the concepts introduced in this Concept Paper. This will include framing how practices may apply in a given scenario and the roles that local government, freight facility developers, owners, and operators, and the public have in land use planning and development review processes.

CARB is seeking robust engagement from community, public, and private industry participants. We encourage you to share your thoughts and expertise in this effort. In addition to any comments you would like to provide, CARB staff can greatly benefit from focused comments that:

- Suggest other land use scenarios that should be highlighted;
- Identify implementation challenges for practices listed in Tables 5 and 6;
- Propose other practices that can be undertaken to support the goals of the Freight Handbook;
- Clearly identify the specific issues on which you are commenting and provide a citation;
- Explain why you agree or disagree with a proposed practice. Where you disagree, please suggest an alternative and consider potential trade-offs as well as opposing views;
- Describe your assumptions and support assertions with factual information by providing technical data, or specific examples, where possible.

CONCEPTS FOR THE FREIGHT HANDBOOK

I. Context for Action

This Concept Paper introduces preliminary thoughts for a Freight Handbook. This Concept Paper serves as a starting point for local, regional, and State discussions about freight facility siting, design, construction, and operational decisions that can minimize near-source exposure to air pollution from new, existing, and expanding freight facilities, and promote clean, healthy air for existing and future Californians and its millions of annual visitors. CARB's intent is to encourage land use planners and local officials, community advocates, and freight facility developers, owners, and operators to integrate emission reduction practices and information about freight facilities into local plans and ordinances, facility-based decisions, and community advocacy.

California's freight transport system is vital to our State economy. California is the nation's largest gateway for international trade and domestic commerce, with an interconnected system of ports, railroads, highways, and roads that allow freight from around the world to move throughout the State and nation. This system is responsible for approximately one-third of the State's economic production, with jobs from freight-dependent industries accounting for over $700 billion in revenue and over 5 million jobs. California's vast transportation system connects the estimated nearly 40 million residents and supports a vibrant economy with nearly $3 trillion in annual gross domestic product. The trucks and equipment that congregate at freight facilities are essential components of the statewide freight system which transports and delivers food, household products, electronics, vehicles, toys, and medicines to the consumer market, both in California and the country. Traditional routes of moving freight face increasing competition from across the globe, and California's system must anticipate and stay ahead of these changes. As California's freight transport system continues to grow under pressure to serve our growing population and satisfy dynamic market demands, other locations in the United States and across the world are competing for this economic activity.

Although the freight system plays an important role in everyday life, communities near freight facilities are burdened by air pollution—specifically toxic air contaminants like diesel particulate matter in the form of exhaust—from the construction and operational activities at freight facilities. Where freight movement increases from new and existing facilities over time, communities may experience increased exposure to higher emissions of toxic and criteria air pollutants. Increased exposure to these emissions have public health implications such as increased risk of premature death, lung cancer, heart and lung diseases, and asthma.

To achieve its air quality, climate, efficiency and economic competitiveness goals, California must transition to a more efficient, zero-emission transportation system for both passenger and freight movement. This is a complex and challenging undertaking. Meeting the State's goals will require the combined efforts of public and

private stakeholders taking action and investing resources across a wide range of sectors that include: energy and fuels, advanced technology, housing and land use, infrastructure, health, the environment, and the economy. Industries operating in California have already made substantial investments in cleaner diesel fuels, vehicles and equipment, reducing diesel particulate matter and other pollutants. Progress is being made in many of these sectors in the form of State regulation, policy and funding, local actions, private innovation, investments supporting communities and exploring new technologies, and more.

The Concept Paper for the Freight Handbook will initiate a new dialogue to identify a set of practices that can be implemented to support flexibility, efficiency, and business practices through policies and programs that support the economy, while working with industry to mitigate the environmental and health inequities certain communities experience due to emissions from freight activities.

A. Roles and Responsibilities

A more efficient, zero and near-zero emission modern freight system will demand not only new vehicles, equipment, and fuels, but also new transportation infrastructure, communications, and industry operating practices. California will need workers trained to build, maintain, and operate this advanced equipment and communications systems. To help fund these efforts, California's logistics industry must remain profitable in the face of increasing competition from other North American seaports and supply chains. The ability to readily adapt to changing trends and expand operations is key to improving the competitiveness of the system. Community acceptance of industry expansion often depends on the prospects for new local jobs, clean air, and safe operations.

The transition to this modern freight system relies on public and private funds invested in infrastructure projects, vehicle and equipment purchases, technological applications, and system management approaches. It also requires the new regulatory and incentive programs underway to spur zero-emission and other clean technology development and deployment. To ensure effective implementation of these actions, many groups must come together to successfully achieve the needs of California's communities from public health, economic, and environmental standpoints.

Local governments that make land use decisions related to freight facilities are on the forefront of the transition to zero-emission operations. They must carefully consider a range of sometimes competing priorities for economic development and jobs, the critical need for affordable housing and infill development, public health, and quality of life for community residents. The owners and operators of new or expanded freight facilities play key roles in leading this transition and are positioned to make cost-effective investments in infrastructure while designing and building projects. Community residents and their advocates need a greater voice in freight facility siting, design, construction, and operation choices so the end result supports or enhances their environment, safety, and opportunities for employment.

B. Need to Accelerate Air Quality Progress

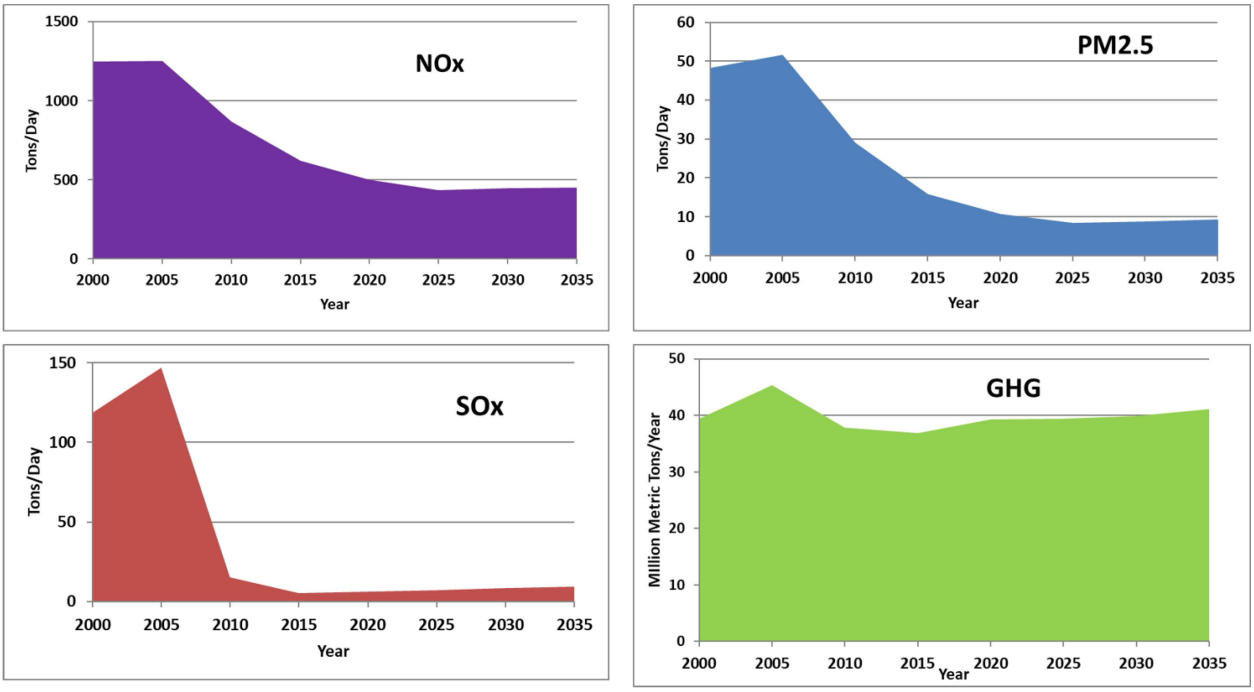
To control and reduce emissions, CARB gathers and analyzes data for updating its mobile source emissions inventories.[1] The inventories assess population, activities, and emissions from mobile sources operating in and around the State. Periodically, these inventories are updated to support the latest air quality plans and regulations. CARB compiles emissions data for on- and off-road mobile sources including off-shore emissions to prepare a statewide freight inventory.

The emissions from the heavy equipment that transports freight in California contributes to elevated ambient levels of criteria pollutants such as fine particulate matter and ozone, as well as localized health impacts near freight facilities. Freight transport accounts for about half of toxic diesel particulate matter (diesel PM) and emissions of nitrogen oxides that form ozone and fine particulate matter in the atmosphere, and six percent of the greenhouse gas emissions in California. These numbers include emissions from trucks, ships, locomotives, aircraft (cargo portion), harbor craft, and all types of equipment used to move freight across the State.

Figure 1 summarizes freight emissions statewide from CARB 2000 inventories projected to 2035. As illustrated in the graphs, CARB strategies for reducing criteria pollutants and greenhouse gas emissions have been effective. However, the State must continue to implement programs and develop new strategies to achieve its air quality goals.

[1] CARB. See, Mobile Source Emissions Inventory.

Figure 1. Freight Emission Inventory Statewide for 2000 and 2035



Source: CARB

Together with our local, regional, and state government partners, we have accelerated extensive changes towards cleaner technologies across the State. Truck owners, ocean carriers, terminal operators, and railroads have made substantial investments to transition their diesel freight equipment to cleaner models, while refineries retooled to produce cleaner diesel fuels. We are seeing the real-world benefits of those investments resulting in measurably cleaner air in communities near seaports and rail yards over the last decade. For example, these combined actions have cut toxic diesel PM at the State's largest seaports by more than 80 percent over the last decade.

However, California must accelerate implementation of air quality programs for the protection of public health. The State must continue to develop policies and make investments in technologies that result in greater emission reductions to achieve its air quality and public health goals. To that end, California is pursuing both incentive and regulatory approaches to reduce the high near-source cancer risk from freight facilities to community members, increase the sustainability of the freight system to meet targets in the State Implementation Plan, and reshape the freight system to achieve our long-term climate goals.

This need is especially acute in specific communities that are exposed to high cumulative levels of air pollution. To reduce this burden, and in response to Assembly Bill 617 (C. Garcia, Chapter 136, Statutes of 2017), CARB established the Community Air Protection Program. Through this program, the Board annually considers for selection impacted communities to collaborate with to develop and implement new locally-focused Community Emissions Reduction Plans (CERPs). Freight facilities are

one of the primary areas of concern in a number of communities currently developing CERPs due to their substantial toxic and criteria air pollution emissions. CARB staff have already begun working closely with local air districts, community groups, community members, environmental organizations, and regulated industries to identify emission reduction practices for freight facilities within the affected communities.

1. Near-Source Health Risks

Despite substantial progress over the last decade, the ongoing use of diesel-fueled trucks and equipment continue to impact communities near major freight facilities. The diesel-fueled equipment operating in and around freight facilities is the most significant source of diesel PM, a toxic air contaminant that can substantially increase the risk of developing cancer and other health problems such as increased respiratory illnesses, risk of heart disease, and premature death. Exposure to diesel PM is a health hazard to people of all ages, but particularly to children whose lungs are still developing and the elderly, who may have other serious health problems. The diesel PM emissions from freight facilities impact communities located adjacent to those operations, as well as people living and working miles away.

In the last decade, advances in science have shown that early-life exposures to air toxics contribute to an increased lifetime risk of developing cancer, or other adverse health effects, compared to exposures that occur in adulthood. This research has shown that children and infants are more sensitive to the harmful effects of exposure to air toxics, like those emitted from freight equipment, than we previously understood.

In March 2015, the California Office of Environmental Health Hazard Assessment released an update to its recommended methodology for conducting health risk assessments in California. The methodology addresses this greater sensitivity and incorporates the most recent data on childhood and adult exposure to air toxics. Health risk assessments conducted by or available to CARB staff show the potential for elevated exposures to diesel PM in communities near freight facilities.

2. More Protective Air Quality Standards

Current control programs are reducing emissions, but the State Implementation Plans required by federal law to demonstrate our path to attain ozone and fine particle ambient air quality standards compel significant additional emission reductions in the South Coast and San Joaquin Valley. At the same time, these two regions, and the San Francisco Bay Area, are experiencing tremendous growth in warehousing and distribution facilities due to e-commerce. The growth in the development of these facilities may increase air pollution from construction and their day-to-day operational activities.

3. Ambitious Climate Change Targets

New efforts in response to climate change are ramping up the pressure for further progress in the 2030 and 2050 timeframes to reduce greenhouse gases and short-lived climate pollutants, like black carbon from diesel-fueled equipment. California has set aggressive targets for reducing greenhouse gas emissions by 40 percent below 1990 levels by 2030, and then 80 percent below 1990 levels by 2050. California also committed to achieve zero-carbon electricity by 2045. Without action, greenhouse gases from the freight sector are projected to grow, driven by increases from freight movement. To curb emissions, the freight industry should accelerate efforts to integrate zero-emission, renewable energy technologies into facility operations to cut petroleum use.

C. State Vision for Sustainable Freight

In 2016, six State agencies, departments, and offices developed the California Sustainable Freight Action Plan. The plan identified State policies, programs, and investments to ensure progress toward a sustainable freight system.



Vision for a Sustainable Freight Transport System

Utilize a partnership of federal, State, regional, local, community, and industry stakeholders to move freight in California on a modern, safe, integrated, and resilient system that continues to support California's economy, jobs, and healthy, livable communities. Transporting freight reliably and efficiently by zero-emission equipment everywhere feasible, and near-zero emission equipment powered by clean, low-carbon renewable fuels everywhere else.

As part of that work, the State is dedicating considerable resources to modernize the freight transport system with a priority to integrate zero and near-zero emission technologies. These and other technologies have the potential to greatly reduce impacts from freight activities on nearby communities and regional air quality, as well as climate change. The benefits of reducing diesel PM emissions and near-source exposure, protecting public health, and achieving systematic reductions in climate pollution cannot be overstated.

II. How the Freight Handbook Can Inform Land Use Planning and Development Decisions

The Freight Handbook will describe practices that reduce diesel PM emissions and near-source exposure, nitrogen oxides, greenhouses gases, and black carbon. We identified potential practices for inclusion in this Concept Paper because they have the potential to increase community participation and minimize community air pollution impacts from freight facilities.

III. Addressing Three Land Use Scenarios for Freight Facilities

This section provides an overview of staff's approach to frame the Freight Handbook. For each of the three land use scenarios, we identify potential practices that local government, freight facility developers, owners, and operators could implement with greater community involvement.

The scenarios are:

A. New and expanding freight facilities near existing residences, schools, health care facilities, and other sensitive receptors

B. Existing freight facilities near existing residences, schools, health care facilities, and other sensitive receptors

C. New residences, schools, health care facilities, and other sensitive receptors near existing freight facilities

A. New and Expanding Freight Facilities near Existing Residences, Schools, Health Care Facilities, and Other Sensitive Receptors

In response to changing market demands, new freight facilities are being built and many existing freight facilities are expanding physical footprints or increasing operational activities, particularly in the warehousing and distribution center sector. As more freight facilities are built, air pollutant emissions may increase from construction and operational activities over the baseline conditions on a development site. The Freight Handbook will describe practices that can minimize air pollutant emissions and community exposure. Table 1 summarizes some key potential practices for siting new or expanded freight facilities near existing residences, schools, health care facilities, and other sensitive receptors.

Table 1. Potential Practices for Siting New or Expanded Freight Facilities near Existing Residences, Schools, Health Care Facilities, and Other Sensitive Receptors

1. Maximize operation of zero-emission trucks and equipment
2. Provide a "transition zone" between new or expanded freight facility and existing residences, schools, health care facilities, and other sensitive receptors
3. Identify and implement exposure reduction approaches (air filters, trees, and walls)
4. Develop and implement truck routes and safety programs

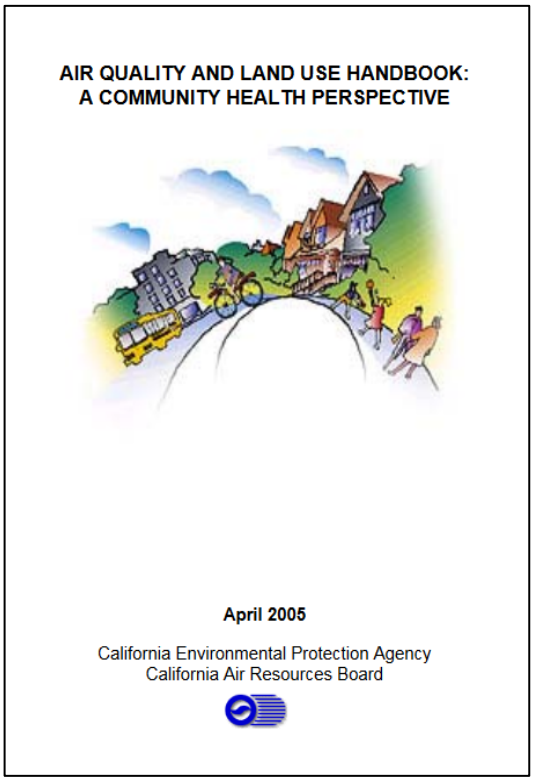
Staff is also identifying potential practices for local governments to consider when preparing or updating land use documents and zoning codes. These include planning documents that identify impacted areas and zoning that supports practices that new and expanding freight facility projects can implement.

Practices for freight facility developers could include use of the lowest emitting construction equipment, routing truck hauling and delivery activities away from neighbors, and locating on-site operations to minimize the air pollution, safety, and nuisance impacts on neighbors. Once built, freight facility owners and operators can utilize zero-emission trucks and equipment on-site. Where zero-emission operations are not yet feasible, owners and operators can use and allow on site near-zero emission technologies utilizing renewable energy, with a plan for transitioning to zero in the future. Owners and operators can also install vegetated barriers, contribute to funding programs for installing and maintaining adequate air filtration on buildings that house sensitive receptors, designate truck delivery routes, and appropriately locate truck access points and loading areas.

Potential community advocacy practices include engagement in land use planning and development review processes, monitoring facility activities, and reporting any concerns. This may include attending community workshops, public events and hearings, and monitoring implementation efforts.

1. Preliminary Distances for Establishing Transition Zones

As described in prior CARB documents, studies show that public exposure to air pollution can be substantially elevated near freight facilities with diesel-fueled vehicles and equipment. And that same pollution decreases sharply with distance from the source because of how particles move and deposit on surfaces. For that reason, CARB will continue to encourage space that separates new or expanded freight facilities served by diesel and other combustion vehicles and equipment from sensitive receptors.



CARB's 2005 Air Quality and Land Use Handbook discussed siting new sensitive receptors a minimum distance away from existing air pollution sources of all types. This Concept Paper discusses siting new or expanded freight facilities away from existing residences, schools, health care facilities, and other sensitive receptors.

In this Concept Paper, we refer to this space as a "transition zone" to separate land use zones for new or expanded freight facilities away from sensitive land uses such as residences, schools, health care facilities, and other sensitive receptors. Transition zones are important because increasing the distance between an emission source and sensitive receptor is a particularly effective means of protecting vulnerable people (children, the elderly, and medically compromised individuals) from exposure to air pollution from freight facilities. Transition zones might contain green space, or revenue-producing uses like commercial office buildings or retail. The key is to find uses that would naturally limit the duration of time that people are exposed to air pollution from the nearby freight facility.

We plan to identify minimum transition zone distances for new and expanded freight facilities to protect the health of communities near these facilities. Through a collaborative public process, CARB will work with community advocates, local decision makers, and freight facility owners, operators, and developers to design and evaluate the technical analysis needed to determine appropriate distances. We encourage you to share your thoughts and expertise in this effort.

Transition zone recommendations in the Freight Handbook will be intended to provide non-binding guidance to local land use decision makers regarding zoning, permitting,

and project approval actions for new or expanded freight facilities. They should not be used as a substitute for site-specific assessments of emissions and health impacts for proposed freight facilities, including those analyses required or recommended as part of federal or State environmental review processes. Additionally, they should not be used as an indicator of a safe level of exposure to emissions from freight facilities, as health risks may exist beyond distances identified.

Freight facilities are often strategically placed in response to the logistic chain or purpose they serve; therefore, each freight facility often has its own activity profile and configuration. Community exposure to diesel PM can vary depending on the proximity to, and the geographic location of, a freight facility.

Regardless of the size of a new freight facility or its operational characteristics, we strongly recommend that new freight facilities be designed and built for eventual full zero-emission operation. Multiple types and models of zero-emission or near zero-emission operation freight vehicles and equipment are available today. Many others are in development or demonstration phases. To support the goal of a zero-emission freight system, CARB is pursuing an ambitious agenda to require vehicles, equipment, and facilities to make the transition to zero-emission options. Building a new freight facility with the infrastructure to power this equipment is more cost effective and less disruptive to operations than retrofitting a facility later.

Even if a new or expanded freight facility is sited consistent with an identified transition zone, the facility should still reduce its air pollutant emissions and mitigate impacts to the maximum extent possible. This is critical to continue California's progress to reduce local air toxics emissions and near-source exposure, achieving and maintaining regional air quality goals, and combatting climate change.

Lastly, a facility would be subject to local ordinances that address other potential impacts such as noise, vibration, light pollution, and water pollution. The local agency would review a proposed freight facility to ensure compliance with applicable standards, rules, and regulations including adequate distances to avoid or reduce an impact.

2. Proposed Approach for Determining Transition Zone Distances

The practices to be provided in the Freight Handbook are intended to reduce air pollution at freight facilities. But the transition zone concept specifically focuses on the proximity of new diesel vehicles and equipment to people, and the associated near-source cancer risks to community members. This section discusses the data and an approach that could be used to develop the distances for the transition zones.

The transition zone distances for new or expanded freight facilities with diesel vehicles or equipment would be based on both technical analysis and discussions within a collaborative public process. The intent of the analysis would be to evaluate the

general diesel PM-related exposure trends for freight facilities based on current practices and pollution control technology. The public discussions would help inform the selection of distances, based on a review of the technical analysis. The technical analysis and discussion would not be intended to identify a distance that should be interpreted to correspond to a safe level of exposure to diesel PM. For all facility types using diesel equipment that we have previously evaluated, the analysis shows that excess cancer risk remains unless zero-emission technology is used. This is important because there is currently no safe level identified for exposure to diesel exhaust.

A freight facility with zero on-site emissions does not present the same issues with near-source cancer risk or other localized health impacts to sensitive receptors as a facility with combustion-related air pollution. However, we are aware that there may be concerns from residents about other factors (e.g. noise, vibration, odor, glare, etc.) associated with freight operations that support a transition zone even around a zero-emission facility. Here, we suggest 500 feet from existing residences, schools, health care facilities, or other sensitive receptors as a potential distance.

We do not propose 500 feet is appropriate distance for a zero-emission freight facility in every instance. Rather, we suggest 500 feet in order to avoid implying zero-emission facilities would not result in any potential impact. We are seeking input to determine an appropriate transition zone for freight facilities with zero on-site emissions.

Table 2 serves to illustrate how CARB staff proposes to display minimum transition zone distances for new and expanded freight facilities. The top value of each range (X and Y) will be the minimum transition zone distance for freight facilities with diesel vehicles and equipment on site, while the 500 foot transition zone assumes zero on-site emissions.

Table 2. Illustration of Transition Zone Distances Around New or Expanded Freight Facilities

Facility Type	Preliminary Distance from Facility
Warehouse/ Distribution Centers > [TBD] square feet	500 feet to X
Cold Storage Warehouses	500 feet to Y

Source: CARB

a. Analytical Approach

An analytical approach could focus on evaluating dispersion modeling results from published Health Risk Assessment (HRA) studies or modeling of a representative facility and the associated cancer risk estimates[2]. Through a collaborative public process, we could identify representative facility characteristics or a representative study for a high-activity freight facility that includes all diesel vehicles and equipment typically operating at that freight facility. This approach would provide the most appropriate and health-protective analysis for this purpose.

The projected ground-level concentrations of diesel PM in the downwind direction for each selected freight facility study could be extracted, with adjustments if needed based on emission changes, and updated estimates of the associated potential excess cancer risks would be generated.

b. Emissions, Exposure, and Cancer Risk

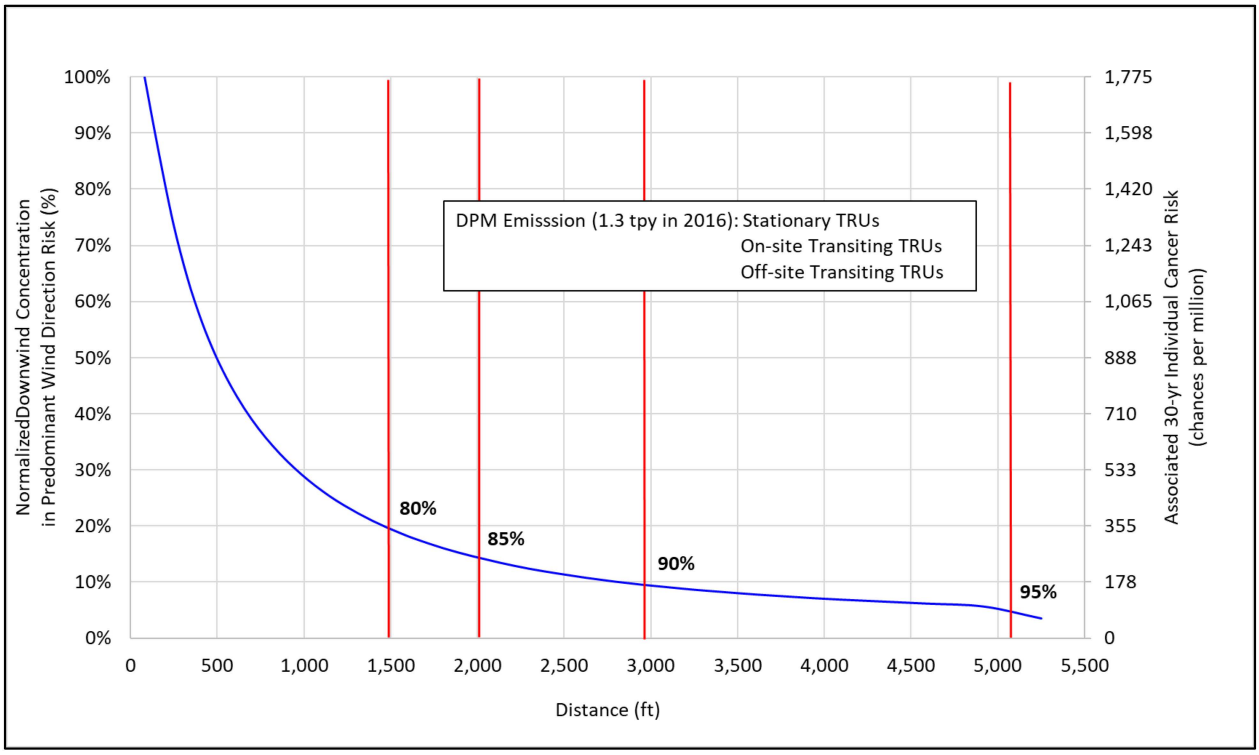
Generally, emissions from a facility depend on the emission level of the equipment, and the number and activity level of the equipment. Since existing studies focus on facility operations and emissions from different years, the facility emissions from different HRAs could be updated to the same reference year, without changing the original activity levels to develop a consistent baseline for a transition zone. We could also assume that the physical location of emission sources would not change from the original analyses. The intent of such an analysis would be to provide a series of reference points that illustrate the relationship between cancer risks, air pollutant concentrations, and distance.

The result of such an analysis would be a series of graphs that would include reference points where the diesel PM concentration and cancer risk decrease, compared to the highest near-source risk level to community members (i.e. the "maximum exposed individual").

For example, Figure 2 illustrates a preliminary analysis of normalized diesel PM concentrations for a high-activity cold-storage warehouse. The red lines in the graph represent the distances downwind from the highest off-site risk value where the diesel PM concentration (left axis) and the associated cancer risks (right axis) are reduced by 80, 85, 90, and 95 percent.

[2] Using the Office of Environmental Health Hazard Assessment (OEHHA) *Air Toxics Hotspots Program Guidance Manual for Preparation of Health Risk Assessments* (OEHHA Guidance)

Figure 2. Normalized Downwind Diesel PM Concentration and Associated 30-Year Cancer Risk by Distance



c. Factors in Identifying Distances

To identify a health-protective distance for the transition zones, CARB staff could provide modeling expertise and scientific judgement, and would work with stakeholders to consider the most relevant factors. Since CARB's 2005 Air Quality and Land Use Handbook recommended distances based on reducing exposure and cancer risk by 80 percent, we could start with that approach. However, in most cases an 80 percent reduction in cancer risk would still result in high residual cancer risks for most facility types, based on the latest health science and health risk assessments in development applications CARB has reviewed. Staff therefore suggests examining, at minimum, the distances needed to achieve an 85, 90, and 95 percent reduction in concentration and cancer risk.

In discussions and further analysis, CARB proposes that all of these factors should be considered to develop reasonable transition zone distances for local land use planners to consider when making zoning and project approval decisions for new and expanded freight facilities. We expect and welcome public feedback on these concepts.

B. Existing Freight Facilities near Existing Residences, Schools, Health Care Facilities, and Other Sensitive Receptors

In many communities, existing freight facilities are located in proximity to existing residencies, schools, health care facilities, and other sensitive receptors. To address health impacts related to emissions from freight facilities, a collective effort among State, regional, and local officials is needed. Table 3 summarizes some of CARB's activities to support efforts that reduce air quality impacts from freight facilities. CARB and air districts continue working to reduce air pollution through regulations and permitting while local agencies primarily address truck routing and parking issues. Together, the combination of actions can minimize air pollution and reduce negative health impacts from existing freight facilities.

Table 3. CARB Activities Supporting California's Efforts to Reduce Impacts from Existing Freight Facilities Near Existing Residences, Schools, Health Care Facilities, and Other Sensitive Receptors

1. Strengthen CARB statewide regulations for new and in-use diesel-fueled equipment, plus charging/fueling infrastructure at freight facilities
2. Petition the federal government for stricter emission standards
3. Use incentives to demonstrate and deploy zero-emission technology and install freight infrastructure, with a focus on communities near freight facilities
4. Support air district Indirect Source Review rules at freight facilities
5. Encourage cities to develop/enforce local truck routing, idling limits, and parking requirements
6. Encourage Caltrans, other government agencies, and industry stakeholders to expand safe and clean truck parking, and reduce truck idling.

Existing and new CARB regulations in development will further reduce air pollution from trucks and equipment. CARB staff plans to propose regulations that strengthen regulations for new and in-use diesel equipment, zero and near-zero emission equipment and charging/fueling infrastructure at freight facilities. CARB currently provides incentives to support demonstration projects that deploy zero-emission technologies, with a focus on communities near freight facilities.

We also advocate with other agencies at all levels for stricter national and international emission standards, zero-emission requirements, new air district rules for freight facilities, and methods to reduce truck impacts. Local governments can designate truck routes and restrict parking near sensitive land uses. Local air districts continue to develop methods for quantifying emissions, new rules to control emissions, and offer an array of financial incentives. State agencies continue to implement and update the California Sustainable Freight Action Plan, with commitments from Caltrans, the Energy Commission, CARB, and others to develop regulations, funding opportunities, and demonstration projects targeted at improving the statewide freight system.

C. New Residences, Schools, Health Care Facilities, and Other Sensitive Receptors near Existing Freight Facilities

The State recognizes the critical need for affordable housing, infill development, and greenhouse gas reductions. The Freight Handbook will describe practices that could be implemented through land use policies and permitting to support development while minimizing pollution. Table 4 lists some examples of positive steps that development projects placing sensitive receptors near existing freight facilities can take.

Table 4. Potential Practices for New Residences, Schools, Health Care Facilities, and Other Sensitive Receptors Near Existing Freight Facilities

1. Health impact disclosures to prospective occupants within transition zone
2. Exposure reduction strategies (air filters, trees, and walls)
3. Developer installation and replacement of air filtration devices through covenants, conditions, and restrictions recorded against the developed property to ensure existing and future owners comply with air filtration requirements throughout the life of the structure
4. Initiate a public process to address and implement truck routing, idling, parking and safety programs

Development proposals can incorporate strategies to reduce exposure like maintaining vegetated walls and barriers between the project site and freight facilities. New freight projects can be designed to minimize community exposure to diesel exhaust along truck routes. Developers can disclose the potential health impacts to prospective occupants within transition zones, install and maintain air filters, and contribute to local investments that reduce emissions from nearby freight facilities.

Freight facility owners and operators can collaborate with local agencies on ways to minimize air pollution from existing operations. This may include upgrading diesel or other combustion equipment and providing operational data to inform land use decisions. Community residents can participate in land use planning and development review processes. To strengthen that participation, community members may wish to organize and engage local officials through advisory committees on solutions to address neighborhood concerns.

IV. Summary of Potential Practices

In the Freight Handbook, CARB staff will describe practices that may apply to one or more of the three land use scenarios. This Concept Paper introduces our approaches in several categories: broad-based, priority project-specific, and additional practices and mitigation. Tables 5 and 6 summarize the potential practices for implementing

entities: local government and air districts; freight facility developers, owners, and operators; and the public.

A. Broad-Based Practices

Local governments can address air pollution from freight facilities on a project-by-project basis and through a broader planning approach. The Freight Handbook will discuss broad-based practices that we are developing from a review of land use documents, ordinances, and conditions of approval as well as relevant land use planning policies and local implementation programs. Broad-based practices aim to help local governments address air pollution through land use documents. The Freight Handbook will encourage local officials to collaborate with air districts and community-based organizations on the development of land use policies.

B. Priority Project-Specific Practices

CARB has established a variety of programs, regulations, incentives, and policies designed to support the State's transformation toward a more sustainable freight system. These include a range of actions to minimize the community health impacts from freight facilities. The Freight Handbook will identify project-specific practices that local governments and freight facility developers, owners, and operators can implement. Community members and organizations are encouraged to provide early input to ensure goals are set that meet community expectations, monitor implementation and report any ongoing concerns.

C. Additional Practices and Mitigation

Freight facilities can deploy additional practices that accelerate the transition to zero-emission operations, reduce the exposure of communities to air pollution, and minimize emissions from their activity and workforce commuting. Potential practices and mitigation include: vegetative walls and other solid barriers, air filtration devices, development programs, and lease agreements.

D. Resources for Development of Potential Practices

CARB staff routinely review and comment on environmental analyses prepared for individual freight facility projects pursuant to CEQA. Comments generally focus on the need for accurate characterization of a project's air pollutant emissions, appropriate modeling assumptions and results, health risk analysis, and mitigation to reduce air quality impacts. We post these comment letters on our website and encourage local governments, freight facility developers and owners, and the public to periodically check for updates to influence project design or mitigation.[3]

[3] California Air Resources Board, California Environmental Quality Act Comment Letters on Freight Facility Projects.

We drew from these letters, staff technology assessments and regulatory requirements, public comments at prior community meetings, and more than 50 documents prepared by other government agencies and advocacy organizations to identify potential practices, as summarized in this Concept Paper and being considered for the Freight Handbook. Many of the identified practices describe existing local government practices while others encourage collaboration between local agencies, freight facilities owners and operators, and the public. Land use planning and decision-making is a complex process. While the authority to regulate land use is primarily vested in local governments, air districts account for, and depend upon, local land use decisions when preparing air quality planning documents and conducting rule-making processes. For that reason, local governments and air districts should consider the identified practices when updating and implementing their planning efforts.

Table 5 presents a list of potential practices to minimize community health impacts from freight facilities. We are sharing this list to signal the range of practices we are considering for inclusion in the Freight Handbook. A refined list of potential practices specific to warehouses, distribution centers, and cold-storage facilities is summarized in Table 6. We are seeking input on the general substance of all potential practices as well as what level the Freight Handbook should describe practices and appropriate methods to implement a practice.

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Table 5. Summary of Potential Practices to Minimize Community Health Impacts from Freight Facilities

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
BROAD-BASED			
Local Freight Committee	Convene a local freight committee comprised of community members and freight representatives to solicit input on land use policies that provide a framework for assessing air quality impacts and addressing community exposure from freight facility projects.	Facility or industry representatives participate on a local freight committee to incorporate community suggestions, gather or provide information, and consider feedback to inform the siting and design of freight facility projects before submitting permit applications.	Form or participate in a freight committee, to help organize and advocate for changes to planning processes and permitting of freight facility projects.
Economic Development Coalition	Establish a coalition of community members, industry stakeholders, and local economic development entities to identify approaches to providing economic and public health benefits to communities near freight facilities.	Facility or industry representatives participate in the coalition to provide operations information and inform cost effectiveness discussions supporting an efficient and strategic deployment of cleaner freight vehicles and equipment.	Building off existing community air protection efforts, participate in the coalition and identify community-specific priorities that determine the balance of economic and public health considerations.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Land Use Policies	Develop land use policies for addressing and minimizing community exposure to air pollution from increased development of freight-related projects when updating land use planning documents.	Design freight facility projects that are consistent with land use policies intended for addressing community exposure prior to submitting permit applications.	Participate in local processes to update land use documents by advocating and proposing land use policies.
Local Ordinances	Update ordinances (i.e., site design standards and operational standards in zoning ordinances) and associated permitting conditions consistent with updated ordinance standards that require freight projects to achieve zero-emission operations.	Integrate zero-emission technologies to the maximum extent feasible and incorporate project design features that minimize community exposure prior to submitting permit applications.	Engage local agencies during the development of ordinances and permitting conditions.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Rezone and Remove Nonconforming Uses	Update or adopt an ordinance to phase out freight facilities or operations in close proximity to sensitive receptors when updating the General Plan and zoning code.	Phase out freight facility operations adjacent to sensitive receptors or phase out older equipment and, where possible, avoid siting new and expanding freight facilities in proximity to sensitive receptors.	Advocate and support local officials in adopting or updating ordinances that restrict or phase out freight operations in areas of the community impacted by existing freight facilities.
Improvement and Financing Districts	Create improvement and/or financing districts to generate revenue for infrastructure that supports zero-emission technologies at freight facilities.	Collaborate with local agencies to identify financing needs for supporting needed infrastructure improvements at freight facilities; commit to investments that achieve zero-emission operations.	Participate in processes to form financing districts that link investments in fully zero-emission operations with benefits to the community.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Development Programs and Agreements	Require freight facilities to establish or contribute towards publically administered Development Programs that help fund projects for reducing community exposure to air pollution from freight.	Negotiate with local agencies and community organizations to establish or contribute towards publically administered development programs that reduce community exposure to air pollution.	Participate in processes to establish or administer development programs in support of activities that fund appropriate projects that reduce community air pollutant exposure.
Cumulative Analysis Criteria	Establish screening criteria to evaluate a freight facility's contribution to a cumulatively considerable air quality impact including but not limited to identifying impacted areas, adopting local thresholds of significance, and developing standardized modeling parameters.	Consider a freight facility's surrounding air quality conditions to inform siting decisions and implementing all feasible practices for reducing air pollution and community exposure before submitting permit applications.	Advocate for planning agencies to collaborate with air districts when developing cumulative thresholds, impact significance criteria, and mitigation to address cumulative impacts from freight facilities.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
PRIORITY PROJECT-SPECIFIC			
Health Protective Siting	Zone freight activities with consideration of avoiding health impacts to sensitive receptors when updating the General Plan and zoning code.	Prioritize development at properties with adequate distances from sensitive receptors and design projects to minimize community exposure.	Inform zoning and permitting decisions to ensure adequate distances are provided for protecting nearby sensitive receptors.
Zero-Emission Technology	Adopt or update site design and operational standards, consistent with updated standards and associated conditions of approval, that require freight facility projects to operate fully with zero-emissions everywhere feasible, and near-zero emission equipment powered by renewable energy everywhere else.	Commit to fully operate with zero-emissions and invest in infrastructure to support zero-emission equipment everywhere feasible, and near-zero emission equipment powered by renewable energy everywhere else, when designing or updating a freight facility.	Inform local processes to develop conditions of approval, monitor implementation and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Zero-Emission Infrastructure	Adopt or update site design and operational standards, consistent with updated ordinance standards, and associated conditions of approval to require infrastructure for freight projects that support full zero-emission operation at the facility.	Commit to investments in zero-emission technologies and infrastructure for all facility operations and service providers, and coordinate with utility companies to provide zero-emission infrastructure when developing site design.	Advocate for land use decisions that help expedite the development of the zero-emission charging/ fueling infrastructure in California.
Clean Heavy-Duty Truck Parking	Establish a heavy-duty truck parking program that provides clean, safe, and affordable truck parking with support for zero-emission technologies.	Reserve land for clean heavy-duty truck parking and install zero-emission infrastructure to eliminate truck and TRU emissions while parked.	Inform land use decisions to identify heavy-duty truck parking, monitor implementation and report any ongoing concerns.
Truck Routing	Designate all truck routes, within community input, that service freight facilities to avoid sensitive receptors when updating land use planning documents and permitting conditions.	Inform local agencies and community members to design truck routes to serve freight facility needs and minimize exposure to air pollution.	Inform land use decisions to designate truck routes, and monitor implementation and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Residential Project Design	Update or adopt ordinances that require site design and operational standards and associated conditions of approval for buildings with sensitive receptors located downwind of freight facilities to require practices that reduce sensitive receptors' exposure to the freight facility's emissions when permitting new development.	Coordinate with local agencies to identify financial tools that accelerate or support investments in zero-emission technology.	Support land use decisions that ensure local agencies consider all applicable practices and permitting conditions that will result in reductions in exposure.
Freight Facility Design	Update or adopt ordinances that require site design and operational standards and associated conditions of approval that require site design features for reducing air pollution and minimizing community exposure during development review.	Design freight facility access points and operational activities to minimize community exposure prior to submitting permit applications.	Support land use decision processes that ensure local agencies consider all applicable practices and permitting conditions that will support reductions in exposure to local communities.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
ADDITIONAL PRACTICES AND MITIGATION			
Vegetation and Other Barriers	Establish a program that requires freight facility owners to maintain vegetated walls or other appropriate barriers that separate facility operations from sensitive receptors when permitting freight facilities.	Dedicate land and resources to construct and maintain vegetated barriers or other appropriate tools to cut exposure when designing freight facilities.	Support land use decisions that ensure local agencies require freight facilities to construct and maintain vegetated walls or other barriers, where appropriate.
Air Filtration Devices	Partner with regional planning agencies and air districts to develop a program for installing and maintaining high-efficiency air filtration devices in existing and new sensitive receptors in proximity to freight facilities.	Support programs to install and maintain high efficiency air filters in existing buildings with sensitive receptors in proximity of freight facilities.	Collaborate with residential property owners and management organizations to promote the deployment, maintenance, and repair of air filtration systems through covenants, conditions, and restrictions.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Implement Required Clean Technology Early	Collaborate with CARB or the local air district on local actions to accelerate implementation of cleaner technologies required by State or district regulation at new freight facilities.	Commit to fund and develop a schedule for early compliance with CARB or district regulations.	Monitor implementation of clean technology programs and report any ongoing concerns.
Rate Structures	Adopt or update conditions of approval that require a rate structure that incentivizes freight facilities to contract with trucking, rail, and marine companies that utilize the lowest emitting transport technologies.	Implement a rate structure and charge more for access by higher emitting trucks, locomotives, or other equipment, and include a fee rate for zero-emission technologies.	Support the development and adoption of rate structures that support the accelerated deployment of zero-emission equipment.
Community Benefit Agreements	Support or administer community benefit agreements to address air quality impacts from freight facility projects and community exposure to air pollution.	Establish or support community benefit agreements to implement practices that provide air pollutant reductions at facilities and provide local benefits to impacted communities.	Negotiate with local agencies and developers to establish and implement community benefit agreements that address community air pollutant exposure from freight activities; monitor implementation and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Lease Agreements	Adopt or update conditions of approval for permitting that require freight facilities to use the cleanest commercially available technologies.	Include contractual language in lease agreements that requires zero-emission technologies everywhere feasible, and near-zero emission equipment powered by renewable energy everywhere else.	Advocate for the development of freight facility agreements that incorporate commitments for deployment of clean technologies.
Advanced Technologies	Require freight facilities to conduct periodic reviews of operations to identify opportunities to upgrade or phase out older equipment, as part of Development Agreements.	Conduct periodic reviews and commit to purchase, or require tenants to utilize zero-emission technologies or near zero-emission technologies if zero is not yet feasible.	Monitor implementation and report any ongoing concerns.
Mitigation Monitoring Reporting Program	Develop mitigation monitoring and reporting programs (MMRPs) to require periodic data and operational information to demonstrate compliance.	Post MMRPs and supporting documentation for public review with periodic updates that describe efforts to implement applicable practices.	Participate in development of MMRPs, follow implementation and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Public Contracting	Include requirements in public contracting document (i.e., Request for Proposals and Request for Qualifications) to specify that bidders implement practices that reduce air quality impacts and address community exposure to air pollution.	Submit proposals that meet or exceed the minimum set criteria for bidders to implement practices that reduce air quality impacts and address community exposure to air pollution.	Monitor implementation and report any ongoing concerns.
Employee Commuting	Establish or update program guidelines with sufficient resources to support alternative commute modes for freight facilities with more than 50 employees.	Commit to fund transit pass subsidies and support incentive programs for other forms of commuting; provide travel data to inform future program updates.	Participate in commuter programs, monitor implementation, and report any ongoing concerns.

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CONCEPTS FOR WAREHOUSE FACILITIES

The Freight Handbook will include practices for the siting, design, construction, and operations of warehouse facilities. Warehouses and other facilities (distribution centers, cold storage, etc., referred to collectively as "warehouse facilities") operate under similar conditions with primarily combustion-powered vehicles and equipment. As of 2019, most freight vehicles and equipment at warehouses run on diesel fuel.

In many communities, warehouse facilities are sited near existing transportation networks to access regional markets. Siting new warehouse facilities within or in close proximity to a neighborhood can compound air quality impacts from other air pollutant sources such as high-volume roadways and existing freight facilities nearby.

We are developing warehouse practices to serve as an informational resource to help communities, decision-makers, and warehouse facility developers, owners, and operators identify and implement practices to minimize community exposure to air pollution from these facilities. As described in CEQA comment letters, CARB staff continues to support building these facilities to achieve full zero-emission operation, implementing zero-emission technologies everywhere feasible, and near-zero emission equipment powered by renewable energy everywhere else.

Table 6 lists potential practices at warehouse facilities. The potential practices below compliment or expand upon potential practices listed in Table 5. As discussed above, local governments and air districts should consider these potential practices when permitting projects and when updating and implementing planning efforts. We are seeking input on the substance of potential practices as well as what level CARB should describe practices and appropriate methods to implement practices for warehouse facilities.

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Table 6. Summary of Potential Practices at Warehouses and Distribution Centers

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
PLANNING, REVIEW, AND PERMITTING			
Update Zoning	Review and update, or adopt, a zoning ordinance (site design and operational standards) to ensure warehousing activities are permitted in areas based on health risks from the warehouse's operational air pollution emissions, an appropriate distance from sensitive receptors.	Identify development opportunities that allow facility operations, or design facility projects, at appropriate distances; utilize air dispersion modeling, as necessary, to estimate exposure risk and inform design-level decisions prior to identifying air pollutant mitigation.	Engage local agencies and participate in review and updates to zoning ordinances for minimizing community exposure to air pollutant emissions.
Zero-Emission Operations: Land Use Policies and Standard Permitting Conditions of Approval	During permit review process, and through standard permitting conditions, to require freight facilities fully operate with zero-emissions equipment everywhere feasible, and near-zero emission equipment powered by renewable energy everywhere else.	Design projects to integrate zero-emission technologies to the extent feasible prior to submitting permit applications; commit to contractual obligations that fully require tenants to zero-emission equipment operations everywhere feasible, and near-zero emission equipment powered by renewable energy everywhere else.	Support local agencies' adoption of land use policies and standard permitting conditions that will result in the deployment of cleaner technologies.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Zero-Emission Infrastructure: Land Use Policies and Standard Permitting Conditions of Approval	Adopt or update ordinances that require site design and operational standards and associated standard permitting conditions to provide needed infrastructure for zero-emission operation.	Commit to investments in zero-emission infrastructure at the project-design stage; deploy zero-emission technologies and incorporate contractual language requiring tenants to utilize zero-emission technologies to the maximum extent possible.	Review and provide input into project designs and monitor implementation and report any ongoing concerns.
Zero-Emission Infrastructure: Investment Plan	Update or adopt permit conditions that require facility developers and owners to establish an investment plan supporting zero-emission infrastructure.	Establish an investment plan and adopt a timeline for making investments in zero-emission technologies; and anticipate emerging technologies becoming commercially available.	Review and assess project designs, monitor implementation and report any ongoing concerns.
Regulatory Compliance, Idling Limits and Dock Electrification	Help enforce mobile and off-road source regulations to limit unnecessary idling, and electrify loading docks serviced by trucks with transport refrigeration units (TRU) or auxiliary power units (APU).	Commit to implementing zero-emission technologies and incorporate contractual language to require tenants demonstrate compliance with mobile and off-road source regulations, limit unnecessary idling, and electrify loading docks servicing trucks with TRUs or APUs.	Review project proposals, and monitor implementation and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Development Programs and Agreements	Require owners and operators to contribute or establish Development Agreements that fund projects for reducing community exposure to air pollution from freight.	Negotiate with local agencies and community organizations to establish or contribute towards publically administered development programs that reduces community exposure to air pollution.	Participate in processes to establish and administer development programs that fund projects that result in a reduction in community air pollutant exposure.
ZERO EMISSION TECHNOLOGY			
Zero and Near-Zero Emission Technologies for All Project Phases	Condition permit approval of warehouse proposals to integrate zero-emission technologies during construction and operational phases everywhere feasible, and near-zero emission equipment powered by renewable energy everywhere else.	Incorporate zero-emission technologies into business decisions, financial planning, and contractual language for construction phases, operational activities, and tenant lease agreements.	Collaborate with freight facility developers and owners, monitor implementation, and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Upgrade On-site Service Equipment	As a permitting condition, require all on-site service equipment (cargo handling, yard hostlers, forklifts, pallet jacks, etc.) to fully operate with zero-emissions, where possible.	Install necessary infrastructure to support zero-emission technologies and contractually obligate tenants to deploy commercially available zero-emission technologies to the maximum extent possible.	Monitor implementation, and report any ongoing concerns.
Intermodal Facility Transport Activities	Organize a committee to collaborate with warehousing facilities owners and operators to maximize cargo transport efficiency of cargo handling, and long-haul truck activities	Integrate operation systems using cleanest available technologies; coordinate management systems to maximize operational efficiency for minimizing unnecessary idling of all diesel engines.	Monitor implementation and report any ongoing concerns.
Fueling Infrastructure for Zero-Emission Operations	Condition permit approval of warehouse facilities to install fueling infrastructure (electric charging and hydrogen fueling stations) for maximizing on-site zero-emission operations.	Incorporate fueling infrastructure to support zero-emission operations into project to the maximum extent possible; coordinate construction plans and activities with utility providers prior to submitting permitting applications.	Monitor implementation and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
On-Site Renewable Energy Generation	Encourage through adoption of general plan policies and goals or through conditioning permit approval of warehouse facilities to incorporate renewable energy resources into project designs or exceed applicable green building standards for warehouses.	Incorporate on-site renewable energy production—solar, wind, etc.—into project design; coordinate with utility providers prior to submitting permitting applications and integrate necessary infrastructure.	Advocate for local governments to develop requirements and incentives for the usage of renewable energy at facilities.
On-Site Microgrid Energy Storage	Coordinate integration of on-site microgrid energy deployment between facilities and utility providers.	Integrate microgrids into project designs to help reduce electricity costs, distribute on-site energy demand across, and increase storage capacities.	Monitor implementation and report any ongoing concerns.
On-Site Energy Storage	Review permitting practices for opportunities to streamline review processes to encourage on-site energy storage solutions for supporting fully zero-emission operations.	Integrate renewable energy storage to ensure adequate storage capacities, including surplus margins, to provide alternative emergency backup power.	Advocate for local governments to develop efficient permitting processes that allow for deployment of energy storage systems.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
WAREHOUSE FACILITY DESIGN			
Establish Truck Routes	Design routing programs in the General Plan to address congestion, provide adequate truck parking capacity, and account for delivery schedules to avoid peak commute periods with a goal of directing trucks around sensitive receptors.	Inform local agencies and community members to establish truck route programs that service facility needs while prioritizing routes that minimize community exposure to air pollution.	Monitor truck activities, collaborate with freight facility owners, and report any ongoing concerns.
Provide Truck Parking	Condition permit approval of warehouse facilities to provide adequate space for truck parking, staging, and loading activities with incentivizes for zero-emission delivery vehicles.	Collaborate with local agencies and utility providers to provide necessary infrastructure for supporting zero-emission delivery vehicles.	Monitor truck activities, collaborate with freight facility owners, and report any ongoing concerns.
Adequate Truck Route Signage	Condition permit approval of warehouse facilities in coordination with Caltrans to install adequate wayfinding strategies along truck routes from highways to facility parking areas.	Provide trainings to inform employee and tenants on proper truck routing and parking programs.	Monitor truck activities, collaborate with freight facility owners, and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Provide Multimodal Commuter Pathways	Condition permit approval of warehouse projects to provide or promote alternative transportation modes for reducing vehicular commuter dependence.	Integrate multimodal design into and around facility access points with the existing transportation infrastructure including connections to existing and planned pedestrian and bicycle pathways.	Review and assess project proposals, monitor implementation, and report any ongoing concerns.
Funding for Freight Transport Infrastructure	Apply and match Federal, State, and local funding sources to support freight transport infrastructure that improves freight facility connectivity and maximizing operational efficiency.	Maximize public funding opportunities to improve facility operations through siting, access, and connectivity to established freight transport corridors.	Advocate for project proposals maximizing public investments in freight transportation planning efforts that improve freight efficiency.
Building Codes for Zero-Emission Charging Stations	Update local codes to require infrastructure for electrification or fueling stations, or adopt State building code for medium and heavy-duty zero-emission infrastructure, as available.	Design or modify facilities to integrate charging station infrastructure; coordinate with utility providers to maximize on-site potential for supporting zero-emission vehicles.	Monitor implementation and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Design Guidelines for Minimizing Community Exposure	Update or adopt site design standards to locate entrance gates, loading docks, staging areas, and parking facilities away from sensitive receptors.	Incorporate design features that demonstrably reduce a community's exposure from loading, staging, and parking activities.	Monitor implementation and report any ongoing concerns.
Vegetative and Other Solid Barriers	Update or adopt site design standards to promote vegetative or other solid barriers for reducing community exposure to air pollution from nearby roadway and on-site activities.	Identify potential air pollutant sources on-site and access routes that may impact nearby communities for informing the location of vegetative or solid barriers, with appropriate design parameters to reduce particulate matter.	Monitor implementation and report any ongoing concerns.
Design Features to Maximize On-Site Truck Maneuvering Efficiency	Review or adopt site design standards to encourage facility designs that maximize efficiency of on-site trucking and loading activities including: turning radii, simultaneous container loading and unloading, and connectivity to site access and roadways.	Design facilities to maximize available space for trucking and loading activities including: turning radii, simultaneous container loading and unloading, and connectivity to site access and roadways.	Monitor implementation and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Multimodal Facility Design	Reduce air quality impacts associated with multimodal facility projects by maximizing transiting efficiencies between transport modes for distributing containers and truck trailers.	Integrate access and loading operations into existing intermodal freight systems for maximizing capacities and operational efficiency.	Monitor implementation and report any ongoing concerns.
WAREHOUSE FACILITY CONSTRUCTION			
Construction Emissions Minimization Plan	Update or adopt an ordinance to establish minimum criteria for construction emissions minimization plans that apply to projects in impacted communities.	Coordinate with local agencies to identify projects in impacted areas and incorporate plan criteria into contractual language for minimizing emissions from all construction-related activities to the extent feasible.	Monitor implementation and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Electrify Low Kilowatt Equipment	Update or adopt ordinances that require site design and operational standards and associated permit conditions to require electrifying all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers, etc.) wherever possible.	Integrate needed electrical infrastructure and hookups into construction planning; include contractual language that requires all contractors to electrify low kilowatt equipment wherever possible.	Monitor implementation and report any ongoing concerns.
Accelerate Regulatory Compliance	Encourage or condition permit approvals of warehouse proposals to maximize commercially available clean-engine technologies for heavy-duty trucks servicing the site.	Include contractual language that requires all contractors to utilize commercially available clean-engine technologies for heavy-duty trucks everywhere possible.	Monitor implementation and report any ongoing concerns.
Minimize Engine Idling	Update or adopt ordinances that require site design and operational standards and associated permit conditions to minimize diesel engine idling for no more than two minutes.	Inform contractors servicing the site of diesel engine idling limits by posting signage at access points, monitoring delivery activities, and training employees to maximize equipment efficiency.	Monitor implementation and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Utilize Generators Utilizing Renewable Fuels	Enforce permit conditions that require generators utilizing renewable fuels to be used, where electrification is infeasible.	Electrify equipment to the maximum extent feasible with connections to the power grid, utilize renewable fuels everywhere else.	Monitor implementation and report any ongoing concerns.
WAREHOUSE FACILITY OPERATIONS			
Minimize Refrigerants	Condition permit approval of warehouse proposals that include cold storage facilities to use low Global Warming Potential (GWP) refrigerants.	Use low GWP refrigerants at cold storage facilities. (e.g. <150 GWP, ammonia, CO_2, Hydrocarbons).	Support proposals that use low GWP refrigerants at cold storage facilities; and monitor implementation.
Minimum Green Building Standards	Update or adopt design guidelines that require facility operations to exceed standard green building criteria for reducing on-site air pollution and nearby community exposure.	Incorporate green building features that demonstrably address on-site air pollution source or minimize nearby community exposure through design and modified operational activities.	Support proposals for applicable green building features, monitor implementation, and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Truck Service Efficiency	Support facility owners and operators to integrate new technologies for improving efficiency of trucking activities to minimize queuing and in-terminal waiting periods.	Coordinate techniques and methods to improve truck delivery and loading activities using available software packages; train service providers on methods to group, streamline, or otherwise maximize facility efficiency during heavy delivery periods.	Collaborate with facility owners and operators to implement technologies, monitor implementation, and report any ongoing concerns.
Container Yard Management Efficiency	Support facility owners and operators to incorporate technologies for operational activities or on-site practices that improve equipment management practices and increase goods movement efficiency.	Coordinate yard management techniques and methods using available software packages to virtualize container loading areas for improving on-site exchanges between import and export activities.	Monitor implementation and report any ongoing concerns.
Coordinate Neighboring Purchasing and Deliveries	Support facility logistics for minimizing duplicative supply deliveries to minimize daily truck visits.	Coordinate supply needs and delivery service contacts with neighboring facilities to maximize supply receiving and shipping activities.	Monitor implementation and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Freight Traffic Information Systems	Collaborate with public agencies to develop and implement a "push" freight traffic information system through a public platform for data sharing that improves logistics planning and truck delivery scheduling.	Support development and implementation of a "push" freight traffic information system by providing trucks servicing a facility with real-time traffic data.	Monitor implementation and report any ongoing concerns.
FINANCING, GRANTS, AND INCENTIVES			
Grants for Zero-Emission Infrastructure and Equipment, Renewable Fuels, and Efficiency	Utilize grants for zero-emission vehicles and equipment, renewable fuel production, charging, and hydrogen fueling infrastructure, and efficiency improvement technologies.	Maximize investments to integrate and deploy zero-emission vehicles and equipment, produce and store renewable fuels, provide charging and fueling infrastructure, and implement efficiency improvements.	Monitor implementation and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Funding for Zero-Emission Technology	Support and fund zero-emission TRU and APU technology to modernize existing facilities and support integrating with proposals for new facilities.	Maximize investments in zero-emission technologies and incorporate contractual language for tenants and service providers to deploy vehicles with TRUs or APUs capable of integrating with electrified loading docks.	Monitor implementation and report any ongoing concerns.
Joint Public and Private Investment Opportunities	Identify local opportunity areas to support clean-technology investments through Property and Business Improvement Districts (PBID) or Enhanced Infrastructure Financing Districts (EIFD).	Collaborate with local agencies to establish and support PBIDs or EIFDs; coordinate with neighboring facilities to maximize investments in business opportunities that support fully zero-emission operations.	Support local agencies and facility owners and operators to establish PBIDs and EIFDs for financing fully zero-emission operations; monitor implementation and report any ongoing concerns.
Projects to Demonstrate Emerging Technologies	Support funding opportunities for demonstrating zero-emission technology technologies for existing and new freight facilities.	Maximize investment opportunities and implement zero-emission demonstration projects in all applicable facility operations.	Support local agency and facility owners and operators to identify opportunities; monitor implementation and report any ongoing concerns.

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LIST OF RESOURCE DOCUMENTS

CARB staff reviewed an extensive selection of resource documents to inform development of the Concept Paper for the Freight Handbook and identify practices for the siting, design, construction, and operation of freight facilities to minimize the resulting air pollution impacts on nearby communities. Some of these documents are listed below. In addition to these documents, this Concept Paper reflects public input CARB gathered through developing and implementing state-level programs related to freight. CARB has also considered the feedback received from local workshops to develop community monitoring and emission reduction plans, the Pathways to Zero and Near-Zero Emissions document, and the Sustainable Freight Action Plan, as well as updated information posted on State and local agency websites.

- Bay Area Air Quality Management District (BAAQMD). *California Environmental Quality Act Air Quality Guidelines* (2017).
- BAAQMD. *Improving Air Quality & Health in Bay Area Communities: Community Air Risk Evaluation Program Retrospect & Path Forward* [2004 - 2013] (2014).
- BAAQMD. *Planning Healthy Places: A Guidebook for Addressing Local Sources of Air Pollutants in Community Planning* (2016).
- BAAQMD. *Regulation 11, Rule 18: Reduction of Risk from Air Toxic Emissions at Existing Facilities* (2017).
- Bay Conservation and Development Commission, Metropolitan Transportation Commission (MTC). *San Francisco Bay Area Seaport Plan* (2017).
- CARB. *Air Quality and Land Use Handbook: A Community Health Perspective* (2005).
- CARB. *Let's Clear the Air: A Public Participation Guide to Air Quality Decision Making in California* (2005).
- CARB. *Sustainable Freight: Pathways to Zero and Near-Zero Emissions* (2015).
- CARB. *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways* (2017).
- California Department of Transportation (Caltrans). *California Freight Mobility Plan* (2014).
- Caltrans. *Mitigating Freight Impacts on Nearby Communities – Preliminary Investigation* (2015).
- Caltrans, CARB, *et. al. California Sustainable Freight Action Plan* (2016).
- California Air Pollution Control Officers Association. *Health Risk Assessments for Proposed Land Use Projects* (2009).
- California Governor's Office of Planning and Research (Cal OPR). *State of California General Plan Guidelines* (2017).
- Cal OPR. *The Planner's Guide to Specific Plans* (2001).
- City of Oakland. *West Oakland Truck Management Plan* (2018).
- City of Riverside. *Good Neighbor Guidelines for Siting New and/or Modified Warehouse Distribution Facilities* (2008).

- Biggs, D., Stansbery, S., and Nance, M. American Planning Association. *100 Great Community Engagement Ideas* (2018).
- Environmental Defense Fund. *Green Freight Handbook* (2014).
- Institute for Local Government. *Effective Public Engagement through Strategic Communication* (2015).
- Institute for Local Government. *What is Public Engagement and Why Should I Do It?* (2016).
- Los Angeles County Metropolitan Transportation Authority, Caltrans. *Healthy Communities and Healthy Economy* (2009).
- MTC, Bay Area Goods Movement Collaborative. *Community Collaborative for Sustainable Freight* (2014).
- MTC. *San Francisco Bay Area Goods Movement Plan* (2016).
- MTC, *et. al. Freight Emissions Reduction Action Plan* [for Plan Bay Area 2040] Final Supplemental Report (2017).
- MTC, *et. al. Plan Bay Area 2040, Draft Environmental Impact Report* (SCH# 2016052041) (2017).
- National Center for Sustainable Transportation. *Freight Efficiency Whitepapers* (2016).
- Natural Resources Defense Council. *Clean Cargo: A Guide to Reducing Diesel Air Pollution from the Freight Industry in Your Community* (2012).
- Natural Resources Defense Council. *Defend Your Air* (2012).
- PolicyLink. *The Sustainable Communities Initiative: The Community Engagement Guide for Sustainable Communities* (2012).
- Port of Long Beach. "Air Quality Programs" (website 2018).
- Port of Long Beach. *Port Master Plan, Update 1990* (As amended, 2005).
- Ports of Long Beach and Los Angeles. *San Pedro Bay Ports Clean Air Action Plan* (2017).
- Port of Los Angeles. *Port Master Plan* (2018).
- Port of Oakland. *Growth With Care: Port of Oakland Strategic Business Plan* 2018-2022 (2018).
- San Diego Unified Port District. *Port Master Plan* (2017).
- San Diego Association of Governments. *2050 Regional Transportation Plan/Sustainable Communities Strategy*, Draft Environmental Impact Report (SCH# 2010041061) (2011).
- San Diego Unified Port District. *Port Master Plan* (2017).
- San Joaquin Council of Governments. *2018 Regional Transportation Plan/Sustainable Communities Strategy*, Draft Environmental Impact Report (SCH# 2017032042) (2018).
- San Joaquin Valley Unified Air Pollution Control District (SJVAPCD). *Guidance for Assessing and Mitigating Air Quality Impacts* (2015).
- SJVAPCD. *Guidance for Assessing and Mitigating Air Quality Impacts* (2015).
- SJVAPCD. *Rule 3180: Administrative Fees for Indirect Source Review* (Adopted 2005, as amended 2018).

- SJVAPCD. *Rule 9150: Indirect Source Review* (Adopted 2005, as amended 2017).
- Transportation Research Board, National Cooperative Freight Research Program. *Guidebook for Understanding Goods Movement* (2012).
- Southern California Association of Governments (SCAG). *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*, Draft Environmental Impact Report (SCH# 2015031035) (2015).
- SCAG. *Industrial Warehousing in the SCAG Region* (2018).
- South Coast Air Quality Management District (SCAQMD). *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* (2005).
- SCAQMD. *Model Air Quality Element* (Reviewed, 2019).
- SCAQMD. *Rule 1402: Control of Toxic Air Contaminants from Existing Sources* (Adopted 1994, as amended 2016).
- Transportation Research Board, National Cooperative Highway Research Program. *Guide to Deploying Clean Truck Freight Strategies* (2017).
- Transportation Research Board, National Cooperative Freight Research Program. *Issues Identified and Lessons Learned from NCFRP 24 - Smart Growth and Urban Goods Movement* (2013).
- Transportation Research Board, National Cooperative Freight Research Program. *Background Research Material for Freight Facility Location Selection: A Guide for Public Officials* (2011).
- United States Department of Transportation, Federal Highway Administration. *Freight and Air Quality Handbook* (2012).
- United Sates Environmental Protection Agency, SmartWay. *Vision 2020: A New Era of Freight Sustainability* (2015).
- West Oakland Environmental Indicators Project. *Clearing the Air: Reducing Diesel Pollution in West Oakland* (2003).
- Western Riverside Council of Governments. *Transportation Uniform Mitigation Fee Program* (2019).

We the Meadows, Michelle Black for Carstens, Black & Minteer LLP

Letter Code: O-6
Date: September 15, 2025

Response to Comment O-6-1

This comment describes that there are attached comments on the Draft Environmental Impact Report prepared for the IPT Enterprise Business Center Project that are the formal comments from We The Meadows. The referenced comment letter was prepared by Carstens, Black & Minteer LLP and is dated September 15, 2025.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment O-6-2

This comment is an introduction to the more detailed comments that follow. The comment letter is submitted on behalf of We The Meadows and was prepared by Carstens, Black & Minteer LLP. The comment letter includes a number of attachments referenced throughout the comment letter and listed as Attachments 1 through 5 on page 20 of the comment letter. Each of these attachments is noted for the record.

The comment expresses opposition to the Project, claiming that the Project and the other cumulative industrial warehouse projects are incompatible with surrounding land uses, and requests the City reject the Project and consider alternative uses such as an office park. The comment states that if the City continues to consider the Project, it should revise the Draft EIR and recirculate for public and agency review.

Refer to Master Response 6 regarding the adequacy of the Draft EIR's cumulative analysis, Master Response 7 regarding the Project's compatibility with surrounding land uses, Master Response 4 regarding the adequacy of the Draft EIR's mitigation under CEQA, and Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the DEIR analysis is inadequate, that there are any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment O-6-3

This general comment provides a summary of the Project as described in the NOA and states the opinion that the Draft EIR does not sufficiently identify and address cumulative impacts from the nearby cumulative industrial warehouse projects, does not correctly characterize environmental effects, does not adequately evaluate feasible alternatives, provides inadequate and unenforceable

mitigation measures, and does not consider long-term impacts to sensitive receptors. In addition, this comment states the opinion that the Draft EIR does not adequately analyze and mitigate the Project's potential impacts on air quality, human health, GHG emissions, traffic and circulation, adjacent communities, noise, and light pollution.

Refer to Master Response 6 regarding the adequacy of the Draft EIR's cumulative analysis, Master Response 2 regarding the adequacy of the Draft EIR, Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project, Response to Comment O-1-4 and Master Response 9 regarding the Draft EIR's air quality and health risk analysis, including impacts to sensitive receptors, Master Response 10 regarding the Draft EIR's GHG analysis, Master Response 8 regarding the Draft EIR's transportation analysis, Master Response 7 regarding the compatibility of the proposed projects with adjacent land uses, Master Response 11 regarding the Draft EIR's noise and vibration analysis, and Master Response 12 regarding the Draft EIR's light and glare analysis. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required. This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment O-6-4

This comment states the opinion that the Draft EIR does not adequately disclose, analyze, and mitigate adverse impacts related to the Project, claiming that impacts to air quality, noise, and human health risks should be classified as significant and unavoidable, and that the Draft EIR does not account for future tenancy, truck trip volumes, and 24 hours per day, 7 days per week operations.

Refer to Response to Comment O-1-4 and Master Response 9 regarding the Draft EIR's air quality and health risk analysis, Master Response 11 regarding the Draft EIR's noise and vibration analysis, and Master Response 8 regarding the Draft EIR's transportation analysis. These Master Responses thoroughly address the topics raised in this comment.

Refer to Response to Comment O-1-10 regarding future tenancy. The Draft EIR acknowledges that the future tenant of the Project has not yet been identified; therefore, the Draft EIR conservatively evaluates potential environmental impacts based on a reasonably foreseeable range of uses consistent with the property's Light Industrial (LI) zoning designation. Additionally, the mitigation measures and regulatory compliance measures provided in the Draft EIR require discretionary permitting associated with future tenancy, ensuring environmental protection at the time of tenant occupancy. This approach is consistent with *State CEQA Guidelines* Sections 15126 and 15144, which require CEQA analysis to be based upon reasonably foreseeable development assumptions.

Regarding cumulative analysis, refer to Master Response 6.

Regarding 24/7 operations, refer to Master Response 12 regarding the light and glare analysis prepared for the Project and refer back to Master Response 11 regarding the noise analysis prepared for the Project, including nighttime activities.

Impacts related to other environmental issues (e.g., biological resources, air quality, public services, hydrology) do not have a temporal component, which is to say that the effects would not vary between daytime or nighttime operation. As the environmental issue topics that could result in impacts during nighttime hours versus daytime hours have been addressed under Threshold 4.1.4, starting on page 4.1-25 of Section 4.1, Aesthetics and Section 4.13.6, Project Impacts, starting on page 4.13-17 of Section 4.13, Noise, of the Draft EIR, additional evaluation or revision to the Draft EIR regarding nighttime operations is not required.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that the impacts that would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment O-6-5

This comment states the opinion that the Draft EIR insufficiently analyzes and mitigates air quality impacts and provides a separate technical evaluation commissioned by the commenter. The air quality technical memorandum was prepared by EPS, Environmental Permitting Specialists (September 10, 2025), and is provided as Attachment 1 to the comment letter. The air quality technical memorandum asserts that the Draft EIR fails to recognize air quality thresholds of significance, quantify peak construction emissions, evaluate the formation of secondary pollutants, or recognize Project violation of NO_X standards during construction. This comment requests that the Draft EIR be revised to accurately identify air quality impacts and mitigation.

Refer to Master Response 9 regarding the Draft EIR's Health Risk Analysis and Master Response 4 regarding the adequacy of the Draft EIR's proposed mitigation.

Section 4.3.3.2, page 4.3-6 of Section 4.3, Air Quality, of the Draft EIR summarizes the appropriate "National and State Ambient Air Quality Standards" which are identified in detail in Table 4.3.B on page 4.3-7 of the Draft EIR. The South Coast Air Quality Management District (SCAQMD) is responsible for demonstrating regional compliance with ambient air quality standards and works cooperatively with the California Air Resources Board (CARB), the Southern California Association of Governments (SCAG), county transportation commissions, local governments, and other federal and State government agencies in the development of Air Quality Management Plans (AQMPs) to meet both State and national air quality standards. The main purpose of an AQMP is to bring the area into compliance with federal and State air quality standards. Every 3 years, SCAQMD prepares a new AQMP, updating the previous plan and 20-year horizon. As stated in Section 4.3.4.2, page 4.3-15, of Section 4.3, Air Quality, of the Draft EIR, the 2022 AQMP builds upon measures already in place from previous AQMP, and includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NO_x technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other Clean Air

Act (CAA) measures to achieve the 2015 8-hour ozone standard, which is the most current ozone standard. The air emission thresholds established by the SCAQMD to meet state and national air quality standards are clearly identified as thresholds (refer to Draft EIR Tables 4.3 I-J, and Q-R on pages 4.3-27 through 4.3-43).

As noted in Master Response 6 and Response to Comment O-6-4, the Project includes a quantitative cumulative analysis of air quality impacts.

As described in Section 4.3.5.2, page 4.3-19 of Section 4.3, Air Quality of the Draft EIR, the SCAQMD's adopted thresholds of significance were determined based on the attainment status of the air basin and the ambient air quality standards for criteria pollutants. Further, page 4.3-2 includes the following text explaining the relationship between the adopted thresholds and the AAQS:

> *"[…] emission thresholds established by an air district are used to manage total regional emissions within an air basin based on the air basin's attainment status for criteria pollutants. These emission thresholds were established for individual projects that would contribute to regional emissions and pollutant concentrations and could adversely affect or delay the projected attainment target year for certain criteria pollutants."*

Additionally, the Draft EIR compared Project emissions to SCAQMD's Localized Significance Thresholds (LSTs), which, according to SCAQMD, "present the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor." Therefore, by relying on the adopted criteria pollutant thresholds of significance and applicable LSTs, the Draft EIR did evaluate the Project in the context of potential violations of State and federal AAQS, in compliance with CEQA and the applicable SCAQMD thresholds.

There is no requirement under CEQA to quantify 1-hour construction emissions, nor is there a requirement to evaluate secondary formation of PM2.5. The secondary formation of PM2.5 is indirect and highly variable, and estimating such emissions would be speculative. The analysis provided in the Draft EIR addressed the thresholds of significance established by the City and regional agencies, and the criteria set forth in Appendix G of the *State CEQA Guidelines*, and all modeling was conducted in accordance with SCAQMD guidance and relied upon estimates from CalEEMod, which is the modeling software recommending for use by SCAQMD.

As demonstrated in Table 4.3.O, construction of the Project is not expected to result in a locally significant air quality impact related to NOx and, therefore, is not expected to violate any AAQS for NOx. The commenter's Attachment 1 does not provide all model inputs or output files to substantiate their claim, and appears to miscalculate the 1-hour averaging period concentration of NOx. The 1-hour NOx value is determined based on the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations, and is not equal to the maximum construction impact, as suggested in the comment letter.

The Project Traffic Impact Assessment (TIA) was prepared following the City's TA Guidelines (refer to Draft EIR Appendix I). The City's consultant on the Draft EIR closely coordinated with the City and reviewed all potential mitigation measures that are listed in the City's TA Guidelines and California Air Pollution Officers Association (CAPCOA) Handbook to mitigate the Project's VMT impact to the greatest degree feasible with directly applicable and enforceable measures. Refer to Master Response 8 regarding VMT mitigation and the incorporation of RCM TRA-1 and MM TRA-2.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment O-6-6

This comment states the opinion that the Draft EIR insufficiently analyzes and mitigates GHG impacts, disagrees with the Draft EIR's findings that the proposed Project's operational emissions would be below the SCAQMD significance threshold, states the opinion that the Draft EIR's significant and unavoidable VMT impact finding requires the Draft EIR to be revised and adopt all feasible mitigation, and requests that the Draft EIR include a more robust GHG analysis. In addition, this comment states the opinion that that MM GHG-1 is insufficient and should provide clarity that the provision of electric truck charging is required before Project operation.

Refer to Master Response 10 regarding the Draft EIR's GHG analysis and Master Response 6 regarding the adequacy of the proposed Project's cumulative analysis. The commenter suggests the timing of electrical truck charging occur with approval of the Project. The purpose of MM GHG-1 is to facilitate electric truck operations of future tenants. As discussed in Master Response 10, MM GHG-1 has been revised to clarify the timing of installation of electric truck charging stations. As noted in Master Response 10, four electric truck charging stations shall be installed and operational prior to tenant occupancy of the proposed building. Therefore, the timing of the installation is not speculative. As the measure provides sufficient assurances that the required charging would be available prior to any tenant occupation or use of the building, no revision of the Draft EIR is required.

As discussed in Section 4.8.7, Cumulative Impacts, starting on page 4.8-20 of Section 4.8, Greenhouse Gas Emission, of the Draft EIR, GHG impacts are by their nature cumulative impacts. Localized impacts of climate change are the result of the cumulative impact of global emissions. A cumulative threshold based on consistency with State targets and actions to reduce GHGs is an appropriate standard of comparison for significance determinations. The thresholds developed by the SCAQMD are based on and apply to individual projects. Since climate change is a global issue, it is unlikely that individual projects would generate enough GHG emissions to influence climate change on their own. Consequently, it is speculative to determine how an individual project's GHG emissions would impact climate change in California. Therefore, impacts identified in Section 4.8.6, Project Impacts, starting on page 4.8-14 of Section 4.8, Greenhouse Gas Emissions, of the Draft EIR, are not Project-specific impacts to global climate change but are the proposed Project's contribution to this cumulative impact. Therefore, further analysis of the GHG impacts resulting from development of additional warehouses in the Project area would not change this outcome; and

additional evaluation is not warranted. It should be noted that the Project, in conjunction with other cumulative projects, would be subject to all applicable regulatory requirements, which would further reduce GHG emissions. Additionally, the Draft EIR identified a significant cumulative GHG impact as it would conflict with the goals of the 2022 Scoping Plan related to VMT.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment O-6-7

This comment states the opinion that the Draft EIR insufficiently analyzes and mitigates traffic and circulation impacts and provides a separate technical evaluation commissioned by the commenter. The memorandum *Review of the Draft EIR for the IPT Business Center Project in the City of Lake Forest – Traffic and Transportation Issues* was prepared by Tom Brohard and Associates (September 4, 2025), and is provided as Attachment 3 to the comment letter. This memorandum asserts that the Draft EIR fails to comply with the City's adopted Transportation Analysis Guidelines because MM-TRA-1 would address 0.5 percent of Project traffic generation and that the Draft EIR does not evaluate additional traffic mitigation options. The comment requests that the Draft EIR be revised and recirculated to include additional evaluation of Project traffic generation.

Refer to Master Response 8 and Response to Comment O-6-5 regarding the Draft EIR's transportation analysis, specifically development and feasibility of transportation-related mitigation measures.

Refer to Response to Comment O-6-5 regarding the TIA prepared for the proposed Project.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment O-6-8

This comment states the opinion that the Draft EIR does not adequately disclose, analyze, or mitigate the Project's impacts to nearby communities, that the Project would introduce heavy diesel truck traffic near residential and school receptors, exacerbate health risks, increase air, noise, and light pollution, and undermine the long-term livability, safety, and environmental integrity of the City. This comment also references the State of California Attorney General NOP comment letter's findings and recommendations and that the Draft EIR demonstrates incompatibility with surrounding land uses in violation of local and regional plans. Refer to Appendix A of the Draft EIR, which contains the referenced NOP comment letter, dated April 5, 2024.

Refer to Master Response 8 regarding truck traffic associated with the Project, Response to Comment O-1-4 and Master Response 9 regarding air emissions and health risks resulting from the Project, Master Response 11 regarding noise, Master Response 12 regarding Project lighting, and

Master Response 7 regarding the compatibility of the Project with surrounding land uses, livability, safety, and environmental integrity associated with the Project. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

The City acknowledges the State of California Attorney General's NOP comment letter and considered the issues presented in the letter during preparation of the Draft EIR. The Draft EIR adequately evaluates air pollution and health risks associated with the Project, as described in Master Response 9.

The State of California Attorney General's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" document provides recommendations and guidance for development and siting of warehouse projects throughout the State; it is not a standalone set of mandatory regulations. As established in the Draft EIR (Section 4.3.6, Table 4.3.I on page 4.3-27) emissions of NOx during construction would exceed established SCAQMD significance thresholds. Mitigation Measure (MM) AQ-1 requires the use of Tier 4 or the most effective Verified Diesel Emission Control Strategies (VDECS) during project activities. This mitigation is similar to the suggested 'best practices" of equipping construction equipment with Tier 4 compliant measures or better. Compliance with SCAQMD Rule 403 requiring the control of fugitive dust, is a standard requirement of all development projects in the Basin. Implementation of MM AQ-1 would reduce emissions of NOx during construction to below SCAQMD thresholds (see Draft EIR, Table 4.3.J on page 4.3-28). Suggested 'Best Practices' relative to the use of low-VOC architectural coatings is addressed through MM AQ-2, requiring the use of "super-compliant" low-VOC paint. This measure address cumulative VOC emissions. Emissions of all other construction pollutants, including fugitive dust, were determined to be less than SCAQMD thresholds. Regarding Health Risk, MM-1 sufficiently reduces the inhalation risk to below established thresholds (see Draft EIR, table 4.3.M on page 4.3-34). The Draft EIR did not identify significant operational-related air emission impacts (see Draft EIR, Table 4.3.K on page 4.3-29) or localized air quality impacts during construction or operation (see Draft EIR, Tables 4.3.O on page 4.3-37 and 4.3.P on page 4.3-38). No additional mitigation or best practices are required for the Project.

As suggested by *Warehouse Project: Best Practices*, the proposed Project would be consistent with the California Green Building Standards Code (CALGreen Code) and Assembly Bill (AB) 1881 water efficient landscape requirements. Additionally, the proposed Project would be consistent with California's Building Energy Efficiency Standards (Energy Code) and requirements for solar photovoltaic systems. The proposed Project will be seeking Leadership in Energy and Environmental Design (LEED) certification through the Applicant's LEED Volume program. Some of the features included in the design will include, but not be limited to, drought-tolerant landscaping, low-flow fixtures, high-efficiency lighting, solar, and infrastructure for EV charging. The proposed Project identifies MM GHG-1, requiring the installation of EV truck charging in conjunction with tenant improvements. In compliance with the SCAQMD Rule 2305 (WAIRE) the future owners and operators of the proposed Project would be required to comply with the WAIRE Program's point-based emission reduction and reporting requirements through the SCAQMD permitting process. The project features provided and mitigation measures identified in the Draft EIR, in tandem with compliance with the applicable provision of the WAIRE program sufficiently satisfy the intent of

Warehouse Projects: Best Practices by requiring the implementation of practices or actions to reduce air quality and greenhouse gas emissions.

As the Draft EIR did not identify significant noise impacts, the implementation of mitigation or suggested best practices is not required, though through building orientation and the construction of screening features, the proposed Project satisfies several suggested measures for reducing noise at nearby receptors.

The *Warehouse Projects: Best Practices* are suggestions and recommendations for warehouse development and would not result in a greater reduction of the proposed Project's identified impacts than that already achieved through the mitigation measures identified in the Draft EIR. The mitigation measures identified in the Draft EIR along with the project design features achieved through LEEDs certification, compliance with appropriate provisions of the CALGreen and Energy Codes, and compliance with existing SCAQMD policies (e.g., Rules 403 and 2305), collectively satisfy the intent of *Warehouse Project: Best Practices*, relative to the air quality, greenhouse gas, health risk, and noise conditions associated with proposed Project.

Beginning January 1, 2026, AB 98 applies different development standards to logistics use facilities based on various factors including: (1) whether a facility's size exceeds 250,000 square feet; (2) whether loading bays (i.e., dock doors) are less than 900 feet from a sensitive receptor (including residences, schools, daycare facilities, parks, nursing homes and hospitals); (3) whether the site's existing zoning is industrial or non-industrial; (4) whether the site is located in a "warehouse concentration region"; and (5) the entitlement application date for the new or expanded facility. The application for the Project was deemed complete prior to September 30, 2024; therefore, AB 98 does not apply to the Project. As established in the Draft EIR, Project-specific impacts relative to aesthetics, air quality, health-risk, and noise were determined to be less than significant.

The City's latest General Plan Update (*2040 Lake Forest General Plan Update*) was approved in June 2020 and provided the long-term vision for land use development in the City. The land use designation and zoning for the Project and cumulative sites is the same as that considered in the City's most recent General Plan. The Project site has been zoned Light Industrial (LI) since 1987.

One of the primary objectives of the City's 2040 General Plan is to encourage economic development in areas adjacent to major roadways and transportation corridors, ensuring a diverse mix of land uses that supports the community's ability to thrive and be economically sustainable over time. City General Plan policies seek to balance economic development, fiscal stability, and land use compatibility. As detailed in the Draft EIR (refer to Table 4.11.B, starting on page 4.11-10), the Project is consistent with the applicable land use compatibility policies established in the General Plan. Furthermore, by providing for the redevelopment of a currently underutilized site, the Project satisfies the goals and policies of the General Plan to promote economic development and support the fiscal health of the City.

The cumulative projects were included in the Draft EIR's quantitative analysis of air quality, health risk, noise, and traffic impacts, and qualitatively in the consideration of the other environmental issues addressed in the Draft EIR. The Draft EIR appropriately assesses the Project-specific and

cumulative impacts associated with development of the proposed use. Refer to Master Response 6 and the Response to Comment O-6-4 regarding the Project's cumulative analysis.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment O-6-9

This comment states the opinion that the Draft EIR does not disclose inconsistencies with the City's General Plan Land Use policies, and that the proposed Project would damage community livability, public health, increase pollution, generate greenhouse gas emissions, and harm compatibility between uses. This comment also claims that the Draft EIR does not include measures for noise attenuation, light pollution, or excessive glare. This comment requests the Draft EIR be revised to disclose such inconsistencies and incorporate enforceable mitigation.

It is unclear the specific inconsistencies with the Lake Forest General Plan Goals and Policies in which the comment is referring. However, refer to Master Response 7 and the Response to Comment O-6-8 regarding the Draft EIR's consistency with applicable land use regulations. As reviewed by the City, the Project has been designed consistent with the Lake Forest General Plan Goals and Policies and all discretionary measures set forth in the City of Lake Forest Citywide Design Guidelines. These Guidelines are intended to guide proposed development so that it is aesthetically pleasing, high quality, and reflective of the character of the surrounding community. Furthermore, the Project would require a Site Development Permit, which would provide an opportunity for the City to review the physical improvements to the Project site, including the overall building scale, massing, and design to ensure compatibility and compliance with the Citywide Design Guidelines.

Regarding community health, the Draft EIR includes a Health Risk Assessment (HRA) (Appendix C of the Draft EIR) that fully analyzes the health risks to all sensitive receptors, which include residences, schools, workplaces, schools, daycare facilities, parks, nursing homes and hospitals surrounding the Project site, as described in Section 4.3, Air Quality, pages 4.3-31 through 4.3-22, of the Draft EIR, (refer to Master Response 9). Regarding 24/7 operations, Section 4.1, Aesthetics, pages 4.1-25 and -26 of the Draft EIR includes a thorough analysis of potential impacts related to Project lighting, which presumably would be operated during evening and nighttime hours. Also, refer to Master Response 12 regarding the assessment of lighting provided in the Draft EIR. Furthermore, the Draft EIR identified that daytime and nighttime noise levels during operation of the Project and the referenced cumulative projects would be 52.8 and 50.0 dBA Leq, respectively. Therefore, the Draft EIR provides an appropriate assessment of potential nighttime operations (refer to Master Response 11).

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment O-6-10

This comment states the opinion that the Draft EIR does not adequately analyze or mitigate the Project's noise pollution impacts, referencing the State of California Attorney General NOP comment letter's findings and recommendations and claiming that the Draft EIR does not disclose the impact of impulsive noise or include enforceable mitigation measures. The comment requests the Draft EIR be revised with the State of California Attorney General recommendations to reduce community noise impacts from warehouses. Refer to Response to Comment 0-6-8 regarding the referenced State of California Attorney General comment letter on the NOP and guidance for the siting of warehouse projects.

Refer to Master Response 11 regarding the Draft EIR's noise and vibration analysis. Impacts related to other environmental issues (e.g., biological resources, public services, hydrology) do not have a temporal component, that is the effects would not vary between daytime or nighttime operation. Furthermore, as shown in Section 4.13.6, Project Impacts, page 4.13-18 of Section 4.13, Noise, of the Draft EIR, the City's nighttime noise standards do take into account the sensitivity of the nighttime hours during which most people sleep; thus, the analysis also considers this time of day when the noise of industrial operations could potentially be more impactful. As the issues that could have an effect at night have been addressed in the Draft EIR, additional evaluation or revision to the Draft EIR is not required.

The commenter cites health effects that may result from 'high" noise levels and speculates or suggests that mere exposure to noise, over time, may result in adverse health effects. The City of Lake Forest has established noise standards which are based on federal and State level requirements. The federal and State level requirements appropriately consider the health effects of excessive noise, which also guide the establishment of local standards. Refer to Master Response 3 regarding speculation without substantial evidence. As stated in the Draft EIR and this response, Project-specific and cumulative noise levels would not exceed noise thresholds established by the City; therefore, there is no connection to the referenced potential health effects cited by the commenter and further evaluation is not warranted. Therefore, no revision to the Draft EIR is required.

The commenter requests 'enforceable mitigation' be required of the Project to account for undisclosed impacts. Refer to Master Response 4 regarding mitigation requirements under CEQA. As stated above, and in Master Response 11, quantitative evaluation of the potential noise generated by the Project was calculated according to industry standards and the Project was not determined to exceed significance thresholds established by the City. In the absence of any such exceedance, no mitigation is warranted.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment O-6-11

This comment states the opinion that the Draft EIR does not adequately analyze or mitigate the proposed Project's light pollution impacts, claiming that the Draft EIR's cumulative impacts analysis is inadequate and fails to address whether the parking, lighting, solar panels, security lighting, or other aspects of the cumulative industrial warehouse projects would have glare impacts.

The Project site and the referenced cumulative projects are located within an urbanized area, previously developed with structures, expansive parking areas, outdoor lighting, and landscaping. Nighttime lighting in the Project area is part of the existing condition. Refer to Master Response 12 regarding the light and glare analysis prepared for the Project. Also, refer to the Response to Comment O-6-4. Regarding glare from solar systems, the concept of efficient solar power is to absorb as much light as possible, while reflecting as little light as possible; therefore, standard solar panels produce less glare and reflection than standard window glass. On a more technical level, solar panels use "high transmission, low iron glass," which absorbs more light and produces less glare and reflectance than normal glass. It is anticipated the rooftop solar systems would be installed to maximize the production of electricity; therefore, it is reasonable to conclude that glare and reflection from rooftop solar panels would not generate a significant amount of glare onto adjacent properties. In addition, the Project would require a Site Development Permit, which would provide the opportunity for the City to review the physical improvements to the Project site, including the overall building scale, massing, and design to ensure compatibility and compliance with City requirements governing scenic quality.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment O-6-12

This comment states the opinion that environmentally superior alternatives are available and should be adopted, including mixed-use developments, business office complexes, research, medical, or clean-tech non-industrial facilities. This comment also expresses concern regarding the Draft EIR's objectives and analysis of alternatives, claiming that the Draft EIR's justification to reject alternatives is inadequate, and requests the Project not be approved because feasible environmentally superior alternatives exist.

Refer to Master Response 5 regarding the adequacy of the range of alternatives considered for the Project. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted. As the Draft EIR identified alternatives that meet the City's primary Project objectives for the site and reduce, in part, the significant impacts associated with the Project, the Draft EIR provides a reasonable range of alternatives to the Project.

The Project site and the referenced cumulative projects are located within an urbanized area, previously developed with structures, expansive parking areas, outdoor lighting, and landscaping. One of the primary objectives of the City's 2040 General Plan is to encourage economic

development in areas adjacent to major roadways and transportation corridors, ensuring a diverse mix of land uses that supports the community's ability to thrive and be economically sustainable over time. The Project objectives identified in the Draft EIR recognize the existing vacant condition of the site, its current industrial zoning, and proximity of industrial uses to transportation features; therefore, the alternatives are consistent with key objectives of the City's General Plan, and the evaluation of the identified alternatives against the stated objectives is appropriate. As noted, the Draft EIR includes an alternative that would allow the reuse of the existing structure to accommodate office and similar uses, and identifies an alternative to reduce the size of the proposed industrial uses.

As required under *State CEQA Guidelines* Section 15126.6, the City considered a reasonable range of alternatives that lessen the Project's contribution to significant environmental impacts. Chapter 5.0 of the Draft EIR includes a robust discussion of alternatives to the Project including a comparative quantification of each alternative's contribution to the environmental impacts.

CEQA also requires the identification of an Environmentally Superior Alternative among the alternatives evaluated in an EIR. While Alternative 1 would avoid the impacts of the proposed Project, it would not achieve the beneficial impacts of the proposed Project including re-envisioning an existing underutilized office/industrial property to provide a building type that is flexible and accommodating to a variety of permitted land uses to extend the useful life of the building, and creating employment opportunities. While Alternative 1 would be environmentally superior in the technical sense in that contribution to the aforementioned impacts would not occur, it would fail to achieve all but one of the Project's objectives. *State CEQA Guidelines* Section 15126.6(e)(2) provides that, if the No Project/No Build Alternative is the Environmentally Superior Alternative, then the EIR shall also identify an Environmentally Superior Alternative among the other alternatives.

Of the other alternatives, Alternative 2 would only meet three of the Project objectives and would result in similar or reduced environmental impacts compared to the proposed Project; though it would still result in a significant and unavoidable transportation impact related to VMT and a significant and unavoidable cumulatively considerable impact related to GHG emissions.

Alternative 3 was identified as the Environmentally Superior Alternative in the Draft EIR as it would result in similar or reduced impacts as the proposed Project. While the number of daily trips is reduced, compared to the proposed project, Alternative 3 would still result in a significant and unavoidable transportation impact related to VMT and a significant and unavoidable cumulatively considerable impact related to GHG emissions. While Alternative 3 would meet the Project's objectives, the objectives would not be met to the same degree as the proposed Project.

However, Alternative 3 would not meet the Project Applicant's business objectives. The business plan created when the property was acquired was predicated on designing a project that optimizes site coverage while adhering to land use regulations and providing necessary infrastructure. The proposed Project, as designed, represents the minimum development intensity necessary to achieve the Project Applicant's fundamental business objectives. Since the Project's initial conception, material changes in market conditions have substantially affected project feasibility. Notably, construction costs for comparable industrial developments have increased by approximately 22 percent between 2021 and 2025. At the same time, lease rates have remained relatively flat. In

addition, the Project has incurred increased additional capital obligations through City-required off-site infrastructure improvements associated with the entitlement process, further elevating total development costs and constraining viability.

Alternative 3 would substantially reduce the overall building area and site coverage. However, the Project Applicant has submitted evidence regarding the economic infeasibility of Alternative 3. For example, the Project Applicant provided evidence that development costs are not linearly scalable with building area due to the presence of many fixed and quasi-fixed costs, including site acquisition, entitlement, permitting, infrastructure, and certain construction components. Therefore, a reduction in project size would not yield a commensurate reduction in total project costs on a per-square-foot basis. In contrast, lease revenues are directly correlated with leasable area and would decrease proportionally with a reduction in building square footage. Accordingly, the Project Applicant provided evidence that Alternative 3 would materially degrade the Project's revenue-to-cost relationship and preclude the achievement of the Project Applicant's business objectives, thereby rendering the Project economically infeasible. Because the proposed Project already reflects a constrained development program necessary to maintain financial viability under current market conditions, the Project Applicant provided that further reduction in scale would prevent the Project from meeting its core business objectives and would not be economically feasible.

Economic viability is a factor that may be considered when assessing the feasibility of alternatives. (CEQA Guidelines § 15126.6(f)(1); *Association of Irritated Residents v. County of Madera* (2003) 107 Cal.App.4th 1383, 1401.) CEQA does not require the City to choose the environmentally superior alternative. Instead CEQA requires the City to consider environmentally superior alternatives, explain the considerations that led it to conclude that those alternatives were infeasible from a policy standpoint, weigh those considerations against the environmental impacts of the proposed project, and make findings that the benefits of those considerations outweigh the harm. The EIR is a public disclosure document. It is the responsibility of the City to balance, as applicable, the economic, legal, social, technological, or other benefits of the proposed Project against its significant unavoidable environmental impacts before approving the Project. As mandated under CEQA, the City will make appropriate findings regarding the infeasibility of alternatives if it adopts the proposed Project or an alternative that has significant unmitigable impacts.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment O-6-13

This comment expresses concern regarding the statement of overriding considerations, claiming that the City must make a finding supported by substantial evidence that alternatives are legally infeasible, and claims that Alternative 3 is legally feasible.

Refer to Master Response 5 and the Response to Comment O-6-12 regarding the range and adequacy of alternatives considered in the Draft EIR. Mitigation measures cannot be required when

a significant impact has not been identified based on the established significance thresholds (refer to Master Response 4). As appropriate, the Draft EIR has identified mitigation to reduce the significance of impacts resulting from the proposed Project. In the case of GHG and VMT impacts, while mitigation has been identified to the extent feasible, significant unavoidable impacts remain. As detailed in Master Response 2, In accordance with *State CEQA Guidelines* Section 15043, a public agency can approve a project even though a project would cause a significant impact on the environment provided there is no feasible way to lessen or avoid the significant impact, and specifically identified expected benefits from the project outweigh the policy of reducing or avoiding the significant environmental impacts of the project. In such instances, the lead agency must state, in writing, the specific reasons to support its action based on the Final EIR and/or other information in the record in a statement of overriding considerations supported by substantial evidence.

Pursuant to *State CEQA Guidelines* Sections 15091 and 15093, the City will make findings for each significant and unavoidable impact and will adopt a Statement of Overriding Considerations, which, in combination with determinations for feasible alternatives, will be made by the City Council during Project consideration. No further response is required because the commenter's concern regarding Statements of Overriding Considerations pertain to the decision-making process which has yet to occur.

Response to Comment O-6-14

This comment concludes the letter and requests the City reject the current Draft EIR and revise the discussion on cumulative impacts and feasible and enforceable mitigation measures and consider alternative land uses.

This general comment has been addressed in responses to the Commenter's previous comments. This comment does not contain any additional substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses above. No further response is required.

From:	Meadows
To:	Stonich, Amy; EnterpriseProjects
Cc:	Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject:	DEIR Public Comments and Expert Reports – IPT Enterprise Business Center Project (CEQA Deficiencies & Omissions Identified)
Date:	Monday, September 15, 2025 12:12:09 PM
Attachments:	IPT DEIR Final.pdf

Dear Amy, Planning Commissioners, and City Council Members,

My name is Harrison Jiang, and on behalf of *We the Meadows* and the concerned residents of Lake Forest, I am submitting our attorney's letter and expert analysis reports regarding the Draft Environmental Impact Report (DEIR) for the IPT Enterprise Business Center Project.

These expert findings make one fact unmistakably clear: the DEIR is **deeply flawed, legally indefensible, and in direct violation of CEQA.** The deficiencies and omissions are not minor technical oversights - they are so fundamental that the City cannot lawfully or responsibly rely on this document as the basis for approving the project or any related warehouse developments proposed by IPT Enterprise Business Center and Western Realco.

Key Findings from the Attorney's Letter:

I. The DEIR Fails to Disclose, Analyze, and Mitigate the Adverse Impacts of the Warehouse Project.

II. Environmentally Superior Alternatives Are Available and Must Be Adopted.

O-7-1

III. CEQA Prohibits Approval of the Proposed Project Because the City Cannot Support Findings Required for a Statement of Overriding Considerations.

Key Conclusion in the Attorney's Letter:

We urge the City to reject the current DEIR and require a comprehensive revision that addresses cumulative impacts and feasible and enforceable mitigation measures that address the industrial Project's proximity to neighborhoods. The City must fully consider alternative land uses that are both economically viable and compatible with nearby residential communities - such as mixed-use developments (e.g., small business + residential condos), business office complexes, research, medical, or clean-tech non-industrial facilities. The City should prioritize community engagement and the long-term well-being of residents over short-term industrial gains, as envisioned in its 2040 General Plan.

Community Opposition:

As residents, our position is unequivocal: **we will not accept sacrificing the health, safety, and integrity of our community for short-term industrial profit.** The proposed three warehouse projects - immediately adjacent to our homes - pose unacceptable risks without a legally and technically adequate environmental review, enforceable protections, and meaningful, feasible mitigation measures. Approving these projects under the current, deficient DEIR would be not only irresponsible, but also unlawful under CEQA.

O-7-1 cont.

We demand that the City and the Developer abandon this flawed approach and instead engage with residents to identify **genuinely compatible and lawful alternatives -** uses that protect public health, respect neighborhood character, and align with the long-term vision of the City's 2040 General Plan. The people of Lake Forest deserve development that is **safe, sustainable, and responsible -** not a fast-tracked industrial project that endangers our families and undermines the City's future.

Thank you for your careful consideration.

Sincerely,

Harrison Jiang
Resident, City of Lake Forest
President, We the Meadows

[redacted]
Lake Forest, CA 92630

CAUTION: Think Security! This email is not from someone at the City of Lake Forest. **Do not click any links or open any attachments you are not expecting.**

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September 15, 2025

Amy Stonich
Assistant Director of Community Development
City of Lake Forest
100 Civic Center Drive
Lake Forest, CA 92630
Email: *EnterpriseProjects@lakeforestca.gov*

Re: Comments on Draft Environmental Impact Report (DEIR) for the IPT Enterprise Business Center Project (SCH No. 2024030755).

Dear Ms. Stonich,

On behalf of We the Meadows, we hereby submit our public comments on the Draft Environmental Impact Report (DEIR) for the IPT Enterprise Business Center Project ("Project") (SCH No. 2024030755).

This Project would establish a warehouse and industrial facility within 82 feet of homes. We ask that you reject the project outright because its extensive, unacceptable impacts cannot and should not be overridden.

The current Project -- along with other warehouse conversion projects nearby -- are completely out of place within residential areas. Alternative, environmentally-superior (quieter and less polluting) uses such as an office park should be seriously considered instead.

If the City wishes to continue processing approval of the proposed Project, it must revise the DEIR, remedy its numerous, serious deficiencies, develop adequate and enforceable mitigation measures and environmentally superior alternatives, and recirculate the revised DEIR for public and public agency review and comment. Proceeding on the basis of the currently available EIR draft would violate the California Environmental Quality Act (CEQA).

As the City's Notice of Availability states:

> The proposed project involves the demolition of the existing 144,906 sq ft, two-story building. In its place, a new 35-foot tall, 165,803 sq ft, tilt-up concrete industrial building will be constructed and operated. The project includes a gated truck loading area, parking spaces, and new landscaping. At this time, the future tenant remains undetermined. Although the tenant has not been determined yet, the proposed project maximizes a mix of office, manufacturing, and warehouse space. Approximately 10,000 sq ft could serve as office space and the interior space may be demised for up to 50,803 sq ft of warehouse use plus up to 105,000 sq ft of manufacturing use. A maximum of eight usable dock high doors, a gated truck loading area, and up to 301 parking spaces for passenger vehicles would be provided.

(City Notice of Availability.)

However, the EIR fails to sufficiently identify and address the cumulative impacts of several nearby and contemporaneous warehouse projects.

The EIR contains numerous areas of concern that point to a broader pattern of:

1. Insufficient cumulative impact analysis;
2. Understated or misclassified environmental effects;
3. Failure to evaluate feasible alternatives;
4. Inadequate and unenforceable mitigation measures; and
5. Disregard for long-term impacts on nearby sensitive residential neighborhoods

The EIR fails to adequately analyze and mitigate the Project's potential impacts with regard to air quality and human health, greenhouse gas emissions, traffic and circulation, adjacent communities, noise, and light pollution. These EIR deficiencies are detailed below.

I. The DEIR Fails to Disclose, Analyze, and Mitigate the Adverse Impacts of the Warehouse Project.

The California Environmental Quality Act (CEQA) was enacted to promote decision making that protects the environment through information gathering and public accountability.

> The CEQA process is intended to be a careful examination, fully open to the public, of the environmental consequences of a given project, covering the entire project, from start to finish. … The EIR is intended to furnish both the road map and the environmental price tag for a project, so that the decision maker and the public both know, before the journey begins, just where the journey will lead, and how much they -- and the environment -- will have to give up in order to take that journey.

(*Natural Resources Defense Council v. City of Los Angeles* (2002) 103 Cal.App.4th 268, 271.) CEQA requires a "mandatory finding of significance" if a project has the potential to "substantially degrade the quality of the environment. ..." (Guidelines §15065(a)(1).)

The DEIR already concedes that the project will result in "Significant and Unavoidable" impacts to: (1) Greenhouse Gas Emissions and (2) Vehicle Miles Traveled (VMT) / Transportation & Traffic. Based on the information contained in the DEIR, and the review of this information by experts, it is clear that the Project's air quality, noise, and human health risks should also be classified as "Significant and Unavoidable." This is especially true when accounting for the combined impacts of ***three contemporaneous warehouse projects***, during construction and operational phases. The DEIR further fails to account for unknown future tenants, truck trip volumes, and 24/7 operations—factors that directly influence environmental health and safety outcomes, and the type and intensity of mitigation needed.

A. The DEIR Insufficiently Analyzes and Mitigates Air Quality Impacts.

An EIR must correlate a project's significant impacts to the health effects that would be caused to people. (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 520-

521 ("*Sierra Club-Friant Ranch*").) In *Sierra Club-Friant Ranch*, the court considered whether an EIR's discussion of air quality effects was adequate in the context of a program EIR for a planned development community. (*Id*. at 507.) The EIR disclosed ozone concentrations in parts per million that triggered health symptoms in people and noted them as a significant impact (*id.* at 517), but the EIR notably did not describe the quantity of ozone generated by the project in parts per million (*id.* at 520). The Supreme Court held, "Because the EIR as written makes it impossible for the public to translate the bare numbers provided into adverse health impacts… the EIR's discussion of air quality impacts in this case was inadequate." (*Id*. at 521.)

As explained by air quality expert Ray Kapahi in the attached expert report (Attachment 1), the EIR fails to calculate air pollution concentrations and instead relies on calculations of emissions rates to conclude that air pollution impacts will be insignificant.

Specifically, the EIR:

- failed to recognize that national and state ambient air quality standards (AAQS) represent thresholds of significance. The EIR must evaluate potential violations of the AAQS

- failed to quantify peak (1-hour) construction emissions

- failed to evaluate the formation of secondary pollutants from the conversion of NOx and VOC into PM2.5

- did not recognize the project would violate the 1-hour NOx standards during the construction phase

The EIR's failure to evaluate or analyze the Project's impacts with regard to certain ambient air quality standards or phases of construction means that the EIR was unable to provide mitigation for air pollution known to harm human and environmental health. The other warehouse projects proposed nearby will likely present similar health and air quality concerns, with cumulative impacts the EIR fails to address. The EIR therefore fails as an informational document and must be revised.

B. **The DEIR Insufficiently Analyzes and Mitigates GHG Impacts.**

Curiously, the EIR concludes the Project's operational impacts would not exceed South Coast Air Quality Management District thresholds of significance because emissions would not exceed 2,884.5 MT carbon dioxide equivalent emissions. Accordingly, the EIR finds the impact not to be significant and requires zero mitigation for the Project's contributions to climate change. However, as this amount is barely below the reference threshold of 3,000 MT (DEIR p. 4.8-16), and because the Project would involve warehouse uses with twenty-three loading bays that could be accessed 24 hours per day, the EIR's conclusions are suspect.

The EIR admits the Project would conflict with the scoping plan by exceeding the City's VMT thresholds. (DEIR p. 4.8-18.) And, here, in the greenhouse gas analysis, the EIR admits its traffic mitigation is ineffective:

> The proposed project would be required to implement Traffic Demand Management (TDM) measures including the installation of bike lanes along Commercentre Drive between Alton Parkway and Dimension Drive as specified in Mitigation Measure (MM) TRA-1, to promote alternative transportation within the intent of reducing VMT. According to the California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (December 2021) (CAPCOA Handbook), the addition of bike lanes (T-20 Expand Bikeway Network) can provide a maximum VMT reduction of 0.5 percent. Assuming that this TDM measure could achieve the maximum 0.5 percent VMT reduction, the reduction achieved would not reduce the project's VMT impact to below the City's VMT threshold. Therefore, even with implementation of the TDM measure (addition of bike lanes), the project's VMT impact would be significant and unavoidable.

This significance conclusion requires the EIR to adopt all feasible mitigation. However, as traffic engineer, Tom Brohard, determined the EIR failed to do this. The EIR must be recirculated after revision to include a robust analysis and adoption of measures to reduce vehicle miles travelled or otherwise reduce the Project's contributions to GHG emissions.

Instead, the EIR proposes MM GHG-1 Electric Vehicle Charging. This measure provides:

> Provisions shall be made at the project site for emerging electric truck technology. Prior to the issuance of a shell building permit, the City shall verify that the site plan identifies an on-site location for future electric truck charging stations, with space available for a minimum of four (4) trucks to simultaneously charge when charging stations are installed in the future. The conduit trenching shall be installed to that location for future conduit pull as a requirement of the shell building permit. In conjunction with the approval of tenant improvement plans and permits, the applicant shall install electric truck charging stations on the site for a minimum of four (4) electric truck to simultaneously charge

There are several problems with this measure. First, there is no reason it cannot be installed with the Project. Electric vehicles, including trucks, exist now and are in wide use in Southern California and at Southern California ports and other logistics facilities. Second, the measure merely requires that the Project identify a location for electric truck charging. There is no requirement that the Project be built with the electrical capacity to utilize the truck charging. Nor is there a requirement for when the charging must be installed outside of "in conjunction with the approval of tenant improvement plans and permits." Are these future improvements? The measure must be tightened so it is clear that the provision of electric truck charging is required before Project operation begins. Mitigation must be enforceable. (Pub. Res. Code 21081.6(b); *Lincoln Place Tenants Ass'n v. City of Los Angeles* (2007) 155 Cal. App. 4th 425, 445 ["mitigation measures must be feasible and enforceable"]). Otherwise, the measure is speculative and cannot be relied on to mitigate the Project's greenhouse gas emissions.

The EIR further fails to analyze the cumulative impacts of additional warehouses proposed nearby.

C. **The DEIR Insufficiently Analyzes and Mitigates Traffic and Circulation Impacts**.

The DEIR also fails to adequately analyze and mitigate the Project's traffic and circulation impacts, as discussed further in the expert comments prepared by traffic

engineer, Tom Brohard (Attachment 3.) The Traffic Impact Analysis upon which the DEIR is based fails to comply with the City's adopted Transportation Analysis Guidelines. For example, the DEIR concludes that the Project's excessive vehicle miles travelled will be addressed by the installation of bike lanes. MM-TRA-1, the required mitigation measure, would address only 0.5% of Project traffic generation. The DEIR fails to evaluate or adopt the many, many, available traffic mitigation options, without any evidence that such mitigation was fully investigated or evaluated. Without demonstration of such exhaustion, the City cannot make the required findings that additional mitigation measures are infeasible. The DEIR must be revised and recirculated once a more thorough evaluation of Project traffic generation and mitigation is completed.

D. The EIR Fails to Adequately Disclose, Analyze, or Mitigate the Project's Impacts to Nearby Communities.

The Project would construct industrial warehouses immediately adjacent to established residential neighborhoods to the north and east including The Meadows at Lake Forest and Baker Ranch. (DEIR p. 4.11-2.)

As the California Department of Justice has found:

> [I]mprudent warehouse development can harm local communities and the environment. Among other pollutants, diesel trucks visiting warehouses emit nitrogen oxide (NOx)—a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation—and diesel particulate matter (a subset of fine particular matter that is smaller than 2.5 micrometers)—a contributor to cancer, heart disease, respiratory illnesses, and premature death. Trucks and on-site loading activities can also be loud, bringing disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure. The hundreds, and sometimes thousands, of daily truck and passenger car trips that warehouses generate contribute to traffic jams, deterioration of road surfaces, and traffic accidents.

(Attachment 2, p. 2, Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act, California Department of Justice, September 2022.)

> Project proximity to residential neighborhoods will:
>
> 1. Introduce heavy diesel truck traffic within 100 feet of family homes and schools;
>
> 2. Exacerbate cancer and respiratory health risks, particularly among vulnerable populations (children, seniors, and low-income residents);
>
> 3. Increase air, noise, and light pollution in a currently surrounding quiet residential zone; and
>
> 4. Undermine the long-term livability, safety, and environmental integrity of the City of Lake Forest.
>
> The Attorney General has found:
>
> > The most important consideration when planning a logistics facility is its location. Warehouses located in residential neighborhoods or near sensitive receptors expose community residents and those using or visiting sensitive receptor sites to the air pollution, noise, traffic, and other environmental impacts they generate. Therefore, placing facilities away from sensitive receptors significantly reduces their environmental and quality of life harms on local communities.

(Attachment 2, p. 5.) To protect human health, the Attorney General and California Air Resources Board recommend siting warehouse facilities "so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive receptors." (*Ibid* p. 6; see also Attachment 4, CARB Air Quality and Land Use Handbook; Attachment 5, CARB, Concept Paper for the Freight Handbook.)

The EIR both fails to acknowledge these realities and to mitigate their impacts by designating as the preferred Project a less damaging alternative. Moreover, by introducing and exacerbating risks to residents and sensitive populations, the Project

demonstrates fundamental incompatibility with surrounding land uses, thereby violating the intent of the City's 2040 General Plan. CEQA requires an EIR to discuss any inconsistencies between the proposed project and all applicable general, specific, and regional plans. (CEQA Guidelines § 15125(d).) In partial recognition of this fact, the EIR adopts Threshold of Significance 4.11.2, which would require a finding of significance if the Project would "Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect."

Despite Project proximity to homes, EIR fails to disclose inconsistencies with the following Lake Forest General Plan 2024 Goals and Policies, finding instead that the master planned nature of the area and a landscape buffer would prevent impacts (DEIR p. 4.11-8 through 25):

- **Policy LU-1.1 Land Use Pattern:** Promote an appropriate land use plan that fosters and enhances community livability and public health; supports economic development; promotes efficient development and multiple transportation options; reduces pollution, greenhouse gas emissions, and the expenditure of energy and other resources; and ensures compatibility between uses.

The Project would damage community livability and public health, increase pollution, generate greenhouse gas emissions, and harm compatibility between uses.

- **Policy LU-2.1 Physical Characteristic Compatibility**: Ensure that new development fits within the existing community setting and is compatible with surrounding land uses and public infrastructure availability; and

- **Policy LU-2.4 Scale and Character**: Ensure that the scale and character of new development is appropriate to the setting and intended use.

The Project is located within 100 feet of residential uses to the north and east.

- **Policy LU-2.7 Interface with Residential Areas**: Promote compatibility of adjacent land uses along the interface of different residential density and non-

residential intensity categories by paying special attention to buffers and transitional areas.

As this industrial and warehouse Project would operate within 100 feet of homes, it cannot comply with the intent of this policy.

- **Action LU-2a**: As part of the City's development review process, ensure that commercial projects are designed to be compatible with residential uses, including appropriate building massing and scale and minimization of impacts related to the operation of the use. Review of employment-generating projects should ensure that the following design concepts are addressed in projects that abut residential areas:

    - Appropriate building scale and/or siting;
    - Site design and noise-attenuating features to avoid exposure to excessive noise due to long hours of operation or inappropriate location of accessory structures;
    - Site and structure design to avoid excessive glare or excessive impacts from light sources onto adjacent properties; and
    - Site design to avoid unnecessary loss of community and environmental resources (archaeological, historical, ecological, recreational, etc.).

The Project could operate 24 hours per day, seven days per week, with twenty-three loading docks and roadways within 100 feet of residential uses, without measures designed to ensure noise attenuation, light pollution, or excessive glare. It is incompatible with this General Plan Action.

The EIR must be revised to clearly disclose these inconsistencies with General Plan policies enacted to promote neighborhood health, livability, and use compatibility. After revision, the EIR must incorporate enforceable mitigation measures to offset these impacts and be recirculated to the public and decisionmakers, including those in the residential communities located directly north and east of the proposed Project site.

E. **The DEIR Insufficiently Analyzes and Mitigates Noise Pollution Impacts.**

Warehouse noise affects neighborhood livability and human health, requiring adequate analysis and mitigation absent here. The California Attorney General has found:

> The noise associated with logistics facilities can be among their most intrusive impacts to nearby sensitive receptors. Various sources, such as unloading activity, diesel truck movement, and rooftop air conditioning units, can contribute substantial noise pollution. These impacts are exacerbated by logistics facilities' typical 24-hour, seven-days-per-week operation.

(Attachment 2, p. 10.)

According to the U.S. Environmental Protection Agency, exposure to high noise levels presents a "health risk in that noise may contribute to the development and aggravation of stress related conditions such as high blood pressure, coronary disease, ulcers, colitis, and migraine headaches…Growing evidence suggests a link between noise and cardiovascular problems. There is also evidence suggesting that noise may be related to birth defects and low birth-weight babies. There are also some indications that noise exposure can increase susceptibility to viral infection and toxic substances."[1]

Potentially deadly cardiovascular impacts can be triggered by long-term average exposure to noise levels as low as 55 decibels.[2] Exposure to even moderately high levels of noise during a single 8-hour period triggers the body's stress response. In turn, the body increases cortisol production, which stimulates vasoconstriction of blood vessels that results in a five- to ten-point increase in blood pressure. Over time, this noise-

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[1] EPA Noise Effects Handbook, http://www.nonoise.org/library/handbook/handbook.htm, incorporated by reference; see also EPA *Noise: A Health Problem* http://www.nonoise.org/library/epahlth/epahlth.htm#heart%20disease, incorporated by reference.

[2] World Health Organization Media Centre, http://www.euro.who.int/eprise/main/WHO/MediaCentre/PR/2009/20091008_1?language [elevated blood pressure and heart attacks], incorporated by reference; http://whqlibdoc.who.int/hq/1999/a68672.pdf [finding demonstrated cardiovascular impacts, including ischemic heart disease and hypertension after long-term exposure to 24 hour average noise values of 65-70 dBA], incorporated by reference.

induced stress can result in hypertension and coronary artery disease, both of which increase the risk of heart attack death.[3] Studies on the use of tranquilizers, sleeping pills, psychotropic drugs, and mental hospital admission rates suggest that high noise levels cause adverse impacts on mental health.[4]

High noise levels also have dramatic developmental impacts on small children, many of which reside near the Project. Children who are exposed to higher average noise levels have heightened sympathetic arousal, expressed by increased stress hormone levels, and elevated resting blood pressure. As proposed, the Project would expose community members to levels of noise that are unsafe for cardiovascular health, mental health, societal well-being, and child development.

The DEIR recognizes that the nearest residence to the site is a mere 82 feet from the Project. (DEIR p. 4.13-5.) Even so, it concludes the Project would not have significant construction impacts (DEIR p. 4.13-17) or operational impacts. As to construction, the DEIR states that construction noise would average 71 dBA at the nearest home, which is less than the City's threshold of 80 dBA. However, the EIR does not disclose the impact of impulsive noise (hammers, jackhammers, etc.) and inconsistent noise, which is far more disturbing and aggravating than a consistent 71 dBA. Additionally, a daily exposure of 80 dBA is a threshold of significance established for occupational exposure – not residential. It is intended to prevent hearing loss and does nothing to prevent disturbance, the inability to work for those who work from home, interference with speech, or interference with sleep or education. At these levels, a workplace is also required to provide hearing protection. Residents are accorded no such care by the EIR.

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[3] World Health Organization, Guidelines for Community Noise, p. x and pp. 47-48. The report is available in its entirety online at http://whqlibdoc.who.int/hq/1999/a68672.pdf; *see also*, Maschke C (2003). "Stress Hormone Changes in Persons exposed to Simulated Night Noise". Noise Health 5 (17): 35–45. PMID 12537833, http://www.noiseandhealth.org/article.asp?issn=1463-1741;year=2002;volume=5;issue=17;spage=35;epage=45;aulast=Maschke, incorporated by reference; Franssen EA, van Wiechen CM, Nagelkerke NJ, Lebret E (2004). "Aircraft noise around a large international airport and its impact on general health and medication use". Occup Environ Med 61 (5): 405–13. doi:10.1136/oem.2002.005488. PMID 15090660.

[4] World Health Organization, p. x. and pp. 48-49.

The Attorney General recommends reducing community noise impacts from warehouses by:

- Constructing physical, structural, or vegetative noise barriers on and/or off the project site.
- Planning and enforcing truck routes that avoid passing sensitive receptors.
- Locating or parking all stationary construction equipment as far from sensitive receptors as possible, and directing emitted noise away from sensitive receptors.
- Verifying that construction equipment has properly operating and maintained mufflers.
- Requiring all combustion-powered construction equipment to be surrounded by a noise protection barrier
- Limiting operation hours to daytime hours on weekdays.
- Paving roads where truck traffic is anticipated with low noise asphalt.
- Orienting any public address systems onsite away from sensitive receptors and setting system volume at a level not readily audible past the property line.

(*Ibid* p. 11.) While the EIR assumes some of these measures in the Project design, the Project contains zero enforceable mitigation measures. The EIR should be revised to incorporate concrete and enforceable noise mitigation to account for its currently undisclosed impacts to adjacent residents.

F. The DEIR Insufficiently Analyzes and Mitigates Light Pollution Impacts.

The Project would allow warehouse and industrial uses within 82 feet of homes, 24 hours per day, seven days per week. The City's General Plan requires Projects be designed to minimize light and glare through Action LU-2b. The City's municipal code further requires all lights be designed and installed so that lighting is confined to the site and adjacent properties are protected from glare. (Lake Forest Municipal Code Section 9.72.085.) The EIR includes Threshold 4.1.4, which provides a Project would have an

adverse impact if it would "Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area."

Unfortunately, the EIR's analysis of cumulative impacts incorrectly claims that a Project must have a significant impact to have a cumulative impact. However, the very reason cumulative impacts analysis is required because the impacts of cumulative development are lost when projects are analyzed individually. This is one of three warehouse projects in close proximity. The EIR fails to address whether the parking lighting, solar panels, security lighting, or other aspects of the combined projects would have an effect with regard to glare.

II. Environmentally Superior Alternatives Are Available and Must Be Adopted.

The City must fully consider alternative land uses that are economically viable and more compatible with nearby residential communities—such as mixed-use developments (e.g., small business + residential condos), business office complexes, research, medical, or clean-tech non-industrial facilities. It is inconceivable that there is not some sort of reduced-intensity alternative that would be feasible on the Project site.

An EIR is intended to identify the adverse environmental impacts of a project, mitigation measures for those impacts, and alternatives that could avoid the impacts altogether. The alternatives section has been identified by the California Supreme Court as the "core" of the EIR (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564), and an adequate EIR must describe a reasonable range of alternatives. (*Laurel Heights Improvement Association v. Regents of the University of California* (1993) 47 Cal.3d 376.) The Guidelines make clear that alternatives must be considered that do not meet all project objectives. The Guidelines say that alternatives should satisfy most of the basic objectives of the project, not all objectives. (Guidelines §15126.6 subd. (a).) In reality, it "is virtually a given that the alternatives to a project will not attain all of the project's objectives." (*Watsonville Pilots Ass'n v. City of Watsonville* (2010) 183 Cal.App.4th 1059, 1087.)

At first glance, the EIR's seven objectives appear relatively broad:

1. Provide a permitted land use that is consistent with the General Plan land use and zoning designation and that helps fulfill the demands of businesses and residents in the City of Lake Forest;
2. Re-envision an existing underutilized office/industrial property to build a new financially and environmentally sustainable building;
3. Re-envision an existing underutilized office/industrial property to provide a building type that is flexible and accommodating to a variety of permitted land uses to extend the useful life of the building;
4. Provide industrial development that is attractive and minimizes conflicts with the surrounding existing land uses;
5. Provide employment opportunities and facilitate job-creation for the residents of Lake Forest and surrounding communities to reduce the need for members of the local workforce to commute outside the area for employment;
6. Redevelop an underutilized site for improvement and enhanced contribution to the City of Lake Forest's fiscal benefits; and
7. Cluster land uses in proximity to other similar industrial/commercial uses and close to access points of the State highway system, such as State Route 241, to reduce traffic congestion on surface streets and reduce local air pollution emissions from vehicle sources

(DEIR p. 5-2.) In summary, the City seeks to reimagine an underused site in a way that is economically beneficial, provides jobs, and is consistent with City land use plans. Many types of developments would meet these goals, including less-intensive or smaller versions of the same Project.

Even so, the EIR rejects smaller alternatives for failing to meet Project objectives. The Reduced Daily Trip Alternative was rejected from consideration in the EIR because development of smaller buildings would allegedly "yield a very low land coverage that would not justify the relation between land value, building construction costs, and potential revenue, resulting in an unfeasible project." (DEIR p. 5-5.) The EIR provides no evidence supporting this conclusion.

The EIR rejects Alternative 2, continued use of the site as office space, for failing to meet 4 objectives. (DEIR p. 5-21.) However, three of these objectives (2, 3, 6) mean essentially the same thing – "revitalize" the site. Characterizing the Project's objectives such that a failure to reimagine the site triggers failure of half of the objectives violates CEQA. It is impermissible for the lead agency to frame the alternatives considered in the EIR too narrowly, and thereby slant the analysis in favor of the proposed project. (*We Advocate Through Environmental Review v. County of Siskiyou* (2022) 78 Cal.App.5th 683, 692 ("WATER") ["If the principal project objective is simply pursuing the proposed project, then no alternative other than the proposed project would do"]; see, also, *In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1163 ["a lead agency may not give a project's purpose an artificially narrow definition."].) Such limitations on alternatives deprive the public of adequate information, and prejudice informed decision making. (*WATER, supra*, 78 Cal.App.5th at 693.)

Finally, the EIR rejects the Reduced Project Alternative. This alternative proposes a 25% smaller version of the Project that would entail a new, 35-ft-tall, 124,352.25 square-foot tilt-up concrete industrial building with 7,500 square feet of office space, 48,750 square feet of manufacturing space, and 68,102.25 square feet of warehouse space. (DEIR p. 5-21 and 5-22.) The EIR admits this alternative would reduce impacts related to aesthetics, air quality, energy, utilities and service systems, and noise. (DEIR p. 5-30.) It would be the environmentally superior alternative. DEIR p. 5-32.) The EIR also admits this alternative would meet all 7 objectives, even if to a slightly lesser degree than the preferred Project. (DEIR p. 5-31.) However, based on its failure to perfectly achieve the applicant's goals, it is not presented as the preferred Alternative.

CEQA requires a robust alternatives analysis with of a range of reasonable less impactful alternatives. (Guidelines, §15126.6, subd. (a).) "Meaningful analysis of alternatives in an EIR requires an analysis of meaningful alternatives." (*Save Our Capitol!*, *supra*, 87 Cal.App.5th at p. 704.) The purpose of an EIR "is not to identify alleged alternatives that meet few if any of the project's objectives so that these alleged alternatives may be readily eliminated.... [T]he key to the selection of the range of alternatives is to identify alternatives that meet most of the project's objectives but have a reduced level of environmental impacts." (*Watsonville Pilots Assn. v. City of Watsonville*

(2010) 183 Cal.App.4th 1059, 1089.) The range of alternatives analyzed must include a no project alternative.

Because feasible, environmentally superior alternatives exist in the form of Alternative 3, the Project may not be approved as proposed. (Pub. Resources Code § 21081; *City of Marina v. Board of Trustees of the California State University* (2006) 39 Cal. 4th 341, 368.)

III. CEQA Prohibits Approval of the Proposed Project Because the City Cannot Support Findings Required for a Statement of Overriding Considerations.

CEQA prohibits approval of projects with significant adverse environmental impacts such as the proposed Project if there are feasible alternatives or mitigation measures that would reduce or eliminate those impacts. (Pub. Resources Code § 21002; Guidelines § 15021(a)(2).) When an agency seeks to approve a project despite its significant unmitigated impacts on the environment, the agency must adopt a statement of overriding considerations. (Pub. Resources Code § 21081.) A statement of overriding considerations must include two specific findings, supported by substantial evidence. The first finding that must be made is that "There is no feasible way to lessen or avoid the significant effect..." of the project. (Guidelines §§ 15043, 15093(b).) The second finding is that the project's benefits outweigh its significant adverse environmental impacts. (Guidelines § 15093(a).) These findings must both be supported by substantial evidence. (Guidelines § 15093(a)-(b).)

"CEQA does not authorize an agency to proceed with a project that will have significant, unmitigated effects on the environment…unless the measures necessary to mitigate those effects are *truly* infeasible." (*City of Marina v. Board of Trustees of the California State University* (2006) 39 Cal. 4th 341, 368 ("*City of Marina*") emphasis added.) "[I]f the project can be economically successful with mitigation, then CEQA requires that mitigation…" (*Uphold our Heritage v. Town of Woodside* (2007) 147 Cal. App. 4th at 600.)

CEQA requires there be substantial evidence in the record to support the claimed benefits of the Project that justify proceeding with a project notwithstanding its adverse impacts. (Public Resources Code § 21081; CEQA Guidelines § 15093(b).) "[A]n

agency's unsupported claim that the project will confer general benefits" is insufficient to override a project's significant impacts. (*Woodward Park Homeowners Ass'n, Inc. v. City of Fresno* (2007) 149 Cal.App.4th 892, 717.)

Rejecting alternatives and mitigation measures and substantiating project benefits requires justification to comply with CEQA (Guidelines § 15091(b)) and provide a basis for a Statement of Overriding Considerations. (Guidelines § 15093(b).) A project alternative may be rejected on the basis of legal infeasibility, but the City must make a finding supported by substantial evidence that such an alternative is legally infeasible. Since Alternative 3 is legally feasible, the City cannot make the findings required to reject its adoption.

Approval of the Project, as proposed, would violate CEQA.

IV. Conclusion.

We urge the City to reject the current DEIR and require a comprehensive revision that addresses cumulative impacts and feasible and enforceable mitigation measures that address the industrial Project's proximity to neighborhoods. The City must fully consider alternative land uses that are both economically viable and compatible with nearby residential communities—such as mixed-use developments (e.g., small business + residential condos), business office complexes, research, medical, or clean-tech non-industrial facilities. The City should prioritize community engagement and the long-term well-being of residents over short-term industrial gains, as envisioned in its 2040 General Plan.

Sincerely,

Michelle Black
Douglas P. Carstens

Attachments

1. Expert Comments of Ray Kapahi, Environmental Permitting Specialists, dated September 10, 2025
2. Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act, California Department of Justice, September 2022, accessed at https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf
3. Expert Comments of Traffic Engineer, Tom Brohard, dated September 4, 2025
4. CARB, Air Quality and Land Use Handbook: A Community Health Perspective, accessed at https://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf
5. CARB, Concept Paper for the Freight Handbook (December 2019), accessed at https://ww2.arb.ca.gov/sites/default/files/2020-03/2019.12.12%20-%20Concept%20Paper%20for%20the%20Freight%20Handbook_1.pdf

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ENVIRONMENTAL PERMITTING SPECIALISTS
Air Quality • Permitting • OHSA • RMP/PSM

TECHNICAL MEMORANDUM

To: Doug Carstens
Carstens, Black & Minteer, LLP

Date: September 10, 2025

From: Ray Kapahi RK
Tel: 916.806.8333
E-Mail: ray.kapahi@gmail.com

Subject: Review of Air Quality Impacts from proposed IPT Enterprise Business Center, LLC
City of Lake Forest, California

INTRODUCTION AND SUMMARY

Environmental Permitting Specialists (EPS) has reviewed the Draft Environmental Impact Report (DEIR) for the proposed IPT Enterprise Business Center LLC (Project) in Lake Forest (Orange County), California. The proposed project would involve demolition of office and industrial buildings and redevelopment of a 165,803 square feet industrial building.

The project is located at 26200 Enterprise Way in the north-central part of Lake Forest. (Figures 1 and 2). The site is assessable by State Route 241 which is located approximately 0.7 mile North of the project location and Interstate 5 which is located 3.75 miles Southwest of the project location.

The focus of our review was impacts from release of various air pollutants. Specifically, Section 4.3 (Air Quality) of the DEIR was reviewed. Impacts from both the construction and operational (occupancy) phases were reviewed and analyzed.

EPS review identified several deficiencies in the DEIR. These are noted on the following pages.

1. **Not All Thresholds of Significance Were Identified**

   Section 4.3.3.2 of the DEIR identified various air pollutants, their sources and their health effects. The section also identified state and federal ambient air quality standards (AAQS) and the prevailing air quality as measured at nearby air quality monitoring stations.

   The DEIR failed to recognize that the concentrations of various air pollutants that appear in the AAQS also represent thresholds of significance. The concentration of various air pollutants in Table 4.3.B defines what we mean by clean or unhealthy air and therefore, project emissions need to be evaluated to identify potential violations of the AAQS that appear in this table.

   This omission also appears in the SCAQMD CEQA Guidelines. In their April 18, 2024 Notice of Preparation the District references the Thresholds of Significance in the Guidelines, but these Guidelines omit the fact that the AAQS also represent a threshold of significance.

2. **Peak Construction Emissions not Evaluated**

   The DEIR failed to quantify peak (1-hour) construction emissions. Many air pollutants, such as NOx, SO_2 and CO have 1-hour AAQS. Without adequately determining peak construction emissions, it is not possible to determine maximum hourly impacts from these pollutants during the construction or operational phases.

3. **Impacts from Secondary Pollutant Formation Ignored**

   The DEIR failed to evaluate the formation of secondary pollutants from the conversion of NOx and VOC into PM2.5. The amount of PM2.5 formed through secondary conversion of NOx can range from 4% to 34% and 11% to 41% through secondary conversion of volatile organic compounds (VOCs).

4. **Violation of Air Quality Standard for NOx During Construction**

   The project would violate the 1-hour NOx standards during the construction phase. This is a critical oversight as the Orange County has been designated as “Extreme” non-attainment for the 8-hour ozone (smog) standard. The NOx violations directly impact the ozone concentration.

5. **Unsupported Conclusions Related to Impacts**

   The DEIR identified Threshold 4.3.1 that states the project would not conflict with or obstruct implementation of the applicable air quality plan. How can this be possible then the project will create new violations of 1-hour NOx standard that directly exacerbated the regions ozone concentration. Similarly, Threshold 4.3.3 asserts that the project would not expose any sensitive receptors to substantial pollutant concentrations when such concentrations were never quantified.

Since CEQA requires complete and full disclosure (Sierra Club v. County of Fresno (Friant Ranch LP) (2018) 6 Cal. 5th 502, 514-515) of all impacts, the above issues are critical omissions. These issues are discussed in this Memorandum.

NOT ALL THRESHOLDS OF SIGNIFICANCE IDENTIFIED

The DEIR identified (Section 4.3.3) the various air pollutants, their sources and their health effects. The section also identifies state and federal ambient air quality standards (AAQS) and the prevailing air quality as measured at nearby air quality monitoring stations.

The DEIR failed to recognize that the concentrations of various air pollutants that appear in the AAQS also represent thresholds of significance. The concentration of various air pollutants in Table 4.3.B defines what we mean by clean or unhealthy air. These standards are based on health studies and are designed to protect the most vulnerable segment of the population.

Periodically, these standards are reviewed in light of new information and are revised accordingly. For example, the ozone standard was originally set to 0.08 parts per million (ppm) in 1971 was revised to 0.12 in 1979 and then revised to 0.075 ppm in 2008 and then revised again to 0.07 ppm in 2015. These changes reflect new data on health impacts to the population from exposure to ozone.

The DEIR quantified the emission rates of several air pollutants listed in Table 4.3-B; however, it failed to translate these emissions to concentrations. Specifically, Table 4.3-J, 4.3-K and 4.3-O summarize the daily emission rate in pounds per day for both the construction and operational phases. However, these emission rates were not translated into concentrations. The harm to the public is from exposure to concentrations (parts per million, micrograms per cubic meter) that is related to emission rates but also is related to other factors discussed later in this Memorandum.

PEAK CONSTRUCTION EMISSIONS NOT EVALUATE

The DEIR failed to quantify peak (1-hour) construction emissions. Many air pollutants, such as NOx and CO have 1-hour AAQS. Without adequately determining peak construction emissions, it is not possible to determine NOx, SO_2 and CO impacts during the construction phase. Since the project involves demolition of existing buildings, peak hourly emissions are likely to be significant.

The DEIR provided daily emissions (lbs/day) in Tables 4.3-J, 4.3-K and 4.3.O. However, peak one-hour emissions were not calculated. Without this information, it is not possible to determine short-term impacts.

IMPACTS FROM SECONDARY POLLUTANT FORMATION

The DEIR failed to evaluate the formation of secondary pollutants from the conversion of NOx and VOC into PM2.5[1]. The amount of PM2.5 formed through secondary conversion of NOx can range from 4% to 34% and 11% to 41% through secondary conversion of VOCs.

[1] USEPA: MACTEC Evaluating the Contribution of PM2.5 Precursor Gases. Available at: https://www3.epa.gov/ttnchie1/conference/ei13/mobile/hodan.pdf

The omission of secondary pollutants is a critical omission since the South Coast Region is designated as "Extreme" non-attainment[2] for ozone and non-attainment for PM2.5.

VIOLATION OF 1-HOUR NOx STANDARDS DURING CONSTRUCTION

EPS analysis determined that NOx emissions during the construction phase as reported in Table 4.3.O (84.3 lbs/day or 10.54 lbs/hr over an 8-hour workday) would violate the federal and state 1-hour ambient air quality standards. The EPS analysis shows that maximum project level 1-hour NOx impacts would be 1,500 ug/m3. This is more than 8 times the federal standard. See Table 1.

When added to existing background concentration the cumulative 1-hour NOx impacts is estimated to equal 1,596 ug/m3.

The fact that both project level and cumulative impacts are significant is especially troubling as the region has been classified as "Extreme" non-attainment for the 8-hour ozone standard. NOx emissions are a precursor to regional ozone formation. High concentrations of ozone lead to increased levels of asthma and other respiratory diseases. The very young and the elderly are most at risk from exposure to these air pollutants.

Table 1

	Project Level and Cumulative Air Quality Concentrations Caused by Project Emissions			
	Background (2023)	Project Level	Cumulative	Standard
1-Hr NOx (NO_2)	96 ug/m3 (0.051 ppm)	1,500 ug/m3	1,596 ug/m^3	State 339 ug/m^3 Federal 188 ug/m^3

Background NOx data from DEIR Table 4.3.D

Threshold 4.3.1 in Section 4.3.3 asserted that the project would not conflict with or obstruct implementation of the applicable air quality plan. How can this be possible when the project creates new violations of the 1-hour NOx standards.

Threshold 4.3.3 presented in Section 4.3.6 of the DEIR concludes that the project would not expose sensitive receptors to substantial pollutant concentrations These conclusions are not substantiated since the project level NOx concentrations were never calculated in the DEIR.

Methodology for Calculating 1-Hour NOx Impacts

EPS used the following methodology to determine the concentrations of 1-hour NOx based on the reported construction emissions. Electronic copies of the modeling files are attached.

[2] Information available at:. https://ww2.arb.ca.gov/capp/cst/tch/ambient-air-quality-standards-designation-tool

Dispersion Model and Model Options Used
AERMOD Version 24142 was used. The following options were used:

- Use of Flat and Terrain
- Use of Urban
- No Exponential Decay

Modeling Grid and Coordinate System
NOx concentrations were calculated using a rectangular (x-y) Cartesian coordinate system. A region 1,975 meters x 1,975 meters was used. The modeling region divided into 25 meter square cells for a total of 6,400 individual receptors in the vicinity of the project area. See Figure 4 for a layout of the modeling grid.

Meteorological Data
5 years (2017-2021) of hourly meteorological data from Mission Viejo as processes by the South Coast Air Quality Management District (SCAQMD) were used. The station elevation as 168 meters.

Construction Emissions
Maximum daily emissions of NOx reported in Table 4.3.O the DEIR (84.3 pounds per day or 10.5 pounds per hour over an eight-hour day. Since peak hourly emissions were not calculated in the DEIR, the actual hourly NOx emissions are likely higher than 10.5 lbs/hr.

RESULTS
The results of this analysis indicate that NOx emissions during the construction phase of the Project would result in ambient concentrations that would violate both the Federal and California's 1-hour ambient air quality standard for NOx emissions. These findings are summarized in Table 1.

Table 2
Summary of Project Level NOx Impacts

Pollutant	Maximum Construction Related Impact (ug/m3)	State or Federal Ambient Air Quality Standard[3] (ug/m3)
NOx (1-hour)	1,500	Federal: 188 State: 339

The spatial distribution of NOx is provided in Figures 5 and 6. Area within the contour marked "188" exceed the federal 1-hour NOx standard. These results indicate that the construction phase of this project would lead to significant NOx related air quality impacts, which have not been disclosed in the DEIR. This is a critical omission as the Orange County suffers from the

[3] Copy of ambient air quality standards available at: https://ww2.arb.ca.gov/sites/default/files/2020-07/aaqs2.pdf, incorporated herein by this reference. The City should print out and include with this letter this referenced material.

worst air quality in the Country. NOx emissions are one of the main precursors that cause ozone (smog). Electronic copies of the modeling files are attached to verify EPS modeling results.

CONCLUSIONS

EPS review has identified numerous deficiencies and omissions related to air quality impacts associated with the proposed project. These are summarized below:

1. Not all thresholds were included in the DEIR. Had this been done, significant impacts would have been identified.
2. Peak construction emissions were not evaluated
3. Impacts from secondary pollutants from conversion of NOx and VOCs into fine particulate were not calculated
4. Violation of the federal and state 1-hour NOx standard
5. Unsupported conclusions on the severity of the air quality impacts

Figures

and

Attachments

Figure 1

Project Location

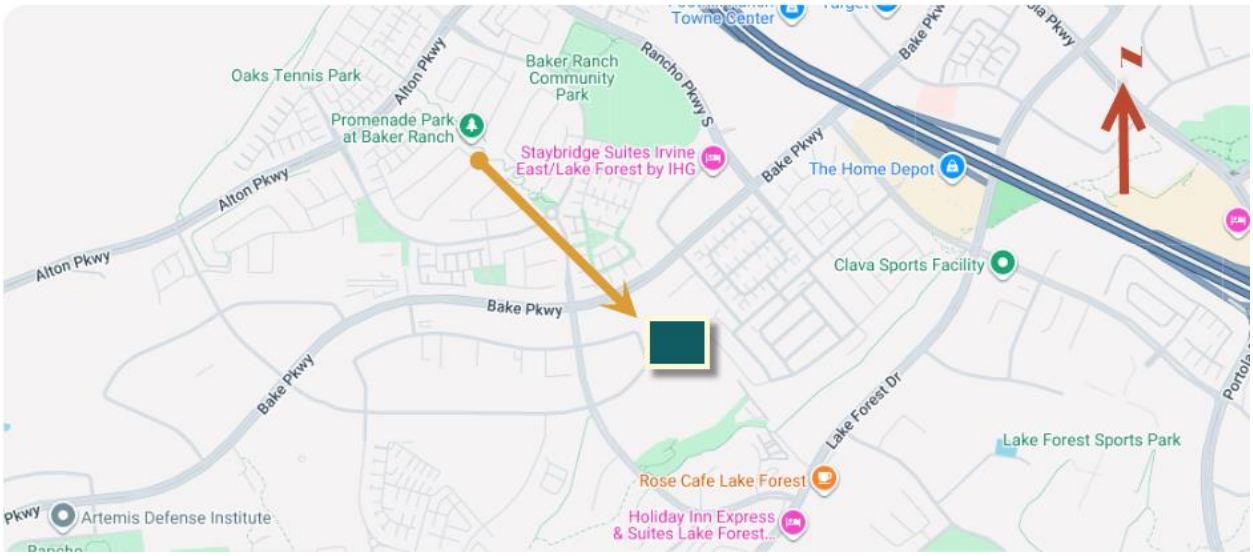


Figure 2

Project Site Map

Source: IPT Enterprise Business Center LLC Project DEIR (July 2025)



Figure 3

Source Location

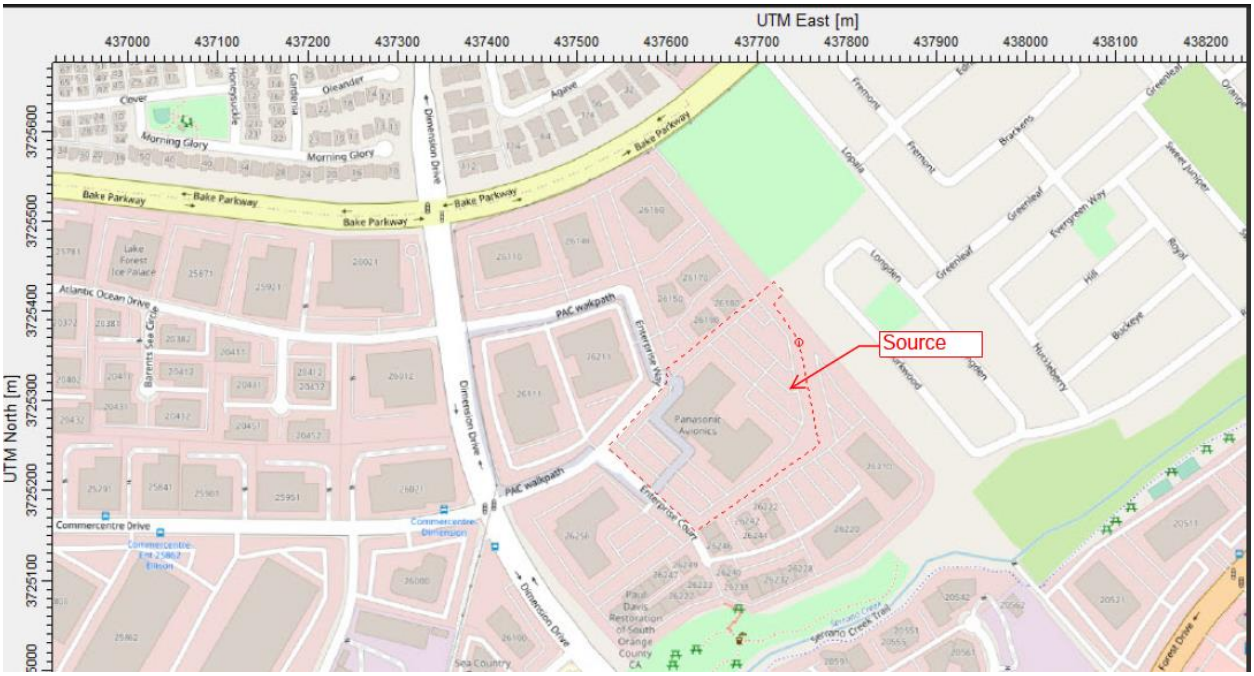
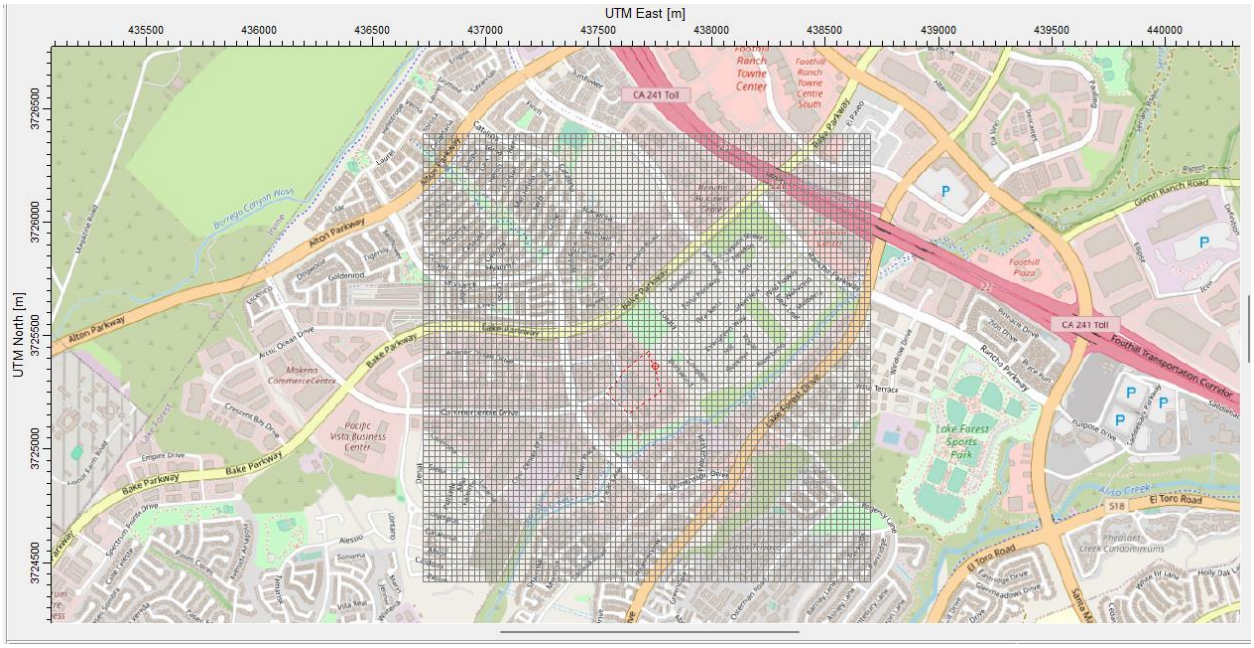


Figure 4

Layout of Modeling Grid

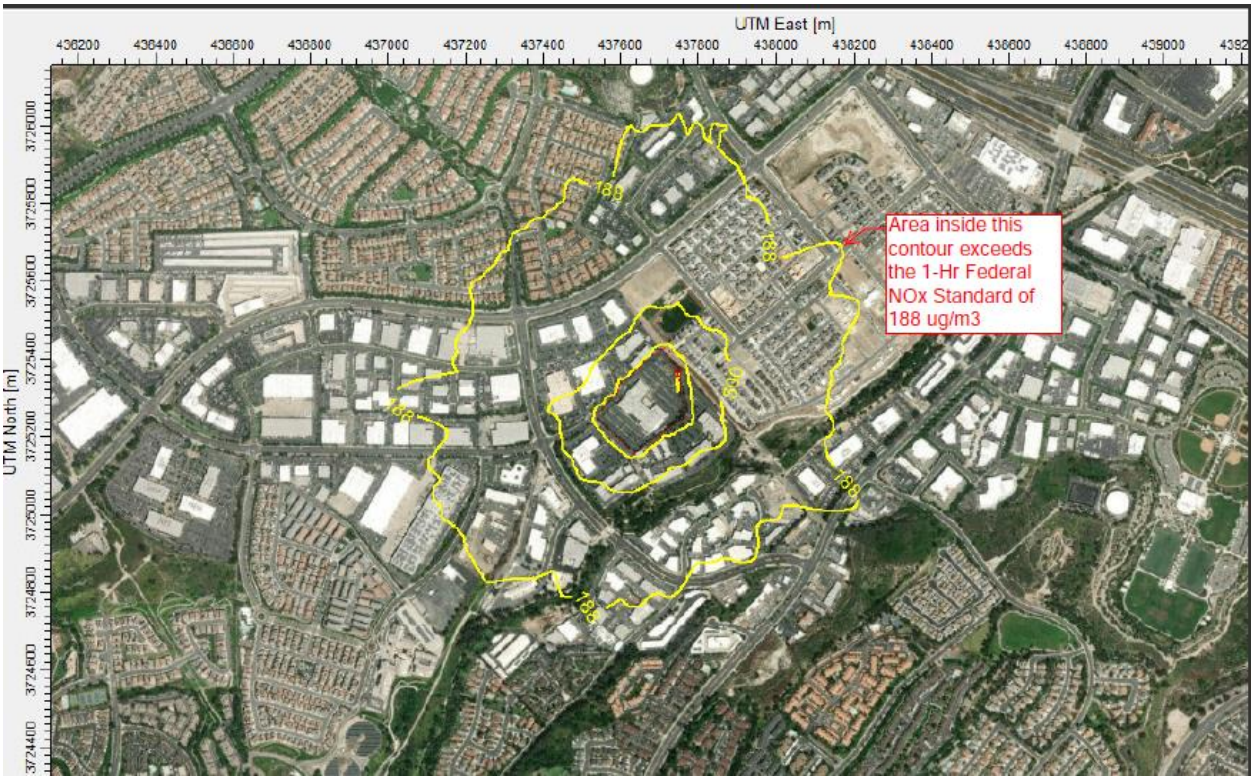


Note: Each square is 25 meters x 25 meters

Figure 5

Spatial Distribution of 1-Hour NOx Concentration

(micrograms per cubic meter)



Note: Area inside the contour labeled "188" exceeds the federal 1-hour NOx standard

Only concentrations outside the project site are subject to ambient air quality standards

Figure 6

1 Hour NOx Concentration Close-Up of Numerical Values

(in micrograms per cubic meter)



Note: Only concentrations outside the project site are subject to ambient air quality standards

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State of California
DEPARTMENT OF JUSTICE

Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act

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In carrying out its duty to enforce laws across California, the California Attorney General's Bureau of Environmental Justice (Bureau)[1] regularly reviews proposed warehouse projects for compliance with the California Environmental Quality Act (CEQA) and other laws. When necessary, the Bureau submits comment letters to lead agencies regarding warehouse projects, and in rare cases the Bureau has filed litigation to enforce CEQA.[2] This document builds upon the Bureau's work on warehouse projects, collecting information gained from the Bureau's review of hundreds of warehouse projects across the state.[3] It is meant to help lead agencies pursue CEQA compliance and promote environmentally-just development as they confront warehouse project proposals.[4] While CEQA analysis is necessarily project-specific, this document provides information on feasible best practices and mitigation measures, nearly all of which have been adapted from actual warehouse projects in California.

I. Background

In recent years, the proliferation of e-commerce and rising consumer expectations of rapid shipping have contributed to a boom in warehouse development.[5] California, with its ports, population centers, and transportation network, has found itself at the center of this trend. In 2020, the Ports of Los Angeles, Long Beach, and Oakland collectively accounted for over 34% of all United States international container trade.[6] The Ports of Los Angeles and Long Beach alone generate about 35,000 container truck trips every day.[7] Accordingly, the South Coast Air Basin now contains approximately 3,000 warehouses of over 100,000 square feet each, with a total warehouse capacity of approximately 700 million square feet, an increase of 20 percent over the last five years.[8] This trend has only accelerated, with e-commerce growing to

[1] https://oag.ca.gov/environment/justice.
[2] https://oag.ca.gov/environment/ceqa; *People of the State of California v. City of Fontana* (Super. Ct. San Bernardino County, No. CIVSB2121829); *South Central Neighbors United et al. v. City of Fresno et al.* (Super. Ct. Fresno County, No. 18CECG00690).
[3] This September 2022 version revises and replaces the prior March 2021 version of this document.
[4] Anyone reviewing this document to determine CEQA compliance responsibilities should consult their own attorney for legal advice.
[5] As used in this document, "warehouse" or "logistics facility" is defined as a facility consisting of one or more buildings that stores cargo, goods, or products on a short- or long-term basis for later distribution to businesses and/or retail customers.
[6] Data from the Bureau of Transportation Statistics, Container TEUs (Twenty-foot Equivalent Units) (2020), https://data.bts.gov/stories/s/Container-TEU/x3fb-aeda/ (Ports of Los Angeles, Long Beach, and Oakland combined for 14.157 million TEUs, 34% of 41.24 million TEUs total nationwide) (last accessed September 18, 2022).
[7] U.S. Dept. of Transportation, Federal Highway Administration, *FHWA Operations Support – Port Peak Pricing Program Evaluation* (2020), available at https://ops.fhwa.dot.gov/publications/fhwahop09014/sect2.htm (last accessed September 18, 2022).
[8] South Coast Air Qual. Mgmt. Dist., *Final Socioeconomic Assessment for Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program and Proposed Rule 316 – Fees for Rule 2305*, at 7-8, 41 (May 2021).

13% of all retail sales and 2021 being a second consecutive record year for new warehouse space leased.[9] The latest data and forecasts predict that the next wave of warehouse development will be in the Central Valley.[10]

When done properly, these activities can contribute to the economy and consumer welfare. However, imprudent warehouse development can harm local communities and the environment. Among other pollutants, diesel trucks visiting warehouses emit nitrogen oxide (NO_x)—a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation—and diesel particulate matter (a subset of fine particular matter that is smaller than 2.5 micrometers)—a contributor to cancer, heart disease, respiratory illnesses, and premature death.[11] Trucks and on-site loading activities can also be loud, bringing disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure.[12] The hundreds, and sometimes thousands, of daily truck and passenger car trips that warehouses generate contribute to traffic jams, deterioration of road surfaces, and traffic accidents.

These environmental impacts also tend to be concentrated in neighborhoods already suffering from disproportionate health impacts and systemic vulnerability. For example, a comprehensive study by the South Coast Air Quality Management District found that communities located near large warehouses scored far higher on California's environmental justice screening tool, which measures overall pollution and demographic vulnerability.[13] That

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[9] U.S. Census Bureau News, Quarterly Retail E-Commerce Sales 4th Quarter 2021 (February 22, 2022), https://www.census.gov/retail/mrts/www/data/pdf/ec_current.pdf (last accessed September 18, 2022); CBRE Research, *2022 North America Industrial Big Box Report: Review and Outlook*, at 2-3 (March 2022), *available at* https://www.cbre.com/insights/reports/2022-north-america-industrial-big-box#download-report (last accessed September 18, 2022).

[10] CBRE Research, *supra note* 9, at 4, 36; New York Times, *Warehouses Are Headed to the Central Valley, Too* (Jul. 22, 2020), *available* at https://www.nytimes.com/2020/07/22/us/coronavirus-ca-warehouse-workers.html.

[11] California Air Resources Board, Nitrogen Dioxide & Health, https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health (last accessed September 18, 2022) (NOx); California Air Resources Board, Summary: Diesel Particular Matter Health Impacts, https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts (last accessed September 18, 2022); Office of Environmental Health Hazard Assessment and American Lung Association of California, Health Effects of Diesel Exhaust, https://oehha.ca.gov/media/downloads/calenviroscreen/indicators/diesel4-02.pdf (last accessed September 18, 2022) (DPM).

[12] Noise Sources and Their Effects, https://www.chem.purdue.edu/chemsafety/Training/PPETrain/dblevels.htm (last accessed September 18, 2022) (a diesel truck moving 40 miles per hour, 50 feet away, produces 84 decibels of sound).

[13] South Coast Air Quality Management District, "Final Socioeconomic Assessment for Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program and Proposed Rule 316 – Fees for Rule 2305" (May 2021), at 4-5.

study concluded that, compared to the South Coast Air Basin averages, communities in the South Coast Air Basin near large warehouses had a substantially higher proportion of people of color; were exposed to more diesel particulate matter; had higher rates of asthma, cardiovascular disease, and low birth weights; and had higher poverty and unemployment rates.[14] Each area has its own unique history, but many of these impacts and vulnerabilities reflect historic redlining practices in these communities, which devalued land and concentrated poverty, racial outgroups, and pollution into designated areas.[15]

II. Proactive Planning: General Plans, Local Ordinances, and Good Neighbor Policies

To systematically guide warehouse development, we encourage local governing bodies to proactively plan for logistics projects in their jurisdictions. Proactive planning allows jurisdictions to prevent land use conflicts before they materialize and direct sustainable development. Benefits also include providing a predictable business environment, protecting residents from environmental harm, and setting consistent expectations jurisdiction-wide.

Proactive planning can take many forms. Land use designation and zoning decisions should channel development into appropriate areas. For example, establishing industrial districts near major highway and rail corridors but away from sensitive receptors[16] can help attract investment while avoiding conflicts between warehouse facilities and residential communities. Transition zones with lighter industrial and commercial land uses may also help minimize conflicts between residential and industrial uses.

In addition, general plan policies, local ordinances, and good neighbor policies should set minimum standards for logistics projects. General plan policies can be incorporated into existing economic development, land use, circulation, or other related general plan elements. Many jurisdictions alternatively choose to consolidate policies in a separate environmental justice element. Adopting general plan policies to guide warehouse development may also help

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[14] *Id*. at 5-7.

[15] Beginning in the 1930s, federal housing policy directed investment away from Black, immigrant, and working-class communities by color-coding neighborhoods according to the purported "riskiness" of loaning to their residents. In California cities where such "redlining" maps were drawn, nearly all of the communities where warehouses are now concentrated were formerly coded "red," signifying the least desirable areas where investment was to be avoided. *See* University of Richmond Digital Scholarship Lab, Mapping Inequality, https://dsl.richmond.edu/panorama/redlining/#loc=12/33.748/-118.272&city=los-angeles-ca (Los Angeles), https://dsl.richmond.edu/panorama/redlining/#loc=13/32.685/-117.132&city=san-diego-ca (San Diego), https://dsl.richmond.edu/panorama/redlining/#loc=11/37.81/-122.38&city=oakland-ca (Oakland), https://dsl.richmond.edu/panorama/redlining/#loc=13/37.956/-121.326&city=stockton-ca (Stockton), https://dsl.richmond.edu/panorama/redlining/#loc=12/36.751/-119.86&city=fresno-ca (Fresno) (all last accessed September 18, 2022).

[16] In this document, "sensitive receptors" refers to residences, schools, public recreation facilities, health care facilities, places of worship, daycare facilities, community centers, or incarceration facilities.

jurisdictions comply with their obligations under SB 1000, which requires local government general plans to identify objectives and policies to reduce health risks in disadvantaged communities, promote civil engagement in the public decision making process, and prioritize improvements and programs that address the needs of disadvantaged communities.[17]

Local ordinances and good neighbor policies that set development standards for all warehouses in the jurisdiction are a critical and increasingly common tool that serve several goals. When well-designed, these ordinances direct investment to local improvements, provide predictability for developers, conserve government resources by streamlining project review processes, and reduce the environmental impacts of industrial development. While many jurisdictions have adopted warehouse-specific development standards, an ordinance in the City of Fontana provides an example to review and build upon.[18] Good neighbor policies in Riverside County and by the Western Riverside Council of Government include additional measures worth consideration.[19]

The Bureau encourages jurisdictions to adopt their own local ordinances that combine the strongest policies from those models with measures discussed in the remainder of this document.

III. Community Engagement

Early and consistent community engagement is central to establishing good relationships between communities, lead agencies, and warehouse developers and tenants. Robust community engagement can give lead agencies access to community residents' on-the-ground knowledge and information about their concerns, build community support for projects, and develop creative solutions to ensure new logistics facilities are mutually beneficial. Examples of best practices for community engagement include:

- Holding a series of community meetings at times and locations convenient to members of the affected community and incorporating suggestions into the project design.
- Posting information in hard copy in public gathering spaces and on a website about the project. The information should include a complete, accurate project description, maps and drawings of the project design, and information about how the public can provide input and be involved in the project approval process. The

[17] For more information about SB 1000, *see* https://oag.ca.gov/environment/sb1000.
[18] https://oag.ca.gov/system/files/attachments/press-docs/Final%20Signed%20Fontana%20Ordinance.pdf (last accessed September 18, 2022).
[19] For example, the Riverside County policy requires community benefits agreements and supplemental funding contributions toward additional pollution offsets, and the Western Riverside Council of Governments policy sets a minimum buffer zone of 300 meters between warehouses and sensitive receptors. https://www.rivcocob.org/wp-content/uploads/2020/01/Good-Neighbor-Policy-F-3-Final-Adopted.pdf (last accessed September 18, 2022) (Riverside County); http://www.wrcog.cog.ca.us/DocumentCenter/View/318/Good-Neighbor-Guidelines-for-Siting-Warehouse-Distribution-Facilities-PDF?bidId= (last accessed September 18, 2022) (Western Riverside Council of Governments).

information should be in a format that is easy to navigate and understand for members of the affected community.

- Providing notice by mail to residents and schools within a certain radius of the project and along transportation corridors to be used by vehicles visiting the project, and by posting a prominent sign on the project site. The notice should include a brief project description and directions for accessing complete information about the project and for providing input on the project.
- Providing translation or interpretation in residents' native language, where appropriate.
- For public meetings broadcast online or otherwise held remotely, providing for access and public comment by telephone and supplying instructions for access and public comment with ample lead time prior to the meeting.
- Partnering with local community-based organizations to solicit feedback, leverage local networks, co-host meetings, and build support.
- Considering adoption of a community benefits agreement, negotiated with input from affected residents and businesses, by which the developer provides benefits to the affected community.
- Creating a community advisory board made up of local residents to review and provide feedback on project proposals in early planning stages.
- Identifying a person to act as a community liaison concerning on-site construction activity and operations, and providing contact information for the community liaison to the surrounding community.
- Requiring signage in public view at warehouse facilities with contact information for a local designated representative for the facility operator who can receive community complaints, and requiring any complaints to be answered by the facility operator within 48 hours of receipt.

IV. Warehouse Siting and Design Considerations

The most important consideration when planning a logistics facility is its location. Warehouses located in residential neighborhoods or near sensitive receptors expose community residents and those using or visiting sensitive receptor sites to the air pollution, noise, traffic, and other environmental impacts they generate. Therefore, placing facilities away from sensitive receptors significantly reduces their environmental and quality of life harms on local communities. The suggested best practices for siting and design of warehouse facilities does not relieve lead agencies' responsibility under CEQA to conduct a project-specific analysis of the project's impacts and evaluation of feasible mitigation measures and alternatives; lead agencies' incorporation of the best practices must be part of the impact, mitigation and alternatives analyses to meet the requirements of CEQA. Examples of best practices when siting and designing warehouse facilities include:

- Per California Air Resources Board (CARB) guidance, siting warehouse facilities so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive receptors.[20]
- Providing adequate amounts of on-site parking to prevent trucks and other vehicles from parking or idling on public streets and to reduce demand for off-site truck yards.
- Establishing setbacks from the property line of the nearest sensitive receptor to warehouse dock doors, loading areas, and truck drive aisles, and locating warehouse dock doors, loading areas, and truck drive aisles on the opposite side of the building from the nearest sensitive receptors—e.g., placing dock doors on the north side of the facility if sensitive receptors are near the south side of the facility.
- Placing facility entry and exit points from the public street away from sensitive receptors—e.g., placing these points on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Ensuring heavy duty trucks abide by the on-site circulation plans by constructing physical barriers to block those trucks from using areas of the project site restricted to light duty vehicles or emergency vehicles only.
- Preventing truck queuing spillover onto surrounding streets by positioning entry gates after a minimum of 140 feet of space for queuing, and increasing the distance by 70 feet for every 20 loading docks beyond 50 docks.
- Locating facility entry and exit points on streets of higher commercial classification that are designed to accommodate heavy duty truck usage.
- Screening the warehouse site perimeter and onsite areas with significant truck traffic (e.g., dock doors and drive aisles) by creating physical, structural, and/or vegetative buffers that prevent or substantially reduce pollutant and noise dispersion from the facility to sensitive receptors.
- Planting exclusively 36-inch box evergreen trees to ensure faster maturity and four-season foliage.
- Requiring all property owners and successors in interest to maintain onsite trees and vegetation for the duration of ownership, including replacing any dead or unhealthy trees and vegetation.
- Posting signs clearly showing the designated entry and exit points from the public street for trucks and service vehicles.
- Including signs and drive aisle pavement markings that clearly identify onsite circulation patterns to minimize unnecessary onsite vehicle travel.
- Posting signs indicating that all parking and maintenance of trucks must be conducted within designated on-site areas and not within the surrounding community or public streets.

[20] CARB, Air Quality and Land Use Handbook: A Community Health Perspective (April 2005), at ES-1. CARB staff has released draft updates to this siting and design guidance which suggests a greater distance may be warranted in some scenarios. CARB, Concept Paper for the Freight Handbook (December 2019), *available at* https://ww2.arb.ca.gov/sites/default/files/2020-03/2019.12.12%20-%20Concept%20Paper%20for%20the%20Freight%20Handbook_1.pdf (last accessed September 18, 2022).

V. Air Quality and Greenhouse Gas Emissions Analysis and Mitigation

Emissions of air pollutants and greenhouse gases are often among the most substantial environmental impacts from new warehouse facilities. CEQA compliance demands a proper accounting of the full air quality and greenhouse gas impacts of logistics facilities and adoption of all feasible mitigation of significant impacts. Although efforts by CARB and other authorities to regulate the heavy-duty truck and off-road diesel fleets have made excellent progress in reducing the air quality impacts of logistics facilities, the opportunity remains for local jurisdictions to further mitigate these impacts at the project level. Lead agencies and developers should also consider designing projects with their long-term viability in mind. Constructing the necessary infrastructure to prepare for the zero-emission future of goods movement not only reduces a facility's emissions and local impact now, but it can also save money as demand for zero-emission infrastructure grows. In planning new logistics facilities, the Bureau strongly encourages developers to consider the local, statewide, and global impacts of their projects' emissions.

Examples of best practices when studying air quality and greenhouse gas impacts include:

- Fully analyzing all reasonably foreseeable project impacts, including cumulative impacts. In general, new warehouse developments are not ministerial under CEQA because they involve public officials' personal judgment as to the wisdom or manner of carrying out the project, even when warehouses are permitted by a site's applicable zoning and/or general plan land use designation.[21]
- When analyzing cumulative impacts, thoroughly considering the project's incremental impact in combination with past, present, and reasonably foreseeable future projects, even if the project's individual impacts alone do not exceed the applicable significance thresholds.
- Preparing a quantitative air quality study in accordance with local air district guidelines.
- Preparing a quantitative health risk assessment in accordance with California Office of Environmental Health Hazard Assessment and local air district guidelines.
- Refraining from labeling compliance with CARB or air district regulations as a mitigation measure—compliance with applicable regulations is required regardless of CEQA.
- Disclosing air pollution from the entire expected length of truck trips. CEQA requires full public disclosure of a project's anticipated truck trips, which entails calculating truck trip length based on likely truck trip destinations, rather than the distance from the facility to the edge of the air basin, local jurisdiction, or other truncated endpoint. All air pollution associated with the project must be considered, regardless of where those impacts occur.

[21] CEQA Guidelines § 15369.

- Accounting for all reasonably foreseeable greenhouse gas emissions from the project, without discounting projected emissions based on participation in California's Cap-and-Trade Program.

Examples of measures to mitigate air quality and greenhouse gas impacts from construction are below. To ensure mitigation measures are enforceable and effective, they should be imposed as permit conditions on the project where applicable.

- Requiring off-road construction equipment to be hybrid electric-diesel or zero-emission, where available, and all diesel-fueled off-road construction equipment to be equipped with CARB Tier IV-compliant engines or better, and including this requirement in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.
- Prohibiting off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day.
- Using electric-powered hand tools, forklifts, and pressure washers, and providing electrical hook ups to the power grid rather than use of diesel-fueled generators to supply their power.
- Designating an area in the construction site where electric-powered construction vehicles and equipment can charge.
- Limiting the amount of daily grading disturbance area.
- Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.
- Forbidding idling of heavy equipment for more than three minutes.
- Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.
- Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.
- Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.
- Providing information on transit and ridesharing programs and services to construction employees.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees.

Examples of measures to mitigate air quality and greenhouse gas impacts from operation include:

- Requiring all heavy-duty vehicles engaged in drayage[22] to or from the project site to be zero-emission beginning in 2030.

[22] "Drayage" refers generally to transport of cargo to or from a seaport or intermodal railyard.

- Requiring all on-site motorized operational equipment, such as forklifts and yard trucks, to be zero-emission with the necessary charging or fueling stations provided.
- Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.
- Forbidding trucks from idling for more than three minutes and requiring operators to turn off engines when not in use.
- Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the local air district, and the building manager.
- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity that is equal to or greater than the building's projected energy needs, including all electrical chargers.
- Designing all project building roofs to accommodate the maximum future coverage of solar panels and installing the maximum solar power generation capacity feasible.
- Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project.
- Running conduit to designated locations for future electric truck charging stations.
- Unless the owner of the facility records a covenant on the title of the underlying property ensuring that the property cannot be used to provide refrigerated warehouse space, constructing electric plugs for electric transport refrigeration units at every dock door and requiring truck operators with transport refrigeration units to use the electric plugs when at loading docks.
- Oversizing electrical rooms by 25 percent or providing a secondary electrical room to accommodate future expansion of electric vehicle charging capability.
- Constructing and maintaining electric light-duty vehicle charging stations proportional to the number of employee parking spaces (for example, requiring at least 10% of all employee parking spaces to be equipped with electric vehicle charging stations of at least Level 2 charging performance)
- Running conduit to an additional proportion of employee parking spaces for a future increase in the number of electric light-duty charging stations.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel.
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of

trucks.

- Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.
- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.
- Designing to LEED green building certification standards.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations.
- Posting signs at every truck exit driveway providing directional information to the truck route.
- Improving and maintaining vegetation and tree canopy for residents in and around the project area.
- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.
- Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants who own, operate, or hire trucking carriers with more than 100 trucks to use carriers that are SmartWay carriers.
- Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.

VI. Noise Impacts Analysis and Mitigation

The noise associated with logistics facilities can be among their most intrusive impacts to nearby sensitive receptors. Various sources, such as unloading activity, diesel truck movement, and rooftop air conditioning units, can contribute substantial noise pollution. These impacts are exacerbated by logistics facilities' typical 24-hour, seven-days-per-week operation. Construction noise is often even greater than operational noise, so if a project site is near sensitive receptors, developers and lead agencies should adopt measures to reduce the noise generated by both construction and operation activities.

Examples of best practices when studying noise impacts include:

- Preparing a noise impact analysis that considers all reasonably foreseeable project noise impacts, including to nearby sensitive receptors. All reasonably foreseeable project noise impacts encompasses noise from both construction and operations, including stationary, on-site, and off-site noise sources.
- Adopting a lower significance threshold for incremental noise increases when baseline noise already exceeds total noise significance thresholds, to account for the cumulative impact of additional noise and the fact that, as noise moves up the decibel scale, each decibel increase is a progressively greater increase in sound

pressure than the last. For example, 70 dBA is ten times more sound pressure than 60 dBA.

- Disclosing and considering the significance of short-term noise levels associated with all aspects of project operation (i.e. both on-site noise generation and off-site truck noise). Considering only average noise levels may mask noise impacts sensitive receptors would consider significant—for example, the repeated but short-lived passing of individual trucks or loading activities at night.

Examples of measures to mitigate noise impacts include:

- Constructing physical, structural, or vegetative noise barriers on and/or off the project site.
- Planning and enforcing truck routes that avoid passing sensitive receptors.
- Locating or parking all stationary construction equipment as far from sensitive receptors as possible, and directing emitted noise away from sensitive receptors.
- Verifying that construction equipment has properly operating and maintained mufflers.
- Requiring all combustion-powered construction equipment to be surrounded by a noise protection barrier
- Limiting operation hours to daytime hours on weekdays.
- Paving roads where truck traffic is anticipated with low noise asphalt.
- Orienting any public address systems onsite away from sensitive receptors and setting system volume at a level not readily audible past the property line.

VII. Traffic Impacts Analysis and Mitigation

Warehouse facilities inevitably bring truck and passenger car traffic. Truck traffic can present substantial safety issues. Collisions with heavy-duty trucks are especially dangerous for passenger cars, motorcycles, bicycles, and pedestrians. These concerns can be even greater if truck traffic passes through residential areas, school zones, or other places where pedestrians are common and extra caution is warranted.

Examples of measures to mitigate traffic impacts include:

- Designing, clearly marking, and enforcing truck routes that keep trucks out of residential neighborhoods and away from other sensitive receptors.
- Installing signs in residential areas noting that truck and employee parking is prohibited.
- Requiring preparation and approval of a truck routing plan describing the facility's hours of operation, types of items to be stored, and truck routing to and from the facility to designated truck routes that avoids passing sensitive receptors. The plan should include measures for preventing truck queuing, circling, stopping, and parking on public streets, such as signage, pavement markings, and queuing analysis and enforcement. The plan should hold facility operators responsible for violations of the truck routing plan, and a revised plan should be required from any new tenant that occupies the property before a business license

is issued. The approving agency should retain discretion to determine if changes to the plan are necessary, including any additional measures to alleviate truck routing and parking issues that may arise during the life of the facility.
- Constructing new or improved transit stops, sidewalks, bicycle lanes, and crosswalks, with special attention to ensuring safe routes to schools.
- Consulting with the local public transit agency and securing increased public transit service to the project area.
- Designating areas for employee pickup and drop-off.
- Implementing traffic control and safety measures, such as speed bumps, speed limits, or new traffic signs or signals.
- Placing facility entry and exit points on major streets that do not have adjacent sensitive receptors.
- Restricting the turns trucks can make entering and exiting the facility to route trucks away from sensitive receptors.
- Constructing roadway improvements to improve traffic flow.
- Preparing a construction traffic control plan prior to grading, detailing the locations of equipment staging areas, material stockpiles, proposed road closures, and hours of construction operations, and designing the plan to minimize impacts to roads frequented by passenger cars, pedestrians, bicyclists, and other non-truck traffic.

VIII. Other Significant Environmental Impacts Analysis and Mitigation

Warehouse projects may result in significant environmental impacts to other resources, such as to aesthetics, cultural resources, energy, geology, or hazardous materials. All significant adverse environmental impacts must be evaluated, disclosed and mitigated to the extent feasible under CEQA. Examples of best practices and mitigation measures to reduce environmental impacts that do not fall under any of the above categories include:

- Appointing a compliance officer who is responsible for implementing all mitigation measures, and providing contact information for the compliance officer to the lead agency, to be updated annually.
- Creating a fund to mitigate impacts on affected residents, schools, places of worship, and other community institutions by retrofitting their property. For example, retaining a contractor to retrofit/install HVAC and/or air filtration systems, doors, dual-paned windows, and sound- and vibration-deadening insulation and curtains.
- Sweeping surrounding streets on a daily basis during construction to remove any construction-related debris and dirt.
- Directing all lighting at the facility into the interior of the site.
- Using full cut-off light shields and/or anti-glare lighting.
- Requiring submission of a property maintenance program for agency review and approval providing for the regular maintenance of all building structures, landscaping, and paved surfaces.
- Using cool pavement to reduce heat island effects.

- Planting trees in parking areas to provide at least 35% shade cover of parking areas within fifteen years to reduce heat island impacts.
- Using light colored roofing materials with a solar reflective index of 78 or greater.
- Including on-site amenities, such as a truck operator lounge with restrooms, vending machines, and air conditioning, to reduce the need for truck operators to idle or travel offsite.
- Designing skylights to provide natural light to interior worker areas.
- Installing climate control and air filtration in the warehouse facility to promote worker well-being.

IX. Conclusion

California's world-class economy, ports, and transportation network position it at the center of the e-commerce and logistics industry boom. At the same time, California is a global leader in environmental protection and environmentally just development. The guidance in this document furthers these dual strengths, ensuring that all can access the benefits of economic development. The Bureau will continue to monitor proposed projects for compliance with CEQA and other laws. Lead agencies, developers, community advocates, and other interested parties should feel free to reach out to us as they consider how to guide warehouse development in their area.

Please do not hesitate to contact the Environmental Justice Bureau at ej@doj.ca.gov if you have any questions.

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September 4, 2025

Tom Brohard and Associates

Mr. Doug Carstens
Carstens, Black & Minteer LLP
700 North Pacific Coast Highway, Suite 200
Redondo Beach, CA 90277-2147

SUBJECT: Review of the Draft EIR for the IPT Business Center Project in the City of Lake Forest – Traffic and Transportation Issues

Dear Mr. Carstens:

As requested and authorized, I, Tom Brohard, P.E., have reviewed the July 2025 Draft Environmental Impact Report (Draft EIR) for the IPT Business Center Project proposed at 26200 Enterprise Way in the City of Lake Forest. My review focused on Chapter 4.17, the Transportation and Traffic Section of the Draft EIR, as well as the May 2025 Traffic Impact Analysis (TIA), Appendix J of the Draft EIR. I have also reviewed the July 21, 2020 City of Lake Forest Transportation Analysis Guidelines which are also known as Appendix 2 to Appendix A, the City of Lake Forest CEQA Significance Thresholds Guide, published November 20, 2001 and revised May 6, 2025.

Primary Finding

Based upon my review of these documents and as explained in detail in this letter, the Draft EIR and the TIA fail to comply with the requirements set forth in the City's Transportation Analysis Guidelines (TA Guidelines). For proposed mitigation of the excessive VMT that will be generated by the warehouse, the analysis only evaluates the installation of bicycle lanes on Commercecentre Drive. This mitigation measure, MM TRA-1, only addresses a small fraction (only 0.5 percent) of the Project's VMT overage that will be generated. The Draft EIR and the TIA fail to study and evaluate the numerous other mitigation opportunities available. Furthermore, no evidence is provided that the "...project applicant has worked with the City and has exhausted all mitigation opportunities..." as required on Page 12 of the City's TA Guidelines. Without such an effort that must include alterations to the project description and together without City concurrence, a Statement of Overriding Consideration cannot be considered according to the City's TA Guidelines.

Education and Experience

Since receiving a Bachelor of Science in Engineering from Duke University in Durham, North Carolina in 1969, I have gained over 55 years of professional engineering experience focused on traffic engineering and transportation planning. I am licensed as a Professional Civil Engineer both in California and

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Hawaii and as a Professional Traffic Engineer in California. I have served as the City Traffic Engineer and as Transportation Planner for 16 cities in Southern California and formed Tom Brohard and Associates in 2000. During my career in both the public and private sectors, I have also reviewed numerous environmental documents and traffic studies for various projects.

Project Description

Page 1-2 of the Draft EIR describes the Proposed Project as follows:

> "The proposed project involves the demolition of the existing 144,906-square-foot (sq ft), two-story office/industrial building and redevelopment, construction and operation of a 35-foot (ft) tall,165,803 sq ft tilt-up concrete industrial building. The project includes a gated truck loading area, truck and auto parking spaces, and new landscaping throughout the site."

Traffic and Transportation Issues

Based on my reviews of various documents, the IPT Business Center Project in the City of Lake Forest at 26200 Enterprise Way will have significant traffic and transportation impacts that must be evaluated further, together with additional study plus mitigation measures conditioned to address these issues:

1) Vehicle Miles Travelled (VMT) Analysis Is Incomplete – The California Environmental Quality Act (CEQA) requires calculation and consideration of vehicle miles traveled to and from land development projects. For this project, the City of Lake Forest requires a reduction of 4.1 VMT, 20 percent below what is estimated in Table 4.17.B on Page 4.17-12 of the Draft EIR. For mitigation, the Draft EIR calls for the installation of bicycle lanes in both directions on Commercecentre Drive between Alton Parkway and Dimension Drive. These proposed bicycle lanes do not connect directly to the Proposed Project on Enterprise Way. If maximum credit for VMT reduction is achieved, then the proposed bicycle lanes would only reduce the VMT by 0.5 percent, significantly below the required 20 percent VMT reduction that is necessary to totally offset the VMT increase. By themselves, the proposed bicycle lanes are insufficient as they provide only nominal benefit.

   The City's TA Guidelines for VMT reductions cite a number of strategies to reduce VMT. A total of 24 VMT reducing mitigation measures are listed in Table 5 on enclosed Pages 11 and 12 of the City's TA Guidelines. Additionally, the City's TA Guidelines refer to the California Air Pollution Control Officers Association (CAPCOA) publication entitled "Quantifying Greenhouse Gas Mitigation Measures – A Resource for Local Government to

Assess Emission Reductions from Greenhouse Gas Mitigation Measures" (see enclosed listing of potential VMT mitigation measures.) According to the City's own TA Guidelines, more mitigation measures to reduce VMT must be evaluated.

Other than the proposed bicycle lanes, the TIA and the Draft EIR fail to develop any additional mitigation measures, calling excess VMT a significant and unavoidable impact. As indicated earlier in this letter, no evidence is provided that the "...project applicant has worked with the City and has exhausted all mitigation opportunities..." as is mandated on Page 12 of the City's TA Guidelines. Without this, without considering alterations to the project description, and without City concurrence, a Statement of Overriding Consideration cannot be considered. The minimal effort to mitigate the excessive VMT cannot be accepted as there are many other mitigation measures from the City's TA Guidelines and from CAPCOA's resource publication beyond the bicycle lanes that must be evaluated and then imposed on the Proposed Project by the City.

2) Commercecentre Drive Is Too Narrow To Safely Provide Bicycle Lanes - Mitigation Measure MM-TR-1 proposes installing striped bicycle lanes on Commercecentre Drive between Alton Parkway and Dimension Drive. The proposed project which is located on Enterprise Way does not directly connect to the proposed bicycle lanes on Commercecentre Drive, with the proposed project 700' and more separated from Dimension Drive. Bicycle lanes should connect to the proposed project to be counted as credits for reducing a project's VMT.

   From current Google Earth aerial photography, Commercecentre Drive is striped for two through vehicle travel lanes in each direction separated by a painted median that includes left turn lanes at crossing and intersecting streets. Commercecentre Drive is 64' between curbs and has a posted 45 MPH speed limit. Accepted traffic engineering practice indicates that the design speed is at least 10 miles per hour higher than the posted speed limit. For the necessary and appropriate design speed of 55 miles per hour, vehicle travel lane widths of at least 11' are needed as well as bicycle lanes of at least 4' plus the concrete gutter width of 2', total of 6'. The required minimum width to retain two through lanes in each direction, retain the painted median with left turn lanes, and add a striped bicycle lane in each direction is 66' which is 2' more than the existing roadway width provides.

   Striping bicycle lanes on both sides of Commercecentre Drive requires that all existing striping be removed and that the painted median and the four through travel lanes be reduced to 10' wide lanes. These resulting traffic lane widths are too narrow to support the 55 miles per hour design speed together with the roadway's rolling profile. Additionally, the volume of truck traffic that will

be generated by the Proposed Project and the other two similar adjacent warehouse projects now being considered together with existing truck traffic volumes require vehicle travel lanes that are at least 11' wide. The minimum width for each bicycle lane must be at least 4' wide exclusive of the concrete gutter.

3) Stopping Sight Distance Is Incorrectly Calculated – Page 4.17-14 of the Draft EIR states the posted speed limit on Enterprise Way is 25 miles per hour, and then erroneously concludes that the speed limit is the same as the design speed. Stopping sight distance is based upon the design speed of the particular roadway being evaluated, and accepted traffic engineering practice indicates that the design speed must be at least 10 miles per hour higher than the posted speed limit. The Draft EIR and the TIA incorrectly and inaccurately state that the speed limit and the design speed are the same technical parameters. On the contrary, the design speed is always at least 10 miles per hour higher than the speed limit.

   To provide traffic safety, vehicles entering Enterprise Way from either of the project's access driveways must be able to see vehicles approaching from the left as well as from the right at 35 miles per hour. The required stopping sight distance at 35 miles per hour is 250' as shown in enclosed Table 3-1 on Page 3-4 of the 7th Edition of "A Policy on Geometric Design of Highways and Streets" published in 2018 by AASHTO, the American Association of State Highway and Transportation Officials. This same table is also the source of the recommended stopping sight distance of 150' for a design speed of 25 miles per hour as suggested in the Draft EIR and as shown in Figure 13 on Page 34 of the TIA.

   The proper design speed of 35 miles per hour must be evaluated to provide appropriate sight distances. These distances are achieved by providing clear zones free of all obstructions and limitations on both sides of each access driveway to ensure adequate stopping sight distance for safe traffic movements. The required stopping sight distance must be increased from 150' in both directions to 250' in both directions on both sides of each of the two access driveways. The areas inside the sight distance triangles must be kept free and clear of all obstacles and obstructions to maintain the clear zones needed to provide the required stopping sight distance.

4) Enterprise Way Improvements Needed – Enterprise Way is identified as a private street on the site plan in Figure 2 on Page 4 in the TIA. In California, traffic laws generally do not apply to private roads. However, local authorities can also extend the application of specific traffic laws to privately owned and maintained roads under certain conditions as set forth in California Vehicle Code Section 21107.6. For this to occur, the City Council may declare by resolution or ordinance that certain privately owned and maintained streets

are generally to be held open for the use of the public for purposes of vehicular traffic and parking. Additionally, the owner of the private road must post specific signing at each entrance to the private road that such facility is subject to public traffic regulations and control. If the City desires this, then the traffic control devices including signing and pavement markings must conform to the requirements set forth in the "California Manual on Uniform Traffic Control Devices."

Based upon my review, the following issues need to be addressed for this to occur:

a) New Sidewalk - Enterprise Way has sidewalk on the inside of the circular roadway, but there is no sidewalk on the outside of this loop roadway where the proposed project fronts Enterprise Way. Construction of sidewalk should be conditioned across the frontage of the Proposed Project as well as down to Dimension Drive.

b) Conforming Pavement Markings and Signing - Google Earth aerial photos show pavement markings on Enterprise Way which do not conform to the California Manual on Uniform Traffic Control Devices including "Down Slow" (upside down as you drive over it and not an authorized marking) together with marked ladder crosswalks within knuckle 90-degree turns without any advance signing or pavement markings. A traffic study should be conducted to determine if these pavement markings should be removed or if appropriate pavement markings should be installed and warning signs should be posted in advance of the marked crossings.

c) Enforceable Speed Limit - The posted 25 MPH speed limit on Enterprise Way most probably was not established by an engineering and traffic survey. The east/west portion of Enterprise Way is 42' between curbs and that cannot be established as prima facie 25 MPH speed limit as the width exceeds 40'. An engineering and traffic survey must be conducted to establish an appropriate and an enforceable speed limit.

d) Clear Zones/Sight Distance - On Page 33 of the TIA and in Figure 13 on Page 34, the sight distance analysis for design speed of 25 miles per hour is inappropriate. A design speed of 35 miles per hour is required with corresponding stopping sight distance of 250'. As previously discussed in this letter, the design speed on Enterprise Way is at least 10 MPH higher. For a design speed of 35 MPH, the stopping sight distance on both sides of each access driveway increases from 150' to 250' in both directions, and clear zone line-of-sight triangles must be clear of all obstructions.

e) Prohibit Trucks From Using The Third Access To Reach Bake Parkway – A parking aisle extends from the northeast corner of the site across and through the adjacent property parking lot. This aisle has perpendicular parking along the east side out to a right turn only driveway access onto Bake Parkway. Trucks must be prohibited from using this connection to and from Bake Parkway as they cannot negotiate the back-to-back 90-degree reverse jogs in the parking lot aisle.

f) Require Trucks to Use Only Enterprise Way To Dimension Drive - Circulation by trucks to and from the Proposed Project driveways must be required to use only the 42' wide portion of the Enterprise Way loop road back and forth directly to Dimension Drive. Trucks cannot safely navigate the 30' wide balance of the Enterprise Way loop road as it is too narrow to provide parking on the west side and two-way traffic flow. All trucks must be prohibited from using the 30' wide portion of Enterprise Way to access the Proposed Project.

g) Enterprise Way May Not Be Structurally Adequate For Heavy Trucks - The TIA and the Draft EIR must address the adequacy of the existing Enterprise Way and the Dimension Drive pavements to sustain increased heavy truck traffic. Traffic index calculations including the mix of all multi-axle trucks for the Proposed Project and the redevelopment of two adjacent office to warehouse projects must be made to evaluate the existing roadways and their condition.

   Each roadways' structural section includes the thickness of the asphalt pavement and the aggregate base as well as the soil conditions under the roadway. Each of the roadways' components must be evaluated with the increased heavy truck trips since there were very few heavy trucks previously serving the office buildings in the Proposed Project as well as the two adjacent similar redevelopment projects. Each project must be conditioned to mitigate their fair share of all of the additional heavy truck load impacts on Enterprise Way as well as on Dimension Drive.

Until the various issues and concerns in this letter are fully addressed, there is substantial evidence that the IPT Business Center Project at 26200 Enterprise Way Project will have adverse traffic impacts that have not been properly analyzed and mitigated.

The recommendations in this letter must be considered. In addition, the various flaws and deficiencies outlined above in the Draft EIR must be addressed through further analysis before the IPT Business Center Project receives further consideration. If you have questions regarding these comments, please call me at your convenience.

Mr. Doug Carstens
Draft EIR for IPT Business Center Project – Traffic/Transportation Issues
September 4, 2025

Respectfully submitted,

Tom Brohard and Associates





Tom Brohard, PE
Principal

Enclosures
- Resume
- City of Lake Forest Transportation Analysis Guidelines, Revised May 6, 2025
- CAPCOA Quantifying Greenhouse Gas Mitigation Measures, August 2010
- AASHTO "A Policy on Geometric Design of Highways and Streets," 7th Edition, 2018, Stopping Sight Distance on Level Roadways

Tom Brohard, PE

Licenses: 1975 / Professional Engineer / California – Civil, No. 24577
1977 / Professional Engineer / California – Traffic, No. 724
2006 / Professional Engineer / Hawaii – Civil, No. 12321

Education: 1969 / BSE / Civil Engineering / Duke University

Experience: 55+ Years

Memberships: 1977 / Institute of Transportation Engineers – Fellow, Life
1978 / Orange County Traffic Engineers Council - Chair 1982-1983
1981 / American Public Works Association – Life Member

Tom is a recognized expert in the field of traffic engineering and transportation planning. His background also includes responsibility for leading and managing the delivery of various contract services to numerous cities in Southern California.

Tom has extensive experience in providing transportation planning and traffic engineering services to public agencies. In addition to conducting traffic engineering investigations for Los Angeles County from 1972 to 1978, he has previously served as City Traffic Engineer in the following communities:

- Bellflower ..... 1997 - 1998
- Bell Gardens ..... 1982 - 1995
- Big Bear Lake..... 2006 - 2015
- Indio..... 2005 - 2019
- Huntington Beach ..... 1998 - 2004
- Lawndale..... 1973 - 1978
- Los Alamitos ..... 1981 - 1982
- Oceanside..... 1981 - 1982
- Paramount ..... 1982 - 1988
- Rancho Palos Verdes ..... 1973 - 1978
- Rolling Hills ..... 1973 - 1978, 1985 - 1993
- Rolling Hills Estates ..... 1973 - 1978, 1984 - 1991
- San Fernando..... 2004 - Present
- San Marcos..... 1981
- Santa Ana ..... 1978 - 1981
- Westlake Village ..... 1983 - 1994

During these assignments, Tom has supervised City staff and directed other consultants including traffic engineers and transportation planners, traffic signal and street lighting personnel, and signing, striping, and marking crews. He has secured over $10 million in grant funding for various improvements. He has managed and directed many traffic and transportation studies and projects. While serving these communities, he has personally conducted investigations of hundreds of citizen requests for various traffic control devices. Tom has also successfully presented numerous engineering reports at City Council, Planning Commission, and Traffic Commission meetings in these and other municipalities.

In his 14 years of service to the City of Indio, Tom accomplished the following:

- Oversaw preparation and adoption of the 2008 Circulation Element Update of the General Plan including development of Year 2035 buildout traffic volumes, revised and simplified arterial roadway cross sections, and reduction in acceptable Level of Service criteria under certain conditions.

- Oversaw preparation of fact sheets/design exceptions to reduce shoulder widths on Jackson Street and on Monroe Street over I-10 as well as justifications for protected-permissive left turn phasing at I-10 on-ramps, the first such installations in Caltrans District 8 in Riverside County; reviewed plans and provided assistance during construction of both $2 million projects to install traffic signals and widen three of four ramps at these two interchanges under Caltrans encroachment permits.

- Reviewed traffic signal, signing, striping, and work area traffic control plans for the County's $45 million I-10 Interchange Improvement Project at Jefferson Street.

- Reviewed traffic impact analyses for Project Study Reports evaluating different alternatives for buildout improvements of the I-10 Interchanges at Jefferson Street, Monroe Street, Jackson Street and Golf Center Parkway.

- Oversaw preparation of plans, specifications, and contract documents and provided construction assistance for over 70 traffic signal installations and modifications.

- Reviewed and approved over 2,000 work area traffic control plans as well as signing and striping plans for all City and developer funded roadway improvement projects.

- Oversaw preparation of a City-wide traffic safety study of conditions at all schools.

- Obtained $47,000 grant from the California Office of Traffic Safety and implemented the City's Traffic Collision Database System. Annually reviews "Top 25" collision locations and provides traffic engineering recommendations to reduce collisions.

- Prepared over 1,500 work orders directing City forces to install, modify, and/or remove traffic signs, pavement and curb markings, and roadway striping.

- Oversaw preparation of engineering and traffic surveys to establish enforceable speed limits on over 500 street segments.

- Reviewed and approved traffic impact studies for more than 35 major projects and special events including the annual Coachella and Stagecoach Music Festivals.

- Developed and implemented the City's Golf Cart Transportation Program.

Since forming Tom Brohard and Associates in 2000, Tom has reviewed many traffic impact reports and environmental documents for various development projects. He has provided expert witness services and also prepared traffic studies for public agencies and private sector clients.

APPENDIX A

CITY OF LAKE FOREST
CEQA SIGNIFICANCE THRESHOLDS GUIDE

Published November 20, 2001
Revised May 6, 2025

Table 5 lists the potential mitigation measures and the maximum VMT reduction per CAPCOA. Note that although a measure has the potential to provide a maximum VMT percentage reduction, the maximum VMT reductions by area type (previously referenced **Table 4**) would apply.

For example, a mixed-use project in the suburban setting may show evidence that the project meets the criteria for "Increase Density" (maximum VMT reduction of 30%), "Improve Destination Accessibility" (maximum VMT reduction of 20%), Limit Parking Supply (maximum VMT reduction of 12.5%) and Traffic Calming Measures (maximum VMT reduction of 1%). However, if the proposed project is located in a suburban setting, the maximum VMT reductions from land use measures combined with parking and traffic calming measures is 15%. Therefore, the project can take credit for a 15% VMT reduction.

Table 5 VMT Reducing Mitigation Measures

Land Use	CAPCOA Code	Measurement	VMT Reduction
Increase Density[1]	LUT-1	Dwelling Units/acre and Jobs/Job acre	Max 30%
Increase Diversity[2]	LUT-3	Applicable to mixed-use developments only	Max 65%/30%/10% Urban/Infill/Suburban
Improve Walkability Design	LUT-9	Intersections/Square Miles	Max 21.3%
Improve Destination Accessibility	LUT-4	Distance to Downtown/Job Center (Miles)	Max 20%
Increase Transit Accessibility	LUT-5	Distance to Transit Station (Miles)	Max 30%
Integrate Below Market Rate Housing[3]	LUT-6	s% Dwelling Units Below Market Rate	Max 4%
Neighborhood Enhancements			
Improve Pedestrian Network	SDT-1	Project Site or Connecting Off-Site	Max 2%
Provide Traffic Calming Measures	SDT-2	% Streets with Improvement % Intersections with Improvement	Max 1%
Implement NEV Network	SDT-3	Number of NEVs per household	Max 12.7%
Parking Policy/Pricing			
Limit Parking Supply	PDT-1	% Reduction in Spaces[4]	Max 12.5%
Unbundle Parking Costs	PDT-2	Monthly Parking Cost ($)	Max 20%
On-Street Market Pricing	PDT-3	% Increase in Price	Max 5.5%
Transit Improvement			
Expand Transit Network	TST-3	% Increase Transit Coverage	Max 8.2%
Increase Transit Frequency	TST-4	Level of Implementation <50%, >=50% % Reduction in Headways	Max 2.5%
Commute Trip			
Implement Trip Reduction Program	TRT-1, TRT-2	% employee eligible Program Type (Required/Voluntary)	Max 21%
Transit Subsidy	TRT-4	% employee eligible Daily Transit Subsidy Amount ($)	Max 20%
Implement Employee Parking "Cash-out"	TRT-15	% employee eligible	Max 7.7%
Workplace Parking Charge	TRT-14	% employee eligible Daily Parking Charge ($)	Max 19.7%
Encourage Telecommuting and Alternative Work Schedules	TRT-6	% employee work 9/80 % employee work 4/40 % employee telecommute 1.5 days	Max 5.5%
Market Commute Trip Reduction Option	TRT-7	% employee eligible	Max 4.0%
Employee Vanpool/Shuttle	TRT-11	% employee eligible % vanpool mode share	Max 13.4%
Provide Ride Sharing Program[5]	TRT-3	% employee eligible	Max 15%
School Trip			
Implement School Bus Program	TRT-13	% family using	Max 63%

Source: CAPCOA
[1] Density relative to a typical ITE development: "Default densities are based on the typical suburban densities in North America which reflects the characteristics of the ITE Trip Generation Manual data used in the baseline estimates." (Source: CAPCOA Land Use Transportation-1 (LUT-1))
[2] An increase in diversity is defined as "at least three of the following on site and/or off site within a quarter-mile: Residential Development, Retail Development, Park, Open Space, or Office." (Source CAPCOA LUT-3)
[3] In order to qualify for VMT reductions, "Residential development projects of five or more dwelling units must provide a deed restricted low-income housing component on-site" CAPCOA utilizes a formula to determine the VMT reductions in relation to percentage below market rate. At a low range, 1% below market rate housing equals to .04% VMT reductions. At a At a high range, 30% below market rate housing equals to 1.2% VMT reductions. (Source: CAPCOA LUT-6)
[4] Percentage reduction in conventional parking provision rates (per ITE rates) should serve as a typical ceiling for the reduction calculation. ITE rates are used as baseline conditions to measure the effectiveness of this strategy. (Source CAPCOA PDT-1)
[5] Measure would need to be in place for the life of the Project. CAPCOA states that "the project will include a ride-sharing program as well as a permanent transportation management association membership and funding requirement. Funding may be provided by Community Facilities, District, or County Service Area, or other non-revocable funding mechanism." (Source: CAPCOA TRT-3)

4.5 Level 2 VMT Mitigation Measures

Mitigation Exchange or Mitigation Bank -TBD

4.6 Unmitigated Projects

If a project applicant has worked with the City and has exhausted all mitigation opportunities, the City will work with the applicant to determine if a Statement of Overriding Consideration is appropriate. However, all feasible mitigation measures must be exhausted, including alterations to the project description, if applicable.

5. LOS Transportation Analysis

A proposed project may be required to prepare a LOS Transportation Analysis per 2040 General Plan Policy M-8.1 for the purposes of planning and designing street improvements as well as supporting implementation of the County CMP.

City staff will scope the LOS Transportation Analysis with the applicant or the applicant's consultant. The scope of the LOS analysis may include, but not be limited to:

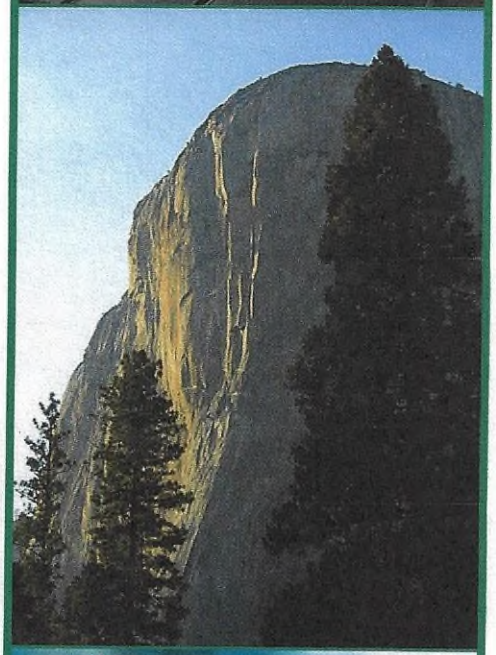
- Collection of existing intersection and mid-block vehicle count data
- Evaluation of intersections utilizing the intersection capacity utilization (ICU) methodology
- Evaluation of multiple existing, near-term or long-term scenarios
- Identification of proposed and potential roadway improvements
- Calculation of fair-share cost contributions for implementation of improvements that improve LOS

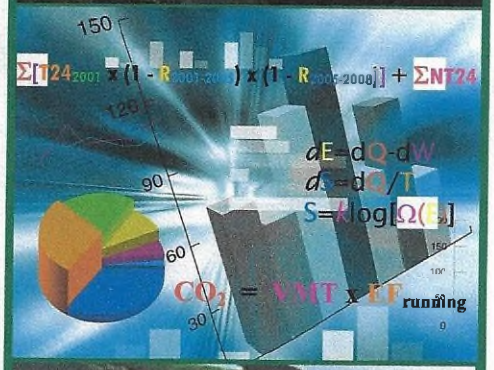
The City's methodology for evaluating intersection performance is generally consistent with the County CMP. The City utilizes a performance standard of LOS D or better and the County CMP utilizes LOS E or better. The performance criteria utilized by the City for a LOS analysis is summarized in **Table 6**.

CAPCOA

CALIFORNIA AIR POLLUTION CONTROL OFFICERS ASSOCIATION









Quantifying Greenhouse Gas Mitigation Measures

A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures

August, 2010

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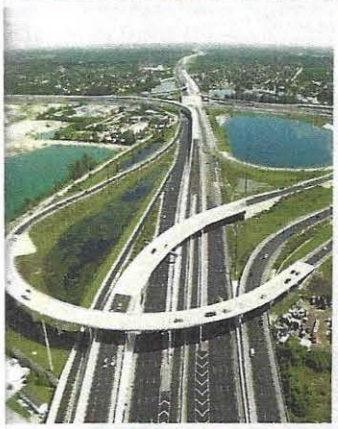
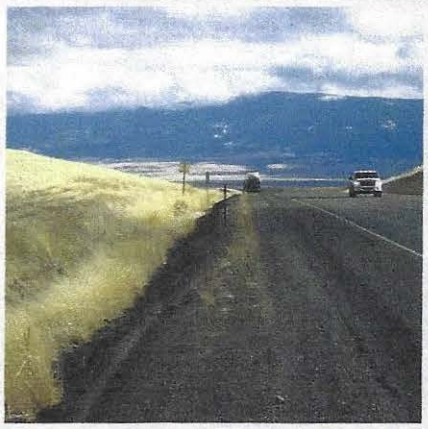
American Association of State Highway and Transportation Officials
AASHTO

A Policy on Geometric Design of Highways and Streets

2018
7th Edition






U.S. Customary	Metric
$d_B = 1.075 \frac{V^2}{a}$	$d_B = 0.039 \frac{V^2}{a}$
where:	where:
d_B = braking distance, ft	d_B = braking distance, m
V = design speed, mph	V = design speed, km/h
a = deceleration rate, ft/s²	a = deceleration rate, m/s²

(3-1)

Studies documented in the literature (*19*) show that most drivers decelerate at a rate greater than 14.8 ft/s² [4.5 m/s²] when confronted with the need to stop for an unexpected object in the roadway. Approximately 90 percent of all drivers decelerate at rates greater than 11.2 ft/s² [3.4 m/s²]. Such decelerations are within the driver's capability to stay within his or her lane and maintain steering control during the braking maneuver on wet surfaces. Therefore, 11.2 ft/s² [3.4 m/s²] (a comfortable deceleration for most drivers) is recommended as the deceleration threshold for determining stopping sight distance. Implicit in the choice of this deceleration threshold is the assessment that most vehicle braking systems and the tire-pavement friction levels of most roadways are capable of providing a deceleration rate of at least 11.2 ft/s² [3.4 m/s²]. The friction available on most wet pavement surfaces and the capabilities of most vehicle braking systems can provide braking friction that exceeds this deceleration rate.

Table 3-1. Stopping Sight Distance on Level Roadways

U.S. Customary					Metric				
Design Speed (mph)	Brake Reaction Distance (ft)	Braking Distance on Level (ft)	Stopping Sight Distance		Design Speed (km/h)	Brake Reaction Distance (m)	Braking Distance on Level (m)	Stopping Sight Distance	
			Calculated (ft)	Design (ft)				Calculated (m)	Design (m)
15	55.1	21.6	76.7	80	20	13.9	4.6	18.5	20
20	73.5	38.4	111.9	115	30	20.9	10.3	31.2	35
25	91.9	60.0	151.9	155	40	27.8	18.4	46.2	50
30	110.3	86.4	196.7	200	50	34.8	28.7	63.5	65
35	128.6	117.6	246.2	250	60	41.7	41.3	83.0	85
40	147.0	153.6	300.6	305	70	48.7	56.2	104.9	105
45	165.4	194.4	359.8	360	80	55.6	73.4	129.0	130
50	183.8	240.0	423.8	425	90	62.6	92.9	155.5	160
55	202.1	290.3	492.4	495	100	69.5	114.7	184.2	185
60	220.5	345.5	566.0	570	110	76.5	138.8	215.3	220
65	238.9	405.5	644.4	645	120	83.4	165.2	248.6	250
70	257.3	470.3	727.6	730	130	90.4	193.8	284.2	285
75	275.6	539.9	815.5	820	140	97.3	224.8	322.1	325
80	294.0	614.3	908.3	910					
85	313.5	693.5	1007.0	1010					

Note: Brake reaction distance predicated on a time of 2.5 s; deceleration rate of 11.2 ft/s² [3.4 m/s²] used to determine calculated sight distance.

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AIR QUALITY AND LAND USE HANDBOOK: A COMMUNITY HEALTH PERSPECTIVE



April 2005

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To My Local Government Colleagues....

I am pleased to introduce this informational guide to air quality and land use issues focused on community health. As a former county supervisor, I know from experience the complexity of local land use decisions. There are multiple factors to consider and balance. This document provides important public health information that we hope will be considered along with housing needs, economic development priorities, and other quality of life issues.

An important focus of this document is prevention. We hope the air quality information provided will help inform decision-makers about the benefits of avoiding certain siting situations. The overarching goal is to avoid placing people in harm's way. Recent studies have shown that public exposure to air pollution can be substantially elevated near freeways and certain other facilities. What is encouraging is that the health risk is greatly reduced with distance. For that reason, we have provided some general recommendations aimed at keeping appropriate distances between sources of air pollution and land uses such as residences.

Land use decisions are a local government responsibility. The Air Resources Board's role is advisory and these recommendations do not establish regulatory standards of any kind. However, we hope that the information in this document will be seriously considered by local elected officials and land use agencies. We also hope that this document will promote enhanced communication between land use agencies and local air pollution control agencies. We developed this document in close coordination with the California Air Pollution Control Officers Association with that goal in mind.

I hope you find this document both informative and useful.

Barbara Riordan

Mrs. Barbara Riordian
Interim Chairman
California Air Resources Board

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Acknowledgments

The ARB staff would like to acknowledge the exceptional contributions made to this document by members of the ARB Environmental Justice Stakeholders Group. Since 2001, ARB staff has consistently relied on this group to provide critical and constructive input on implementing the specifics of ARB's environmental justice policies and actions. The Stakeholders Group is convened by the ARB, and comprised of representatives from local land use and air agencies, community interest groups, environmental justice organizations, academia, and business. Their assistance and suggestions throughout the development of this Handbook have been invaluable.

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Executive Summary

The Air Resources Board's (ARB) primary goal in developing this document is to provide information that will help keep California's children and other vulnerable populations out of harm's way with respect to nearby sources of air pollution. Recent air pollution studies have shown an association between respiratory and other non-cancer health effects and proximity to high traffic roadways. Other studies have shown that diesel exhaust and other cancer-causing chemicals emitted from cars and trucks are responsible for much of the overall cancer risk from airborne toxics in California. Also, ARB community health risk assessments and regulatory programs have produced important air quality information about certain types of facilities that should be considered when siting new residences, schools, day care centers, playgrounds, and medical facilities (i.e., sensitive land uses). Sensitive land uses deserve special attention because children, pregnant women, the elderly, and those with existing health problems are especially vulnerable to the non-cancer effects of air pollution. There is also substantial evidence that children are more sensitive to cancer-causing chemicals.

Focusing attention on these siting situations is an important preventative action. ARB and local air districts have comprehensive efforts underway to address new and existing air pollution sources under their respective jurisdictions. The issue of siting is a local government function. As more data on the connection between proximity and health risk from air pollution become available, it is essential that air agencies share what we know with land use agencies. We hope this document will serve that purpose.

The first section provides ARB recommendations regarding the siting of new sensitive land uses near freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities. This list consists of the air pollution sources that we have evaluated from the standpoint of the proximity issue. It is based on available information and reflects ARB's primary areas of jurisdiction – mobile sources and toxic air contaminants. A key air pollutant common to many of these sources is particulate matter from diesel engines. Diesel particulate matter (diesel PM) is a carcinogen identified by ARB as a toxic air contaminant and contributes to particulate pollution statewide.

Reducing diesel particulate emissions is one of ARB's highest public health priorities and the focus of a comprehensive statewide control program that is reducing diesel PM emissions each year. ARB's long-term goal is to reduce diesel PM emissions 85% by 2020. However, cleaning up diesel engines will take time as new engine standards phase in and programs to accelerate fleet turnover or retrofit existing engines are implemented. Also, these efforts are reducing diesel particulate emissions on a statewide basis, but do not yet capture every site where diesel vehicles and engines may congregate. Because living or going to school too close to such air pollution sources may increase both cancer and non-cancer health risks, we are recommending that proximity be considered in the siting of new sensitive land uses.

There are also other key toxic air contaminants associated with specific types of facilities. Most of these are subject to stringent state and local air district regulations. However, what we know today indicates that keeping new homes and other sensitive land uses from siting too close to such facilities would provide additional health protection. Chrome platers are a prime example of facilities that should not be located near vulnerable communities because of the cancer health risks from exposure to the toxic material used during their operations.

In addition to source specific recommendations, we also encourage land use agencies to use their planning processes to ensure the appropriate separation of industrial facilities and sensitive land uses. While we provide some suggestions, how to best achieve that goal is a local issue. In the development of these guidelines, we received valuable input from local government about the spectrum of issues that must be considered in the land use planning process. This includes addressing housing and transportation needs, the benefits of urban infill, community economic development priorities, and other quality of life issues. All of these factors are important considerations. The recommendations in the Handbook need to be balanced with other State and local policies.

Our purpose with this document is to highlight the potential health impacts associated with proximity to air pollution sources so planners explicitly consider this issue in planning processes. We believe that with careful evaluation, infill development, mixed use, higher density, transit-oriented development, and other concepts that benefit regional air quality can be compatible with protecting the health of individuals at the neighborhood level. One suggestion for achieving this goal is more communication between air agencies and land use planners. Local air districts are an important resource that should be consulted regarding sources of air pollution in their jurisdictions. ARB staff will also continue to provide updated technical information as it becomes available.

Our recommendations are as specific as possible given the nature of the available data. In some cases, like refineries, we suggest that the siting of new sensitive land uses should be avoided immediately downwind. However, we leave definition of the size of this area to local agencies based on facility specific considerations. Also, project design that would reduce air pollution exposure may be part of the picture and we encourage consultation with air agencies on this subject.

In developing the recommendations, our first consideration was the adequacy of the data available for an air pollution source category. Using that data, we assessed whether we could reasonably characterize the relative exposure and health risk from a proximity standpoint. That screening provided the list of air pollution sources that we were able to address with specific recommendations. We also considered the practical implications of making hard and fast recommendations where the potential impact area is large, emissions will be reduced with time, and air agencies are in the process of looking at options for additional emission control. In the end, we tailored our recommendations to minimize the highest exposures for each source category independently. Due to the large variability in relative risk in the source categories, we chose not to apply

a uniform, quantified risk threshold as is typically done in air quality permitting programs. Instead, because these guidelines are not regulatory or binding on local agencies, we took a more qualitative approach in developing the distance-based recommendations.

Where possible, we recommend a minimum separation between a new sensitive land use and known air pollution risks. In other cases, we acknowledge that the existing health risk is too high in a relatively large area, that air agencies are working to reduce that risk, and that in the meantime, we recommend keeping new sensitive land uses out of the highest exposure areas. However, it is critical to note that our implied identification of the high exposure areas for these sources does not mean that the risk in the remaining impact area is insignificant. Rather, we hope this document will bring further attention to the potential health risk throughout the impact area and help garner support for our ongoing efforts to reduce health risk associated with air pollution sources. Areas downwind of major ports, rail yards, and other inter-modal transportation facilities are prime examples.

We developed these recommendations as a means to share important public health information. The underlying data are publicly available and referenced in this document. We also describe our rationale and the factors considered in developing each recommendation, including data limitations and uncertainties. These recommendations are advisory and should not be interpreted as defined "buffer zones." We recognize the opportunity for more detailed site-specific analyses always exists, and that there is no "one size fits all" solution to land use planning.

As California continues to grow, we collectively have the opportunity to use all the information at hand to avoid siting scenarios that may pose a health risk. As part of ARB's focus on communities and children's health, we encourage land use agencies to apply these recommendations and work more closely with air agencies. We also hope that this document will help educate a wider audience about the value of preventative action to reduce environmental exposures to air pollution.

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1. ARB Recommendations on Siting New Sensitive Land Uses

Protecting California's communities and our children from the health effects of air pollution is one of the most fundamental goals of state and local air pollution control programs. Our focus on children reflects their special vulnerability to the health impacts of air pollution. Other vulnerable populations include the elderly, pregnant women, and those with serious health problems affected by air pollution. With this document, we hope to more effectively engage local land use agencies as partners in our efforts to reduce health risk from air pollution in all California communities.

Later sections emphasize the need to strengthen the connection between air quality and land use in both planning and permitting processes. Because the siting process for many, but not all air pollution sources involves permitting by local air districts, there is an opportunity for interagency coordination where the proposed location might pose a problem. To enhance the evaluation process from a land use perspective, section 4 includes recommended project related questions to help screen for potential proximity related issues.

Unlike industrial and other stationary sources of air pollution, the siting of new homes or day care centers does not require an air quality permit. Because these situations fall outside the air quality permitting process, it is especially important that land use agencies be aware of potential air pollution impacts.

The following recommendations address the issue of siting "sensitive land uses" near specific sources of air pollution; namely:

- High traffic freeways and roads
- Distribution centers
- Rail yards
- Ports
- Refineries
- Chrome plating facilities
- Dry cleaners
- Large gas dispensing facilities

The recommendations for each category include a summary of key information and guidance on what to avoid from a public health perspective.

Sensitive individuals refer to those segments of the population most susceptible to poor air quality (i.e., children, the elderly, and those with pre-existing serious health problems affected by air quality). Land uses where sensitive individuals are most likely to spend time include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities (sensitive sites or sensitive land uses).

We are characterizing sensitive land uses as simply as we can by using the example of residences, schools, day care centers, playgrounds, and medical facilities. However, a variety of facilities are encompassed. For example, residences can include houses, apartments, and senior living complexes. Medical facilities can include hospitals, convalescent homes, and health clinics. Playgrounds could be play areas associated with parks or community centers.

In developing these recommendations, ARB first considered the adequacy of the data available for each air pollution source category. We assessed whether we could generally characterize the relative exposure and health risk from a proximity standpoint. The documented non-cancer health risks include triggering of asthma attacks, heart attacks, and increases in daily mortality and hospitalization for heart and respiratory diseases. These health impacts are well documented in epidemiological studies, but less easy to quantify from a particular air pollution source. Therefore, the cancer health impacts are used in this document to provide a picture of relative risk. This screening process provided the list of source categories we were able to address with specific recommendations. In evaluating the available information, we also considered the practical implications of making hard and fast recommendations where the potential impact area is large, emissions will be reduced with time, and air agencies are in the process of looking at options for additional emission control. Due to the large variability in relative risk between the source categories, we chose not to apply a uniform, quantified risk threshold as is typically done in regulatory programs. Therefore, in the end, we tailored our recommendations to minimize the highest exposures for each source category independently. Additionally, because this guidance is not regulatory or binding on local agencies, we took a more qualitative approach to developing distance based recommendations.

Where possible, we recommend a minimum separation between new sensitive land uses and existing sources. However, this is not always possible, particularly where there is an elevated health risk over large geographical areas. Areas downwind of ports and rail yards are prime examples. In such cases, we recommend doing everything possible to avoid locating sensitive receptors within the highest risk zones. Concurrently, air agencies and others will be working to reduce the overall risk through controls and measures within their scope of authority.

The recommendations were developed from the standpoint of siting new sensitive land uses. Project-specific data for new and existing air pollution sources are available as part of the air quality permitting process. Where such information is available, it should be used. Our recommendations are designed to fill a gap where information about existing facilities may not be readily available. These recommendations are only guidelines and are not designed to substitute for more specific information if it exists.

A summary of our recommendations is shown in Table 1-1. The basis and references[1] supporting each of these recommendations, including health studies, air quality modeling and monitoring studies is discussed below beginning with freeways and summarized in Table 1-2. As new information becomes available, it will be included on ARB's community health web page.

[1]Detailed information on these references are available on ARB's website at: http://www.ARB.ca.gov/ch/landuse.htm.

Table 1-1

Recommendations on Siting New Sensitive Land Uses Such As Residences, Schools, Daycare Centers, Playgrounds, or Medical Facilities*

Source Category	Advisory Recommendations
Freeways and High-Traffic Roads	• Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.
Distribution Centers	• Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week). • Take into account the configuration of existing distribution centers and avoid locating residences and other new sensitive land uses near entry and exit points.
Rail Yards	• Avoid siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard. • Within one mile of a rail yard, consider possible siting limitations and mitigation approaches.
Ports	• Avoid siting of new sensitive land uses immediately downwind of ports in the most heavily impacted zones. Consult local air districts or the ARB on the status of pending analyses of health risks.
Refineries	• Avoid siting new sensitive land uses immediately downwind of petroleum refineries. Consult with local air districts and other local agencies to determine an appropriate separation.
Chrome Platers	• Avoid siting new sensitive land uses within 1,000 feet of a chrome plater.
Dry Cleaners Using Perchloro-ethylene	• Avoid siting new sensitive land uses within 300 feet of any dry cleaning operation. For operations with two or more machines, provide 500 feet. For operations with 3 or more machines, consult with the local air district. • Do not site new sensitive land uses in the same building with perc dry cleaning operations.
Gasoline Dispensing Facilities	• Avoid siting new sensitive land uses within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater). A 50 foot separation is recommended for typical gas dispensing facilities.

*Notes:

- These recommendations are advisory. Land use agencies have to balance other considerations, including housing and transportation needs, economic development priorities, and other quality of life issues.

- Recommendations are based primarily on data showing that the air pollution exposures addressed here (i.e., localized) can be reduced as much as 80% with the recommended separation.
- The relative risk for these categories varies greatly (see Table 1-2). To determine the actual risk near a particular facility, a site-specific analysis would be required. Risk from diesel PM will decrease over time as cleaner technology phases in.
- These recommendations are designed to fill a gap where information about existing facilities may not be readily available and are not designed to substitute for more specific information if it exists. The recommended distances take into account other factors in addition to available health risk data (see individual category descriptions).
- Site-specific project design improvements may help reduce air pollution exposures and should also be considered when siting new sensitive land uses.
- This table does not imply that mixed residential and commercial development in general is incompatible. Rather it focuses on known problems like dry cleaners using perchloroethylene that can be addressed with reasonable preventative actions.
- A summary of the basis for the distance recommendations can be found in Table 1-2.

Table 1-2

Summary of Basis for Advisory Recommendations

Source Category	Range of Relative Cancer Risk[1,2]	Summary of Basis for Advisory Recommendations
Freeways and High-Traffic Roads	300 – 1,700	• In traffic-related studies, the additional non-cancer health risk attributable to proximity was seen within 1,000 feet and was strongest within 300 feet. California freeway studies show about a 70% drop off in particulate pollution levels at 500 feet.
Distribution Centers[3]	Up to 500	• Because ARB regulations will restrict truck idling at distribution centers, transport refrigeration unit (TRU) operations are the largest onsite diesel PM emission source followed by truck travel in and out of distribution centers. • Based on ARB and South Coast District emissions and modeling analyses, we estimate an 80 percent drop-off in pollutant concentrations at approximately 1,000 feet from a distribution center.
Rail Yards	Up to 500	• The air quality modeling conducted for the Roseville Rail Yard Study predicted the highest impact is within 1,000 feet of the Yard, and is associated with service and maintenance activities. The next highest impact is between a half to one mile of the Yard, depending on wind direction and intensity.
Ports	Studies underway	• ARB will evaluate the impacts of ports and develop a new comprehensive plan that will describe the steps needed to reduce public health impacts from port and rail activities in California. In the interim, a general advisory is appropriate based on the magnitude of diesel PM emissions associated with ports.
Refineries	Under 10	• Risk assessments conducted at California refineries show risks from air toxics to be under 10 chances of cancer per million.[4] • Distance recommendations were based on the amount and potentially hazardous nature of many of the pollutants released as part of the refinery process, particularly during non-routine emissions releases.
Chrome Platers	10-100	• ARB modeling and monitoring studies show localized risk of hexavalent chromium diminishing significantly at 300 feet. There are data limitations in both the modeling and monitoring studies. These include variability of plating activities and uncertainty of emissions such as fugitive dust. Hexavalent chromium is one of the most potent toxic air contaminants. Considering these factors, a distance of 1,000 feet was used as a precautionary measure.
Dry Cleaners Using Perchloro-ethylene (perc)	15-150	• Local air district studies indicate that individual cancer risk can be reduced by as much as 75 percent by establishing a 300 foot separation between a sensitive land use and a one-machine perc dry cleaning operation. For larger operations (2 machines or more), a separation of 500 feet can reduce risk by over 85 percent.

Source Category	Range of Relative Cancer Risk[1,2]	Summary of Basis for Advisory Recommendations
Gasoline Dispensing Facilities (GDF)[5]	Typical GDF: Less than 10 Large GDF: Between Less than 10 and 120	• Based on the CAPCOA Gasoline Service Station Industry-wide Risk Assessment Guidelines, most typical GDFs (less than 3.6 million gallons per year) have a risk of less than 10 at 50 feet under urban air dispersion conditions. Over the last few years, there has been a growing number of extremely large GDFs with sales over 3.6 and as high as 19 million gallons per year. Under rural air dispersion conditions, these large GDFs can pose a larger risk at a greater distance.

[1]For cancer health effects, risk is expressed as an estimate of the increased chances of getting cancer due to facility emissions over a 70-year lifetime. This increase in risk is expressed as chances in a million (e.g., 10 chances in a million).

[2]The estimated cancer risks are a function of the proximity to the specific category and were calculated independent of the regional health risk from air pollution. For example, the estimated regional cancer risk from air toxics in the Los Angeles region (South Coast Air Basin) is approximately 1,000 in a million.

[3]Analysis based on refrigerator trucks.

[4]Although risk assessments performed by refineries indicate they represent a low cancer risk, there is limited data on non-cancer effects of pollutants that are emitted from these facilities. Refineries are also a source of non-routine emissions and odors.

[5]A typical GDF in California dispenses under 3.6 million gallons of gasoline per year. The cancer risk for this size facility is likely to be less than 10 in a million at the fence line under urban air dispersion conditions.

A large GDF has fuel throughputs that can range from 3.6 to 19 million gallons of gasoline per year. The upper end of the risk range (i.e., 120 in a million) represents a hypothetical worst case scenario for an extremely large GDF under rural air dispersion conditions.

Freeways and High Traffic Roads

Air pollution studies indicate that living close to high traffic and the associated emissions may lead to adverse health effects beyond those associated with regional air pollution in urban areas. Many of these epidemiological studies have focused on children. A number of studies identify an association between adverse non-cancer health effects and living or attending school near heavily traveled roadways (see findings below). These studies have reported associations between residential proximity to high traffic roadways and a variety of respiratory symptoms, asthma exacerbations, and decreases in lung function in children.

One such study that found an association between traffic and respiratory symptoms in children was conducted in the San Francisco Bay Area. Measurements of traffic-related pollutants showed concentrations within 300 meters (approximately 1,000 feet) downwind of freeways were higher than regional values. Most other studies have assessed exposure based on proximity factors such as distance to freeways or traffic density.

These studies linking traffic emissions with health impacts build on a wealth of data on the adverse health effects of ambient air pollution. The data on the effects of proximity to traffic-related emissions provides additional information that can be used in land use siting and regulatory actions by air agencies. The key observation in these studies is that close proximity increases both exposure and the potential for adverse health effects. Other effects associated with traffic emissions include premature death in elderly individuals with heart disease.

Key Health Findings

- Reduced lung function in children was associated with traffic density, especially trucks, within 1,000 feet and the association was strongest within 300 feet. (Brunekreef, 1997)
- Increased asthma hospitalizations were associated with living within 650 feet of heavy traffic and heavy truck volume. (Lin, 2000)
- Asthma symptoms increased with proximity to roadways and the risk was greatest within 300 feet. (Venn, 2001)
- Asthma and bronchitis symptoms in children were associated with proximity to high traffic in a San Francisco Bay Area community with good overall regional air quality. (Kim, 2004)
- A San Diego study found increased medical visits in children living within 550 feet of heavy traffic. (English, 1999)

In these and other proximity studies, the distance from the roadway and truck traffic densities were key factors affecting the strength of the association with adverse health effects. In the above health studies, the association of traffic-related emissions with adverse health effects was seen within 1,000 feet and was

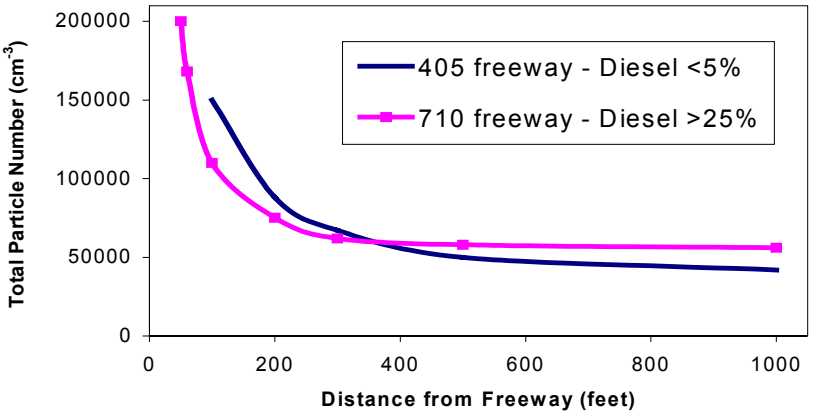
strongest within 300 feet. This demonstrates that the adverse effects diminished with distance.

In addition to the respiratory health effects in children, proximity to freeways increases potential cancer risk and contributes to total particulate matter exposure. There are three carcinogenic toxic air contaminants that constitute the majority of the known health risk from motor vehicle traffic – diesel particulate matter (diesel PM) from trucks, and benzene and 1,3-butadiene from passenger vehicles. On a typical urban freeway (truck traffic of 10,000-20,000/day), diesel PM represents about 70 percent of the potential cancer risk from the vehicle traffic. Diesel particulate emissions are also of special concern because health studies show an association between particulate matter and premature mortality in those with existing cardiovascular disease.

Distance Related Findings

A southern California study (Zhu, 2002) showed measured concentrations of vehicle-related pollutants, including ultra-fine particles, decreased dramatically within approximately 300 feet of the 710 and 405 freeways. Another study looked at the validity of using distance from a roadway as a measure of exposure

Figure 1-1
Decrease In Concentration of Freeway Diesel PM Emissions With Distance



to traffic related air pollution (Knape, 1999). This study showed that concentrations of traffic related pollutants declined with distance from the road, primarily in the first 500 feet.

These findings are consistent with air quality modeling and risk analyses done by ARB staff that show an estimated range of potential cancer risk that decreases with distance from freeways. The estimated risk varies with the local meteorology, including wind pattern. As an example, at 300 feet downwind from a freeway (Interstate 80) with truck traffic of 10,000 trucks per day, the potential cancer risk was as high as 100 in one million (ARB Roseville Rail Yard Study). The cancer health risk at 300 feet on the upwind side of the freeway was much

less. The risk at that distance for other freeways will vary based on local conditions – it may be higher or lower. However, in all these analyses the relative exposure and health risk dropped substantially within the first 300 feet. This phenomenon is illustrated in Figure 1-1.

State law restricts the siting of new schools within 500 feet of a freeway, urban roadways with 100,000 vehicles/day, or rural roadways with 50,000 vehicles with some exceptions.[2] However, no such requirements apply to the siting of residences, day care centers, playgrounds, or medical facilities. The available data show that exposure is greatly reduced at approximately 300 feet. In the traffic-related studies the additional health risk attributable to the proximity effect was strongest within 1,000 feet.

The combination of the children's health studies and the distance related findings suggests that it is important to avoid exposing children to elevated air pollution levels immediately downwind of freeways and high traffic roadways. These studies suggest a substantial benefit to a 500-foot separation.

The impact of traffic emissions is on a gradient that at some point becomes indistinguishable from the regional air pollution problem. As air agencies work to reduce the underlying regional health risk from diesel PM and other pollutants, the impact of proximity will also be reduced. In the meantime, as a preventative measure, we hope to avoid exposing more children and other vulnerable individuals to the highest concentrations of traffic-related emissions.

Recommendation

- Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.

References

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- Lin, S. et al. *"Childhood asthma hospitalization and residential exposure to state route traffic."* Environ Res. 2002;88:73-81
- Venn. et al. *"Living near a main road and the risk of wheezing illness in children."* American Journal of Respiratory and Critical Care Medicine. 2001; Vol.164, pp. 2177-2180
- Kim, J. et al. *"Traffic-related air pollution and respiratory health: East Bay Children's Respiratory Health Study."* American Journal of Respiratory and Critical Care Medicine 2004; Vol. 170. pp. 520-526

[2] Section 17213 of the California Education Code and section 21151.8 of the California Public Resources Code. See also Appendix E for a description of special processes that apply to school siting.

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Distribution Centers

Distribution centers or warehouses are facilities that serve as a distribution point for the transfer of goods. Such facilities include cold storage warehouses, goods transfer facilities, and inter-modal facilities such as ports. These operations involve trucks, trailers, shipping containers, and other equipment with diesel engines. A distribution center can be comprised of multiple centers or warehouses within an area. The size can range from several to hundreds of acres, involving a number of different transfer operations and long waiting periods. A distribution center can accommodate hundreds of diesel trucks a day that deliver, load, and/or unload goods up to seven days a week. To the extent that these trucks are transporting perishable goods, they are equipped with diesel-powered transport refrigeration units (TRUs) or TRU generator sets.

The activities associated with delivering, storing, and loading freight produces diesel PM emissions. Although TRUs have relatively small diesel-powered engines, in the normal course of business, their emissions can pose a significant health risk to those nearby. In addition to onsite emissions, truck travel in and out of distribution centers contributes to the local pollution impact.

ARB is working to reduce diesel PM emissions through regulations, financial incentives, and enforcement programs. In 2004, ARB adopted two airborne toxic control measures that will reduce diesel PM emissions associated with distribution centers. The first will limit nonessential (or unnecessary) idling of diesel-fueled commercial vehicles, including those entering from other states or countries. This statewide measure, effective in 2005, prohibits idling of a vehicle more than five minutes at any one location.[3] The elimination of unnecessary idling will reduce the localized impacts caused by diesel PM and other air toxics

[3] For further information on the Anti-Idling ATCM, please click on: http://www.arb.ca.gov/toxics/idling/outreach/factsheet.pdf

in diesel vehicle exhaust. This should be a very effective new strategy for reducing diesel PM emissions at distribution centers as well as other locations.

The second measure requires that TRUs operating in California become cleaner over time. The measure establishes in-use performance standards for existing TRU engines that operate in California, including out-of-state TRUs. The requirements are phased-in beginning in 2008, and extend to 2019.[4]

ARB also operates a smoke inspection program for heavy-duty diesel trucks that focuses on reducing truck emissions in California communities. Areas with large numbers of distribution centers are a high priority.

Key Health Findings

Diesel PM has been identified by ARB as a toxic air contaminant and represents 70 percent of the known potential cancer risk from air toxics in California. Diesel PM is an important contributor to particulate matter air pollution. Particulate matter exposure is associated with premature mortality and health effects such as asthma exacerbation and hospitalization due to aggravating heart and lung disease.

Distance Related Findings

Although distribution centers are located throughout the state, they are usually clustered near transportation corridors, and are often located in or near population centers. Diesel PM emissions from associated delivery truck traffic and TRUs at these facilities may result in elevated diesel PM concentrations in neighborhoods surrounding those sites. Because ARB regulations will restrict truck idling at distribution centers, the largest continuing onsite diesel PM emission source is the operation of TRUs. Truck travel in and out of distribution centers also contributes to localized exposures, but specific travel patterns and truck volumes would be needed to identify the exact locations of the highest concentrations.

As part of the development of ARB's regulation for TRUs, ARB staff performed air quality modeling to estimate exposure and the associated potential cancer risk of onsite TRUs for a typical distribution center. For an individual person, cancer risk estimates for air pollution are commonly expressed as a probability of developing cancer from a lifetime (i.e., 70 years) of exposure. These risks were calculated independent of regional risk. For example, the estimated regional cancer risk from air toxics in the Los Angeles region (South Coast Air Basin) is approximately 1,000 additional cancer cases per one million population.

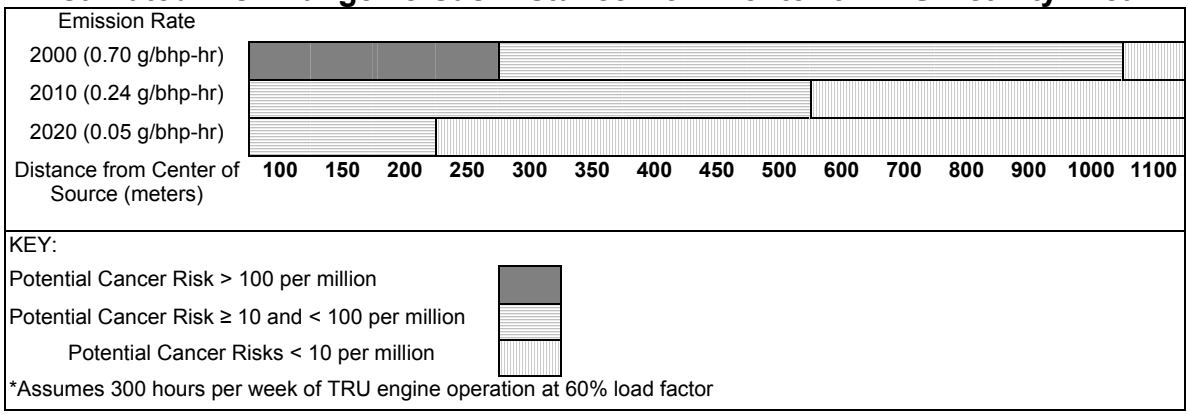
[4] For further information on the Transport Refrigeration Unit ATCM, please click on: http://www.arb.ca.gov/diesel/documents/trufaq.pdf

The diesel PM emissions from a facility are dependent on the size (horsepower), age, and number of engines, emission rates, the number of hours the truck engines and/or TRUs operate, distance, and meteorological conditions at the site. This assessment assumes a total on-site operating time for all TRUs of 300 hours per week. This would be the equivalent of 40 TRU-equipped trucks a day, each loading or unloading on-site for one hour, 12 hours a day and seven days a week.

As shown in Figure 1-2 below, at this estimated level of activity and assuming a current fleet diesel PM emission rate, the potential cancer risk would be over 100 in a million at 800 feet from the center of the TRU activity. The estimated potential cancer risk would be in the 10 to 100 per million range between 800 to 3,300 feet and fall off to less than 10 per million at approximately 3,600 feet. However with the implementation of ARB's regulation on TRUs, the risk will be significantly reduced.[5] We have not conducted a risk assessment for distribution centers based on truck traffic alone, but on an emissions basis, we would expect similar risks for a facility with truck volumes in the range of 100 per day.

Figure 1-2

Estimated Risk Range versus Distance from Center of TRU Activity Area*

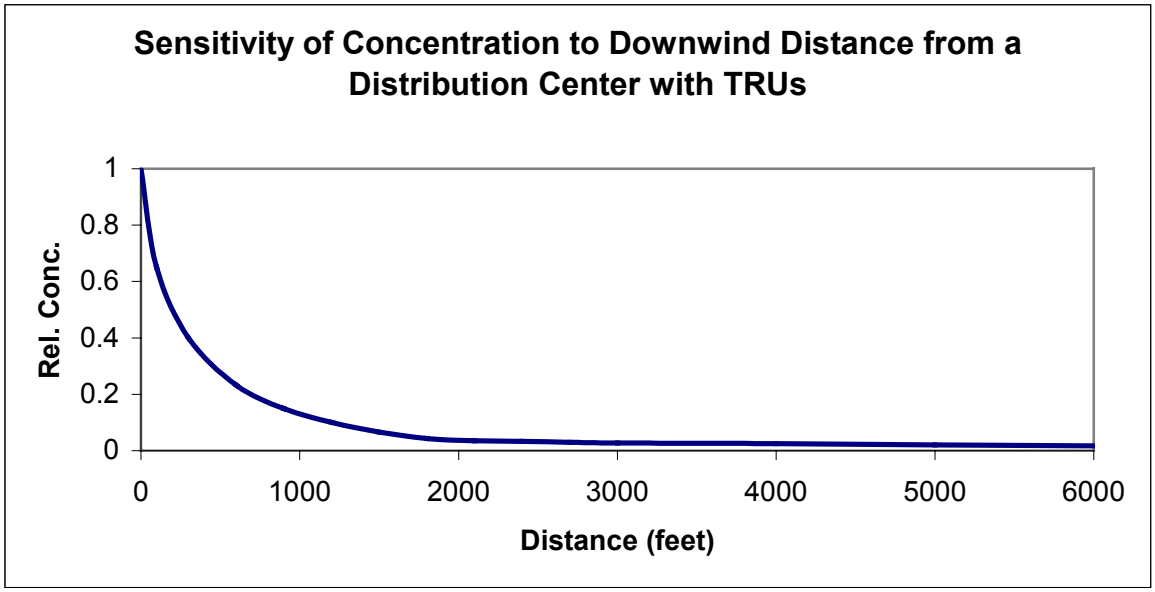


The estimated potential cancer risk level in Figure 1-2 is based on a number of assumptions that may not reflect actual conditions for a specific site. For example, increasing or decreasing the hours of diesel engine operations would change the potential risk levels. Meteorological and other facility specific parameters can also impact the results. Therefore, the results presented here are not directly applicable to any particular facility or operation. Rather, this information is intended to provide an indication as to the potential relative levels of risk that may be observed from operations at distribution centers. As shown in Figure 1-2, the estimated risk levels will decrease over time as lower-emitting diesel engines are used.

[5] These risk values assume an exposure duration of 70 years for a nearby resident and uses the methodology specified in the 2003 OEHHA health risk assessment guidelines.

Another air modeling analysis, performed by the South Coast Air Quality Management District (South Coast AQMD), evaluated the impact of diesel PM emissions from distribution center operations in the community of Mira Loma in southern California. Based on dispersion of diesel PM emissions from a large distribution center, Figure 1-3 shows the relative pollution concentrations at varying distances downwind. As Figure 1-3 shows, there is about an 80 percent drop off in concentration at approximately 1,000 feet.

Figure 1-3
Decrease In Relative Concentration of Risk With Distance



Both the ARB and the South Coast AQMD analyses indicate that providing a separation of 1,000 feet would substantially reduce diesel PM concentrations and public exposure downwind of a distribution center. While these analyses do not provide specific risk estimates for distribution centers, they provide an indication of the range of risk and the benefits of providing a separation. ARB recommends a separation of 1,000 feet based on the combination of risk analysis done for TRUs and the decrease in exposure predicted with the South Coast AQMD modeling. However, ARB staff plans to provide further information on distribution centers as we collect more data and implement the TRU control measure.

Taking into account the configuration of distribution centers can also reduce population exposure and risk. For example, locating new sensitive land uses away from the main entry and exit points helps to reduce cancer risk and other health impacts.

Recommendations

- Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating TRUs per day, or where TRU unit operations exceed 300 hours per week).

- Take into account the configuration of existing distribution centers and avoid locating residences and other new sensitive land uses near entry and exit points.

References

- *Airborne Toxic Control Measure To Limit Diesel-Fueled Commercial Motor Vehicle Idling.* ARB (August 20, 2004). Rule effectiveness date awaiting submittal of regulation to the Office of Administration Law. http://www.arb.ca.gov/regact/idling/idling.htm

- *Revised Staff Report: Initial Statement of Reasons for Proposed Rulemaking. Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets, and Facilities Where TRUs Operate.* ARB (October 28, 2003). http://www.arb.ca.gov/regact/trude03/revisor.doc

- *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis.* SCAQMD (August 2003) http://www.aqmd.gov/ceqa/handbook/diesel_analysis.doc

- *"Mira Loma Study: Analysis of the Impact of Diesel Particulate Emissions from Warehouse/Distribution Center Operations",* PowerPoint presentation. SCAQMD (July 31, 2002)

Rail Yards

Rail yards are a major source of diesel particulate air pollution. They are usually located near inter-modal facilities, which attract heavy truck traffic, and are often sited in mixed industrial and residential areas. ARB, working with the Placer County air district and Union Pacific Railroad, recently completed a study[6] of the Roseville Rail Yard (Yard) in northern California that focused on the health risk from diesel particulate. A comprehensive emissions analysis and air quality modeling were conducted to characterize the estimated potential cancer risk associated with the facility.

[6] To review the study, please click on: http://www.arb.ca.gov/diesel/documents/rrstudy.htm

The Yard encompasses about 950 acres on a one-quarter mile wide by four-mile long strip of land that parallels Interstate 80. It is surrounded by commercial, industrial, and residential properties. The Yard is one of the largest service and maintenance rail yards in the West with over 30,000 locomotives visiting annually.

Using data provided by Union Pacific Railroad, the ARB determined the number and type of locomotives visiting the Yard annually and what those locomotives were doing - moving, idling, or undergoing maintenance testing. Union Pacific provided the annual, monthly, daily, and hourly locomotive activity in the yard including locomotive movements; routes for arrival, departure, and through trains; and locomotive service and testing. This information was used to estimate the emissions of particulate matter from the locomotives, which was then used to model the potential impacts on the surrounding community.

The key findings of the study are:

- Diesel PM emissions in 2000 from locomotive operations at the Roseville Yard were estimated at about 25 tons per year.

- Of the total diesel PM in the Yard, moving locomotives accounted for about 50 percent, idling locomotives about 45 percent, and locomotive testing about five percent.

- Air quality modeling predicts potential cancer risks greater than 500 in a million (based on 70 years of exposure) in a 10-40 acre area immediately adjacent to the Yard's maintenance operations.

- The risk assessment also showed elevated cancer risk impacting a larger area covering about a 10 by 10 mile area around the Yard.

The elevated concentrations of diesel PM found in the study contribute to an increased risk of cancer and premature death due to cardiovascular disease, and non-cancer health effects such as asthma and other respiratory illnesses. The magnitude of the risk, the general location, and the size of the impacted area depended on the meteorological data used to characterize conditions at the Yard, the dispersion characteristics, and exposure assumptions. In addition to these variables, the nature of locomotive activity will influence a risk characterization at a particular rail yard. For these reasons, the quantified risk estimates in the Roseville Rail Yard Study cannot be directly applied to other rail yards. However, the study does indicate the health risk due to diesel PM from rail yards needs to be addressed. ARB, in conjunction with the U.S. Environmental Protection Agency (U.S. EPA), and local air districts, is working with the rail industry to identify and implement short term, mid-term and long-term mitigation strategies. ARB also intends to conduct a second rail study in southern California to increase its understanding of rail yard operations and the associated public health impacts.

Key Health Findings

Diesel PM has been identified by ARB as a toxic air contaminant and represents 70 percent of the known potential cancer risk from air toxics in California. Diesel PM is an important contributor to particulate matter air pollution. Particulate matter exposure is associated with premature mortality and health effects such as asthma exacerbation and hospitalization due to aggravating heart and lung disease.

Distance Related Findings

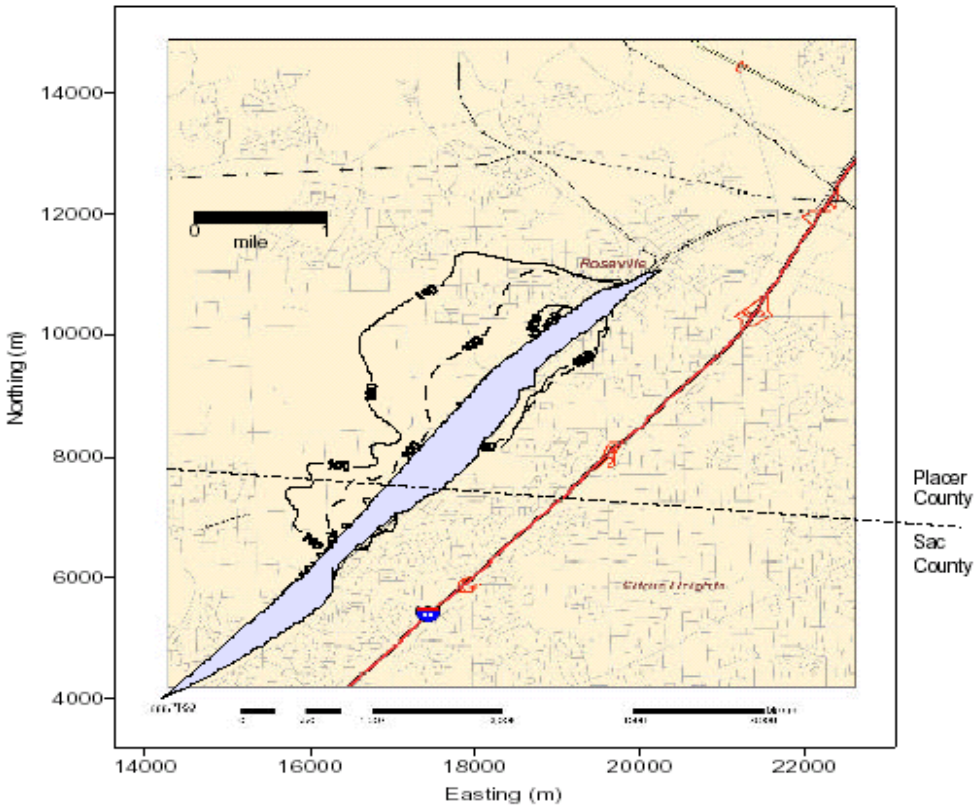
Two sets of meteorological data were used in the Roseville study because of technical limitations in the data. The size of the impact area was highly dependent on the meteorological data set used. The predicted highest impact area ranged from 10 - 40 acres with the two different meteorological data sets. This area, with risks estimated above 500 in a million, is adjacent to an area that includes a maintenance shop (see Figure 1-4). The high concentration of diesel PM emissions is due to the number of locomotives and nature of activities in this area, particularly idling locomotives.

The area of highest impact is within 1,000 feet of the Yard. The next highest impact zone as defined in the report had a predicted risk between 500 and 100 in one million and extends out between a half to one mile in some spots, depending on which meteorological conditions were assumed. The impact areas are irregular in shape making it difficult to generalize about the impact of distance at a particular location. However, the Roseville Rail Yard Study clearly indicates that the localized health risk is high, the impact area is large, and mitigation of the locomotive diesel PM emissions is needed.

For facilities like rail yards and ports, the potential impact area is so large that the real solution is to substantially reduce facility emissions. However, land use planners can avoid encroaching upon existing rail facilities and those scheduled for expansion. We also recommend that while air agencies tackle this problem, land use planners try not to add new sensitive individuals into the highest exposure areas. Finally, we recommend that land use agencies consider the potential health impacts of rail yards in their planning and permitting processes. Additional limitations and mitigation may be feasible to further reduce exposure on a site-specific basis.

Figure 1-4

Estimated Cancer Risk from the Yard
(100 and 500 in a million risk isopleths)



Notes: 100/Million Contours: Solid Line – Roseville Met Data; Dashed Line-McClellan Met Data, Urban Dispersion Coefficients, 80th Percentile Breathing Rate, All Locomotives' Activities (23 TPY), 70-Year Exposure

Recommendation

- Avoid siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard[7].

- Within one mile of a rail yard, consider possible siting limitations and mitigation approaches.

References

- *Roseville Rail Yard Study.* ARB (2004)

[7] The rail yard risk analysis was conducted for the Union Pacific rail yard in Roseville, California. This rail yard is one of the largest in the state. There are other rail yards in California with comparable levels of activity that should be considered "major" for purposes of this Handbook.

Ports

Air pollution from maritime port activities is a growing concern for regional air quality as well as air quality in nearby communities. The primary air pollutant associated with port operations is directly emitted diesel particulate. Port-related activities also result in emissions that form ozone and secondary particulate in the atmosphere. The emission sources associated with ports include diesel engine-powered ocean-going ships, harbor craft, cargo handling equipment, trucks, and locomotives. The size and concentration of these diesel engines makes ports one of the biggest sources of diesel PM in the state. For that reason, ARB has made it a top priority to reduce diesel PM emissions at the ports, in surrounding communities, and throughout California.

International, national, state, and local government collaboration is critical to reducing port emissions based on both legal and practical considerations. For example, the International Maritime Organization (IMO) and the U.S. EPA establish emission standards for ocean-going vessels and U.S.-flagged harbor craft, respectively. ARB is pursuing further federal actions to tighten these standards. In addition, ARB and local air districts are reducing emissions from ports through a variety of approaches. These include: incentive programs to fund cleaner engines, enhanced enforcement of smoke emissions from ships and trucks, use of dockside electricity instead of diesel engines, cleaner fuels for ships, harbor craft, locomotives, and reduced engine idling. The two ATCMs that limit truck idling and reduce emissions from TRUs (discussed under “Distribution Centers”) also apply to ports.

ARB is also developing several other regulations that will reduce port-related emissions. One rule would require ocean-going ships to use a cleaner marine diesel fuel to power auxiliary engines while in California coastal waters and at dock. Ships that frequently visit California ports would also be required to further reduce their emissions. ARB has adopted a rule that would require harbor craft to use the same cleaner diesel fuel used by on-road trucks in California. In 2005, ARB will consider a rule that would require additional controls for in-use harbor craft, such as the use of add-on emission controls and accelerated turnover of older engines.

Key Health Findings

Port activities are a major source of diesel PM. Diesel PM has been identified by ARB as a toxic air contaminant and represents 70 percent of the known potential cancer risk from air toxics in California. Diesel PM is an important contributor to particulate matter air pollution. Particulate matter exposure is associated with premature mortality and health effects such as asthma exacerbation and hospitalization due to aggravating heart and lung disease.

Distance Related Findings

The Ports of Los Angeles and Long Beach provide an example of the emissions impact of port operations. A comprehensive emissions inventory was completed in June 2004. These ports combined are one of the world's largest and busiest seaports. Located in San Pedro Bay, about 20 miles south of downtown Los Angeles, the port complex occupies approximately 16 square miles of land and water. Port activities include five source categories that produce diesel emissions. These are ocean-going vessels, harbor craft, cargo handling equipment, railroad locomotives, and heavy-duty trucks.

The baseline emission inventory provides emission estimates for all major air pollutants. This analysis focuses on diesel PM from in-port activity because these emissions have the most potential health impact on the areas adjacent to the port. Ocean vessels are the largest overall source of diesel PM related to the ports, but these emissions occur primarily outside of the port in coastal waters, making the impact more regional in nature.

The overall in-port emission inventory for diesel particulate for the ports of Los Angeles and Long Beach is estimated to be 550 tons per year. The emissions fall in the following major categories: ocean-going vessels (17%), harbor craft (25%), cargo handling (47%), railroad locomotive (3%), and heavy duty vehicles (8%). In addition to in-port emissions, ship, rail, and trucking activities also contribute to regional emissions and increase emissions in nearby neighborhoods. Off-port emissions associated with related ship, rail, and trucking activities contribute an additional 680 tons per year of diesel particulate at the Port of Los Angeles alone.

To put this in perspective, the diesel PM emissions estimated for the Roseville Yard in ARB's 2004 study are 25 tons per year. The potential cancer risk associated with these emissions is 100 in one million at a distance of one mile, or one half mile, depending on the data set used. This rail yard covers one and a half square miles. The Los Angeles and Long Beach ports have combined diesel PM emissions of 550 tons per year emitted from a facility that covers a much larger area - 16 miles. The ports have about twice the emission density of the rail yard - 34 tons per year per square mile compared to 16 tons per year per square mile. However, while this general comparison is illustrative of the overall size of the complex, a detailed air quality modeling analysis would be needed to assess the potential health impact on specific downwind areas near the ports.

ARB is in the process of evaluating the various port-related emission sources from the standpoint of existing emissions, growth forecasts, new control options, regional air quality impacts, and localized health risk. A number of public processes - both state and local - are underway to address various aspects of these issues. Until more of these analyses are complete, there is little basis for recommending a specific separation between new sensitive land uses and ports.

For example, the type of data we have showing the relationship between air pollutant concentrations and distance from freeways is not yet available.

Also, the complexity of the port facilities makes a site-specific analysis critical. Ports are a concentration of multiple emission sources with differing dispersion and other characteristics. In the case of the Roseville rail yard, we found a high, very localized impact associated with a particular activity, service and maintenance. By contrast, the location, size, and nature of impact areas can be expected to vary substantially for different port activities. For instance, ground level emissions from dockside activities would behave differently from ship stack level emissions.

Nonetheless, on an emissions basis alone, we expect locations downwind of ports to be substantially impacted. For that reason, we recommend that land use agencies track the current assessment efforts, and consider limitations on the siting of new sensitive land uses in areas immediately downwind of ports.

Recommendations

Avoid siting new sensitive land uses immediately downwind of ports in the most heavily impacted zones. Consult local air districts or the ARB on the status of pending analyses of health risks.

References

- *Roseville Rail Yard Study.* ARB (2004)
- Final Draft, "*Port-Wide Baseline Air Emissions Inventory."* Port of Los Angeles (June 2004)
- Final Draft, "*2002 Baseline Air Emissions Inventory."* Port of Long Beach (February 2004)

Petroleum Refineries

A petroleum refinery is a complex facility where crude oil is converted into petroleum products (primarily gasoline, diesel fuel, and jet fuel), which are then transported through a system of pipelines and storage tanks for final distribution by delivery truck to fueling facilities throughout the state. In California, most crude oil is delivered either by ship from Alaska or foreign sources, or is delivered via pipeline from oil production fields within the state. The crude oil then undergoes many complex chemical and physical reactions, which include distillation, catalytic cracking, reforming, and finishing. These refining processes have the potential to emit air contaminants, and are subject to extensive emission controls by district regulations.

As a result of these regulations covering the production, marketing, and use of gasoline and other oil by-products, California has seen significant regional air quality benefits both in terms of cleaner fuels and cleaner operating facilities. In

the 1990s, California refineries underwent significant modifications and modernization to produce cleaner fuels in response to changes in state law. Nevertheless, while residual emissions are small when compared to the total emissions controlled from these major sources, refineries are so large that even small amounts of fugitive, uncontrollable emissions and associated odors from the operations, can be significant. This is particularly the case for communities that may be directly downwind of the refinery. Odors can cause health symptoms such as nausea and headache. Also, because of the size, complexity, and vast numbers of refinery processes onsite, the occasional refinery upset or malfunction can potentially result in acute or short-term health effects to exposed individuals.

Key Health Findings

Petroleum refineries are large single sources of emissions. For volatile organic compounds (VOCs), eight of the ten largest stationary sources in California are petroleum refineries. For oxides of nitrogen (NOx), four of the ten largest stationary sources in California are petroleum refineries. Both of these compounds react in the presence of sunlight to form ozone. Ozone impacts lung function by irritating and damaging the respiratory system. Petroleum refineries are also large stationary sources of both particulate matter under 10 microns in size (PM_{10}) and particulate matter under 2.5 microns in size ($PM_{2.5}$). Exposure to particulate matter aggravates a number of respiratory illnesses, including asthma, and is associated with premature mortality in people with existing cardiac and respiratory disease. Both long-term and short-term exposure can have adverse health impacts. Finer particles pose an increased health risk because they can deposit deep in the lung and contain substances that are particularly harmful to human health. NOx are also significant contributors to the secondary formation of $PM_{2.5}$.

Petroleum refineries also emit a variety of toxic air pollutants. These air toxics vary by facility and process operation but may include: acetaldehyde, arsenic, antimony, benzene, beryllium, 1,3-butadiene, cadmium compounds, carbonyl sulfide, carbon disulfide, chlorine, dibenzofurans, diesel particulate matter, formaldehyde, hexane, hydrogen chloride, lead compounds, mercury compounds, nickel compounds, phenol, 2,3,7,8 tetrachlorodibenzo-p-dioxin, toluene, and xylenes (mixed) among others. The potential health effects associated with these air toxics can include cancer, respiratory irritation, and damage to the central nervous system, depending on exposure levels.

Distance Related Findings

Health risk assessments for petroleum refineries have shown risks from toxic air pollutants that have quantifiable health risk values to be around 10 potential cancer cases per million. Routine air monitoring and several air monitoring studies conducted in the San Francisco Bay Area (Crockett) and the South Coast Air Basin (Wilmington) have not identified significant health risks specifically

associated with refineries. However, these studies did not measure diesel PM as no accepted method currently exists, and there are many toxic air pollutants that do not have quantifiable health risk values.

In 2002, ARB published a report on the results of the state and local air district air monitoring done near oil refineries. The purpose of this evaluation was to try to determine how refinery-related emissions might impact nearby communities. This inventory of air monitoring activities included 10 ambient air monitoring stations located near refineries in Crockett and four stations near refineries in Wilmington. These monitoring results did not identify significant increased health risks associated with the petroleum refineries. In 2002-2003, ARB conducted additional monitoring studies in communities downwind of refineries in Crockett and Wilmington. These monitoring results also did not indicate significant increased health risks from the petroleum refineries.

Consequently, there are no air quality modeling or air monitoring data that provides a quantifiable basis for recommending a specific separation between refineries and new sensitive land uses. However, in view of the amount and potentially hazardous nature of many of the pollutants released as part of the refinery process, we believe the siting of new sensitive land uses immediately downwind should be avoided. Land use agencies should consult with the local air district when considering how to define an appropriate separation for refineries within their jurisdiction.

Recommendations

- Avoid siting new sensitive land uses immediately downwind of petroleum refineries. Consult with local air districts and other local agencies to determine an appropriate separation.

References

- *Review of Current Ambient Air Monitoring Activities Related to California Bay Area and South Coast Refineries. ARB (March 2002)* http://www.arb.ca.gov/aaqm/qmosqual/special/mldrefinery.pdf
- *Community Air Quality Monitoring: Special Studies – Crockett. ARB (September 2004)* http://www.arb.ca.gov/ch/communities/studies/crockett/crockett.htm
- *Wilmington Study - Air Monitoring Results. ARB (2003)* http://www.arb.ca.gov/ch/communities/studies/wilmington/wilmington.htm

Chrome Plating Operations

Chrome plating operations rely on the use of the toxic metal hexavalent chromium, and have been subject to ARB and local air district control programs for many years. Regulation of chrome plating operations has reduced statewide emissions substantially. However, due to the nature of chrome plating

operations and the highly toxic nature of hexavalent chromium, the remaining health risk to nearby residents is a continuing concern.

Chrome plating operations convert hexavalent chromium in solution to a chromium metal layer by electroplating, and are categorized based upon the thickness of the chromium metal layer applied. In “decorative plating”, a layer of nickel is first plated over a metal substrate. Following this step, a thin layer of chromium is deposited over the nickel layer to provide a decorative and protective finish, for example, on faucets and automotive wheels. “Hard chrome plating” is a process in which a thicker layer of chromium metal is deposited directly on metal substrates such as engine parts, industrial machinery, and tools to provide greater protection against corrosion and wear.

Hexavalent chromium is emitted into the air when an electric current is applied to the plating bath. Emissions are dependent upon the amount of electroplating done per year and the control requirements. A unit of production referred to as an ampere-hour represents the amount of electroplating produced. Small facilities have an annual production rate of 100,000 – 500,000 ampere-hours, while medium-size facilities may have a production rate of 500,000 to about 3 million ampere-hours. The remaining larger facilities have a range of production rates that can be as high as 80 million ampere-hours.

The control requirements, which reduce emissions from the plating tanks, vary according to the size and type of the operation. Facilities either install add-on pollution control equipment, such as filters and scrubbers, or in-tank controls, such as fume suppressants and polyballs. With this combination of controls, the overall hexavalent chromium emissions have been reduced by over 90 percent. Larger facilities typically have better controls that can achieve efficiencies greater than 99 percent. However, even with stringent controls, the lack of maintenance and good housekeeping practices can lead to problems. And, since the material itself is inherently dangerous, any lapse in compliance poses a significant risk to nearby residents.

A 2002 ARB study in the San Diego community of Barrio Logan measured unexpectedly high concentrations of hexavalent chromium near chrome platers. The facilities were located in a mixed-use area with residences nearby. The study found that fugitive dust laden with hexavalent chromium was an important source of emissions that likely contributed to the elevated cancer risk. Largely as a result of this study, ARB is in the process of updating the current requirements to further reduce the emissions from these facilities.

In December 2004, the ARB adopted an ATCM to reduce emissions of hexavalent chromium and nickel from thermal spraying operations through the installation of best available control technology. The ATCM requires all existing facilities to comply with its requirements by January 1, 2006. New and modified thermal spraying operations must comply upon initial startup. An existing thermal spraying facility may be exempt from the minimum control efficiency

requirements of the ATCM if it is located at least 1,640 feet from the nearest sensitive receptor and emits no more than 0.5 pound per year of hexavalent chromium.[8]

Key Health Findings

Hexavalent chromium is one of the most toxic air pollutants regulated by the State of California. Hexavalent chromium is a carcinogen and has been identified in worker health studies as causing lung cancer. Exposure to even very low levels of hexavalent chromium should be avoided.

The California Office of Environmental Health Hazard Assessment has found that: 1) many epidemiological studies show a strong association between hexavalent chromium exposure in the work place and respiratory cancer; and 2) all short-term assays reported show that hexavalent chromium compounds can cause damage to human DNA.

Hexavalent chromium when inhaled over a period of many years can cause a variety of non-cancer health effects. These health effects include damage to the nose, blood disorders, lung disease, and kidney damage. The non-cancer health impacts occur with exposures considerably higher than exposures causing significant cancer risks. It is less likely that the public would be exposed to hexavalent chromium at levels high enough to cause these non-cancer health effects. Non-cancer health effects, unlike cancer health effects, have a threshold or exposure level below which non-cancer health effects would not be expected.

Distance Related Findings

ARB's 2002 Barrio Logan Study measured concentrations of hexavalent chromium in the air near two chrome plating facilities. The study was conducted from December 2001 to May 2002. There were two chrome platers on the street - one decorative and one hard plater. The purpose of the study was to better understand the near source impact of hexavalent chromium emissions. Air monitors were placed at residences next to the platers and at varying distances down the street. The monitors were moved periodically to look at the spatial distribution of the impact. Source testing and facility inspections identified one of the facilities as the likely source.

The first two weeks of monitoring results showed unexpectedly high levels of hexavalent chromium at a number of the monitoring sites. The high concentrations were intermittent. The concentrations ranged from 1 to 22 ng/m3 compared to the statewide average of 0.1 ng/m3. If these levels were to continue for 70 years, the potential cancer risk would be 150 in one million. The highest value was found at an air monitor behind a house adjacent to one of the

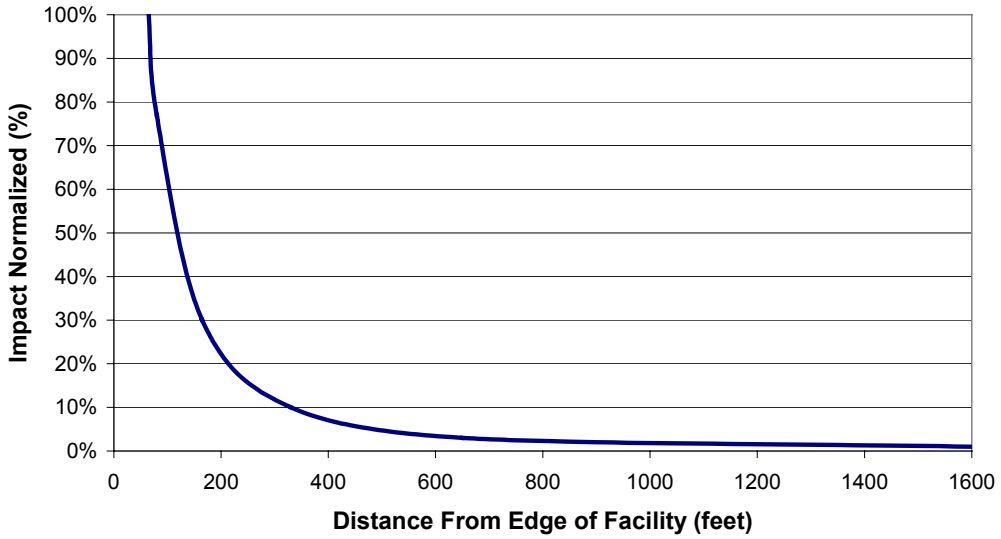
[8] For further information on the ATCM, please refer to: http://www.arb.ca.gov/regact/thermspr/thermalspr.htm

plating facilities–approximately 30 feet from the back entrance. Lower, but significant concentrations were found at an ambient air monitor 250 feet away.

The monitoring covered a period when the facility was not operating its plating tank. During this period, one of the highest concentrations was measured at an adjacent house. It appears that chromium-laden dust was responsible for high concentrations at this location since there was no plating activity at the time. Dust samples from the facility were tested and found to contain high levels of hexavalent chromium. On the day the highest concentration was measured at the house next door, a monitor 350 feet away from the plater's entrance showed very little impact. Similar proximity effects are shown in ARB modeling studies.

Figure 1-5 shows how the relative health risk varies as a function of distance from a chrome plater. This analysis is based on a medium-sized chrome plater with an annual production rate of 3 million ampere-hours. As shown in Figure 1- 5, the potential health risk drops off rapidly, with over 90 percent reduction in risk within 300 feet. This modeling was done in 2003 as part of a review of ARB's current air toxic control measure for chrome platers and is based on data from a recent ARB survey of chrome platers in California. The emission

Figure 1-5
Risk vs. Distance From Chrome Plater
(Based on plating tank emissions)



rates are only for plating operations. Because there are insufficient data available to directly quantify the impacts, the analysis does not include fugitive emissions, which the Barrio Logan analysis indicated could be significant.

Both the ARB Barrio Logan monitoring results and ARB's 2003 modeling analysis suggests that the localized emissions impact of a chrome plater diminishes significantly at 300 feet. However, in developing our recommendation, we also considered the following factors:

- some chrome platers will have higher volumes of plating activity,
- potential dust impacts were not modeled,
- we have only one monitoring study looking at the impact of distance, and,
- hexavalent chromium is one of the most potent toxic air contaminants ARB has identified.

Given these limitations in the analysis, we recommend a separation of 1,000 feet as a precautionary measure. For large chrome platers, site specific information should be obtained from the local air district.

Recommendation

- Avoid siting new sensitive land uses within 1,000 feet of a chrome plater.

References

- *Ambient Air Monitoring for Hexavalent Chromium and Metals in Barrio Logan: May 2001 through May 2002.* ARB, Monitoring and Laboratory Division (October 14, 2003)
- *Draft Barrio Logan Report.* ARB, Planning and Technical Support Division (November 2004)
- *Proposed Amendments to the Hexavalent Chromium Control Measure for Decorative and Hard Chrome Plating and Chromic Acid Anodizing Facilities.* ARB (April 1998)
- Murchison, Linda; Suer, Carolyn; Cook, Jeff. *"Neighborhood Scale Monitoring in Barrio Logan," (*AWMA Annual Conference Proceedings, June 2003)

Dry Cleaners Using Perchloroethylene (Perc Dry Cleaners)

Perchloroethylene (perc) is the solvent most commonly used by the dry cleaning industry to clean clothes or other materials. The ARB and other public health agencies have identified perc as a potential cancer-causing compound. Perc persists in the atmosphere long enough to contribute to both regional air pollution and localized exposures. Perc dry cleaners are the major source of perc emissions in California.

Since 1990, the statewide concentrations and health risk from exposure to perc has dropped over 70 percent. This is due to a number of regulatory requirements on perc dry cleaners and other sources, including degreasing operations, brake cleaners, and adhesives. ARB adopted an Airborne Toxic Control Measure (ATCM) for Perc Emissions from Dry Cleaning Operations in 1993. ARB has also prohibited the use of perc in aerosol adhesives and automotive brake cleaners.

Perc dry cleaners statewide are required to comply with ARB and local air district regulations to reduce emissions. However, even with these controls, some emissions continue to occur. Air quality studies indicate that there is still the potential for significant risks even near well-controlled dry cleaners. The South Coast AQMD has adopted a rule requiring that all new dry cleaners use alternatives to perc and that existing dry cleaners phase out the use of perc by December 2020. Over time, transition to non-toxic alternatives should occur. However, while perc continues to be used, a preventative approach should be taken to siting of new sensitive land uses.

Key Health Findings

Inhalation of perc may result in both cancer and non-cancer health effects. An assessment by California's Office of Environmental Health Hazard Assessment (OEHHA) concluded that perc is a potential human carcinogen and can cause non-cancer health effects. In addition to the potential cancer risk, the effects of long-term exposure include dizziness, impaired judgment and perception, and damage to the liver and kidneys. Workers have shown signs of liver toxicity following chronic exposure to perc, as well as kidney dysfunction and neurological effects. Non-cancer health effects occur with higher exposure levels than those associated with significant cancer risks. The public is more likely to be exposed to perchloroethylene at levels causing significant cancer risks than to levels causing non-cancer health effects. Non-cancer health effects, unlike cancer health effects, have a threshold or exposure level below which non-cancer health effects would not be expected. The ARB formally identified perc as a toxic air contaminant in October 1991.

One study has determined that inhalation of perc is the predominant route of exposure to infants living in apartments co-located in the same building with a business operating perc dry cleaning equipment. Results of air sampling within co-residential buildings indicate that dry cleaners can cause a wide range of exposures depending on the type and maintenance of the equipment. For example, a well-maintained state-of-the-art system may have risks in the range of 10 in one million, whereas a badly maintained machine with major leaks can have potential cancer risks of thousands in one million.

The California Air Pollution Control Officers Association (CAPCOA) is developing Industry-wide Risk Assessment Guidelines for Perchloroethylene Dry Cleaners which, when published, will provide detailed information on public health risk from exposure to emissions from this source.

Distance Related Findings

Risk created by perc dry cleaning is dependent on the amount of perc emissions, the type of dry cleaning equipment, proximity to the source, and how the emissions are released and dispersed (e.g., type of ventilation system, stack parameters, and local meteorology). Dry cleaners are often located near

residential areas, and near shopping centers, schools, day-care centers, and restaurants.

The vast majority of dry cleaners in California have one dry cleaning machine per facility. The South Coast AQMD estimates that an average well-controlled dry cleaner uses about 30 to 160 gallons of cleaning solvent per year, with an average of about 100 gallons. Based on these estimates, the South Coast AQMD estimates a potential cancer risk between 25 to 140 in one million at residential locations 75 feet or less from the dry cleaner, with an average of about 80 in one million. The estimate could be as high as 270 in one million for older machines.

CAPCOA's draft industry-wide risk assessment of perc dry cleaning operations indicates that the potential cancer risk for many dry cleaners may be in excess of potential cancer risk levels adopted by the local air districts. The draft document also indicates that, in general, the public's exposure can be reduced by at least 75 percent, by providing a separation distance of about 300 feet from the operation. This assessment is based on a single machine with perc use of about 100 gallons per year. At these distances, the potential cancer risk would be less than 10 potential cases per million for most scenarios.

The risk would be proportionately higher for large, industrial size, dry cleaners. These facilities typically have two or more machines and use 200 gallons or more per year of perc. Therefore, separation distances need to be greater for large dry cleaners. At a distance of 500 feet, the remaining risk for a large plant can be reduced by over 85 percent.

In California, a small number of dry cleaners that are co-located (sharing a common wall, floor, or ceiling) with a residence have the potential to expose the inhabitants of the residence to high levels of perc. However, while special requirements have been imposed on these existing facilities, the potential for exposure still exists. Avoiding these siting situations in the future is an important preventative measure.

Local air districts are a source of information regarding specific dry cleaning operations—particularly for large industrial operations with multiple machines. The 300 foot separation recommended below reflects the most common situation – a dry cleaner with only one machine. While we recommend 500 feet when there are two or more machines, site specific information should be obtained from the local air district for some very large industrial operations. Factors that can impact the risk include the number and type of machines, controls used, source configuration, building dimensions, terrain, and meteorological data.

Recommendation

- Avoid siting new sensitive land uses within 300 feet of any dry cleaning operation. For operations with two or more machines provide 500 feet. For operations with 3 or more machines, consult with the local air district.

- Do not site new sensitive land uses in the same building with perc dry cleaning operations.

References

- *Proposed Amended Rule 1421 – Control of Perchloroethylene Emissions from Dry Cleaning Systems,* Final Staff Report. South Coast AQMD. (October 2002)
- *Air Toxic Control Measure for Emissions of Perchloroethylene from Dry Cleaning Operations.* ARB (1994) (http://www.arb.ca.gov/toxics/atcm/percatcm.htm)
- *"An Assessment of Tetrachloroethylene in Human Breast Milk"*, Judith Schreiber, New York State Department of Health – Bureau of Toxic Substance Assessment, Journal of Exposure Analysis and Environmental Epidemiology, Vol.2, Suppl.2, pp. 15-26, 1992.
- Draft *Air Toxics "Hot Spots" Program Perchloroethylene Dry Cleaner Industry-wide Risk Assessment Guidelines.* (CAPCOA (November 2002)
- *Final Environmental Assessment for Proposed Amended Rule 1421 – Control of Perchloroethylene Emissions from Dry Cleaning Systems.* South Coast AQMD. (October 18, 2002)

Gasoline Dispensing Facilities

Refueling at gasoline dispensing facilities releases benzene into the air. Benzene is a potent carcinogen and is one of the highest risk air pollutants regulated by ARB. Motor vehicles and motor vehicle-related activity account for over 90 percent of benzene emissions in California. While gasoline-dispensing facilities account for a small part of total benzene emissions, near source exposures for large facilities can be significant.

Since 1990, benzene in the air has been reduced by over 75 percent statewide, primarily due to the implementation of emissions controls on motor vehicle vapor recovery equipment at gas stations, and a reduction in benzene levels in gasoline. However, benzene levels are still significant. In urban areas, average benzene exposure is equivalent to about 50 in one million.

Gasoline dispensing facilities tend to be located in areas close to residential and shopping areas. Benzene emissions from the largest gas stations may result in near source health risk beyond the regional background and district health risk thresholds. The emergence of very high gasoline throughput at large retail or

wholesale outlets makes this a concern as these types of outlets are projected to account for an increasing market share in the next few years.

Key Health Findings

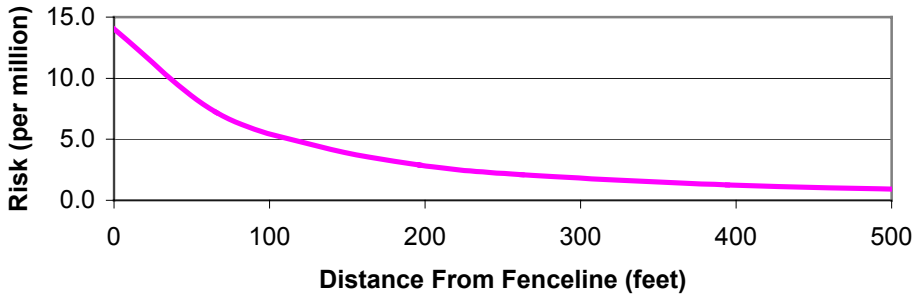
Benzene is a human carcinogen identified by ARB as a toxic air contaminant. Benzene also can cause non-cancer health effects above a certain level of exposure. Brief inhalation exposure to high concentrations can cause central nervous system depression. Acute effects include central nervous system symptoms of nausea, tremors, drowsiness, dizziness, headache, intoxication, and unconsciousness. It is unlikely that the public would be exposed to levels of benzene from gasoline dispensing facilities high enough to cause these non-cancer health effects.

Distance Related Findings

A well-maintained vapor recovery system can decrease emissions of benzene by more than 90% compared with an uncontrolled facility. Almost all facilities have emission control systems. Air quality modeling of the health risks from gasoline dispensing facilities indicate that the impact from the facilities decreases rapidly as the distance from the facility increases.

Statistics reported in the ARB's staff reports on Enhanced Vapor Recovery released in 2000 and 2002, indicated that almost 96 percent of the gasoline dispensing facilities had a throughput less than 2.4 million gallons per year. The remaining four percent, or approximately 450 facilities, had throughputs exceeding 2.4 million gallons per year. For these stations, the average gasoline throughput was 3.6 million gallons per year.

Figure 1-6
Gasoline Dispensing Facility Health Risk
for 3,600,000 gal/yr throughput



As shown in Figure 1-6, the risk levels for a gasoline dispensing facility with a throughput of 3.6 million gallons per year is about 10 in one million at a distance of 50 feet from the fenceline. However, as the throughput increases, the potential risk increases.

As mentioned above, air pollution levels in the immediate vicinity of large gasoline dispensing facilities may be higher than the surrounding area (although tailpipe emissions from motor vehicles dominates the health impacts). Very large gasoline dispensing facilities located at large wholesale and discount centers may dispense nine million gallons of gasoline per year or more. At nine million gallons, the potential risk could be around 25 in one million at 50 feet, dropping to about five in one million at 300 feet. Some facilities have throughputs as high as 19 million gallons.

Recommendation

- Avoid siting new sensitive land uses within 300 feet of a large gasoline dispensing facility (defined as a facility with a throughput of 3.6 million gallons per year or greater). A 50 foot separation is recommended for typical gas dispensing facilities.

References

- *Gasoline Service Station Industry-wide Risk Assessment Guidelines.* California Air Pollution Control Officers Association (December 1997 and revised November 1, 2001)
- *Staff Report on Enhanced Vapor Recovery.* ARB (February 4, 2000)
- *The California Almanac of Emissions and Air Quality.* ARB (2004)
- *Staff Report on Enhanced Vapor Recovery Technology Review.* ARB (October 2002)

Other Facility Types that Emit Air Pollutants of Concern

In addition to source specific recommendations, Table 1-3 includes a list of other industrial sources that could pose a significant health risk to nearby sensitive individuals depending on a number of factors. These factors include the amount of pollutant emitted and its toxicity, the distance to nearby individuals, and the type of emission controls in place. Since these types of facilities are subject to air permits from local air districts, facility specific information should be obtained where there are questions about siting a sensitive land use close to an industrial facility.

Potential Sources of Odor and Dust Complaints

Odors and dust from commercial activities are the most common sources of air pollution complaints and concerns from the public. Land use planning and permitting processes should consider the potential impacts of odor and dust on surrounding land uses, and provide for adequate separation between odor and dust sources. As with other types of air pollution, a number of factors need to be considered when determining an adequate distance or mitigation to avoid odor or

Table 1-3 – Examples of Other Facility Types That Emit[1] Air Pollutants of Concern

Categories	Facility Type	Air Pollutants of Concern
Commercial		
	Autobody Shops	Metals, Solvents
	Furniture Repair	Solvents[2], Methylene Chloride
	Film Processing Services	Solvents, Perchloroethylene
	Distribution Centers	Diesel Particulate Matter
	Printing Shops	Solvents
	Diesel Engines	Diesel Particulate Matter
Industrial		
	Construction	Particulate Matter, Asbestos
	Manufacturers	Solvents, Metals
	Metal Platers, Welders, Metal Spray (flame spray) Operations	Hexavalent Chromium, Nickel, Metals
	Chemical Producers	Solvents, Metals
	Furniture Manufacturers	Solvents
	Shipbuilding and Repair	Hexavalent chromium and other metals, Solvents
	Rock Quarries and Cement Manufacturers	Particulate Matter, Asbestos
	Hazardous Waste Incinerators	Dioxin, Solvents, Metals
	Power Plants	Benzene, Formaldehyde, Particulate Matter
	Research and Development Facilities	Solvents, Metals, etc.
Public		
	Landfills	Benzene, Vinyl Chloride, Diesel Particulate Matter
	Waste Water Treatment Plants	Hydrogen Sulfide
	Medical Waste Incinerators	Dioxin, Benzene, PAH, PCBs, 1,3-Butadiene
	Recycling, Garbage Transfer Stations	Diesel Particulate Matter
	Municipal Incinerators	Dioxin, Benzene, PAH, PCBs, 1,3-Butadiene
Transportation		
	Truck Stops	Diesel Particulate Matter
Agricultural Operations		
	Farming Operations	Diesel Particulate Matter, VOCs, NOx, PM10, CO, SOx, Pesticides
	Livestock and Dairy Operations	Ammonia, VOCs, PM10

[1]Not all facilities will emit pollutants of concern due to process changes or chemical substitution. Consult the local air district regarding specific facilities.
[2]Some solvents may emit toxic air pollutants, but not all solvents are toxic air contaminants.

dust complaints in a specific situation. Local air districts should be consulted for advice when these siting situations arise.

Table 1-4 lists some of the most common sources of odor complaints received by local air districts. Complaints about odors are the responsibility of local air districts and are covered under state law. The types of facilities that can cause odor complaints are varied and can range from small commercial facilities to large industrial facilities, and may include waste disposal and recycling operations. Odors can cause health symptoms such as nausea and headache. Facilities with odors may also be sources of toxic air pollutants (See Table 1-3). Some common sources of odors emitted by facilities are sulfur compounds, organic solvents, and the decomposition/digestion of biological materials. Because of the subjective nature of an individual's sensitivity to a particular type of odor, there is no specific rule for assigning appropriate separations from odor sources. Under the right meteorological conditions, some odors may still be offensive several miles from the source.

Table 1-4
Sources of Odor Complaints

- Sewage Treatment Plants
- Landfills
- Recycling Facilities
- Waste Transfer Stations
- Petroleum Refineries
- Biomass Operations
- Autobody Shops
- Coating Operations
- Fiberglass Manufacturing
- Foundries
- Rendering Plants
- Livestock Operations

Sources of dust are also common sources of air pollution-related complaints. Operations that can result in dust problems are rock crushing, gravel production, stone quarrying, and mining operations. A common source of complaints is the dust and noise associated with blasting that may be part of these operations. Besides the health impacts of dust as particulate matter, thick dust also impairs visibility, aesthetic values, and can soil homes and automobiles. Local air districts typically have rules for regulating dust sources in their jurisdictions, but dust sources can still be a concern. Therefore, separation of these facilities from residential and other new sensitive land uses should be considered.

In some areas of California, asbestos occurs naturally in stone deposits. Asbestos is a potent carcinogenic substance when inhaled. Asbestos-containing dust may be a public health concern in areas where asbestos-containing rock is mined, crushed, processed, or used. Situations where asbestos-containing gravel has been used in road paving materials are also a source of asbestos exposure to the general public. Planners are advised to consult with local air pollution agencies in areas where asbestos-containing gravel or stone products are produced or used.

2. Handbook Development

ARB and local air districts share responsibility for improving statewide air quality. As a result of California's air pollution control programs, air quality has improved and health risk has been reduced statewide. However, state and federal air quality standards are still exceeded in many areas of California and the statewide health risk posed by toxic air contaminants (air toxics) remains too high. Also, some communities experience higher pollution exposures than others - making localized impacts, as well regional or statewide impacts, an important consideration. It is for this reason that this Handbook has been produced - to promote better, more informed decision-making by local land use agencies that will improve air quality and public health in their communities.

Land use policies and practices, including planning, zoning, and siting activities, can play a critical role in air quality and public health at the local level. For instance, even with the best available control technology, some projects that are sited very close to homes, schools, and other public places can result in elevated air pollution exposures. The reverse is also true – siting a new school or home too close to an existing source of air pollution can pose a public health risk. The ARB recommendations in section 1 address this issue.

> *This Handbook is an informational document that we hope will strengthen the relationship between air quality and land use agencies. It highlights the need for land use agencies to address the potential for new projects to result in localized health risk or contribute to cumulative impacts where air pollution sources are concentrated.*

Avoiding these incompatible land uses is a key to reducing localized air pollution exposures that can result in adverse health impacts, especially to sensitive individuals.

Individual siting decisions that result in incompatible land uses are often the result of locating "sensitive" land uses next to polluting sources. These decisions can be of even greater concern when existing air pollution exposures in a community are considered. In general terms, this is often referred to as the issue of "cumulative impacts." ARB is working with local air districts to better define these situations and to make information about existing air pollution levels (e.g., from local businesses, motor vehicles, and other areawide sources) more readily available to land use agencies.

In December 2001, the ARB adopted "Policies and Actions for Environmental Justice" (Policies). These Policies were developed in coordination with a group of stakeholders, representing local government agencies, community interest

groups, environmental justice organizations, academia, and business (Environmental Justice Stakeholders Group).

The Policies included a commitment to work with land use planners, transportation agencies, and local air districts to develop ways to identify, consider, and reduce cumulative air pollution emissions, exposure, and health risks associated with land use planning and decision-making. Developed under the auspices of the ARB's Environmental Justice Stakeholders Group, this Handbook is a first step in meeting that commitment.

ARB has produced this Handbook to help achieve several objectives:

- Provide recommendations on situations to avoid when siting new residences, schools, day care centers, playgrounds, and medical-related facilities (sensitive sites or sensitive land uses);

- Identify approaches that land use agencies can use to prevent or reduce potential air pollution impacts associated with general plan policies, new land use development, siting, and permitting decisions;

- Improve and facilitate access to air quality data and evaluation tools for use in the land use decision-making process;

- Encourage stronger collaboration between land use agencies and local air districts to reduce community exposure to source-specific and cumulative air pollution impacts; and

- Emphasize community outreach approaches that promote active public involvement in the air quality/land use decision-making process.

This Handbook builds upon California's 2003 General Plan Guidelines. These Guidelines, developed by the Governor's Office of Planning and Research (OPR), explain the land use planning process and applicable legal requirements. This Handbook also builds upon a 1997 ARB report, "The Land Use-Air Quality Linkage" ("Linkage Report").[9] The Linkage Report was an outgrowth of the California Clean Air Act which, among other things, called upon local air districts to focus particular attention on reducing emissions from sources that indirectly cause air pollution by attracting vehicle trips. Such indirect sources include, but are not limited to, shopping centers, schools and universities, employment centers, warehousing, airport hubs, medical offices, and sports arenas. The Linkage Report summarizes data as of 1997 on the relationships between land use, transportation, and air quality, and highlights strategies that can help to reduce the use of single occupancy automobile use. Such strategies

[9] To access this report, please refer to ARB's website or click on: http://www.arb.ca.gov/ch/programs/link97.pdf

complement ARB regulatory programs that continue to reduce motor vehicle emissions.

In this Handbook, we identify types of air quality-related information that we recommend land use agencies consider in the land use decision-making processes such as the development of regional, general, and community plans; zoning ordinances; environmental reviews; project siting; and permit issuance. The Handbook provides recommendations on the siting of new sensitive land uses based on current analyses. It also contains information on approaches and methodologies for evaluating new projects from an air pollution perspective.

The Handbook looks at air quality issues associated with emissions from industrial, commercial, and mobile sources of air pollution. Mobile sources continue to be the largest overall contributors to the state's air pollution problems, representing the greatest air pollution health risk to most Californians. Based on current health risk information for air toxics, the most serious pollutants on a statewide basis are diesel PM, benzene, and 1,3-butadiene, all of which are primarily emitted by motor vehicles. From a state perspective, ARB continues to pursue new strategies to further reduce motor vehicle-related emissions in order to meet air quality standards and reduce air toxics risk.

While mobile sources are the largest overall contributors to the state's air pollution problems, industrial and commercial sources can also pose a health risk, particularly to people near the source. For this reason, the issue of incompatible land uses is an important focus of this document.

Handbook Audience

Even though the primary users of the Handbook will likely be agencies responsible for air quality and land use planning, we hope the ideas and technical issues presented in this Handbook will also be useful for:

- public and community organizations and community residents;
- federal, state and regional agencies that fund, review, regulate, oversee, or otherwise influence environmental policies and programs affected by land use policies; and
- private developers.

3. Key Community Focused Issues Land Use Agencies Should Consider

Two key air quality issues that land use agencies should consider in their planning, zoning, and permitting processes are:

1) **Incompatible Land Uses.** Localized air pollution impacts from incompatible land use can occur when polluting sources, such as a heavily trafficked roadway, warehousing facilities, or industrial or commercial facilities, are located near a land use where sensitive individuals are found such as a school, hospital, or homes.

2) **Cumulative Impacts.** Cumulative air pollution impacts can occur from a concentration of multiple sources that individually comply with air pollution control requirements or fall below risk thresholds, but in the aggregate may pose a public health risk to exposed individuals. These sources can be heavy or light-industrial operations, commercial facilities such as autobody shops, large gas dispensing facilities, dry cleaners, and chrome platers, and freeways or other nearby busy transportation corridors.

Incompatible Land Uses

Land use policies and practices can worsen air pollution exposure and adversely affect public health by mixing incompatible land uses. Examples include locating new sensitive land uses, such as housing or schools, next to small metal plating facilities that use a highly toxic form of chromium, or very near large industrial facilities or freeways. Based on recent monitoring and health-based studies, we now know that air quality impacts from incompatible land uses can contribute to increased risk of illness, missed work and school, a lower quality of life, and higher costs for public health and pollution control.[10]

Avoiding incompatible land uses can be a challenge in the context of mixed-use industrial and residential zoning. For a variety of reasons, government agencies and housing advocates have encouraged the proximity of affordable housing to employment centers, shopping areas, and transportation corridors, partially as a means to reduce vehicle trips and their associated emissions. Generally speaking, typical distances in mixed-use communities between businesses and industries and other land uses such as homes and schools, should be adequate to avoid health risks. However, generalizations do not always hold as we addressed in section 1 of this Handbook.

In terms of siting air pollution sources, the proposed location of a project is a major factor in determining whether it will result in localized air quality impacts. Often, the problem can be avoided by providing an adequate distance or setback

[10] For more information, the reader should refer to ARB's website on community health: http://www.arb.ca.gov/ch/ch.htm

between a source of emissions and nearby sensitive land uses. Sometimes, suggesting project design changes or mitigation measures in the project review phase can also reduce or avoid potential impacts. This underscores the importance of addressing potential incompatible land uses as early as possible in the project review process, ideally in the general plan itself.

Cumulative Air Pollution Impacts

The broad concept of cumulative air pollution impacts reflects the combination of regional air pollution levels and any localized impacts. Many factors contribute to air pollution levels experienced in any location. These include urban background air pollution, historic land use patterns, the prevalence of freeways and other transportation corridors, the concentration of industrial and commercial businesses, and local meteorology and terrain.

When considering the potential air quality impacts of polluting sources on individuals, project location and the concentration of emissions from air pollution sources need to be considered in the land use decision-making process. In section 4, the Handbook offers a series of questions that helps land use agencies determine if a project should undergo a more careful analysis. This holds true regardless of whether the project being sited is a polluting source or a sensitive land use project.

Large industrial areas are not the only land uses that may result in public health concerns in mixed-use communities. Cumulative air pollution impacts can also occur if land uses do not adequately provide setbacks or otherwise protect sensitive individuals from potential air pollution impacts associated with nearby light industrial sources. This can occur with activities such as truck idling and traffic congestion, or from indirect sources such as warehousing facilities that are located in a community or neighborhood.

In October 2004, Cal/EPA published its Environmental Justice Action Plan. In February 2005, the Cal/EPA Interagency Working Group approved a working definition of "cumulative impacts" for purposes of initially guiding the pilot projects that are being conducted pursuant to that plan. Cal/EPA is now in the process of developing a Cumulative Impacts Assessment Guidance document. Cal/EPA will revisit the working definition of "cumulative impacts" as the Agency develops that guidance. The following is the working definition:

> *"Cumulative impacts means exposures, public health or environmental effects from the combined emissions and discharges, in a geographic area, including environmental pollution from all sources, whether single or multi-media, routinely, accidentally, or otherwise released. Impacts will take into account sensitive populations and socio-economic factors, where applicable, and to the extent data are available."*

4. Mechanisms for Integrating Localized Air Quality Concerns Into Land Use Processes

Land use agencies should use each of their existing planning, zoning, and permitting authorities to address the potential health risk associated with new projects. Land use-specific mechanisms can go a long way toward addressing both localized and cumulative impacts from new air pollution sources that are not otherwise addressed by environmental regulations. Likewise, close collaboration and communication between land use agencies and local air districts in both the planning and project approval stages can further reduce these impacts. Local agency partnerships can also result in early identification of potential impacts from proposed activities that might otherwise escape environmental review. When this happens, pollution problems can be prevented or reduced before projects are approved, when it is less complex and expensive to mitigate.

The land use entitlement process requires a series of planning decisions. At the highest level, the General Plan sets the policies and direction for the jurisdiction, and includes a number of mandatory elements dealing with issues such as housing, circulation, and health hazards. Zoning is the primary tool for implementing land use policies. Specific or community plans created in conjunction with a specific project also perform many of the same functions as a zoning ordinance. Zoning can be modified by means of variances and conditional use permits. The latter are frequently used to insure compatibility between otherwise conflicting land uses. Finally, new development usually requires the approval of a parcel or tract map before grading and building permits can be issued. These parcel or tract maps must be consistent with the applicable General Plan, zoning and other standards.

Land use agencies can use their planning authority to separate industrial and residential land uses, or to require mitigation where separation is not feasible. By separating incompatible land uses, land use agencies can prevent or reduce both localized and cumulative air pollution impacts without denying what might otherwise be a desirable project.[11] For instance:

- a dry cleaner could open a storefront operation in a community with actual cleaning operations performed at a remote location away from residential areas;
- gas dispensing facilities with lower fuel throughput could be sited in mixed-use areas;
- enhanced building ventilation or filtering systems in schools or senior care centers can reduce ambient air from nearby busy arterials; or
- landscaping and regular watering can be used to reduce fugitive dust at a building construction site near a school yard.

[11] It should be noted that such actions should also be considered as part of the General Plan or Plan element process.

The following general and specific land use approaches can help to reduce potential adverse air pollution impacts that projects may have on public health.

General Plans

The primary purpose of planning, and the source of government authority to engage in planning, is to protect public health, safety, and welfare. In its most basic sense, a local government General Plan expresses the community's development goals and embodies public policy relative to the distribution of future land uses, forming the basis for most land use decisions. Therefore, the most effective mechanism for dealing with the central land use concept of compatibility and its relationship to cumulative air pollution impacts is the General Plan. Well before projects are proposed within a jurisdiction, the General Plan sets the stage for where projects can be sited, and their compatibility with comprehensive community goals, objectives, and policies.

In 2003, OPR revised its General Plan Guidelines, highlighting the importance of incorporating sustainable development and environmental justice policies in the planning process. The OPR General Plan Guidelines provides an effective and long-term approach to reduce cumulative air pollution impacts at the earliest planning stages. In light of these important additions to the Guidelines, land use agencies should consider updating their General Plans or Plan elements to address these revisions.

The General Plan and related Plan elements can be used to avoid incompatible land uses by incorporating air quality considerations into these documents. For instance, a General Plan safety element with an air quality component could be used to incorporate policies or objectives that are intended to protect the public from the potential for facility breakdowns that may result in a dangerous release of air toxics. Likewise, an air quality component to the transportation circulation element of the General Plan could include policies or standards to prevent or reduce local exposure to diesel exhaust from trucks and other vehicles. For instance, the transportation circulation element could encourage the construction of alternative routes away from residential areas for heavy-duty diesel trucks. By considering the relationship between air quality and transportation, the circulation element could also include air quality policies to prevent or reduce trips and travel, and thus vehicle emissions. Policies in the land use element of the General Plan could identify areas appropriate for future industrial, commercial, and residential uses. Such policies could also introduce design and distance parameters that reduce emissions, exposure, and risk from industrial and some commercial land uses (e.g., dry cleaners) that are in close proximity to residential areas or schools.

Land use agencies should also consider updating or creating an air quality element in the jurisdiction's General Plan. In the air quality element, local decision-makers could develop long-term, effective plans and policies to address

air quality issues, including cumulative impacts. The air quality element can also provide a general reference guide that informs local land use planners about regional and community level air quality, regulatory air pollution control requirements and guidelines, and references emissions and pollution source data bases and assessment and modeling tools. As is further described in Appendix C of the Handbook, new assessment tools that ARB is developing can be included into the air quality element by reference. For instance, ARB's statewide risk maps could be referenced in the air quality element as a resource that could be consulted by developers or land use agencies

Zoning

The purpose of "zoning" is to separate different land uses. Zoning ordinances establish development controls to ensure that private development takes place within a given area in a manner in which:

- All uses are compatible (e.g., an industrial plant is not permitted in a residential area);
- Common development standards are used (e.g., all homes in a given area are set back the same minimum distance from the street); and,
- Each development does not unreasonably impose a burden upon its neighbors (e.g., parking is required on site so as not to create neighborhood parking problems).

To do this, use districts called "zones" are established and standards are developed for these zones. The four basic zones are residential, commercial, industrial and institutional.

Land use agencies may wish to consider how zoning ordinances, particularly those for mixed-use areas, can be used to avoid exacerbating poor land use practices of the past or contributing to localized and cumulative air pollution impacts in the community.

Sometimes, especially in mixed-use zones, there is a potential for certain categories of existing businesses or industrial operations to result in cumulative air pollution impacts to new development projects. For example:

- An assisted living project is proposed for a mixed-use zone adjacent to an existing chrome plating facility, or several dry cleaners;
- Multiple industrial sources regulated by a local air district are located directly upwind of a new apartment complex;
- A new housing development is sited in a mixed-use zone that is downwind or adjacent to a distribution center that attracts diesel-fueled delivery trucks and TRUs; or
- A new housing development or sensitive land use is sited without adequate setbacks from an existing major transportation corridor or rail yard.

As part of the public process for making zoning changes, local land use agencies could work with community planning groups, local businesses, and community residents to determine how best to address existing incompatible land uses.

Land Use Permitting Processes

■ Questions to Consider When Reviewing New Projects

Very often, just knowing what questions to ask can yield critical information about the potential air pollution impacts of proposed projects – both from the perspective of a specific project as well as in the nature of existing air pollution sources in the same impact area. Available land use information can reveal the proximity of air pollution sources to sensitive individuals, the potential for incompatible land uses, and the location and nature of nearby air pollution sources. Air quality data, available from the ARB and local air districts, can provide information about the types and amounts of air pollution emitted in an area, regional air quality concentrations, and health risk estimates for specific sources.

General Plans and zoning maps are an excellent starting point in reviewing project proposals for their potential air pollution impacts. These documents contain information about existing or proposed land uses for a specific location as well as the surrounding area. Often, just looking at a map of the proposed location for a facility and its surrounding area will help to identify a potential adjacent incompatible land use.

The following pages are a “pull-out” list of questions to consider along with cross-references to pertinent information in the Handbook. These questions are intended to assist land use agencies in evaluating potential air quality-related concerns associated with new project proposals.

The first group of questions contains project-related queries designed to help identify the potential for localized project impacts, particularly associated with incompatible land uses. The second group of questions focuses on the issue of potential cumulative impacts by including questions about existing emissions and air quality in the community, and community feedback. Depending on the answers to these questions, a land use agency may decide a more detailed review of the proposal is warranted.

The California Department of Education has already developed a detailed process for school siting which is outlined in Appendix E. However, school districts may also find this section helpful when evaluating the most appropriate site for new schools in their area. At a minimum, using these questions may encourage school districts to engage throughout their siting process with land use agencies and local air districts. The combined expertise of these entities can be useful in devising relevant design standards and mitigation measures that can

reduce exposure to cumulative emissions, exposure, and health risk to students and school workers.

As indicated throughout the Handbook, we strongly encourage land use agencies to consult early and often with local air districts. Local air districts have the expertise, many of the analytical tools, and a working knowledge of the sources they regulate. It is also critical to fully involve the public and businesses that could be affected by the siting decision. The questions provided in the chart below do not imply any particular action should be taken by land use agencies. Rather the questions are intended to improve the assessment process and facilitate informed decision-making.

- **Project-Related Questions**

This section includes project-related questions that, in conjunction with the questions in the next section, can be used to tailor the project evaluation. These questions are designed to help identify the potential for incompatible land uses from localized project impacts.

Questions to Consider When Reviewing New Projects

Project-Related Questions	Cross-Reference to Relevant Handbook Sections
1. Is the proposed project: ▲ A business or commercial license renewal ▲ A new or modified commercial project ▲ A new or modified industrial project ▲ A new or modified public facility project ▲ A new or modified transportation project ▲ A housing or other development in which sensitive individuals may live or play	See Appendix A for typical land use classifications and associated project categories that could emit air pollutants.
2. Does the proposed project: ▲ Conform to the zoning designation? ▲ Require a variance to the zoning designation? ▲ Include plans to expand operations over the life of the business such that additional emissions may increase the pollution burden in the community (e.g., from additional truck operations, new industrial operations or process lines, increased hours of operation, build-out to the property line, etc.)?	See Appendix F for a general explanation of land use processes. In addition, Section 3 contains a discussion of how land use planning, zoning, and permitting practices can result in incompatible land uses or cumulative air pollution impacts.
3. Has the local air district provided comments or information to assist in the analysis?	See Section 5 and Appendix C for a description of air quality-related tools that the ARB and local air districts use to provide information on potential air pollution impacts.
4. Have public meetings been scheduled with the affected community to solicit their involvement in the decision-making process for the proposed project?	See Section 7 for a discussion of public participation, information and outreach tools.
5. If the proposed project will be subject to local air district regulations: ▲ Has the project received a permit from the local air district? ▲ Would it comply with applicable local air district requirements? ▲ Is the local air district contemplating new regulations that would reduce emissions from the source over time? ▲ Will potential emissions from the project	See Appendix C for a description of local air district programs.

Project-Related Questions	Cross-Reference to Relevant Handbook Sections
trigger the local air district's new source review for criteria pollutants or air toxics emissions? ▲ Is the local air district expected to ask the proposed project to perform a risk assessment? ▲ Is there sufficient new information or public concern to call for a more thorough environmental analysis of the proposed project? ▲ Are there plans to expand operations over time? ▲ Are there land-use based air quality significance thresholds or design standards that could be applied to this project in addition to applicable air district requirements?	
6. If the proposed project will release air pollution emissions, either directly or indirectly, but is not regulated by the local air district: ▲ Is the local air district informed of the project? ▲ Does the local air district believe that there could be potential air pollution impacts associated with this project category because of the proximity of the project to sensitive individuals? ▲ If the project is one in which individuals live or play (e.g., a home, playground, convalescent home, etc.), does the local air district believe that the project's proximity to nearby sources could pose potential air pollution impacts? ▲ Are there indirect emissions that could be associated with the project (e.g., truck traffic or idling, transport refrigeration unit operations, stationary diesel engine operations, etc.) that will be in close proximity to sensitive individuals? ▲ Will the proposed project increase or serve as a magnet for diesel traffic? ▲ Are there land-use based air quality significance thresholds or design standards that could be applied to this project in addition to applicable air district requirements? ▲ Is there sufficient new information or public concern to call for a more thorough environmental analysis of the proposed project? ▲ Should the site approval process include identification and mitigation of potential	See Section 1 for recommendations on situations to avoid when siting projects where sensitive individuals would be located (sensitive sites).

Project-Related Questions	Cross-Reference to Relevant Handbook Sections
direct or indirect emissions associated with the potential project?	
7. Does the local air district or land use agency have pertinent information on the source, such as: ▲ Available permit and enforcement data, including for the owner or operator of the proposed source that may have other sources in the State. ▲ Proximity of the proposed project to sensitive individuals. ▲ Number of potentially exposed individuals from the proposed project. ▲ Potential for the proposed project to expose sensitive individuals to odor or other air pollution nuisances. ▲ Meteorology or the prevailing wind patterns between the proposed project and the nearest receptor, or between the proposed sensitive receptor project and sources that could pose a localized or cumulative air pollution impact.	See Appendix C for a description of local air district programs. See Appendix B for a listing of useful information that land use agencies should have on hand or have accessible when reviewing proposed projects for potential air pollution impacts. Also, do not hesitate to contact your local air district regarding answers to any of these questions that might not be available at the land use agency. See Section 1 for recommendations on situations to avoid when siting projects where sensitive individuals would be located (sensitive sites).
8. Based upon the project application, its location, and the nature of the source, could the proposed project: ▲ Be a polluting source that is located in proximity to, or otherwise upwind, of a location where sensitive individuals live or play? ▲ Attract sensitive individuals and be located in proximity to or otherwise downwind, of a source or multiple sources of pollution, including polluting facilities or transportation-related sources that contribute emissions either directly or indirectly? ▲ Result in health risk to the surrounding community?	See Section 3 for a discussion of what is an incompatible land use and the potential cumulative air pollution impacts. See Section 1 for recommendations on situations to avoid when siting projects where sensitive individuals would be located (sensitive sites).
9. If a CEQA categorical exemption is proposed, were the following questions considered: ▲ Is the project site environmentally sensitive as defined by the project's location? (A project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant.) ▲ Would the project and successive future projects of the same type in the approximate location potentially result in cumulative impacts? ▲ Are there "unusual circumstances" creating the possibility of significant effects?	See CEQA Guidelines section 15300, and Public Resources Code, section 21084. See Section 1 for recommendations on situations to avoid when siting projects where sensitive individuals would be located (sensitive sites). See also Section 5 and Appendix C for a description of air quality-related tools that the ARB and local air districts use to provide information on potential air pollution impacts.

- **Questions Related to Cumulative Impact Assessment**

The following questions can be used to provide the decision-maker with a better understanding of the potential for cumulative air pollution impacts to an affected community. Answers to these questions will help to determine if new projects or activities warrant a more detailed review. It may also help to see potential environmental concerns from the perspective of the affected community. Additionally, responses can provide local decision-makers with information with which to assess the best policy options for addressing neighborhood-scale air pollution concerns.

The questions below can be used to identify whether existing tools and procedures are adequate to address land use-related air pollution issues. This process can also be used to pinpoint project characteristics that may have the greatest impact on community-level emissions, exposure, and risk. Such elements can include: the compliance record of existing sources including those owned or operated by the project proponent; the concentration of emissions from polluting sources within the approximate area of sensitive sites; transportation circulation in proximity to the proposed project; compatibility with the General Plan and General Plan elements; etc.

The local air district can provide useful assistance in the collection and evaluation of air quality-related information for some of the questions and should be consulted early in the process.

Questions Related to Cumulative Impact Assessment

Technical Questions	Cross-Reference to Relevant Handbook Sections
1. Is the community home to industrial facilities?	See Appendix A for typical land use classifications and associated project categories that could emit air pollutants.
2. Do one or more major freeways or high-traffic volume surface streets cut through the community?	See transportation circulation element of your general plan. See also Appendix B for useful information that land use agencies should have on hand or have accessible when reviewing proposed projects for potential air pollution impacts. See Section 1 for recommendations on situations to avoid when siting projects where sensitive individuals would be located (sensitive sites).
3. Is the area classified for mixed-use zoning?	See your general plan and zoning ordinances.
4. Is there an available list of air pollution sources in the community?	Contact your local air district.
5. Has a walk-through of the community been conducted to gather the following information:	See Appendix B for a listing of useful information that land use agencies

Technical Questions	Cross-Reference to Relevant Handbook Sections
▲ Corroborate available information on land use activities in the area (e.g., businesses, housing developments, sensitive individuals, etc.)? ▲ Determine the proximity of existing and anticipated future projects to residential areas or sensitive individuals? ▲ Determine the concentration of emission sources (including anticipated future projects) to residential areas or sensitive individuals?	should have on hand or have accessible when reviewing proposed projects for potential air pollution impacts. Also contact your local air district.
6. Has the local air district been contacted to obtain information on sources in the community?	See Section 7 for a discussion of public participation, information and outreach tools.
7. What categories of commercial establishments are currently located in the area and does the local air district have these sources on file as being regulated or permitted?	See Appendix A for typical land use classifications and associated project categories that could emit air pollutants. Also contact your local air district.
8. What categories of indirect sources such as distribution centers or warehouses are currently located in the area?	See Appendix A for typical land use classifications and associated project categories that emit air pollutants.
9. What air quality monitoring data are available?	Contact your local air district.
10. Have any risk assessments been performed on emission sources in the area?	Contact your local air district.
11. Does the land use agency have the capability of applying a GIS spatial mapping tool that can overlay zoning, sub-development information, and other neighborhood characteristics, with air pollution and transportation data?	See Appendix B for a listing of useful information that land use agencies should have on hand or have accessible when reviewing proposed projects for potential air pollution impacts. Also contact your local air district for tools that can be used to supplement available land use agency tools.
12. Based on available information, is it possible to determine if the affected community or neighborhood experiences elevated health risk due to a concentration of air pollution sources in close proximity, and if not, can the necessary information be obtained?	Contact your local air district. Also see Section 1 for recommendations on situations to avoid when siting projects where sensitive individuals would be located (sensitive sites).
13. Does the community have a history of chronic complaints about air quality?	See Section 7 for a discussion of public participation, information and outreach tools. Also contact your local air district.
14. Is the affected community included in the public participation process for the agency's decision?	See Section 7 for a discussion of public participation, information and outreach tools.
15. Have community leaders or groups been contacted about any pre-existing or chronic community air quality concerns?	See Section 7 for a discussion of public participation, information and outreach tools. Also contact your local air district.

- **Mitigation Approaches**

In addition to considering the suitability of the project location, opportunities for mitigation of air pollution impacts should be considered. Sometimes, a land use agency may find that selection of a different project location to avoid a health risk is not feasible. When that happens, land use agencies should consider design improvements or other strategies that would reduce the risk. Such strategies could include performance or design standards, consultation with local air districts and other agencies on appropriate actions that these agencies should, or plan to, undertake, and consultation and outreach in the affected community. Potential mitigation measures should be feasible, cost-effective solutions within the available resources and authority of implementing agencies to enforce.[12]

- **Conditional Use Permits and Performance Standards**

Some types of land uses are only allowed upon approval of a conditional use permit (also called a CUP or special use permit). A conditional use permit does not re-zone the land but specifies conditions under which a particular land use will be permitted. Such land uses could be those with potentially significant environmental impacts. Local zoning ordinances specify the uses for which a conditional use permit is required, the zones they may be allowed in, and public hearing procedures. The conditional use permit imposes special requirements to ensure that the use will not be detrimental to its surroundings.

In the context of land use planning, performance standards are requirements imposed on projects or project categories through conditional use permits to ensure compliance with general plan policies and local ordinances. These standards could apply to such project categories as distribution centers, very large gas dispensing facilities, autobody shops, dry cleaners, and metal platers. Land use agencies may wish to consider adding land use-based performance standards to zoning ordinances in existing mixed-use communities for certain air pollution project categories. Such standards would provide certainty and equitable treatment to all projects of a similar nature, and reserve the more resource intensive conditional or special use permits to projects that require a more detailed analysis. In developing project design or performance standards, land use agencies should consult with the local air district. Early and regular consultation can avoid duplication or inconsistency with local air district control requirements when considering the site-specific design and operation of a project.

[12] A land use agency has the authority to condition or deny a project based upon information collected and evaluated through the land use decision-making process. However, any denial would need to be based upon identifiable, generally applicable, articulated standards set forth in the local government's General Plan and zoning codes. One way of averting this is to conduct early and regular outreach to the community and the local air district so that community and environmental concerns can be addressed and accommodated into the project proposal.

Examples of land use-based air quality-specific performance standards include the following:

- Placing a process vent away from the direction of the local playground that is nearby or increasing the stack height so that emissions are dispersed to reduce the emissions impact on surrounding homes or schools.
- Setbacks between the project fence line and the population center.
- Limiting the hours of operation of a facility to avoid excess emissions exposure or foul odors to nearby individuals.
- An ordinance that requires fleet operators to use cleaner vehicles before project approval (if a new business), or when expanding the fleet (if an existing business); and
- Providing alternate routes for truck operations that discourage detours into residential neighborhoods.

Outreach to Other Agencies

When questions arise regarding the air quality impacts of projects, including potential cumulative impacts, land use agencies should consult the local air district. Land use agencies should also consider the following suggestions to avoid creating new incompatible land uses:

- Consult with the local air district to help determine if emissions from a particular project will adversely impact sensitive individuals in the area, if existing or future effective regulations or permit requirements will affect the proposed project or other sources in the vicinity of the proposed project, or if additional inspections should be required.
- Check with ARB for new information and modeling tools that can help evaluate projects seeking to site within your jurisdiction.
- Become familiar with ARB's Land Use-Air Quality Linkage Report to determine whether approaches and evaluation tools contained in the Report can be used to reduce transportation-related impacts on communities.
- Contact and collaborate with other state agencies that play a role in the land use decision-making process, e.g., the State Department of Education, the California Energy Commission, and Caltrans. These agencies have information on mitigation measures and mapping tools that could be useful in addressing local problems.

- **Information Clearinghouse**

  - Land use agencies can refer to the ARB statewide electronic information clearinghouse for information on what measures other jurisdictions are using to address comparable issues or sources.[13]

[13] This information can be accessed from ARB's website by going to: http://www.arb.ca.gov/ch/clearinghouse.htm

The next section addresses available air quality assessment tools that land use agencies can use to evaluate the potential for localized or cumulative impacts in their communities.

5. Available Tools to Evaluate Cumulative Air Pollution Emissions and Risk

Until recently, California has traditionally approached air pollution control from the perspective of assessing whether the pollution was regional, category-specific, or from new or existing sources. This methodology has been generally effective in reducing statewide and regional air pollution impacts and risk levels. However, such an incremental, category-by-category, source-by-source approach may not always address community health impacts from multiple sources - including mobile, industrial, and commercial facilities.

As a result of air toxics and children's health concerns over the past several years, ARB and local air districts have begun to develop new tools to evaluate and inform the public about cumulative air pollution impacts at the community level. One aspect of ARB's programs now underway is to consolidate and make accessible air toxics emissions and monitoring data by region, using modeling tools and other analytical techniques to take a preliminary look at emissions, exposure, and health risk in communities.

ARB has developed multiple tools to assist local air districts perform assessments of cumulative emissions, exposure, and risk on a neighborhood scale. These tools include:

- Regional risk maps that show trends in potential cancer risk from toxic air pollutants in southern and central California between 1990 and 2010. These maps are based on the U.S. EPA's ASPEN model. These maps provide an estimate of background levels of toxic air pollutant risk but are not detailed enough to assess individual neighborhoods or facilities.[14]

- The Community Health Air Pollution Information System (CHAPIS) is a user-friendly, Internet-based system for displaying information on emissions from sources of air pollution in an easy to use mapping format. CHAPIS contains information on air pollution emissions from selected large facilities and small businesses that emit criteria and toxic air pollutants. It also contains information on air pollution emissions from motor vehicles. When released in 2004, CHAPIS did not contain information on every source of air pollution or every air pollutant. However, ARB continues to work with local air districts to include all of the largest air pollution sources and those with the highest documented air pollution risk. Additional facilities will be added to CHAPIS as more data become available.[15]

[14] For further information on these maps, please visit ARB's website at: http://www.arb.ca.gov/toxics/cti/hlthrisk/hlthrisk.htm

[15] For further information on CHAPIS, please click on: http://www.arb.ca.gov/ch/chapis1/chapis1.htm

- The Hot Spots Analysis and Reporting Program (HARP) is a software database package that evaluates emissions from one or more facilities to determine the overall health risk posed by the facility(-ies) on the surrounding community. Proper use of HARP ensures that the risk assessment meets the latest risk assessment guidelines published by the State Office of Environmental Health Hazard Assessment (OEHHA). HARP is designed with air quality professionals in mind and is available from the ARB.

- The Urban Emissions Model (URBEMIS) is a computer program that can be used to estimate emissions associated with land development projects in California such as residential neighborhoods, shopping centers, office buildings, and construction projects. URBEMIS uses emission factors available from the ARB to estimate vehicle emissions associated with new land uses.

Local air districts, and others can use these tools to assess a new project, or plan revision. For example, these tools can be used to:

- Identify if there are multiple sources of air pollution in the community;
- Identify the major sources of air pollution in the area under consideration;
- Identify the background potential cancer risk from toxic air pollution in the area under consideration;
- Estimate the risk from a new facility and how it adds to the overall risk from other nearby facilities; and
- Provide information to decision-makers and key stakeholders on whether there may be significant issues related to cumulative emissions, exposure, and health risk due to a permitting or land use decision.

If an air agency wishes to perform a cumulative air pollution impact analysis using any of these tools, it should consult with the ARB and/or the local air district to obtain information or assistance on the data inputs and procedures necessary to operate the program. In addition, land use agencies could consult with local air districts to determine the availability of land use and air pollution data for entry into an electronic Geographical Information System (GIS) format. GIS is an easier mapping tool than the more sophisticated models described in Appendix C. GIS mapping makes it possible to superimpose land use with air pollution information so that the spatial relationship between air pollution sources, sensitive receptors, and air quality can be visually represented. Appendix C provides a general description of the impact assessment process and micro-scale, or community level modeling tools that are available to evaluate potential cumulative air pollution impacts. Modeling protocols will be accessible on ARB's website as they become available. The ARB will also provide land use agencies and local air districts with statewide regional modeling results and information regarding micro-scale modeling.

6. ARB Programs to Reduce Air Pollution in Communities

ARB's regulatory programs reduce air pollutant emissions through statewide strategies that improve public health in all California communities. ARB's overall program addresses motor vehicles, consumer products, air toxics, air-quality planning, research, education, enforcement, and air monitoring. Community health and environmental justice concerns are a consideration in all these programs. ARB's programs are statewide but recognize that extra efforts may be needed in some communities due to historical mixed land-use patterns, limited participation in public processes in the past, and a greater concentration of air pollution sources in some communities.

ARB's strategies are intended to result in better air quality and reduced health risk to residents throughout California. The ARB's priority is to prevent or reduce the public's exposure to air pollution, including from toxic air contaminants that pose the greatest risk, particularly to infants and children who are more vulnerable to air pollution.

In October 2003, ARB updated its statewide control strategy to reduce emissions from source categories within its regulatory authority. A primary focus of the strategy is to achieve federal and state air quality standards for ozone and particulate matter throughout California, and to reduce health risk from diesel PM. Along with local air districts, ARB will continue to address air toxics emissions from regulated sources (see Table 6-1 for a summary of ARB activities). As indicated earlier, ARB will also provide analytical tools and information to land use agencies and local air districts to help assess and mitigate cumulative air pollution impacts.

The ARB will continue to consider the adoption of or revisions to needed air toxics control measures as part of the state's ongoing air toxics assessment program.[16]

As part of its effort to reduce particulate matter and air toxics emissions from diesel PM, the ARB has developed a Diesel Risk Reduction Program[17] that lays out several strategies in a three-pronged approach to reduce emissions and their associated risk:

- Stringent emission standards for all new diesel-fueled engines;
- Aggressive reductions from in-use engines; and
- Low sulfur fuel that will reduce PM and still provide the quality of diesel fuel needed to control diesel PM.

[16] For continuing information and updates on state measures, the reader can refer to ARB's website at http://www.arb.ca.gov/toxics/toxics.htm.
[17] For a comprehensive description of the program, please refer to ARB's website at http://www.arbB.ca.gov/diesel/dieselrrp.htm.

Table 6-1
ARB ACTIONS TO ADDRESS
CUMULATIVE AIR POLLUTION IMPACTS IN COMMUNITIES

Information Collection

- Improve emission inventories, air monitoring data, and analysis tools that can help to identify areas with high cumulative air pollution impacts
- Conduct studies in coordination with OEHHA on the potential for cancer and non-cancer health effects from air pollutants emitted by specific source categories
- Establish web-based clearinghouse for local land use strategies

Emission Reduction Approaches (2004-2006)*

- Through a public process, consider development and/or amendment of regulations and related guidance to reduce emissions, exposure, and health risk at a statewide and local level for the following sources:
  - Diesel PM sources such as stationary diesel engines, transport refrigeration units, portable diesel engines, on-road public fleets, off-road public fleets, heavy-duty diesel truck idling, harbor craft vessels, waste haulers
  - Other air toxics sources, such as formaldehyde in composite wood products, hexavalent chromium for chrome plating and chromic acid anodizing, thermal spraying, and perchloroethylene dry cleaning
- Develop technical information for the following:*
  - Distribution centers
  - Modeling tools such as HARP and CHAPIS
- Adopt rules and pollution prevention initiatives within legal authority to reduce emissions from mobile sources and fuels, and consumer products
- Develop and maintain Air Quality Handbook as a tool for use by land use agencies and local air districts to address cumulative air pollution impacts

Other Approaches

- Establish guidelines for use of statewide incentive funding for high priority mobile source emission reduction projects

*Because ARB will continue to review the need to adopt or revise statewide measures, the information contained in this chart will be updated on an ongoing basis.

A number of ARB's diesel risk reduction strategies have been adopted. These include measures to reduce emissions from refuse haulers, urban buses, transport refrigeration units, stationary and portable diesel engines, and idling trucks and school buses. These sources are all important from a community perspective.[18]

[18] The reader can refer to ARB's website for information on its mobile source-related programs at: http://www.arb.ca.gov/msprog/msprog.htm, as well as regulations adopted and under consideration as part of the Diesel Risk Reduction Program at: http://www.arb.ca.gov/diesel/dieselrrp.htm

The ARB will continue to evaluate the health effects of air pollutants while implementing programs with local air districts to reduce air pollution in all California communities.

Local air districts also have ambitious programs to reduce criteria pollutants and air toxics from regulated sources in their region. Many of these programs also benefit air quality in local communities as well as in the broader region. For more information on what is being done in your area to reduce cumulative air pollution impacts through air pollution control programs, you should contact your local air district.[19]

[19] Local air district contacts can be found on the inside cover to this Handbook.

7. Ways to Enhance Meaningful Public Participation

Community involvement is an important part of the land use process. The public is entitled to the best possible information about the air they breathe and what is being done to prevent or reduce unhealthful air pollution in their communities. In particular, information on how land use decisions can affect air pollution and public health should be made accessible to all communities, including low-income and minority communities.

Effective community participation consistently relies on a two-way flow of information – from public agencies to community members about opportunities, constraints, and impacts, and from community members back to public officials about needs, priorities, and preferences. The outreach process needed to build understanding and local neighborhood involvement requires data, methodologies, and formats tailored to the needs of the specific community. More importantly, it requires the strong collaboration of local government agencies that review and approve projects and land uses to improve the physical and environmental surroundings of the local community.

Many land use agencies, especially those in major metropolitan areas, are familiar with, and have a long-established public review process. Nevertheless, public outreach can often be improved. Active public involvement requires engaging the public in ways that do not require their previous interest in or knowledge of the land use or air pollution control requirements, and a commitment to taking action where appropriate to address the concerns that are raised.

■ Direct Community Outreach

In conjunction with local air districts, land use agencies should consider designing an outreach program for community groups, other stakeholders, and local government agency staffs that address the problem of cumulative air pollution impacts, and the public and government role in reducing them. Such a program could consider analytical tools that assist in the preparation and presentation of information in a way that supports sensible decision-making and public involvement. Table 7-1 contains some general outreach approaches that might be considered.

Table 7-1
Public Participation Approaches

- Staff and community leadership awareness training on environmental justice programs and community-based issues
- Surveys to identify the website information needs of interested community-based organizations and other stakeholders
- Information materials on local land use and air district authorities
- Community-based councils to facilitate and invite resident participation in the planning process
- Neighborhood CEQA scoping sessions that allows for community input prior to technical analysis
- Public information materials on siting issues are under review including materials written for the affected community, and in different media that widens accessibility
- Public meetings
- Identify other opportunities to include community-based organizations in the process

To improve outreach, local land use agencies should consider the following activities:

- Hold meetings in communities affected by agency programs, policies, and projects at times and in places that encourage public participation, such as evenings and weekends at centrally located community meeting rooms, libraries, and schools.
- Assess the need for and provide translation services at public meetings.
- Hold community meetings to update residents on the results of any special air monitoring programs conducted in their neighborhood.
- Hold community meetings to discuss and evaluate the various options to address cumulative impacts in their community.
- In coordination with local air districts, make staff available to attend meetings of community organizations and neighborhood groups to listen to and, where appropriate, act upon community concerns.
- Establish a specific contact person for environmental justice issues.
- Increase student and community awareness of local government land use activities and policies through outreach opportunities.
- Make air quality and land use information available to communities in an easily understood and useful format, including fact sheets, mailings, brochures, public service announcements, and web pages, in English and other languages.
- On the local government web-site, dedicate a page or section to what the land use program is doing regarding environmental justice and cumulative environmental impacts, and, as applicable, activities conducted with local air districts such as neighborhood air monitoring studies, pollution prevention, air pollution sources in neighborhoods, and risk reduction.

- Allow, encourage, and promote community access to land use activities, including public meetings, General Plan or Community Plan updates, zoning changes, special studies, CEQA reviews, variances, etc.
- Distribute information in multiple languages, as needed, on how to contact the land use agency or local air district to obtain information and assistance regarding environmental justice programs, including how to participate in public processes.
- Create and distribute a simple, easy-to-read, and understandable public participation handbook, which may be based on the "Public Participation Guidebook" developed by ARB.

- **Other Opportunities for Meaningful Public Outreach**

  - Community-Based Planning Committees

  Neighborhood-based or community planning advisory councils could be established to invite and facilitate direct resident participation into the planning process. With the right training and technical assistance, such councils can provide valuable input and a forum for the review of proposed amendments to plans, zone changes, land use permits, and suggestions as to how best to prevent or reduce cumulative air pollution impacts in their community.

  - Regional Partnerships

  Consider creating regional coalitions of key growth-related organizations from both the private and public sectors, with corporations, communities, other jurisdictions, and government agencies. Such partnerships could facilitate agreement on common goals and win-win solutions tailored specifically for the region. With this kind of dialogue, shared vision, and collaboration, barriers can be overcome and locally acceptable sustainable solutions implemented. Over the long term, such strategies will help to bring about clean air in communities as well as regionally.

LAND USE CLASSIFICATIONS AND ASSOCIATED FACILITY CATEGORIES THAT COULD EMIT AIR POLLUTANTS

(1) Land Use Classifications – by Activity[i]	(2) Facility or Project Examples	(3) Key Pollutants[ii,iii]	(4) Air Pollution Permits[iv]
COMMERCIAL/ LIGHT INDUSTRIAL: SHOPPING, BUSINESS, AND COMMERCIAL			
▲ Primarily retail shops and stores, office, commercial activities, and light industrial or small business	Dry cleaners; drive-through restaurants; gas dispensing facilities; auto body shops; metal plating shops; photographic processing shops; textiles; apparel and furniture upholstery; leather and leather products; appliance repair shops; mechanical assembly cleaning; printing shops	VOCs, air toxics, including diesel PM, NOx, CO, SOx	Limited; Rules for applicable equipment
▲ Goods storage or handling activities, characterized by loading and unloading goods at warehouses, large storage structures, movement of goods, shipping, and trucking.	Warehousing; freight-forwarding centers; drop-off and loading areas; distribution centers	VOCs, air toxics, including diesel PM, NOx, CO, SOx	No[v]
LIGHT INDUSTRIAL: RESEARCH AND DEVELOPMENT			
▲ Medical waste at research hospitals and labs	Incineration; surgical and medical instrument manufacturers, pharmaceutical manufacturing, biotech research facilities	Air toxics, NOx, CO, SOx	Yes
▲ Electronics, electrical apparatus, components, and accessories	Computer manufacturer; integrated circuit board manufacturer; semi-conductor production	Air toxics, VOCs	Yes
▲ College or university lab or research center	Medical waste incinerators; lab chemicals handling, storage and disposal	Air toxics, NOx, CO, SOx, PM10	Yes
▲ Research and development labs	Satellite manufacturer; fiber-optics manufacturer; defense contractors; space research and technology; new vehicle and fuel testing labs	Air toxics, VOCs	Yes
▲ Commercial testing labs	Consumer products; chemical handling, storage and disposal	Air toxics, VOCs	Yes

(1) Land Use Classifications – by Activity[i]	(2) Facility or Project Examples	(3) Key Pollutants[ii,iii]	(4) Air Pollution Permits[iv]
INDUSTRIAL: NON-ENERGY-RELATED			
▲ Assembly plants, manufacturing facilities, industrial machinery	Adhesives; chemical; textiles; apparel and furniture upholstery; clay, glass, and stone products production; asphalt materials; cement manufacturers, wood products; paperboard containers and boxes; metal plating; metal and canned food product fabrication; auto manufacturing; food processing; printing and publishing; drug, vitamins, and pharmaceuticals; dyes; paints; pesticides; photographic chemicals; polish and wax; consumer products; metal and mineral smelters and foundries; fiberboard; floor tile and cover; wood and metal furniture and fixtures; leather and leather products; general industrial and metalworking machinery; musical instruments; office supplies; rubber products and plastics production; saw mills; solvent recycling; shingle and siding; surface coatings	VOCs, air toxics, including diesel PM, NOx, PM, CO, SOx	Yes
INDUSTRIAL: ENERGY AND UTILITIES			
▲ Water and sewer operations	Pumping stations; air vents; treatment	VOCs, air toxics, NOx, CO, SOx, PM10	Yes
▲ Power generation and distribution	Power plant boilers and heaters; portable diesel engines; gas turbine engines	NOx, diesel PM, NOx, CO, SOx, PM10, VOCs	Yes
▲ Refinery operations	Refinery boilers and heaters; coke cracking units; valves and flanges; flares	VOCs, air toxics, including diesel PM, NOx, CO, SOx, PM10	Yes
▲ Oil and gas extraction	Oil recovery systems; uncovered wells	NOx, diesel PM, VOCs, CO, SOx, PM10	Yes
▲ Gasoline storage, transmission, and marketing	Above and below ground storage tanks; floating roof tanks; tank farms; pipelines	VOCs, air toxics, including diesel PM, NOx, CO, SOx, PM10	Yes
▲ Solid and hazardous waste treatment, storage, and disposal activities.	Landfills; methane digester systems; process recycling facility for concrete and asphalt materials	VOCs, air toxics, NOx, CO, SOx, PM10	Yes
CONSTRUCTION (NON-TRANSPORTATION)			
	Building construction; demolition sites	PM (re-entrained road dust), asbestos, diesel PM, NOx, CO, SOx, PM10, VOCs	Limited; state and federal off-road equipment standards

(1) Land Use Classifications – by Activity[i]	(2) Facility or Project Examples	(3) Key Pollutants[ii,iii]	(4) Air Pollution Permits[iv]
DEFENSE			
	Ordnance and explosives demolition; range and testing activities; chemical production; degreasing; surface coatings; vehicle refueling; vehicle and engine operations and maintenance	VOCs, air toxics, including diesel PM, NOx, CO, SOx, PM10	Limited; prescribed burning; equipment and solvent rules
TRANSPORTATION			
▲ Vehicular movement	Residential area circulation systems; parking and idling at parking structures; drive-through establishments; car washes; special events; schools; shopping malls, etc.	VOCs, NOx, PM (re-entrained road dust) air toxics e.g., benzene, diesel PM, formaldehyde, acetaldehyde, 1,3 butadiene, CO, SOx, PM10	No
▲ Road construction and surfacing	Street paving and repair; new highway construction and expansion	VOCs, air toxics, including diesel PM, NOx, CO, SOx, PM10	No
▲ Trains	Railroads; switch yards; maintenance yards	VOCs, NOx, CO, SOx, PM10, air toxics, including diesel PM	Limited; Applicable state and federal MV standards, and possible equipment rules
▲ Marine and port activities	Recreational sailing; commercial marine operations; hotelling operations; loading and un-loading; servicing; shipping operations; port or marina expansion; truck idling		
▲ Aircraft	Takeoff, landing, and taxiing; aircraft maintenance; ground support activities		
▲ Mass transit and school buses	Bus repair and maintenance		
NATURAL RESOURCES			
▲ Farming operations	Agricultural burning; diesel operated engines and heaters; small food processors; pesticide application; agricultural off-road equipment	Diesel PM, VOCs, NOx, PM10, CO, SOx, pesticides	Limited[vi]; Agricultural burning requirements, applicable state and federal mobile source standards; pesticide rules
▲ Livestock and dairy operations	Dairies and feed lots	Ammonia, VOCs, PM10	Yes[vii]
▲ Logging	Off-road equipment e.g., diesel fueled chippers, brush hackers, etc.	Diesel PM, NOx, CO, SOx, PM10, VOCs	Limited; Applicable state/federal mobile source standards
▲ Mining operations	Quarrying or stone cutting; mining; drilling or dredging	PM10, CO, SOx, VOCs, NOx, and asbestos in some geographical areas	Applicable equipment rules and dust controls

(1) Land Use Classifications – by Activity[i]	(2) Facility or Project Examples	(3) Key Pollutants[ii,iii]	(4) Air Pollution Permits[iv]
RESIDENTIAL			
Housing	Housing developments; retirement developments; affordable housing	Fireplace emissions (PM10, NOx, VOCs, CO, air toxics); Water heater combustion (NOx, VOCs, CO)	No[vii]
ACADEMIC AND INSTITUTIONAL			
▲ Schools, including school-related recreational activities	Schools; school yards; vocational training labs/classrooms such as auto repair/painting and aviation mechanics	Air toxics	Yes/No[viii]
▲ Medical waste	Incineration	Air toxics, NOx, CO, PM10	Yes
▲ Clinics, hospitals, convalescent homes		Air toxics	Yes

[i] These classifications were adapted from the American Planning Association's "Land Based Classification Standards." The Standards provide a consistent model for classifying land uses based on their characteristics. The model classifies land uses by refining traditional categories into multiple dimensions, such as activities, functions, building types, site development character, and ownership constraints. Each dimension has its own set of categories and subcategories. These multiple dimensions allow users to have precise control over land-use classifications. For more information, the reader should refer to the Association's website at http://www.planning.org/LBCS/GeneralInfo/.

[ii] This column includes key criteria pollutants and air toxic contaminants that are most typically associated with the identified source categories.

Additional information on specific air toxics that are attributed to facility categories can be found in ARB's Emission Inventory Criteria and Guidelines Report for the Air Toxics Hot Spots Program (May 15, 1997). This information can be viewed at ARB's web site at http://www.arb.ca.gov/ab2588/final96/guide96.pdf.

Criteria air pollutants are those air pollutants for which acceptable levels of exposure can be determined and for which an ambient air quality standard has been set. Criteria pollutants include ozone (formed by the reaction of volatile organic compounds and nitrogen oxides in the presence of sunlight), particulate matter, nitrogen dioxide, sulfur dioxide, carbon monoxide, and lead.

Volatile organic compounds (VOCs) combine with nitrogen oxides to form ozone, as well as particulate matter. VOC emissions result primarily from incomplete fuel combustion and the evaporation of chemical solvents and fuels. On-road mobile sources are the largest contributors to statewide VOC emissions. Stationary sources of VOC emissions include processes that use solvents (such as dry-cleaning, degreasing, and coating operations) and petroleum-related processes (such as petroleum refining, gasoline marketing and dispensing, and oil and gas extraction). Areawide VOC sources include consumer products, pesticides, aerosols and paints, asphalt paving and roofing, and other evaporative emissions.

Nitrogen oxides (NOx) are a group of gaseous compounds of nitrogen and oxygen, many of which contribute to the formation of ozone and particulate matter. Most NOx emissions are produced by the combustion of fuels. Mobile sources make up about 80 percent of the total statewide NOx emissions. Mobile sources include on-road vehicles and trucks, aircraft, trains, ships, recreational boats, industrial and construction equipment, farm

equipment, off-road recreational vehicles, and other equipment. Stationary sources of NOx include both internal and external combustion processes in industries such as manufacturing, food processing, electric utilities, and petroleum refining. Areawide source, which include residential fuel combustion, waste burning, and fires, contribute only a small portion of the total statewide NOx emissions, but depending on the community, may contribute to a cumulative air pollution impact.

Particulate matter (PM) refers to particles small enough to be breathed into the lungs (under 10 microns in size). It is not a single substance, but a mixture of a number of highly diverse types of particles and liquid droplets. It can be formed directly, primarily as dust from vehicle travel on paved and unpaved roads, agricultural operations, construction and demolition.

Carbon monoxide (CO) is a colorless and odorless gas that is directly emitted as a by-product of combustion. The highest concentrations are generally associated with cold stagnant weather conditions that occur during winter. CO problems tend to be localized.

An Air Toxic Contaminant (air toxic) is defined as an air pollutant that may cause or contribute to an increase in mortality or in serous illness, or which may pose a present or potential hazard to human health. Similar to criteria pollutants, air toxics are emitted from stationary, areawide, and mobile sources. They contribute to elevated regional and localized risks near industrial and commercial facilities and busy roadways. The ten compounds that pose the greatest statewide risk are: acetaldehyde; benzene; 1,3-butadiene; carbon tetrachloride; diesel particulate matter (diesel PM); formaldehyde; hexavalent chromium; methylene chloride; para-dichlorobenzene; and perchloroethylene. The risk from diesel PM is by far the largest, representing about 70 percent of the known statewide cancer risk from outdoor air toxics. The exhaust from diesel-fueled engines is a complex mixture of gases, vapors, and particles, many of which are known human carcinogens. Diesel PM is emitted from both mobile and stationary sources. In California, on-road diesel-fueled vehicles contribute about 26 percent of statewide diesel PM emissions, with an additional 72 percent attributed to other mobile sources such as construction and mining equipment, agricultural equipment, and other equipment. Stationary engines in shipyards, warehouses, heavy equipment repair yards, and oil and gas production operations contribute about two percent of statewide emissions. However, when this number is disaggregated to a sub-regional scale such as neighborhoods, the risk factor can be far greater.

[iii] The level of pollution emitted is a major determinant of the significance of the impact.

[iv] Indicates whether facility activities listed in column 4 are generally subject to local air district permits to operate. This does not include regulated products such as solvents and degreasers that may be used by sources that may not require an operating permit per se, e.g., a gas station or dry cleaner.

[v] Generally speaking, warehousing or distribution centers are not subject to local air district permits. However, depending on the district, motor vehicle fleet rules may apply to trucks or off-road vehicles operated and maintained by the facility operator. Additionally, emergency generators or internal combustion engines operated on the site may require an operating permit.

[vi] Authorized by recent legislation SB700.

[vii] Local air districts do not require permits for woodburning fireplaces inside private homes. However, some local air districts and land use agencies do have rules or ordinances that require new housing developments or home re-sales to install U.S. EPA –certified stoves. Some local air districts also ban residential woodburning during weather inversions that concentrate smoke in residential areas. Likewise, home water heaters are not subject to permits; however, new heaters could be subject to emission limits that are imposed by federal or local agency regulations.

[viii] Technical training schools that conduct activities normally permitted by a local air district could be subject to an air permit.

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LAND USE-BASED REFERENCE TOOLS TO EVALUATE NEW PROJECTS FOR POTENTIAL AIR POLLUTION IMPACTS

Land use agencies generally have a variety of tools and approaches at hand, or accessible from local air districts that can be useful in performing an analysis of potential air pollution impacts associated with new projects. These tools and approaches include:

- Base map of the city or county planning area and terrain elevations.
- General Plan designations of land use (existing and proposed).
- Zoning maps.
- Land use maps that identify existing land uses, including the location of facilities that are permitted or otherwise regulated by the local air district. Land use agencies should consult with their local air district for information on regulated facilities.
- Demographic data, e.g., population location and density, distribution of population by income, distribution of population by ethnicity, and distribution of population by age. The use of population data is a normal part of the planning process. However, from an air quality perspective, socioeconomic data is useful to identify potential community health and environmental justice issues.
- Emissions, monitoring, and risk-based maps created by the ARB or local air districts that show air pollution-related health risk by community across the state.
- Location of public facilities that enhance community quality of life, including parks, community centers, and open space.
- Location of industrial and commercial facilities and other land uses that use hazardous materials, or emit air pollutants. These include chemical storage facilities, hazardous waste disposal sites, dry cleaners, large gas dispensing facilities, auto body shops, and metal plating and finishing shops.
- Location of sources or facility types that result in diesel on-road and off-road emissions, e.g., stationary diesel power generators, forklifts, cranes, construction equipment, on-road vehicle idling, and operation of transportation refrigeration units. Distribution centers, marine terminals and ports, rail yards, large industrial facilities, and facilities that handle bulk goods are all examples of complex facilities where these types of emission sources are frequently concentrated.[1] Very large facilities, such as ports, marine terminals, and airports, could be analyzed regardless of proximity to a receptor if they are within the modeling area.
- Location and zoning designations for existing and proposed schools, buildings, or outdoor areas where sensitive individuals may live or play.
- Location and density of existing and proposed residential development.
- Zoning requirements, property setbacks, traffic flow requirements, and idling restrictions for trucks, trains, yard hostlers[2], construction equipment, or school buses.
- Traffic counts (including diesel truck traffic counts), within a community to validate or augment existing regional motor vehicle trip and speed data.

[1] The ARB is currently evaluating the types of facilities that may act as complex point sources and developing methods to identify them.

[2] Yard hostler means a tractor less than 300 horsepower that is used to transfer semi-truck or tractor-trailer containers in and around storage, transfer, or distribution yards or areas and is often equipped with a hydraulic lifting fifth wheel for connection to trailer containers.

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ARB AND LOCAL AIR DISTRICT INFORMATION AND TOOLS CONCERNING CUMULATIVE AIR POLLUTION IMPACTS

It is the ARB's policy to support research and data collection activities toward the goal of reducing cumulative air pollution impacts. These efforts include updating and improving the air toxics emissions inventory, performing special air monitoring studies in specific communities, and conducting a more complete assessment of non-cancer health effects associated with air toxics and criteria pollutants.[1] This information is important because it helps us better understand links between air pollution and the health of sensitive individuals -- children, the elderly, and those with pre-existing serious health problems affected by air quality.

ARB is working with CAPCOA and OEHHA to improve air pollutant data and evaluation tools to determine when and where cumulative air pollution impacts may be a problem. The following provides additional information on this effort.

How are emissions assessed?

Detailed information about the sources of air pollution in an area is collected and maintained by local air districts and the ARB in what is called an emission inventory. Emission inventories contain information about the nature of the business, the location, type and amount of air pollution emitted, the air pollution-producing processes, the type of air pollution control equipment, operating hours, and seasonal variations in activity. Local districts collect emission inventory data for most stationary source categories.

Local air districts collect air pollution emission information directly from facilities and businesses that are required to obtain an air pollution operating permit. Local air districts use this information to compile an emission inventory for areas within their jurisdiction. The ARB compiles a statewide emission inventory based on the information collected by the ARB and local air districts. Local air districts provide most of the stationary source emission data, and ARB provides mobile source emissions as well as some areawide emission sources such as consumer products and paints. ARB is also developing map-based tools that will display information on air pollution sources.

Criteria pollutant data have been collected since the early 1970's, and toxic pollutant inventories began to be developed in the mid-1980's.

[1] A criteria pollutant is any air pollutant for which EPA has established a National Ambient Air Quality Standard or for which California has established a State Ambient Air Quality Standard, including: carbon monoxide, lead, nitrogen oxides, ozone, particulates and sulfur oxides. Criteria pollutants are measured in each of California's air basins to determine whether the area meets or does not meet specific federal or state air quality standards. Air toxics or air toxic contaminants are listed pollutants recognized by California or EPA as posing a potential risk to health.

How is the toxic emission inventory developed?

Emissions data for toxic air pollutants is a high priority for communities because of concerns about potential health effects. Most of ARB's air toxics data is collected through the toxic "Hot Spots" program. Local air districts collect emissions data from industrial and commercial facilities. Facilities that exceed health-based thresholds are required to report their air toxics emissions as part of the toxic "Hot Spots" program and update their emissions data every four years. Facilities are required to report their air toxics emissions data if there is an increase that would trigger the reporting threshold of the hotspots program. Air toxics emissions from motor vehicles and consumer products are estimated by the ARB. These estimates are generally regional in nature, reflecting traffic and population.

The ARB also maintains chemical speciation profiles that can be used to estimate toxics emissions when no toxic emissions data is available.

What additional toxic emissions information is needed?

In order to assess cumulative air pollution impacts, updated information from individual facilities is needed. Even for sources where emissions data are available, additional information such as the location of emissions release points is often needed to better model cumulative impacts. In terms of motor vehicles, emissions data are currently based on traffic models that only contain major roads and freeways. Local traffic data are needed so that traffic emissions can be more accurately assigned to specific streets and roads. Local information is also needed for off-road emission sources, such as ships, trains, and construction equipment. In addition, hourly maximum emissions data are needed for assessing acute air pollution impacts.

What work is underway?

ARB is working with CAPCOA to improve toxic emissions data, developing a community health air pollution information system to improve access to emission information, conducting neighborhood assessment studies to better understand toxic emission sources, and conducting surveys of sources of toxic pollutants.

How is air pollution monitored?

While emissions data identify how much air pollution is going into the air, the state's air quality monitoring network measures air pollutant levels in outdoor air. The statewide air monitoring network is primarily designed to measure regional exposure to air pollutants, and consists of more than 250 air monitoring sites.

The air toxics monitoring network consists of approximately 20 permanent sites. These sites are supplemented by special monitoring studies conducted by ARB and local air districts. These sites measure approximately sixty toxic air pollutants. Diesel PM, which is the major driver of urban air toxic risk, is not monitored directly. Ten of the

60 toxic pollutants, not including diesel, account for most of the remaining potential cancer risk in California urban areas.

What additional monitoring has been done?

Recently, additional monitoring has been done to look at air quality at the community level. ARB's community monitoring was conducted in six communities located throughout the state. Most sites were in low-income, minority communities located near major sources of air pollution, such as refineries or freeways. The monitoring took place for a year or more in each community, and included measurements of both criteria and toxic pollutants.

What is being learned from community monitoring?

In some cases, the ARB or local air districts have performed air quality monitoring or modeling studies covering a particular region of the state. When available, these studies can give information about regional air pollution exposures.

The preliminary results of ARB's community monitoring are providing insights into air pollution at the community level. Urban background levels are a major contributor to the overall risk from air toxics in urban areas, and this urban background tends to mask the differences between communities. When localized elevated air pollutant levels were measured, they were usually associated with local ground-level sources of toxic pollutants. The most common source of this type was busy streets and freeways. The impact these ground-level sources had on local air quality decreased rapidly with distance from the source. Pollutant levels usually returned to urban background levels within a few hundred meters of the source.

These results indicate that tools to assess cumulative impacts must be able to account for both localized, near-source impacts, as well as regional background air pollution. The tools that ARB is developing for this purpose are air quality models.

How can air quality modeling be used?

While air monitoring can directly measure cumulative exposure to air pollution, it is limited because all locations cannot be monitored. To address this, air quality modeling provides the capability to estimate exposure when air monitoring is not feasible. Air quality modeling can be refined to assess local exposure, identify locations of potential hot spots, and identify the relative contribution of emission sources to exposure at specific locations. The ARB has used this type of information to develop regional cumulative risk maps that estimate the cumulative cancer air pollution risk for most of California. While these maps only show one air pollution-related health risk, it does provide a useful starting point.

What is needed for community modeling?

Air quality models have been developed to assess near-source impacts, but they have very exacting data requirements. These near-source models estimate the impact of local sources, but do not routinely include the contribution from regional air pollution background. To estimate cumulative air pollution exposure at a neighborhood scale, a modeling approach needs to combine features of both micro-scale and regional models.

In addition, improved methods are needed to assess near-source impacts under light and variable wind conditions, when high local concentrations are more likely to occur. A method for modeling long-term exposure to air pollutants near freeways and other high traffic areas is also needed.

What modeling work has ARB developed?

A key component of ARB's Community Health Program is the Neighborhood Assessment Program (NAP). As described later in this section, the NAP studies are being conducted to better understand pollution impacts at the community level. Through two such studies conducted in Barrio Logan (San Diego) and Wilmington (Los Angeles), ARB is refining community-level modeling methodologies. Regional air toxics modeling is also being performed to better understand regional air pollution background levels.

In a parallel effort, ARB is developing modeling protocols for estimating cumulative emissions, exposure, and risk from air pollution. The protocols will cover modeling approaches and uncertainties, procedures for running the models, the development of statewide risk maps, and methods for estimating health risks. The protocols are subject to an extensive peer review process prior to release.

How are air pollution impacts on community health assessed?

On a statewide basis, ARB's toxic air contaminant program identifies and reduces public exposure to air toxics. The focus of the program has been on reducing potential cancer risk, because monitoring results show potential urban cancer risk levels are too high. ARB has also looked for potential non-cancer risks based on health reference levels provided by OEHHA. On a regional basis, the pollutants measured in ARB's toxic monitoring network are generally below the OEHHA non-cancer reference exposure levels.

As part of its community health program, the ARB is looking at potential cancer and non-cancer risk. This could include chronic or acute health effects. If the assessment work shows elevated exposures on a localized basis, ARB will work with OEHHA to assess the health impacts.

What tools has ARB developed to assess cumulative air pollution impacts?

ARB has developed the following tools and reports to assist land use agencies and local air districts assess and reduce cumulative emissions, exposure, and risk on a neighborhood scale.

Statewide Risk Maps

ARB has produced regional risk maps that show the statewide trends for Southern and Central California in estimated potential cancer risk from air toxics between 1990 and 2010.[2] These maps will supplement U.S. EPA's ASPEN model and are available on the ARB's Internet site. These maps are best used to obtain an estimate of the regional background air pollution health risk and are not detailed enough to estimate the exact risk at a specific location.

ARB also has maps that focus in more detail on smaller areas that fall within the Southern and Central California regions for these same modeled years. The finest visual resolution available in the maps on this web site is two by two kilometers. These maps are not detailed enough to assess individual neighborhoods or facilities.

Community Health Air Pollution Information System (CHAPIS)

CHAPIS is an Internet-based procedure for displaying information on emissions from sources of air pollution in an easy to use mapping format. CHAPIS uses Geographical Information System (GIS) software to deliver interactive maps over the Internet. CHAPIS relies on emission estimates reported to the ARB's emission inventory database - California Emissions Inventory Development and Reporting System, or CEIDARS.

Through CHAPIS, air district staff can quickly and easily identify pollutant sources and emissions within a specified area. CHAPIS contains information on air pollution emissions from selected large facilities and small businesses that emit criteria and toxic air pollutants. It also contains information on air pollution emissions from motor vehicle and areawide emissions. CHAPIS does not contain information on every source of air pollution or every air pollutant. It is a major long-term objective of CHAPIS to include all of the largest air pollution sources and those with the highest documented air pollution risk. CHAPIS will be updated on a periodic basis and additional facilities will be added to CHAPIS as more data becomes available.

CHAPIS is being developed in stages to assure data quality. The initial release of CHAPIS will include facilities emitting 10 or more tons per year of nitrogen oxides, sulfur dioxide, carbon monoxide, PM10, or reactive organic gases; air toxics from refineries and power plants of 50 megawatts or more; and facilities that conducted health risk

[2]ARB maintains state trends and local potential cancer risk maps that show statewide trends in potential inhalable cancer risk from air toxics between 1990 and 2010. This information can be viewed at ARB's web site at http://www.arb.ca.gov/toxics/cti/hlthrisk/hlthrisk.htm)

assessments under the California Air Toxics "Hot Spots" Information and Assessment Program.[3]

CHAPIS can be used to identify the emission contributions from mobile, area, and point sources on that community.

"Hot Spots" Analysis and Reporting Program (HARP)

HARP[4] is a software package available from the ARB and is designed with air quality professionals in mind. It models emissions and release data from one or more facilities to estimate the potential health risk posed by the selected facilities on the neighboring community. HARP uses the latest risk assessment guidelines published by OEHHA.

With HARP, a user can perform the following tasks:

- Create and manage facility databases;
- Perform air dispersion modeling;
- Conduct health risk analyses;
- Output data reports; and
- Output results to GIS mapping software.

HARP can model downwind concentrations of air toxics based on the calculated emissions dispersion at a single facility. HARP also has the capability of assessing the risk from multiple facilities, and for multiple locations of concern near those facilities. While HARP has the capability to assess multiple source impacts, there had been limited application of the multiple facility assessment function in the field at the time of HARP's debut in 2003. HARP can also evaluate multi-pathway, non-inhalation health risk resulting from air pollution exposure, including skin and soil exposure, and ingestion of meat and vegetables contaminated with air toxics, and other toxics that have accumulated in a mother's breast milk.

Neighborhood Assessment Program (NAP)

The NAP[5] has been a key component of ARB's Community Health Program. It includes the development of tools that can be used to perform assessments of cumulative air pollution impacts on a neighborhood scale. The NAP studies have been done to better understand how air pollution affects individuals at the neighborhood level. Thus far, ARB has conducted neighborhood scale assessments in Barrio Logan and Wilmington.

As part of these studies, ARB is collecting data and developing a modeling protocol that can be used to conduct cumulative air pollution impact assessments. Initially these

[3] California Health & Safety Code section 44300, et seq.
[4] More detailed information can be found on ARB's website at: http://www.arb.ca.gov/toxics/harp/harp.htm
[5] For more information on the Program, please refer to: http://www.arb.ca.gov/ch/programs/nap/nap.htm

assessments will focus on cumulative inhalation cancer health risk and chronic non-cancer impacts. The major challenge is developing modeling methods that can combine both regional and localized air pollution impacts, and identifying the critical data necessary to support these models. The objective is to develop methods and tools from these studies that can ultimately be applied to other areas of the state. In addition, the ARB plans to use these methods to replace the ASPEN regional risk maps currently posted on the ARB Internet site.

Urban Emissions Model (URBEMIS)

URBEMIS[6] is a computer program that can be used to estimate emissions associated with land development projects in California such as residential neighborhoods, shopping centers, office buildings, and construction projects. URBEMIS uses emission factors available from the ARB to estimate vehicle emissions associated with new land uses. URBEMIS estimates sulfur dioxide emissions from motor vehicles in addition to reactive organic gases, nitrogen oxides, carbon monoxide, and PM10.

Land-Use Air Quality Linkage Report[7]

This report summarizes data currently available on the relationships between land use, transportation and air quality. It also highlights strategies that can help to reduce the use of the private automobile. It also briefly summarizes two ARB-funded research projects. The first project analyzes the travel patterns of residents living in five higher density, mixed use neighborhoods in California, and compares them to travel in more auto-oriented areas. The second study correlates the relationship between travel behavior and community characteristics, such as density, mixed land uses, transit service, and accessibility for pedestrians.

[6] For more information on this model, please refer to ARB's website at http://www.arb.ca.gov/html/soft.htm.

[7] To access this report, please refer to ARB's website or click on: http://www.arb.ca.gov/ch/programs/link97.pdf

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LAND USE AND AIR QUALITY AGENCY ROLES IN THE LAND USE PROCESS

A wide variety of federal, state, and local government agencies are responsible for regulatory, planning, and siting decisions that can have an impact on air pollution. They include local land use agencies, regional councils of government, school districts, local air districts, ARB, the California Department of Transportation (Caltrans), and the Governor's Office of Planning and Research (OPR) to name a few. This Section will focus on the roles and responsibilities of local and state agencies. The role of school districts will be discussed in Appendix E.

Local Land Use Agencies

Under the State Constitution, land use agencies have the primary authority to plan and control land use.[1] Each of California's incorporated cities and counties are required to adopt a comprehensive, long-term General Plan.[2]

The General Plan's long-term goals are implemented through zoning ordinances. These are local laws adopted by counties and cities that describe for specific areas the kinds of development that will be allowed within their boundaries.

Land use agencies are also the lead for doing environmental assessments under CEQA for new projects that may pose a significant environmental impact, or for new or revised General Plans.

Local Agency Formation Commissions (LAFCOs)

Operating in each of California's 58 counties, LAFCOs are composed of local elected officials and public members who are responsible for coordinating changes in local governmental boundaries, conducting special studies that review ways to reorganize, simplify, and streamline governmental structures, and preparing a sphere of influence for each city and special district within each county. Each Commission's efforts are directed toward seeing that local government services are provided efficiently and economically while agricultural and open-space lands are protected. LAFCO decisions strive to balance the competing needs in California for efficient services, affordable housing, economic opportunity, and conservation of natural resources.

[1] The legal basis for planning and land use regulation is the "police power" of the city or county to protect the public's health, safety and welfare. The California Constitution gives cities and counties the power to make and enforce all local police, sanitary and other ordinances and regulations not in conflict with general laws. State law reference: California Constitution, Article XI §7.

[2] OPR General Plan Guidelines, 2003: http://www.opr.ca.gov/planning/PDFs/General_Plan_Guidelines_2003.pdf

Councils of Government (COG)

COGs are organizations composed of local counties and cities that serve as a focus for the development of sound regional planning, including plans for transportation, growth management, hazardous waste management, and air quality. They can also function as the metropolitan planning organization for coordinating the region's transportation programs. COGs also prepare regional housing need allocations for updates of General Plan housing elements.

Local Air Districts

Under state law, air pollution control districts or air quality management districts (local air districts) are the local government agencies responsible for improving air quality and are generally the first point of contact for resolving local air pollution issues or complaints. There are 35 local air districts in California[3] that have authority and primary responsibility for regional clean air planning. Local air districts regulate stationary sources of air pollutants within their jurisdiction including but not limited to industrial and commercial facilities, power plants, construction activities, outdoor burning, and other non-mobile sources of air pollution. Some local air districts also regulate public and private motor vehicle fleet operators such as public bus systems, private shuttle and taxi services, and commercial truck depots.

- **Regional Clean Air Plans**

Local air districts are responsible for the development and adoption of clean air plans that protect the public from the harmful effects of air pollution. These plans incorporate strategies that are necessary to attain ambient air quality standards. Also included in these regional air plans are ARB and local district measures to reduce statewide emissions from mobile sources, consumer products, and industrial sources.

- **Facility-Specific Considerations**

Permitting. In addition to the planning function, local air districts adopt and enforce regulations, issue permits, and evaluate the potential environmental impacts of projects.

Pollution is regulated through permits and technology-based rules that limit emissions from operating units within a facility or set standards that vehicle fleet operators must meet. Permits to construct and permits to operate contain very specific requirements and conditions that tell each regulated source what it must do to limit its air pollution in compliance with local air district rules, regulations, and state law. Prior to receiving a permit, new facilities must go through a New Source Review (NSR) process that establishes air pollution control requirements for the facility. Permit conditions are typically contained in the permit to operate and specify requirements that businesses must follow; these may include limits on the amount of pollution that can be emitted, the

[3] Contact information for local air districts in California is listed in the front of this Handbook.

type of pollution control equipment that must be installed and maintained, and various record-keeping requirements.

Local air districts also notify the public about new permit applications for major new facilities, or major modifications to existing facilities that seek to locate within 1,000 feet of a school.

Local air districts can also regulate other types of sources to reduce emissions. These include regulations to reduce emissions from the following sources:

- hazardous materials in products used by industry such as paints, solvents, and de-greasers;
- agricultural and residential burning;
- leaking gasoline nozzles at service stations;
- public fleet vehicles such as sanitation trucks and school buses; and
- fugitive or uncontrolled dust at construction sites.

However, while emissions from industrial and commercial sources are typically subject to the permit authority of the local air district, sensitive sites such as a day care center, convalescent home, or playground are not ordinarily subject to an air permit. Local air district permits address the air pollutant emissions of a project but not its location.

Under the state's air toxics program, local air districts regulate air toxic emissions by adopting ARB air toxic control measures, or more stringent district-specific requirements, and by requiring individual facilities to perform a health risk assessment if emissions at the source exceed district-specific health risk thresholds[4], [5] (See the section on ARB programs for a more detailed summary of this program).

One approach by which local air districts regulate air toxics emissions is through the "Hot Spots" program.[6] The risk assessments submitted by the facilities under this

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[4] Cal/EPA's Office of Environmental Health Hazard Assessment has published "A Guide to Health Risk Assessment" for lay people involved in environmental health issues, including policymakers, businesspeople, members of community groups, and others with an interest in the potential health effects of toxic chemicals. To access this information, please refer to http://www.oehha.ca.gov/pdf/HRSguide2001.pdf

[5] Section 44306 of the California Health & Safety Code defines a health risk assessment as a detailed comprehensive analysis that a polluting facility uses to evaluate and predict the dispersion of hazardous substances in the environment and the potential for exposure of human populations, and to assess and quantify both the individual and population-wide health risks associated with those levels of exposure.

[6] AB-2588 (the Air Toxics "Hot Spots" Information and Assessment Act) requires local air districts to prioritize facilities by high, intermediate, and low priority categories to determine which must perform a health risk assessment. Each district is responsible for establishing the prioritization score threshold at which facilities are required to prepare a health risk assessment. In establishing priorities for each facility, local air districts must consider the potency, toxicity, quantity, and volume of hazardous materials released from the facility, the proximity of the facility to potential receptors, and any other factors that the district determines may indicate that the facility may pose a significant risk. All facilities within the highest category must prepare a health risk assessment. In addition, each district may require facilities in the intermediate and low priority categories to also submit a health risk assessment.

Table D-1
Local Sources of Air Pollution, Responsible Agencies, and Associated Regulatory Programs

Source	Examples	Primary Agency	Applicable Regulations
Large Stationary	Refineries, power plants, chemical facilities, certain manufacturing plants	Local air districts	Operating permit rules Air Toxics "Hot Spots" Law (AB 2588) Local district rules Air Toxic Control Measures (ATCMs)* New Source Review rules Title V permit rules
Small Stationary	Dry cleaners, auto body shops, welders, chrome plating facilities, service stations, certain manufacturing plants	Local air districts	Operating permit conditions, Air Toxics "Hot Spots" Law (AB 2588) Local district rules ATCMs* New Source Review rules
Mobile (non-fleet)	Cars, trucks, buses	ARB	Emission standards Cleaner-burning fuels (e.g., unleaded gasoline, low-sulfur diesel) Inspection and repair programs (e.g., Smog Check)
Mobile Equipment	Construction equipment	ARB, U.S. EPA	ARB rules U.S. EPA rules
Mobile (fleet)	Truck depots, school buses, taxi services	Local air districts, ARB	Local air district rules ARB urban bus fleet rule
Areawide	Paints and consumer products such as hair spray and spray paint	Local air district, ARB	ARB rules Local air district rules

*ARB adopts ATCMs, but local air districts have the responsibility to implement and enforce these measures or more stringent ones.

program are reviewed by OEHHA and approved by the local air district. Risk assessments are available by contacting the local air district.

Enforcement. Local air districts also take enforcement action to ensure compliance with air quality requirements. They enforce air toxic control measures, agricultural and residential burning programs, gasoline vapor control regulations, laws that prohibit air pollution nuisances, visible emission limits, and many other requirements designed to

clean the air. Local districts use a variety of enforcement tools to ensure compliance. These include notices of violation, monetary penalties, and abatement orders. Under some circumstances, a permit may be revoked.

- **Environmental Review**

As required by the California Environmental Quality Act (CEQA), local air districts also review and comment on proposed land use plans and development projects that can have a significant effect on the environment or public health.[7]

California Air Resources Board

The ARB is the air pollution control agency at the state level that is responsible for the preparation of air plans required by state and federal law. In this regard, it coordinates the activities of all local air districts to ensure all statutory requirements are met and to reduce air pollution emissions for sources under its jurisdiction.

Motor vehicles are the single largest emissions source category under ARB's jurisdiction as well as the largest overall emissions source statewide. ARB also regulates emissions from other mobile equipment and engines as well as emissions from consumer products such as hair sprays, perfumes, cleaners, and aerosol paints.

Air Toxics Program

Under state law, the ARB has a critical role to play in the identification, prioritization, and control of air toxic emissions. The ARB statewide comprehensive air toxics program was established in the early 1980's. The Toxic Air Contaminant Identification and Control Act of 1983 (AB 1807, Tanner 1983) created California's program to reduce exposure to air toxics.[8] The Air Toxics "Hot Spots" Information and Assessment Act (Hot Spots program) supplements the AB 1807 program, by requiring a statewide air toxics inventory, notification of people exposed to a significant health risk, and facility plans to reduce these risks.

Under AB 1807, the ARB is required to use certain criteria to prioritize the identification and control of air toxics. In selecting substances for review, the ARB must consider criteria relating to emissions, exposure, and health risk, as well as persistence in the atmosphere, and ambient concentrations in the community. AB 1807 also requires the ARB to use available information gathered from the Hot Spots program when prioritizing compounds.

The ARB identifies pollutants as toxic air contaminants and adopts statewide air toxic control measures (ATCMs). Once ARB adopts an ATCM, local air districts must

[7] Section 4 of this Handbook contains more information on the CEQA process.
[8] For a general background on California's air toxics program, the reader should refer to ARB's website at http://www.arb.ca.gov/toxics/tac/appendxb.htm.

implement the measure, or adopt and implement district-specific measures that are at least as stringent as the state standard. Taken in the aggregate, these ARB programs will continue to further reduce emissions, exposure, and health risk statewide.

With regard to the land use decision-making process, ARB, in conjunction with local air districts, plays an advisory role by providing technical information on land use-related air issues.

Other Agencies

Governor's Office of Planning and Research (OPR)

In addition to serving as the Governor's advisor on land use planning, research, and liaison with local government, OPR develops and implements the state's policy on land use planning and coordinates the state's environmental justice programs. OPR updated its General Plan Guidelines in 2003 to highlight the importance of sustainable development and environmental justice policies in the planning process. OPR also advises project proponents and government agencies on CEQA provisions and operates the State Clearinghouse for environmental and federal grant documents.

California Department of Housing and Community Development

The Department of Housing and Community Development (HCD) administers a variety of state laws, programs and policies to preserve and expand housing opportunities, including the development of affordable housing. All local jurisdictions must update their housing elements according to a staggered statutory schedule, and are subject to certification by HCD. In their housing elements, cities and counties are required to include a land inventory which identifies and zones sites for future residential development to accommodate a mix of housing types, and to remove barriers to the development of housing.

An objective of state housing element law is to increase the overall supply and affordability of housing. Other fundamental goals include conserving existing affordable housing, improving the condition of the existing housing stock, removing regulatory barriers to housing production, expanding equal housing opportunities, and addressing the special housing needs of the state's most vulnerable residents (frail elderly, disabled, large families with children, farmworkers, and the homeless).

Transportation Agencies

Transportation agencies can also influence mobile source-related emissions in the land use decision-making process. Local transportation agencies work with land use agencies to develop a transportation (circulation) element for the General Plan. These local government agencies then work with other transportation-related agencies, such as the Congestion Management Agency (CMA), Metropolitan Planning Organization

(MPO), Regional Transportation Planning Agency (RTPA), and Caltrans to develop long and short range transportation plans and projects.

Caltrans is the agency responsible for setting state transportation goals and for state transportation planning, design, construction, operations and maintenance activities. Caltrans is also responsible for delivering California's multibillion-dollar state Transportation Improvement Program, a list of transportation projects that are approved for funding by the California Transportation Commission in a 4-year cycle.

When safety hazards or traffic circulation problems are identified in the existing road system, or when land use changes are proposed such as a new residential subdivision, shopping mall or manufacturing center, Caltrans and/or the local transportation agency ensure the projects meet applicable state, regional, and local goals and objectives.

Caltrans also evaluates transportation-related projects for regional air quality impacts, from the perspective of travel-related emissions as well as road congestion and increases in road capacity (new lanes).

California Energy Commission (CEC)

The CEC is the state's CEQA lead agency for permitting large thermal power plants (50 megawatts or greater). The CEC works closely with local air districts and other federal, state and local agencies to ensure compliance with applicable laws, ordinances, regulations and standards in the permitting, construction, operation and closure of such plants. The CEC uses an open and public review process that provides communities with outreach and multiple opportunities to participate and be heard. In addition to its comprehensive environmental impact and engineering design assessment process, the CEC also conducts an environmental justice evaluation. This evaluation involves an initial demographic screening to determine if a qualifying minority or low-income population exists in the vicinity of the proposed project. If such a population is present, staff considers possible environmental justice impacts including from associated project emissions in its technical assessments.[9]

Department of Pesticides Regulation (DPR)

Pesticides are industrial chemicals produced specifically for their toxicity to a target pest. They must be released into the environment to do their job. Therefore, regulation of pesticides focuses on using toxicity and other information to ensure that when pesticides are used according to their label directions, potential for harm to people and the environment is minimized. DPR imposes strict controls on use, beginning before pesticide products can be sold in California, with an extensive scientific program to ensure they can be used safely. DPR and county enforcement staff tracks the use of pesticides to ensure that pesticides are used properly. DPR collects periodic

[9] See California Energy Commission, "Environmental Performance Report," July 2001 at http://www.energy.ca.gov/reports/2001-11-20_700-01-001.PDF

measurements of any remaining amounts of pesticides in water, air, and on fresh produce. If unsafe levels are found, DPR requires changes in how pesticides are used, to reduce the possibility of harm. If this cannot be done - that is, if a pesticide cannot be used safely - use of the pesticide will be banned in California.[10]

Federal Agencies

Federal agencies have permit authority over activities on federal lands and certain resources, which have been the subject of congressional legislation, such as air, water quality, wildlife, and navigable waters. The U.S. Environmental Protection Agency generally oversees implementation of the federal Clean Air Act, and has broad authority for regulating certain activities such as mobile sources, air toxics sources, the disposal of toxic wastes, and the use of pesticides. The responsibility for implementing some federal regulatory programs such as those for air and water quality and toxics is delegated by management to specific state and local agencies. Although federal agencies are not subject to CEQA they must follow their own environmental process established under the National Environmental Policy Act (NEPA).

[10] For more information, the reader is encouraged to visit the Department of Pesticide Regulation web site at www.cdpr.ca.gov/docs/empm/pubs/tacmenu.htm.

SPECIAL PROCESSES THAT APPLY TO SCHOOL SITING

The California Education Code and the California Public Resources Code place primary authority for siting public schools with the local school district, which is the 'lead agency' for purposes of CEQA. The California Education Code requires public school districts to notify the local planning agency about siting a new public school or expanding an existing school. The planning agency then reports back to the school district regarding a project's conformity with the adopted General Plan. However, school districts can overrule local zoning and land use designations for schools if they follow specified procedures. In addition, all school districts must evaluate new school sites using site selection standards established in Section 14010 of Title 5 of the California Code of Regulations. Districts seeking state funding for school site acquisition must also obtain site approval from the California Department of Education.

Before making a final decision on a school site acquisition, a school district must comply with CEQA and evaluate the proposed site acquisition/new school project for air emissions and health risks by preparing and certifying an environmental impact report or negative declaration. Both the California Education Code section 17213 and the California Public Resources Code section 21151.8 require school districts to consult with administering agencies and local air districts when preparing the environmental assessment. Such consultation is required to identify both permitted and non-permitted "facilities" that might significantly affect health at the new site. These facilities include, but are not limited to, freeways and other busy traffic corridors, large agricultural operations, and rail yards that are within one-quarter mile of the proposed school site, and that might emit hazardous air emissions, or handle hazardous or acutely hazardous materials, substances, or waste.

As part of the CEQA process and before approving a school site, the school district must make a finding that either it found none of the facilities or significant air pollution sources, or alternatively, if the school district finds that there are such facilities or sources, it must determine either that they pose no significant health risks, or that corrective actions by another governmental entity would be taken so that there would be no actual or potential endangerment to students or school workers.

In addition, if the proposed school site boundary is within 500 feet of the edge of the closest traffic lane of a freeway or traffic corridor that has specified minimum average daily traffic counts, the school district is required to determine through specified risk assessment and air dispersion modeling that neither short-term nor long term exposure poses significant heath risks to pupils.

State law changes effective January 1, 2004 (SB352, Escutia 2003, amending Education Code section 17213 and Public Resources Code section 21151.8) also provides for cases in which the school district cannot make either of those two findings and cannot find a suitable alternative site. When this occurs, the school district must adopt a statement of over-riding considerations, as part of an environmental impact

report, that the project should be approved based on the ultimate balancing of the merits.

Some school districts use a standardized assessment process to determine the environmental impacts of a proposed school site. In the assessment process, school districts can use maps and other available information to evaluate risk, including a local air district's database of permitted source emissions. School districts can also perform field surveys and record searches to identify and calculate emissions from non-permitted sources within one-quarter mile radius of a proposed site. Traffic count data and vehicular emissions data can also be obtained from Caltrans for major roadways and freeways in proximity to the proposed site to model potential emissions impacts to students and school employees. This information is available from the local COG, Caltrans, or local cities and counties for non-state maintained roads.

GENERAL PROCESSES USED BY LAND USE AGENCIES TO ADDRESS AIR POLLUTION IMPACTS

There are several separate but related processes for addressing the air pollution impacts of land use projects. One takes place as part of the planning and zoning function. This consists of preparing and implementing goals and policies contained in county or city General Plans, community or area plans, and specific plans governing land uses such as residential, educational, commercial, industrial, and recreational activities. It also includes recommending locations for thoroughfares, parks and other public improvements.

Land use agencies also have a permitting function that includes performing environmental reviews and mitigation when projects may pose a significant environmental impact. They conduct inspections for zoning permits issued, enforce the zoning regulations and issue violations as necessary, issue zoning certificates of compliance, and check compliance when approving certificates of occupancy.

Planning

- **General Plan**[1]

The General Plan is a local government "blueprint" of existing and future anticipated land uses for long-term future development. It is composed of the goals, policies, and general elements upon which land use decisions are based. Because the General Plan is the foundation for all local planning and development, it is an important tool for implementing policies and programs beneficial to air quality. Local governments may choose to adopt a separate air quality element into their General Plan or to integrate air quality-beneficial objectives, policies, and strategies in other elements of the Plan, such as the land use, circulation, conservation, and community design elements.

More information on General Plan elements is contained in Appendix D.

- **Community Plans**

Community or area plans are terms for plans that focus on a particular region or community within the overall general plan area. It refines the policies of the general plan as they apply to a smaller geographic area and is implemented by ordinances and other discretionary actions, such as zoning.

[1] In October 2003, OPR revised its General Plan Guidelines. An entire chapter is now devoted to a discussion of how sustainable development and environmental justice goals can be incorporated into the land use planning process. For further information, the reader is encouraged to obtain a copy of OPR's General Plan Guidelines, or refer to their website at: http://www.opr.ca.gov/planning/PDFs/General_Plan_Guidelines_2003.pdf

- **Specific Plan**

A specific plan is a hybrid that can combine policies with development regulations or zoning requirements. It is often used to address the development requirements for a single project such as urban infill or a planned community. As a result, its emphasis is on concrete standards and development criteria.

- **Zoning**

Zoning is the public regulation of the use of land. It involves the adoption of ordinances that divide a community into various districts or zones. For instance, zoning ordinances designate what projects and activities can be sited in particular locations. Each zone designates allowable uses of land within that zone, such as residential, commercial, or industrial. Zoning ordinances can address building development standards, e.g., minimum lot size, maximum building height, minimum building setback, parking, signage, density, and other allowable uses.

Land Use Permitting

In addition to the planning and zoning function, land use agencies issue building and business permits, and evaluate the potential environmental impacts of projects. To be approved, projects must be located in a designated zone and comply with applicable ordinances and zoning requirements.

Even if a project is sited properly in a designated zone, a land use agency may require a new source to mitigate potential localized environmental impacts to the surrounding community below what would be required by the local air district. In this case, the land use agency could condition the permit by limiting or prescribing allowable uses including operating hour restrictions, building standards and codes, property setbacks between the business property and the street or other structures, vehicle idling restrictions, or traffic diversion.

Land use agencies also evaluate the environmental impacts of proposed land use projects or activities. If a project or activity falls under CEQA, the land use agency requires an environmental review before issuing a permit to determine if there is the potential for a significant impact, and if so, to mitigate the impact or possibly deny the project.

- **Land Use Permitting Process**

In California, the authority to regulate land use is delegated to city and county governments. The local land use planning agency is the local government administrative body that typically provides information and coordinates the review of development project applications. Conditional Use Permits (CUP) typically fall within a land use agency's discretionary authority and therefore are subject to CEQA. CUPs are

intended to provide an opportunity to review the location, design, and manner of development of land uses prior to project approval. A traditional purpose of the CUP is to enable a municipality to control certain uses that could have detrimental environmental effects on the community.

The process for permitting new discretionary projects is quite elaborate, but can be broken down into five fundamental components:

- Project application
- Environmental assessment
- Consultation
- Public comment
- Public hearing and decision

Project Application

The permit process begins when the land use agency receives a project application, with a detailed project description, and support documentation. During this phase, the agency reviews the submitted application for completeness. When the agency deems the application to be complete, the permit process moves into the environmental review phase.

Environmental Assessment

If the project is discretionary and the application is accepted as complete, the project proposal or activity must undergo an environmental clearance process under CEQA and the CEQA Guidelines adopted by the California Resources Agency.[2] The purpose of the CEQA process is to inform decision-makers and the public of the potential significant environmental impacts of a project or activity, to identify measures to minimize or eliminate those impacts to the point they are no longer significant, and to discuss alternatives that will accomplish the project goals and objectives in a less environmentally harmful manner.

What is a "Lead Agency"?

A lead agency is the public agency that has the principal responsibility for carrying out or approving a project that is subject to CEQA. In general, the land use agency is the preferred public agency serving as lead agency because it has jurisdiction over general land uses. The lead agency is responsible for determining the appropriate environmental document, as well as its preparation.

What is a "Responsible Agency"?

A responsible agency is a public agency with discretionary approval authority over a portion of a CEQA project (e.g., projects requiring a permit). As a responsible agency, the agency is available to the lead agency and project proponent for early consultation on a project to apprise them of applicable rules and regulations, potential adverse impacts, alternatives, and mitigation measures, and provide guidance as needed on applicable methodologies or other related issues.

What is a "Commenting Agency"?

A commenting agency is any public agency that comments on a CEQA document, but is neither a lead agency nor a responsible agency. For example, a local air district, as the agency with the responsibility for comprehensive air pollution control, could review and comment on an air quality analysis in a CEQA document for a proposed distribution center, even though the project was not subject to a permit or other pollution control requirements.

[2] Projects and activities that may have a significant adverse impact on the environment are evaluated under CEQA Guidelines set forth in title 14 of the California Code of Regulations, sections 15000 et seq.

To assist the lead agency in determining whether the project or activity may have a significant effect that would require the preparation of an EIR, the land use agency may consider criteria, or thresholds of significance, to assess the potential impacts of the project, including its air quality impacts. The land use agency must consider any credible evidence in addition to the thresholds, however, in determining whether the project or activity may have a significant effect that would trigger the preparation of an EIR.

The screening criteria to determine significance is based on a variety of factors, including local, state, and federal regulations, administrative practices of other public agencies, and commonly accepted professional standards. However, the final determination of significance for individual projects is the responsibility of the lead agency. In the case of land use projects, the lead agency would be the City Council or County Board of Supervisors.

A new land use plan or project can also trigger an environmental assessment under CEQA if, among other things, it will expose sensitive sites such as schools, day care centers, hospitals, retirement homes, convalescence facilities, and residences to substantial pollutant concentrations.[3]

CEQA only applies to "discretionary projects." Discretionary means the public agency must exercise judgment and deliberation when deciding to approve or disapprove a particular project or activity, and may append specific conditions to its approval. Examples of discretionary projects include the issuance of a CUP, re-zoning a property, or widening of a public road. Projects that are not subject to the exercise of agency discretion, and can therefore be approved administratively through the application of set standards are referred to as ministerial projects. CEQA does not apply to ministerial projects.[4] Examples of typical ministerial projects include the issuance of most building permits or a business license.

Once a potential environmental impact associated with a project is identified through an environmental assessment, mitigation must be considered. A land use agency should incorporate mitigation measures that are suggested by the local air district as part of the project review process.

Consultation

Application materials are provided to various departments and agencies that may have an interest in the project (e.g., air pollution, building, police, fire, water agency, Fish and Game, etc.) for consultation and input.

[3] Readers interested in learning more about CEQA should contact OPR or visit their website at http://www.opr.ca.gov/.

[4] See California Public Resources Code section 21080(b)(1).

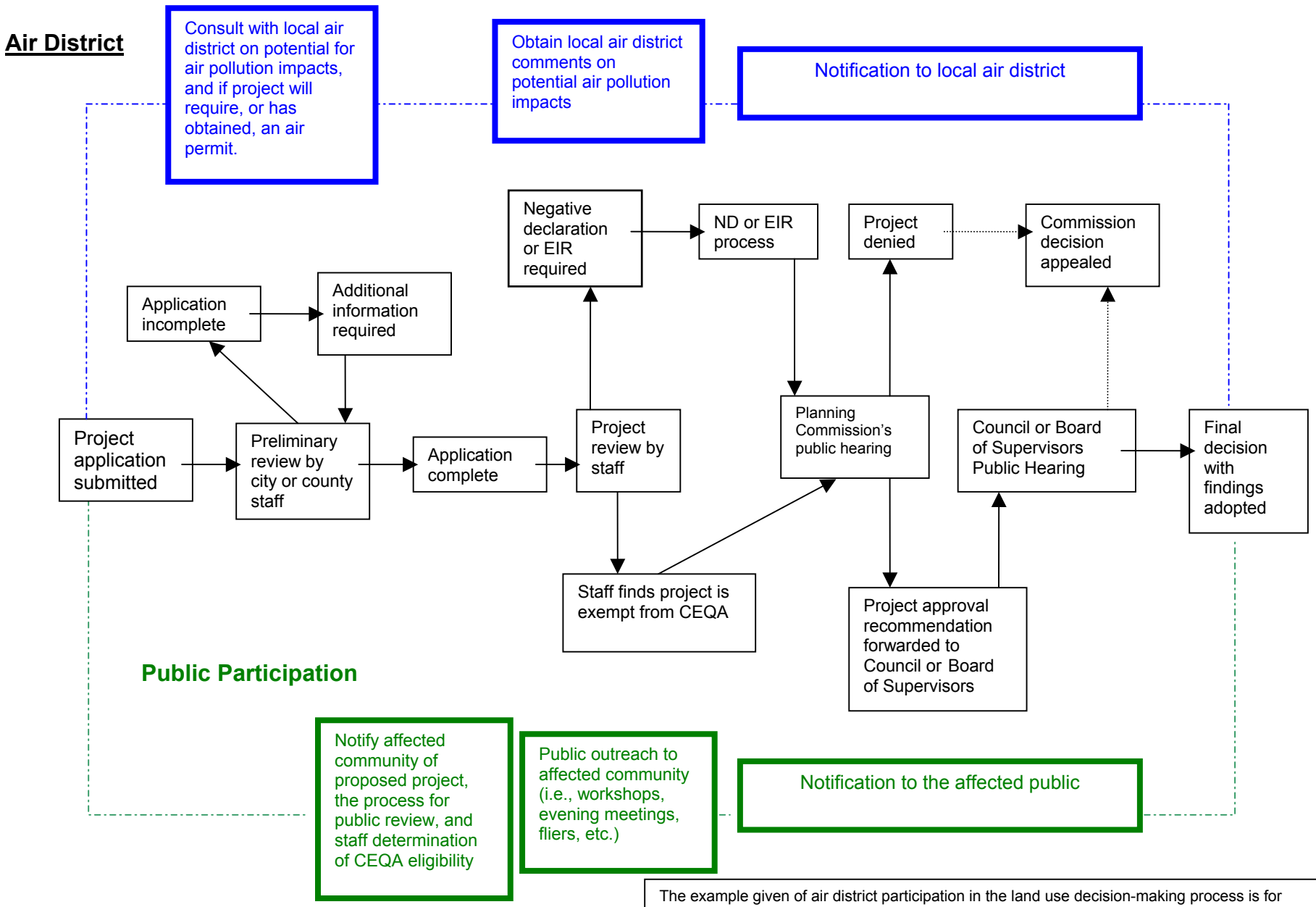
Public Comment

Following the environmental review process, the Planning Commission reviews application along with the staff's report on the project assessment and a public comment period is set and input is solicited.

Public Hearing and Decision

Permit rules vary depending on the particular permit authority in question, but the process generally involves comparing the proposed project with the land use agency standards or policies. The procedure usually leads to a public hearing, which is followed by a written decision by the agency or its designated officer. Typically, a project is approved, denied, or approved subject to specified conditions.

USE PERMIT (DISCRETIONARY ACTION) REVIEW PROCESS*



The example given of air district participation in the land use decision-making process is for illustrative purposes only. In reality, the land use siting process involves the ongoing participation of multiple affected agencies and stakeholders throughout the process.

GLOSSARY OF KEY AIR POLLUTION TERMS

Air Pollution Control Board or Air Quality Management Board: Serves as the governing board for local air districts. It consists of appointed or elected members from the public or private sector. It conducts public hearings to adopt local air pollution regulations.

Air Pollution Control Districts or Air Quality Management Districts (local air district): A county or regional agency with authority to regulate stationary and area sources of air pollution within a given county or region. Governed by a district air pollution control board.

Air Pollution Control Officer (APCO): Head of a local air pollution control or air quality management district.

Air Toxic Control Measures (ATCM): A control measure adopted by the ARB (Health and Safety Code section 39666 et seq.), which reduces emissions of toxic air contaminants.

Ambient Air Quality Standards: An air quality standard defines the maximum amount of a pollutant that can be present in the outdoor air during a specific time period without harming the public's health. Only U.S. EPA and the ARB may establish air quality standards. No other state has this authority. Air quality standards are a measure of clean air. More specifically, an air quality standard establishes the concentration at which a pollutant is known to cause adverse health effects to sensitive groups within the population, such as children and the elderly. Federal standards are referred to as National Ambient Air Quality Standards (NAAQS); state standards are referred to as California ambient air quality standards (CAAQS).

Area-wide Sources: Sources of air pollution that individually emit small amounts of pollution, but together add up to significant quantities of pollution. Examples include consumer products, fireplaces, road dust, and farming operations.

Attainment vs. Nonattainment Area: An attainment area is a geographic area that meets the National Ambient Air Quality Standards for the criteria pollutants and a non-attainment area is a geographic area that doesn't meet the NAAQS for criteria pollutants.

Attainment Plan: Attainment plans lay out measures and strategies to attain one or more air quality standards by a specified date.

California Clean Air Act (CCAA): A California law passed in 1988, which provides the basis for air quality planning and regulation independent of federal regulations. A major element of the Act is the requirement that local air districts in violation of the CAAQS

must prepare attainment plans which identify air quality problems, causes, trends, and actions to be taken to attain and maintain California's air quality standards by the earliest practicable date.

California Environmental Quality Act (CEQA): A California law that sets forth a process for public agencies to make informed decisions on discretionary project approvals. The process helps decision-makers determine whether any potential, significant, adverse environmental impacts are associated with a proposed project and to identify alternatives and mitigation measures that will eliminate or reduce such adverse impacts.[1]

California Health and Safety Code: A compilation of California laws, including state air pollution laws, enacted by the Legislature to protect the health and safety of people in California. Government agencies adopt regulations to implement specific provisions of the California Health and Safety Code.

Clean Air Act (CAA): The federal Clean Air Act was adopted by the United States Congress and sets forth standards, procedures, and requirements to be implemented by the U.S. Environmental Protection Agency (U.S. EPA) to protect air quality in the United States.

Councils of Government (COGs): There are 25 COGs in California made up of city and county elected officials. COGs are regional agencies concerned primarily with transportation planning and housing; they do not directly regulate land use.

Criteria Air Pollutant: An air pollutant for which acceptable levels of exposure can be determined and for which an ambient air quality standard has been set. Examples include ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, and PM10 and PM2.5. The term "criteria air pollutants" derives from the requirement that the U.S. EPA and ARB must describe the characteristics and potential health and welfare effects of these pollutants. The U.S. EPA and ARB periodically review new scientific data and may propose revisions to the standards as a result.

District Hearing Board: Hears local air district permit appeals and issues variances and abatement orders. The local air district board appoints the members of the hearing board.

Emission Inventory: An estimate of the amount of pollutants emitted into the atmosphere from mobile, stationary, area-wide, and natural source categories over a specific period of time such as a day or a year.

Environmental Impact Report (EIR): The public document used by a governmental agency to analyze the significant environmental effects of a proposed project, to identify

[1] To track the submittal of CEQA documents to the State Clearinghouse within the Office of Planning and Research, the reader can refer to CEQAnet at http://www.ceqanet.ca.gov.

alternatives, and to disclose possible ways to reduce or avoid the possible negative environmental impacts.

Environmental Justice: California law defines environmental justice as the fair treatment of people of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies (California Government Code sec.65040.12(c)).

General Plans: A statement of policies developed by local governments, including text and diagrams setting forth objectives, principles, standards, and plan proposals for the future physical development of the city or county.

Hazardous Air Pollutants (HAPs): An air pollutant listed under section 112 (b) of the federal Clean Air Act as particularly hazardous to health. U.S. EPA identifies emission sources of hazardous air pollutants, and emission standards are set accordingly. In California, HAPs are referred to as toxic air contaminants.

Land Use Agency: Local government agency that performs functions associated with the review, approval, and enforcement of general plans and plan elements, zoning, and land use permitting. For purposes of this Handbook, a land use agency is typically a local planning department.

Mobile Source: Sources of air pollution such as automobiles, motorcycles, trucks, off-road vehicles, boats, and airplanes.

National Ambient Air Quality Standard (NAAQS): A limit on the level of an outdoor air pollutant established by the US EPA pursuant to the Clean Air Act. There are two types of NAAQS. Primary standards set limits to protect public health and secondary standards set limits to protect public welfare.

Negative Declaration (ND): When the lead agency (the agency responsible for preparing the EIR or ND) under CEQA, finds that there is no substantial evidence that a project may have a significant environmental effect, the agency will prepare a "negative declaration" instead of an EIR.

New Source Review (NSR): A federal Clean Air Act requirement that state implementation plans must include a permit review process, which applies to the construction and operation of new or modified stationary sources in nonattainment areas. Two major elements of NSR to reduce emissions are best available control technology requirements and emission offsets.

Office of Planning and Research (OPR): OPR is part of the Governor's office. OPR has a variety of functions related to local land-use planning and environmental programs. It provides General Plan Guidelines for city and county planners, and coordinates the state clearinghouse for Environmental Impact Reports.

Ordinance: A law adopted by a City Council or County Board of Supervisors. Ordinances usually amend, repeal or supplement the municipal code; provide zoning specifications; or appropriate money for specific purposes.

Overriding Considerations: A ruling made by the lead agency in the CEQA process when the lead agency finds the importance of the project to the community outweighs potential adverse environmental impacts.

Public Comment: An opportunity for the general public to comment on regulations and other proposals made by government agencies. You can submit written or oral comments at the public meeting or send your written comments to the agency.

Public Hearing: A public hearing is an opportunity to testify on a proposed action by a governing board at a public meeting. The public and the media are welcome to attend the hearing and listen to, or participate in, the proceedings.

Public Notice: A public notice identifies the person, business, or local government seeking approval of a specific course of action (such as a regulation). It describes the activity for which approval is being sought, and describes the location where the proposed activity or public meeting will take place.

Public Nuisance: A public nuisance, for the purposes of air pollution regulations, is defined as a discharge from any source whatsoever of such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. (Health and Safety Code section 41700).

Property Setback: In zoning parlance, a setback is the minimum amount of space required between a lot line and a building line.

Risk: For cancer health effects, risk is expressed as an estimate of the increased chances of getting cancer due to facility emissions over a 70-year lifetime. This increase in risk is expressed as chances in a million (e.g.,10 chances in a million).

Sensitive Individuals: Refers to those segments of the population most susceptible to poor air quality (i.e., children, the elderly, and those with pre-existing serious health problems affected by air quality).

Sensitive Sites or Sensitive Land Uses: Land uses where sensitive individuals are most likely to spend time, including schools and schoolyards, parks and playgrounds, day care centers, nursing homes, hospitals, and residential communities.

Setback: An area of land separating one parcel of land from another that acts to soften or mitigate the effects of one land use on the other.

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CALIFORNIA
SUSTAINABLE FREIGHT INITIATIVE

Concept Paper for the Freight Handbook

Release date: December 12, 2019
Comments due: February 28, 2020

CALIFORNIA
AIR RESOURCES BOARD

Disclaimer

This Concept Paper has been prepared by the staff of the California Air Resources Board. Publication does not signify that the contents reflect the views and policies of the California Air Resources Board, nor does mention of trade names or commercial products constitute endorsement or recommendation for use.

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Concept Paper for the Freight Handbook

Document Availability

Electronic copies of this document and related materials can be found at: https://ww2.arb.ca.gov/our-work/programs/sustainable-freight-transport. Alternatively, paper copies may be obtained from our Public Information Office, 1001 I Street, 1st Floor, Visitors and Environmental Services Center, Sacramento, California, 95814, (916) 322-2990.

Versiones en Español de este documento y materiales relacionados estarán disponibles en: https://ww2.arb.ca.gov/our-work/programs/sustainable-freight-transport

Special Accommodation Request

If you need this document in an alternative format (i.e. Braille, large print) or another language, please contact Christopher Garcia at (916) 322-8382, or freight@arb.ca.gov

Para solicitar estas comodidades especiales o necesidades de otro idioma, favor de contactar a Stephen Cutts al (916) 323-1603 o freight@arb.ca.gov.

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Comments

We welcome written comments sent to: freight@arb.ca.gov. Please provide any written comments on this Concept Paper by February 28, 2020.

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INTRODUCTION

To support public review, discussion, and feedback, this Concept Paper shares the California Air Resources Board (CARB or Board) staff's preliminary thoughts for the Freight Handbook. CARB is developing a Freight Handbook as an informational resource for community advocates, local decision makers, and freight facility developers, owners, and operators. The document will frame efforts to address air pollution impacts as "practices" which may apply to the siting, design, construction, and operation of freight facilities to minimize health impacts on nearby communities.

In recognition that specific communities in California are heavily impacted by air pollution, the California Legislature passed Assembly Bill 617 (AB 617) to reduce emissions directly from sources contributing to cumulative exposure burdens within and directly surrounding such communities. To implement AB 617, CARB established the Community Air Protection Program. In September 2018, the Board selected a set of initial communities to create Community Emissions Reduction Plans (CERPs), and will annually consider the selection of additional impacted communities. Freight facilities are one of the primary areas of concern in a number of communities currently developing CERPs. New actions proposed by these communities include increased engagement with local land use and transportation agencies to help minimize impacts from freight activities. Many of the actions and ideas summarized in this Concept Paper build off and support these AB 617 activities.

Prior to engaging in the AB 617 process, CARB initiated additional work on freight activities, through increased reviews of California Environmental Quality Act (CEQA) documents for proposed facilities, creation of the Sustainable Freight: Pathways to Zero and Near-Zero Emissions (April 2015) document, and development of the multi-agency California Sustainable Freight Action Plan (July 2016). Also, CARB staff have met frequently with residents and advocates for communities impacted by air pollution from freight operations and heard a consistent request for guidance that identifies possible local actions that could minimize freight facility emissions and related community exposure to air pollution.

The Governor's 2019 Executive Order N-19-19 furthered the State's commitment to transition towards a healthier, sustainable, and more inclusive economy. This includes addressing direct tailpipe emissions from diesel equipment and vehicles through strong public investments. California has prioritized billions of dollars in annual transportation spending for the construction, operation, and maintenance of infrastructure to help reverse the trend of increased fuel consumption and decrease vehicle miles traveled. The State also continues its effort to accelerate zero-emission vehicle sales through incentive programs, grants, and regulatory actions.

This Concept Paper supports the relevant freight-related actions proposed by communities developing CERPs through the Community Air Protection Program, ideas we've heard from communities, the recommendations we've included in our CEQA comment letters on proposed freight facilities, and other existing resources. This Concept Paper is intended to aid and encourage public participation to help shape the Freight Handbook. CARB staff will continue to collaborate with communities,

agencies, industry and other stakeholders through a public process, and will integrate public feedback into the creation a Freight Handbook that will provide a detailed discussion of the concepts introduced in this Concept Paper. This will include framing how practices may apply in a given scenario and the roles that local government, freight facility developers, owners, and operators, and the public have in land use planning and development review processes.

CARB is seeking robust engagement from community, public, and private industry participants. We encourage you to share your thoughts and expertise in this effort. In addition to any comments you would like to provide, CARB staff can greatly benefit from focused comments that:

- Suggest other land use scenarios that should be highlighted;
- Identify implementation challenges for practices listed in Tables 5 and 6;
- Propose other practices that can be undertaken to support the goals of the Freight Handbook;
- Clearly identify the specific issues on which you are commenting and provide a citation;
- Explain why you agree or disagree with a proposed practice. Where you disagree, please suggest an alternative and consider potential trade-offs as well as opposing views;
- Describe your assumptions and support assertions with factual information by providing technical data, or specific examples, where possible.

CONCEPTS FOR THE FREIGHT HANDBOOK

I. Context for Action

This Concept Paper introduces preliminary thoughts for a Freight Handbook. This Concept Paper serves as a starting point for local, regional, and State discussions about freight facility siting, design, construction, and operational decisions that can minimize near-source exposure to air pollution from new, existing, and expanding freight facilities, and promote clean, healthy air for existing and future Californians and its millions of annual visitors. CARB's intent is to encourage land use planners and local officials, community advocates, and freight facility developers, owners, and operators to integrate emission reduction practices and information about freight facilities into local plans and ordinances, facility-based decisions, and community advocacy.

California's freight transport system is vital to our State economy. California is the nation's largest gateway for international trade and domestic commerce, with an interconnected system of ports, railroads, highways, and roads that allow freight from around the world to move throughout the State and nation. This system is responsible for approximately one-third of the State's economic production, with jobs from freight-dependent industries accounting for over $700 billion in revenue and over 5 million jobs. California's vast transportation system connects the estimated nearly 40 million residents and supports a vibrant economy with nearly $3 trillion in annual gross domestic product. The trucks and equipment that congregate at freight facilities are essential components of the statewide freight system which transports and delivers food, household products, electronics, vehicles, toys, and medicines to the consumer market, both in California and the country. Traditional routes of moving freight face increasing competition from across the globe, and California's system must anticipate and stay ahead of these changes. As California's freight transport system continues to grow under pressure to serve our growing population and satisfy dynamic market demands, other locations in the United States and across the world are competing for this economic activity.

Although the freight system plays an important role in everyday life, communities near freight facilities are burdened by air pollution—specifically toxic air contaminants like diesel particulate matter in the form of exhaust—from the construction and operational activities at freight facilities. Where freight movement increases from new and existing facilities over time, communities may experience increased exposure to higher emissions of toxic and criteria air pollutants. Increased exposure to these emissions have public health implications such as increased risk of premature death, lung cancer, heart and lung diseases, and asthma.

To achieve its air quality, climate, efficiency and economic competitiveness goals, California must transition to a more efficient, zero-emission transportation system for both passenger and freight movement. This is a complex and challenging undertaking. Meeting the State's goals will require the combined efforts of public and

private stakeholders taking action and investing resources across a wide range of sectors that include: energy and fuels, advanced technology, housing and land use, infrastructure, health, the environment, and the economy. Industries operating in California have already made substantial investments in cleaner diesel fuels, vehicles and equipment, reducing diesel particulate matter and other pollutants. Progress is being made in many of these sectors in the form of State regulation, policy and funding, local actions, private innovation, investments supporting communities and exploring new technologies, and more.

The Concept Paper for the Freight Handbook will initiate a new dialogue to identify a set of practices that can be implemented to support flexibility, efficiency, and business practices through policies and programs that support the economy, while working with industry to mitigate the environmental and health inequities certain communities experience due to emissions from freight activities.

A. Roles and Responsibilities

A more efficient, zero and near-zero emission modern freight system will demand not only new vehicles, equipment, and fuels, but also new transportation infrastructure, communications, and industry operating practices. California will need workers trained to build, maintain, and operate this advanced equipment and communications systems. To help fund these efforts, California's logistics industry must remain profitable in the face of increasing competition from other North American seaports and supply chains. The ability to readily adapt to changing trends and expand operations is key to improving the competitiveness of the system. Community acceptance of industry expansion often depends on the prospects for new local jobs, clean air, and safe operations.

The transition to this modern freight system relies on public and private funds invested in infrastructure projects, vehicle and equipment purchases, technological applications, and system management approaches. It also requires the new regulatory and incentive programs underway to spur zero-emission and other clean technology development and deployment. To ensure effective implementation of these actions, many groups must come together to successfully achieve the needs of California's communities from public health, economic, and environmental standpoints.

Local governments that make land use decisions related to freight facilities are on the forefront of the transition to zero-emission operations. They must carefully consider a range of sometimes competing priorities for economic development and jobs, the critical need for affordable housing and infill development, public health, and quality of life for community residents. The owners and operators of new or expanded freight facilities play key roles in leading this transition and are positioned to make cost-effective investments in infrastructure while designing and building projects. Community residents and their advocates need a greater voice in freight facility siting, design, construction, and operation choices so the end result supports or enhances their environment, safety, and opportunities for employment.

B. Need to Accelerate Air Quality Progress

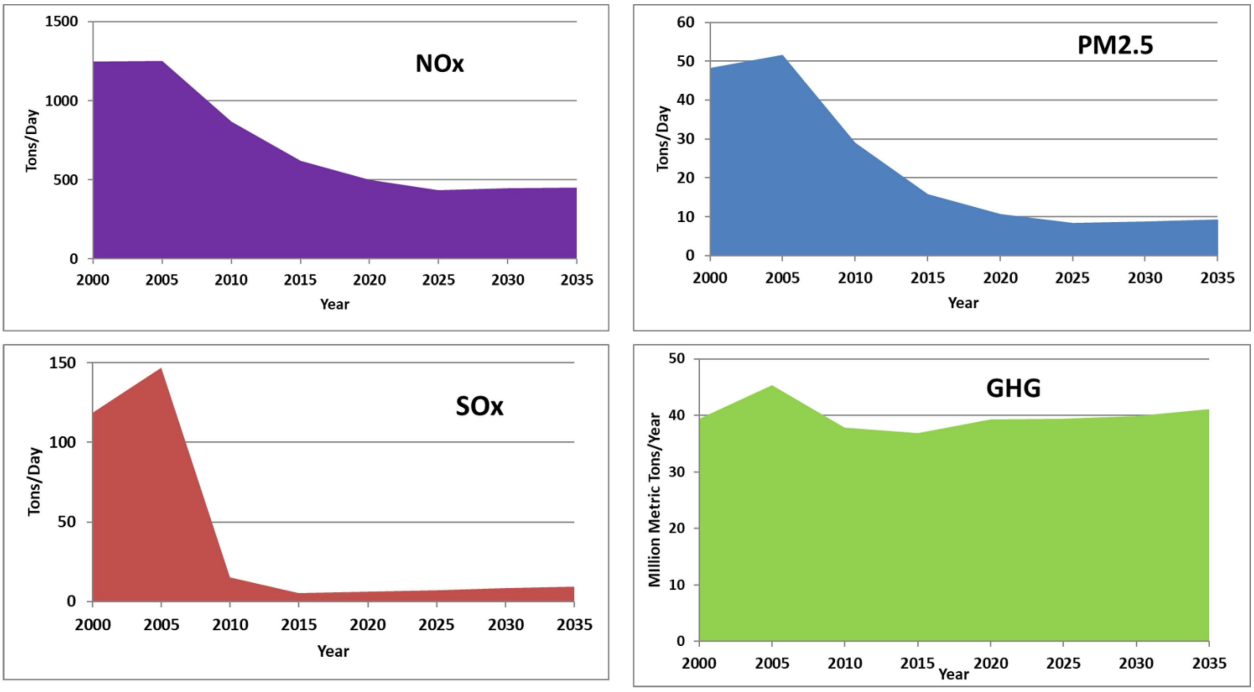
To control and reduce emissions, CARB gathers and analyzes data for updating its mobile source emissions inventories.[1] The inventories assess population, activities, and emissions from mobile sources operating in and around the State. Periodically, these inventories are updated to support the latest air quality plans and regulations. CARB compiles emissions data for on- and off-road mobile sources including off-shore emissions to prepare a statewide freight inventory.

The emissions from the heavy equipment that transports freight in California contributes to elevated ambient levels of criteria pollutants such as fine particulate matter and ozone, as well as localized health impacts near freight facilities. Freight transport accounts for about half of toxic diesel particulate matter (diesel PM) and emissions of nitrogen oxides that form ozone and fine particulate matter in the atmosphere, and six percent of the greenhouse gas emissions in California. These numbers include emissions from trucks, ships, locomotives, aircraft (cargo portion), harbor craft, and all types of equipment used to move freight across the State.

Figure 1 summarizes freight emissions statewide from CARB 2000 inventories projected to 2035. As illustrated in the graphs, CARB strategies for reducing criteria pollutants and greenhouse gas emissions have been effective. However, the State must continue to implement programs and develop new strategies to achieve its air quality goals.

[1] CARB. See, Mobile Source Emissions Inventory.

Figure 1. Freight Emission Inventory Statewide for 2000 and 2035



Source: CARB

Together with our local, regional, and state government partners, we have accelerated extensive changes towards cleaner technologies across the State. Truck owners, ocean carriers, terminal operators, and railroads have made substantial investments to transition their diesel freight equipment to cleaner models, while refineries retooled to produce cleaner diesel fuels. We are seeing the real-world benefits of those investments resulting in measurably cleaner air in communities near seaports and rail yards over the last decade. For example, these combined actions have cut toxic diesel PM at the State's largest seaports by more than 80 percent over the last decade.

However, California must accelerate implementation of air quality programs for the protection of public health. The State must continue to develop policies and make investments in technologies that result in greater emission reductions to achieve its air quality and public health goals. To that end, California is pursuing both incentive and regulatory approaches to reduce the high near-source cancer risk from freight facilities to community members, increase the sustainability of the freight system to meet targets in the State Implementation Plan, and reshape the freight system to achieve our long-term climate goals.

This need is especially acute in specific communities that are exposed to high cumulative levels of air pollution. To reduce this burden, and in response to Assembly Bill 617 (C. Garcia, Chapter 136, Statutes of 2017), CARB established the Community Air Protection Program. Through this program, the Board annually considers for selection impacted communities to collaborate with to develop and implement new locally-focused Community Emissions Reduction Plans (CERPs). Freight facilities are

one of the primary areas of concern in a number of communities currently developing CERPs due to their substantial toxic and criteria air pollution emissions. CARB staff have already begun working closely with local air districts, community groups, community members, environmental organizations, and regulated industries to identify emission reduction practices for freight facilities within the affected communities.

1. Near-Source Health Risks

Despite substantial progress over the last decade, the ongoing use of diesel-fueled trucks and equipment continue to impact communities near major freight facilities. The diesel-fueled equipment operating in and around freight facilities is the most significant source of diesel PM, a toxic air contaminant that can substantially increase the risk of developing cancer and other health problems such as increased respiratory illnesses, risk of heart disease, and premature death. Exposure to diesel PM is a health hazard to people of all ages, but particularly to children whose lungs are still developing and the elderly, who may have other serious health problems. The diesel PM emissions from freight facilities impact communities located adjacent to those operations, as well as people living and working miles away.

In the last decade, advances in science have shown that early-life exposures to air toxics contribute to an increased lifetime risk of developing cancer, or other adverse health effects, compared to exposures that occur in adulthood. This research has shown that children and infants are more sensitive to the harmful effects of exposure to air toxics, like those emitted from freight equipment, than we previously understood.

In March 2015, the California Office of Environmental Health Hazard Assessment released an update to its recommended methodology for conducting health risk assessments in California. The methodology addresses this greater sensitivity and incorporates the most recent data on childhood and adult exposure to air toxics. Health risk assessments conducted by or available to CARB staff show the potential for elevated exposures to diesel PM in communities near freight facilities.

2. More Protective Air Quality Standards

Current control programs are reducing emissions, but the State Implementation Plans required by federal law to demonstrate our path to attain ozone and fine particle ambient air quality standards compel significant additional emission reductions in the South Coast and San Joaquin Valley. At the same time, these two regions, and the San Francisco Bay Area, are experiencing tremendous growth in warehousing and distribution facilities due to e-commerce. The growth in the development of these facilities may increase air pollution from construction and their day-to-day operational activities.

3. Ambitious Climate Change Targets

New efforts in response to climate change are ramping up the pressure for further progress in the 2030 and 2050 timeframes to reduce greenhouse gases and short-lived climate pollutants, like black carbon from diesel-fueled equipment. California has set aggressive targets for reducing greenhouse gas emissions by 40 percent below 1990 levels by 2030, and then 80 percent below 1990 levels by 2050. California also committed to achieve zero-carbon electricity by 2045. Without action, greenhouse gases from the freight sector are projected to grow, driven by increases from freight movement. To curb emissions, the freight industry should accelerate efforts to integrate zero-emission, renewable energy technologies into facility operations to cut petroleum use.

C. State Vision for Sustainable Freight

In 2016, six State agencies, departments, and offices developed the California Sustainable Freight Action Plan. The plan identified State policies, programs, and investments to ensure progress toward a sustainable freight system.



Vision for a Sustainable Freight Transport System

Utilize a partnership of federal, State, regional, local, community, and industry stakeholders to move freight in California on a modern, safe, integrated, and resilient system that continues to support California's economy, jobs, and healthy, livable communities. Transporting freight reliably and efficiently by zero-emission equipment everywhere feasible, and near-zero emission equipment powered by clean, low-carbon renewable fuels everywhere else.

As part of that work, the State is dedicating considerable resources to modernize the freight transport system with a priority to integrate zero and near-zero emission technologies. These and other technologies have the potential to greatly reduce impacts from freight activities on nearby communities and regional air quality, as well as climate change. The benefits of reducing diesel PM emissions and near-source exposure, protecting public health, and achieving systematic reductions in climate pollution cannot be overstated.

II. How the Freight Handbook Can Inform Land Use Planning and Development Decisions

The Freight Handbook will describe practices that reduce diesel PM emissions and near-source exposure, nitrogen oxides, greenhouses gases, and black carbon. We identified potential practices for inclusion in this Concept Paper because they have the potential to increase community participation and minimize community air pollution impacts from freight facilities.

III. Addressing Three Land Use Scenarios for Freight Facilities

This section provides an overview of staff's approach to frame the Freight Handbook. For each of the three land use scenarios, we identify potential practices that local government, freight facility developers, owners, and operators could implement with greater community involvement.

The scenarios are:

A. New and expanding freight facilities near existing residences, schools, health care facilities, and other sensitive receptors

B. Existing freight facilities near existing residences, schools, health care facilities, and other sensitive receptors

C. New residences, schools, health care facilities, and other sensitive receptors near existing freight facilities

A. New and Expanding Freight Facilities near Existing Residences, Schools, Health Care Facilities, and Other Sensitive Receptors

In response to changing market demands, new freight facilities are being built and many existing freight facilities are expanding physical footprints or increasing operational activities, particularly in the warehousing and distribution center sector. As more freight facilities are built, air pollutant emissions may increase from construction and operational activities over the baseline conditions on a development site. The Freight Handbook will describe practices that can minimize air pollutant emissions and community exposure. Table 1 summarizes some key potential practices for siting new or expanded freight facilities near existing residences, schools, health care facilities, and other sensitive receptors.

Table 1. Potential Practices for Siting New or Expanded Freight Facilities near Existing Residences, Schools, Health Care Facilities, and Other Sensitive Receptors

1. Maximize operation of zero-emission trucks and equipment
2. Provide a "transition zone" between new or expanded freight facility and existing residences, schools, health care facilities, and other sensitive receptors
3. Identify and implement exposure reduction approaches (air filters, trees, and walls)
4. Develop and implement truck routes and safety programs

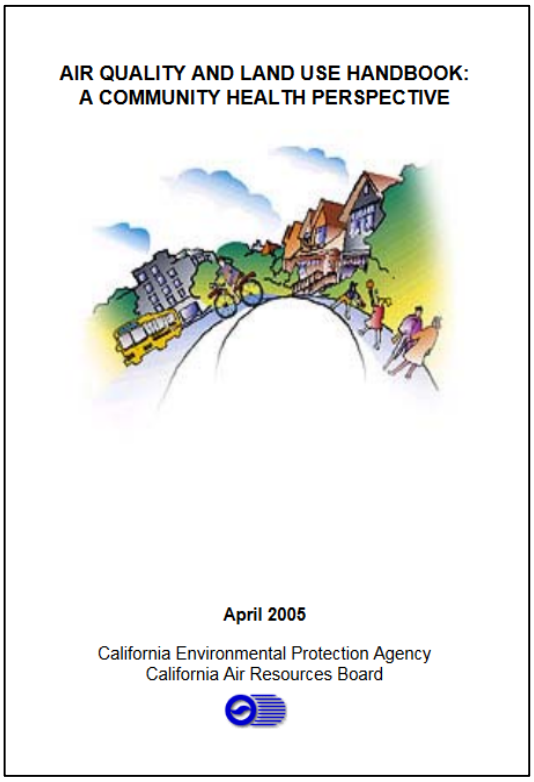
Staff is also identifying potential practices for local governments to consider when preparing or updating land use documents and zoning codes. These include planning documents that identify impacted areas and zoning that supports practices that new and expanding freight facility projects can implement.

Practices for freight facility developers could include use of the lowest emitting construction equipment, routing truck hauling and delivery activities away from neighbors, and locating on-site operations to minimize the air pollution, safety, and nuisance impacts on neighbors. Once built, freight facility owners and operators can utilize zero-emission trucks and equipment on-site. Where zero-emission operations are not yet feasible, owners and operators can use and allow on site near-zero emission technologies utilizing renewable energy, with a plan for transitioning to zero in the future. Owners and operators can also install vegetated barriers, contribute to funding programs for installing and maintaining adequate air filtration on buildings that house sensitive receptors, designate truck delivery routes, and appropriately locate truck access points and loading areas.

Potential community advocacy practices include engagement in land use planning and development review processes, monitoring facility activities, and reporting any concerns. This may include attending community workshops, public events and hearings, and monitoring implementation efforts.

1. Preliminary Distances for Establishing Transition Zones

As described in prior CARB documents, studies show that public exposure to air pollution can be substantially elevated near freight facilities with diesel-fueled vehicles and equipment. And that same pollution decreases sharply with distance from the source because of how particles move and deposit on surfaces. For that reason, CARB will continue to encourage space that separates new or expanded freight facilities served by diesel and other combustion vehicles and equipment from sensitive receptors.



CARB's 2005 Air Quality and Land Use Handbook discussed siting new sensitive receptors a minimum distance away from existing air pollution sources of all types. This Concept Paper discusses siting new or expanded freight facilities away from existing residences, schools, health care facilities, and other sensitive receptors.

In this Concept Paper, we refer to this space as a "transition zone" to separate land use zones for new or expanded freight facilities away from sensitive land uses such as residences, schools, health care facilities, and other sensitive receptors. Transition zones are important because increasing the distance between an emission source and sensitive receptor is a particularly effective means of protecting vulnerable people (children, the elderly, and medically compromised individuals) from exposure to air pollution from freight facilities. Transition zones might contain green space, or revenue-producing uses like commercial office buildings or retail. The key is to find uses that would naturally limit the duration of time that people are exposed to air pollution from the nearby freight facility.

We plan to identify minimum transition zone distances for new and expanded freight facilities to protect the health of communities near these facilities. Through a collaborative public process, CARB will work with community advocates, local decision makers, and freight facility owners, operators, and developers to design and evaluate the technical analysis needed to determine appropriate distances. We encourage you to share your thoughts and expertise in this effort.

Transition zone recommendations in the Freight Handbook will be intended to provide non-binding guidance to local land use decision makers regarding zoning, permitting,

and project approval actions for new or expanded freight facilities. They should not be used as a substitute for site-specific assessments of emissions and health impacts for proposed freight facilities, including those analyses required or recommended as part of federal or State environmental review processes. Additionally, they should not be used as an indicator of a safe level of exposure to emissions from freight facilities, as health risks may exist beyond distances identified.

Freight facilities are often strategically placed in response to the logistic chain or purpose they serve; therefore, each freight facility often has its own activity profile and configuration. Community exposure to diesel PM can vary depending on the proximity to, and the geographic location of, a freight facility.

Regardless of the size of a new freight facility or its operational characteristics, we strongly recommend that new freight facilities be designed and built for eventual full zero-emission operation. Multiple types and models of zero-emission or near zero-emission operation freight vehicles and equipment are available today. Many others are in development or demonstration phases. To support the goal of a zero-emission freight system, CARB is pursuing an ambitious agenda to require vehicles, equipment, and facilities to make the transition to zero-emission options. Building a new freight facility with the infrastructure to power this equipment is more cost effective and less disruptive to operations than retrofitting a facility later.

Even if a new or expanded freight facility is sited consistent with an identified transition zone, the facility should still reduce its air pollutant emissions and mitigate impacts to the maximum extent possible. This is critical to continue California's progress to reduce local air toxics emissions and near-source exposure, achieving and maintaining regional air quality goals, and combatting climate change.

Lastly, a facility would be subject to local ordinances that address other potential impacts such as noise, vibration, light pollution, and water pollution. The local agency would review a proposed freight facility to ensure compliance with applicable standards, rules, and regulations including adequate distances to avoid or reduce an impact.

2. Proposed Approach for Determining Transition Zone Distances

The practices to be provided in the Freight Handbook are intended to reduce air pollution at freight facilities. But the transition zone concept specifically focuses on the proximity of new diesel vehicles and equipment to people, and the associated near-source cancer risks to community members. This section discusses the data and an approach that could be used to develop the distances for the transition zones.

The transition zone distances for new or expanded freight facilities with diesel vehicles or equipment would be based on both technical analysis and discussions within a collaborative public process. The intent of the analysis would be to evaluate the

general diesel PM-related exposure trends for freight facilities based on current practices and pollution control technology. The public discussions would help inform the selection of distances, based on a review of the technical analysis. The technical analysis and discussion would not be intended to identify a distance that should be interpreted to correspond to a safe level of exposure to diesel PM. For all facility types using diesel equipment that we have previously evaluated, the analysis shows that excess cancer risk remains unless zero-emission technology is used. This is important because there is currently no safe level identified for exposure to diesel exhaust.

A freight facility with zero on-site emissions does not present the same issues with near-source cancer risk or other localized health impacts to sensitive receptors as a facility with combustion-related air pollution. However, we are aware that there may be concerns from residents about other factors (e.g. noise, vibration, odor, glare, etc.) associated with freight operations that support a transition zone even around a zero-emission facility. Here, we suggest 500 feet from existing residences, schools, health care facilities, or other sensitive receptors as a potential distance.

We do not propose 500 feet is appropriate distance for a zero-emission freight facility in every instance. Rather, we suggest 500 feet in order to avoid implying zero-emission facilities would not result in any potential impact. We are seeking input to determine an appropriate transition zone for freight facilities with zero on-site emissions.

Table 2 serves to illustrate how CARB staff proposes to display minimum transition zone distances for new and expanded freight facilities. The top value of each range (X and Y) will be the minimum transition zone distance for freight facilities with diesel vehicles and equipment on site, while the 500 foot transition zone assumes zero on-site emissions.

Table 2. Illustration of Transition Zone Distances Around New or Expanded Freight Facilities

Facility Type	Preliminary Distance from Facility
Warehouse/ Distribution Centers > [TBD] square feet	500 feet to X
Cold Storage Warehouses	500 feet to Y

Source: CARB

a. Analytical Approach

An analytical approach could focus on evaluating dispersion modeling results from published Health Risk Assessment (HRA) studies or modeling of a representative facility and the associated cancer risk estimates[2]. Through a collaborative public process, we could identify representative facility characteristics or a representative study for a high-activity freight facility that includes all diesel vehicles and equipment typically operating at that freight facility. This approach would provide the most appropriate and health-protective analysis for this purpose.

The projected ground-level concentrations of diesel PM in the downwind direction for each selected freight facility study could be extracted, with adjustments if needed based on emission changes, and updated estimates of the associated potential excess cancer risks would be generated.

b. Emissions, Exposure, and Cancer Risk

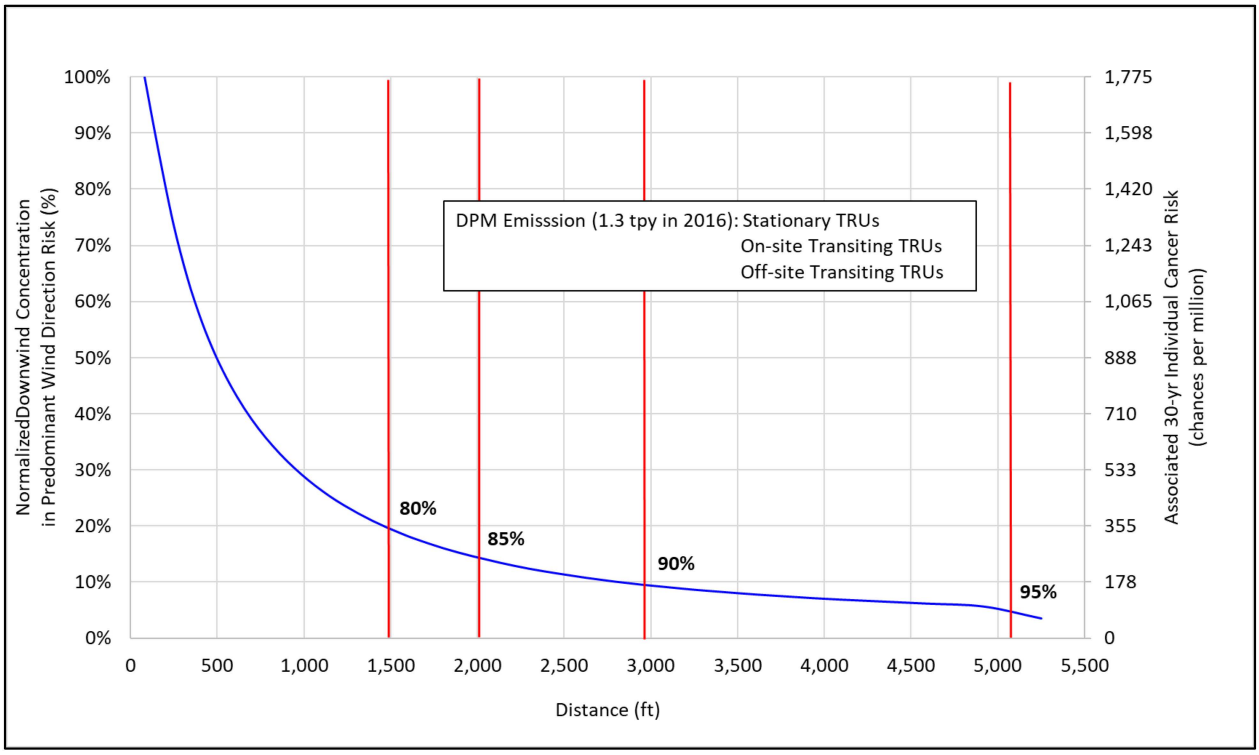
Generally, emissions from a facility depend on the emission level of the equipment, and the number and activity level of the equipment. Since existing studies focus on facility operations and emissions from different years, the facility emissions from different HRAs could be updated to the same reference year, without changing the original activity levels to develop a consistent baseline for a transition zone. We could also assume that the physical location of emission sources would not change from the original analyses. The intent of such an analysis would be to provide a series of reference points that illustrate the relationship between cancer risks, air pollutant concentrations, and distance.

The result of such an analysis would be a series of graphs that would include reference points where the diesel PM concentration and cancer risk decrease, compared to the highest near-source risk level to community members (i.e. the "maximum exposed individual").

For example, Figure 2 illustrates a preliminary analysis of normalized diesel PM concentrations for a high-activity cold-storage warehouse. The red lines in the graph represent the distances downwind from the highest off-site risk value where the diesel PM concentration (left axis) and the associated cancer risks (right axis) are reduced by 80, 85, 90, and 95 percent.

[2] Using the Office of Environmental Health Hazard Assessment (OEHHA) *Air Toxics Hotspots Program Guidance Manual for Preparation of Health Risk Assessments* (OEHHA Guidance)

Figure 2. Normalized Downwind Diesel PM Concentration and Associated 30-Year Cancer Risk by Distance



c. Factors in Identifying Distances

To identify a health-protective distance for the transition zones, CARB staff could provide modeling expertise and scientific judgement, and would work with stakeholders to consider the most relevant factors. Since CARB's 2005 Air Quality and Land Use Handbook recommended distances based on reducing exposure and cancer risk by 80 percent, we could start with that approach. However, in most cases an 80 percent reduction in cancer risk would still result in high residual cancer risks for most facility types, based on the latest health science and health risk assessments in development applications CARB has reviewed. Staff therefore suggests examining, at minimum, the distances needed to achieve an 85, 90, and 95 percent reduction in concentration and cancer risk.

In discussions and further analysis, CARB proposes that all of these factors should be considered to develop reasonable transition zone distances for local land use planners to consider when making zoning and project approval decisions for new and expanded freight facilities. We expect and welcome public feedback on these concepts.

B. Existing Freight Facilities near Existing Residences, Schools, Health Care Facilities, and Other Sensitive Receptors

In many communities, existing freight facilities are located in proximity to existing residencies, schools, health care facilities, and other sensitive receptors. To address health impacts related to emissions from freight facilities, a collective effort among State, regional, and local officials is needed. Table 3 summarizes some of CARB's activities to support efforts that reduce air quality impacts from freight facilities. CARB and air districts continue working to reduce air pollution through regulations and permitting while local agencies primarily address truck routing and parking issues. Together, the combination of actions can minimize air pollution and reduce negative health impacts from existing freight facilities.

Table 3. CARB Activities Supporting California's Efforts to Reduce Impacts from Existing Freight Facilities Near Existing Residences, Schools, Health Care Facilities, and Other Sensitive Receptors

1. Strengthen CARB statewide regulations for new and in-use diesel-fueled equipment, plus charging/fueling infrastructure at freight facilities
2. Petition the federal government for stricter emission standards
3. Use incentives to demonstrate and deploy zero-emission technology and install freight infrastructure, with a focus on communities near freight facilities
4. Support air district Indirect Source Review rules at freight facilities
5. Encourage cities to develop/enforce local truck routing, idling limits, and parking requirements
6. Encourage Caltrans, other government agencies, and industry stakeholders to expand safe and clean truck parking, and reduce truck idling.

Existing and new CARB regulations in development will further reduce air pollution from trucks and equipment. CARB staff plans to propose regulations that strengthen regulations for new and in-use diesel equipment, zero and near-zero emission equipment and charging/fueling infrastructure at freight facilities. CARB currently provides incentives to support demonstration projects that deploy zero-emission technologies, with a focus on communities near freight facilities.

We also advocate with other agencies at all levels for stricter national and international emission standards, zero-emission requirements, new air district rules for freight facilities, and methods to reduce truck impacts. Local governments can designate truck routes and restrict parking near sensitive land uses. Local air districts continue to develop methods for quantifying emissions, new rules to control emissions, and offer an array of financial incentives. State agencies continue to implement and update the California Sustainable Freight Action Plan, with commitments from Caltrans, the Energy Commission, CARB, and others to develop regulations, funding opportunities, and demonstration projects targeted at improving the statewide freight system.

C. New Residences, Schools, Health Care Facilities, and Other Sensitive Receptors near Existing Freight Facilities

The State recognizes the critical need for affordable housing, infill development, and greenhouse gas reductions. The Freight Handbook will describe practices that could be implemented through land use policies and permitting to support development while minimizing pollution. Table 4 lists some examples of positive steps that development projects placing sensitive receptors near existing freight facilities can take.

Table 4. Potential Practices for New Residences, Schools, Health Care Facilities, and Other Sensitive Receptors Near Existing Freight Facilities

1. Health impact disclosures to prospective occupants within transition zone
2. Exposure reduction strategies (air filters, trees, and walls)
3. Developer installation and replacement of air filtration devices through covenants, conditions, and restrictions recorded against the developed property to ensure existing and future owners comply with air filtration requirements throughout the life of the structure
4. Initiate a public process to address and implement truck routing, idling, parking and safety programs

Development proposals can incorporate strategies to reduce exposure like maintaining vegetated walls and barriers between the project site and freight facilities. New freight projects can be designed to minimize community exposure to diesel exhaust along truck routes. Developers can disclose the potential health impacts to prospective occupants within transition zones, install and maintain air filters, and contribute to local investments that reduce emissions from nearby freight facilities.

Freight facility owners and operators can collaborate with local agencies on ways to minimize air pollution from existing operations. This may include upgrading diesel or other combustion equipment and providing operational data to inform land use decisions. Community residents can participate in land use planning and development review processes. To strengthen that participation, community members may wish to organize and engage local officials through advisory committees on solutions to address neighborhood concerns.

IV. Summary of Potential Practices

In the Freight Handbook, CARB staff will describe practices that may apply to one or more of the three land use scenarios. This Concept Paper introduces our approaches in several categories: broad-based, priority project-specific, and additional practices and mitigation. Tables 5 and 6 summarize the potential practices for implementing

entities: local government and air districts; freight facility developers, owners, and operators; and the public.

A. Broad-Based Practices

Local governments can address air pollution from freight facilities on a project-by-project basis and through a broader planning approach. The Freight Handbook will discuss broad-based practices that we are developing from a review of land use documents, ordinances, and conditions of approval as well as relevant land use planning policies and local implementation programs. Broad-based practices aim to help local governments address air pollution through land use documents. The Freight Handbook will encourage local officials to collaborate with air districts and community-based organizations on the development of land use policies.

B. Priority Project-Specific Practices

CARB has established a variety of programs, regulations, incentives, and policies designed to support the State's transformation toward a more sustainable freight system. These include a range of actions to minimize the community health impacts from freight facilities. The Freight Handbook will identify project-specific practices that local governments and freight facility developers, owners, and operators can implement. Community members and organizations are encouraged to provide early input to ensure goals are set that meet community expectations, monitor implementation and report any ongoing concerns.

C. Additional Practices and Mitigation

Freight facilities can deploy additional practices that accelerate the transition to zero-emission operations, reduce the exposure of communities to air pollution, and minimize emissions from their activity and workforce commuting. Potential practices and mitigation include: vegetative walls and other solid barriers, air filtration devices, development programs, and lease agreements.

D. Resources for Development of Potential Practices

CARB staff routinely review and comment on environmental analyses prepared for individual freight facility projects pursuant to CEQA. Comments generally focus on the need for accurate characterization of a project's air pollutant emissions, appropriate modeling assumptions and results, health risk analysis, and mitigation to reduce air quality impacts. We post these comment letters on our website and encourage local governments, freight facility developers and owners, and the public to periodically check for updates to influence project design or mitigation.[3]

[3] California Air Resources Board, California Environmental Quality Act Comment Letters on Freight Facility Projects.

We drew from these letters, staff technology assessments and regulatory requirements, public comments at prior community meetings, and more than 50 documents prepared by other government agencies and advocacy organizations to identify potential practices, as summarized in this Concept Paper and being considered for the Freight Handbook. Many of the identified practices describe existing local government practices while others encourage collaboration between local agencies, freight facilities owners and operators, and the public. Land use planning and decision-making is a complex process. While the authority to regulate land use is primarily vested in local governments, air districts account for, and depend upon, local land use decisions when preparing air quality planning documents and conducting rule-making processes. For that reason, local governments and air districts should consider the identified practices when updating and implementing their planning efforts.

Table 5 presents a list of potential practices to minimize community health impacts from freight facilities. We are sharing this list to signal the range of practices we are considering for inclusion in the Freight Handbook. A refined list of potential practices specific to warehouses, distribution centers, and cold-storage facilities is summarized in Table 6. We are seeking input on the general substance of all potential practices as well as what level the Freight Handbook should describe practices and appropriate methods to implement a practice.

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Table 5. Summary of Potential Practices to Minimize Community Health Impacts from Freight Facilities

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
BROAD-BASED			
Local Freight Committee	Convene a local freight committee comprised of community members and freight representatives to solicit input on land use policies that provide a framework for assessing air quality impacts and addressing community exposure from freight facility projects.	Facility or industry representatives participate on a local freight committee to incorporate community suggestions, gather or provide information, and consider feedback to inform the siting and design of freight facility projects before submitting permit applications.	Form or participate in a freight committee, to help organize and advocate for changes to planning processes and permitting of freight facility projects.
Economic Development Coalition	Establish a coalition of community members, industry stakeholders, and local economic development entities to identify approaches to providing economic and public health benefits to communities near freight facilities.	Facility or industry representatives participate in the coalition to provide operations information and inform cost effectiveness discussions supporting an efficient and strategic deployment of cleaner freight vehicles and equipment.	Building off existing community air protection efforts, participate in the coalition and identify community-specific priorities that determine the balance of economic and public health considerations.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Land Use Policies	Develop land use policies for addressing and minimizing community exposure to air pollution from increased development of freight-related projects when updating land use planning documents.	Design freight facility projects that are consistent with land use policies intended for addressing community exposure prior to submitting permit applications.	Participate in local processes to update land use documents by advocating and proposing land use policies.
Local Ordinances	Update ordinances (i.e., site design standards and operational standards in zoning ordinances) and associated permitting conditions consistent with updated ordinance standards that require freight projects to achieve zero-emission operations.	Integrate zero-emission technologies to the maximum extent feasible and incorporate project design features that minimize community exposure prior to submitting permit applications.	Engage local agencies during the development of ordinances and permitting conditions.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Rezone and Remove Nonconforming Uses	Update or adopt an ordinance to phase out freight facilities or operations in close proximity to sensitive receptors when updating the General Plan and zoning code.	Phase out freight facility operations adjacent to sensitive receptors or phase out older equipment and, where possible, avoid siting new and expanding freight facilities in proximity to sensitive receptors.	Advocate and support local officials in adopting or updating ordinances that restrict or phase out freight operations in areas of the community impacted by existing freight facilities.
Improvement and Financing Districts	Create improvement and/or financing districts to generate revenue for infrastructure that supports zero-emission technologies at freight facilities.	Collaborate with local agencies to identify financing needs for supporting needed infrastructure improvements at freight facilities; commit to investments that achieve zero-emission operations.	Participate in processes to form financing districts that link investments in fully zero-emission operations with benefits to the community.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Development Programs and Agreements	Require freight facilities to establish or contribute towards publically administered Development Programs that help fund projects for reducing community exposure to air pollution from freight.	Negotiate with local agencies and community organizations to establish or contribute towards publically administered development programs that reduce community exposure to air pollution.	Participate in processes to establish or administer development programs in support of activities that fund appropriate projects that reduce community air pollutant exposure.
Cumulative Analysis Criteria	Establish screening criteria to evaluate a freight facility's contribution to a cumulatively considerable air quality impact including but not limited to identifying impacted areas, adopting local thresholds of significance, and developing standardized modeling parameters.	Consider a freight facility's surrounding air quality conditions to inform siting decisions and implementing all feasible practices for reducing air pollution and community exposure before submitting permit applications.	Advocate for planning agencies to collaborate with air districts when developing cumulative thresholds, impact significance criteria, and mitigation to address cumulative impacts from freight facilities.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
PRIORITY PROJECT-SPECIFIC			
Health Protective Siting	Zone freight activities with consideration of avoiding health impacts to sensitive receptors when updating the General Plan and zoning code.	Prioritize development at properties with adequate distances from sensitive receptors and design projects to minimize community exposure.	Inform zoning and permitting decisions to ensure adequate distances are provided for protecting nearby sensitive receptors.
Zero-Emission Technology	Adopt or update site design and operational standards, consistent with updated standards and associated conditions of approval, that require freight facility projects to operate fully with zero-emissions everywhere feasible, and near-zero emission equipment powered by renewable energy everywhere else.	Commit to fully operate with zero-emissions and invest in infrastructure to support zero-emission equipment everywhere feasible, and near-zero emission equipment powered by renewable energy everywhere else, when designing or updating a freight facility.	Inform local processes to develop conditions of approval, monitor implementation and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Zero-Emission Infrastructure	Adopt or update site design and operational standards, consistent with updated ordinance standards, and associated conditions of approval to require infrastructure for freight projects that support full zero-emission operation at the facility.	Commit to investments in zero-emission technologies and infrastructure for all facility operations and service providers, and coordinate with utility companies to provide zero-emission infrastructure when developing site design.	Advocate for land use decisions that help expedite the development of the zero-emission charging/ fueling infrastructure in California.
Clean Heavy-Duty Truck Parking	Establish a heavy-duty truck parking program that provides clean, safe, and affordable truck parking with support for zero-emission technologies.	Reserve land for clean heavy-duty truck parking and install zero-emission infrastructure to eliminate truck and TRU emissions while parked.	Inform land use decisions to identify heavy-duty truck parking, monitor implementation and report any ongoing concerns.
Truck Routing	Designate all truck routes, within community input, that service freight facilities to avoid sensitive receptors when updating land use planning documents and permitting conditions.	Inform local agencies and community members to design truck routes to serve freight facility needs and minimize exposure to air pollution.	Inform land use decisions to designate truck routes, and monitor implementation and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Residential Project Design	Update or adopt ordinances that require site design and operational standards and associated conditions of approval for buildings with sensitive receptors located downwind of freight facilities to require practices that reduce sensitive receptors' exposure to the freight facility's emissions when permitting new development.	Coordinate with local agencies to identify financial tools that accelerate or support investments in zero-emission technology.	Support land use decisions that ensure local agencies consider all applicable practices and permitting conditions that will result in reductions in exposure.
Freight Facility Design	Update or adopt ordinances that require site design and operational standards and associated conditions of approval that require site design features for reducing air pollution and minimizing community exposure during development review.	Design freight facility access points and operational activities to minimize community exposure prior to submitting permit applications.	Support land use decision processes that ensure local agencies consider all applicable practices and permitting conditions that will support reductions in exposure to local communities.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
ADDITIONAL PRACTICES AND MITIGATION			
Vegetation and Other Barriers	Establish a program that requires freight facility owners to maintain vegetated walls or other appropriate barriers that separate facility operations from sensitive receptors when permitting freight facilities.	Dedicate land and resources to construct and maintain vegetated barriers or other appropriate tools to cut exposure when designing freight facilities.	Support land use decisions that ensure local agencies require freight facilities to construct and maintain vegetated walls or other barriers, where appropriate.
Air Filtration Devices	Partner with regional planning agencies and air districts to develop a program for installing and maintaining high-efficiency air filtration devices in existing and new sensitive receptors in proximity to freight facilities.	Support programs to install and maintain high efficiency air filters in existing buildings with sensitive receptors in proximity of freight facilities.	Collaborate with residential property owners and management organizations to promote the deployment, maintenance, and repair of air filtration systems through covenants, conditions, and restrictions.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Implement Required Clean Technology Early	Collaborate with CARB or the local air district on local actions to accelerate implementation of cleaner technologies required by State or district regulation at new freight facilities.	Commit to fund and develop a schedule for early compliance with CARB or district regulations.	Monitor implementation of clean technology programs and report any ongoing concerns.
Rate Structures	Adopt or update conditions of approval that require a rate structure that incentivizes freight facilities to contract with trucking, rail, and marine companies that utilize the lowest emitting transport technologies.	Implement a rate structure and charge more for access by higher emitting trucks, locomotives, or other equipment, and include a fee rate for zero-emission technologies.	Support the development and adoption of rate structures that support the accelerated deployment of zero-emission equipment.
Community Benefit Agreements	Support or administer community benefit agreements to address air quality impacts from freight facility projects and community exposure to air pollution.	Establish or support community benefit agreements to implement practices that provide air pollutant reductions at facilities and provide local benefits to impacted communities.	Negotiate with local agencies and developers to establish and implement community benefit agreements that address community air pollutant exposure from freight activities; monitor implementation and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Lease Agreements	Adopt or update conditions of approval for permitting that require freight facilities to use the cleanest commercially available technologies.	Include contractual language in lease agreements that requires zero-emission technologies everywhere feasible, and near-zero emission equipment powered by renewable energy everywhere else.	Advocate for the development of freight facility agreements that incorporate commitments for deployment of clean technologies.
Advanced Technologies	Require freight facilities to conduct periodic reviews of operations to identify opportunities to upgrade or phase out older equipment, as part of Development Agreements.	Conduct periodic reviews and commit to purchase, or require tenants to utilize zero-emission technologies or near zero-emission technologies if zero is not yet feasible.	Monitor implementation and report any ongoing concerns.
Mitigation Monitoring Reporting Program	Develop mitigation monitoring and reporting programs (MMRPs) to require periodic data and operational information to demonstrate compliance.	Post MMRPs and supporting documentation for public review with periodic updates that describe efforts to implement applicable practices.	Participate in development of MMRPs, follow implementation and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Public Contracting	Include requirements in public contracting document (i.e., Request for Proposals and Request for Qualifications) to specify that bidders implement practices that reduce air quality impacts and address community exposure to air pollution.	Submit proposals that meet or exceed the minimum set criteria for bidders to implement practices that reduce air quality impacts and address community exposure to air pollution.	Monitor implementation and report any ongoing concerns.
Employee Commuting	Establish or update program guidelines with sufficient resources to support alternative commute modes for freight facilities with more than 50 employees.	Commit to fund transit pass subsidies and support incentive programs for other forms of commuting; provide travel data to inform future program updates.	Participate in commuter programs, monitor implementation, and report any ongoing concerns.

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CONCEPTS FOR WAREHOUSE FACILITIES

The Freight Handbook will include practices for the siting, design, construction, and operations of warehouse facilities. Warehouses and other facilities (distribution centers, cold storage, etc., referred to collectively as "warehouse facilities") operate under similar conditions with primarily combustion-powered vehicles and equipment. As of 2019, most freight vehicles and equipment at warehouses run on diesel fuel.

In many communities, warehouse facilities are sited near existing transportation networks to access regional markets. Siting new warehouse facilities within or in close proximity to a neighborhood can compound air quality impacts from other air pollutant sources such as high-volume roadways and existing freight facilities nearby.

We are developing warehouse practices to serve as an informational resource to help communities, decision-makers, and warehouse facility developers, owners, and operators identify and implement practices to minimize community exposure to air pollution from these facilities. As described in CEQA comment letters, CARB staff continues to support building these facilities to achieve full zero-emission operation, implementing zero-emission technologies everywhere feasible, and near-zero emission equipment powered by renewable energy everywhere else.

Table 6 lists potential practices at warehouse facilities. The potential practices below compliment or expand upon potential practices listed in Table 5. As discussed above, local governments and air districts should consider these potential practices when permitting projects and when updating and implementing planning efforts. We are seeking input on the substance of potential practices as well as what level CARB should describe practices and appropriate methods to implement practices for warehouse facilities.

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Table 6. Summary of Potential Practices at Warehouses and Distribution Centers

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
PLANNING, REVIEW, AND PERMITTING			
Update Zoning	Review and update, or adopt, a zoning ordinance (site design and operational standards) to ensure warehousing activities are permitted in areas based on health risks from the warehouse's operational air pollution emissions, an appropriate distance from sensitive receptors.	Identify development opportunities that allow facility operations, or design facility projects, at appropriate distances; utilize air dispersion modeling, as necessary, to estimate exposure risk and inform design-level decisions prior to identifying air pollutant mitigation.	Engage local agencies and participate in review and updates to zoning ordinances for minimizing community exposure to air pollutant emissions.
Zero-Emission Operations: Land Use Policies and Standard Permitting Conditions of Approval	During permit review process, and through standard permitting conditions, to require freight facilities fully operate with zero-emissions equipment everywhere feasible, and near-zero emission equipment powered by renewable energy everywhere else.	Design projects to integrate zero-emission technologies to the extent feasible prior to submitting permit applications; commit to contractual obligations that fully require tenants to zero-emission equipment operations everywhere feasible, and near-zero emission equipment powered by renewable energy everywhere else.	Support local agencies' adoption of land use policies and standard permitting conditions that will result in the deployment of cleaner technologies.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Zero-Emission Infrastructure: Land Use Policies and Standard Permitting Conditions of Approval	Adopt or update ordinances that require site design and operational standards and associated standard permitting conditions to provide needed infrastructure for zero-emission operation.	Commit to investments in zero-emission infrastructure at the project-design stage; deploy zero-emission technologies and incorporate contractual language requiring tenants to utilize zero-emission technologies to the maximum extent possible.	Review and provide input into project designs and monitor implementation and report any ongoing concerns.
Zero-Emission Infrastructure: Investment Plan	Update or adopt permit conditions that require facility developers and owners to establish an investment plan supporting zero-emission infrastructure.	Establish an investment plan and adopt a timeline for making investments in zero-emission technologies; and anticipate emerging technologies becoming commercially available.	Review and assess project designs, monitor implementation and report any ongoing concerns.
Regulatory Compliance, Idling Limits and Dock Electrification	Help enforce mobile and off-road source regulations to limit unnecessary idling, and electrify loading docks serviced by trucks with transport refrigeration units (TRU) or auxiliary power units (APU).	Commit to implementing zero-emission technologies and incorporate contractual language to require tenants demonstrate compliance with mobile and off-road source regulations, limit unnecessary idling, and electrify loading docks servicing trucks with TRUs or APUs.	Review project proposals, and monitor implementation and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Development Programs and Agreements	Require owners and operators to contribute or establish Development Agreements that fund projects for reducing community exposure to air pollution from freight.	Negotiate with local agencies and community organizations to establish or contribute towards publically administered development programs that reduces community exposure to air pollution.	Participate in processes to establish and administer development programs that fund projects that result in a reduction in community air pollutant exposure.
ZERO EMISSION TECHNOLOGY			
Zero and Near-Zero Emission Technologies for All Project Phases	Condition permit approval of warehouse proposals to integrate zero-emission technologies during construction and operational phases everywhere feasible, and near-zero emission equipment powered by renewable energy everywhere else.	Incorporate zero-emission technologies into business decisions, financial planning, and contractual language for construction phases, operational activities, and tenant lease agreements.	Collaborate with freight facility developers and owners, monitor implementation, and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Upgrade On-site Service Equipment	As a permitting condition, require all on-site service equipment (cargo handling, yard hostlers, forklifts, pallet jacks, etc.) to fully operate with zero-emissions, where possible.	Install necessary infrastructure to support zero-emission technologies and contractually obligate tenants to deploy commercially available zero-emission technologies to the maximum extent possible.	Monitor implementation, and report any ongoing concerns.
Intermodal Facility Transport Activities	Organize a committee to collaborate with warehousing facilities owners and operators to maximize cargo transport efficiency of cargo handling, and long-haul truck activities	Integrate operation systems using cleanest available technologies; coordinate management systems to maximize operational efficiency for minimizing unnecessary idling of all diesel engines.	Monitor implementation and report any ongoing concerns.
Fueling Infrastructure for Zero-Emission Operations	Condition permit approval of warehouse facilities to install fueling infrastructure (electric charging and hydrogen fueling stations) for maximizing on-site zero-emission operations.	Incorporate fueling infrastructure to support zero-emission operations into project to the maximum extent possible; coordinate construction plans and activities with utility providers prior to submitting permitting applications.	Monitor implementation and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
On-Site Renewable Energy Generation	Encourage through adoption of general plan policies and goals or through conditioning permit approval of warehouse facilities to incorporate renewable energy resources into project designs or exceed applicable green building standards for warehouses.	Incorporate on-site renewable energy production—solar, wind, etc.—into project design; coordinate with utility providers prior to submitting permitting applications and integrate necessary infrastructure.	Advocate for local governments to develop requirements and incentives for the usage of renewable energy at facilities.
On-Site Microgrid Energy Storage	Coordinate integration of on-site microgrid energy deployment between facilities and utility providers.	Integrate microgrids into project designs to help reduce electricity costs, distribute on-site energy demand across, and increase storage capacities.	Monitor implementation and report any ongoing concerns.
On-Site Energy Storage	Review permitting practices for opportunities to streamline review processes to encourage on-site energy storage solutions for supporting fully zero-emission operations.	Integrate renewable energy storage to ensure adequate storage capacities, including surplus margins, to provide alternative emergency backup power.	Advocate for local governments to develop efficient permitting processes that allow for deployment of energy storage systems.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
WAREHOUSE FACILITY DESIGN			
Establish Truck Routes	Design routing programs in the General Plan to address congestion, provide adequate truck parking capacity, and account for delivery schedules to avoid peak commute periods with a goal of directing trucks around sensitive receptors.	Inform local agencies and community members to establish truck route programs that service facility needs while prioritizing routes that minimize community exposure to air pollution.	Monitor truck activities, collaborate with freight facility owners, and report any ongoing concerns.
Provide Truck Parking	Condition permit approval of warehouse facilities to provide adequate space for truck parking, staging, and loading activities with incentivizes for zero-emission delivery vehicles.	Collaborate with local agencies and utility providers to provide necessary infrastructure for supporting zero-emission delivery vehicles.	Monitor truck activities, collaborate with freight facility owners, and report any ongoing concerns.
Adequate Truck Route Signage	Condition permit approval of warehouse facilities in coordination with Caltrans to install adequate wayfinding strategies along truck routes from highways to facility parking areas.	Provide trainings to inform employee and tenants on proper truck routing and parking programs.	Monitor truck activities, collaborate with freight facility owners, and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Provide Multimodal Commuter Pathways	Condition permit approval of warehouse projects to provide or promote alternative transportation modes for reducing vehicular commuter dependence.	Integrate multimodal design into and around facility access points with the existing transportation infrastructure including connections to existing and planned pedestrian and bicycle pathways.	Review and assess project proposals, monitor implementation, and report any ongoing concerns.
Funding for Freight Transport Infrastructure	Apply and match Federal, State, and local funding sources to support freight transport infrastructure that improves freight facility connectivity and maximizing operational efficiency.	Maximize public funding opportunities to improve facility operations through siting, access, and connectivity to established freight transport corridors.	Advocate for project proposals maximizing public investments in freight transportation planning efforts that improve freight efficiency.
Building Codes for Zero-Emission Charging Stations	Update local codes to require infrastructure for electrification or fueling stations, or adopt State building code for medium and heavy-duty zero-emission infrastructure, as available.	Design or modify facilities to integrate charging station infrastructure; coordinate with utility providers to maximize on-site potential for supporting zero-emission vehicles.	Monitor implementation and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Design Guidelines for Minimizing Community Exposure	Update or adopt site design standards to locate entrance gates, loading docks, staging areas, and parking facilities away from sensitive receptors.	Incorporate design features that demonstrably reduce a community's exposure from loading, staging, and parking activities.	Monitor implementation and report any ongoing concerns.
Vegetative and Other Solid Barriers	Update or adopt site design standards to promote vegetative or other solid barriers for reducing community exposure to air pollution from nearby roadway and on-site activities.	Identify potential air pollutant sources on-site and access routes that may impact nearby communities for informing the location of vegetative or solid barriers, with appropriate design parameters to reduce particulate matter.	Monitor implementation and report any ongoing concerns.
Design Features to Maximize On-Site Truck Maneuvering Efficiency	Review or adopt site design standards to encourage facility designs that maximize efficiency of on-site trucking and loading activities including: turning radii, simultaneous container loading and unloading, and connectivity to site access and roadways.	Design facilities to maximize available space for trucking and loading activities including: turning radii, simultaneous container loading and unloading, and connectivity to site access and roadways.	Monitor implementation and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Multimodal Facility Design	Reduce air quality impacts associated with multimodal facility projects by maximizing transiting efficiencies between transport modes for distributing containers and truck trailers.	Integrate access and loading operations into existing intermodal freight systems for maximizing capacities and operational efficiency.	Monitor implementation and report any ongoing concerns.
WAREHOUSE FACILITY CONSTRUCTION			
Construction Emissions Minimization Plan	Update or adopt an ordinance to establish minimum criteria for construction emissions minimization plans that apply to projects in impacted communities.	Coordinate with local agencies to identify projects in impacted areas and incorporate plan criteria into contractual language for minimizing emissions from all construction-related activities to the extent feasible.	Monitor implementation and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Electrify Low Kilowatt Equipment	Update or adopt ordinances that require site design and operational standards and associated permit conditions to require electrifying all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers, etc.) wherever possible.	Integrate needed electrical infrastructure and hookups into construction planning; include contractual language that requires all contractors to electrify low kilowatt equipment wherever possible.	Monitor implementation and report any ongoing concerns.
Accelerate Regulatory Compliance	Encourage or condition permit approvals of warehouse proposals to maximize commercially available clean-engine technologies for heavy-duty trucks servicing the site.	Include contractual language that requires all contractors to utilize commercially available clean-engine technologies for heavy-duty trucks everywhere possible.	Monitor implementation and report any ongoing concerns.
Minimize Engine Idling	Update or adopt ordinances that require site design and operational standards and associated permit conditions to minimize diesel engine idling for no more than two minutes.	Inform contractors servicing the site of diesel engine idling limits by posting signage at access points, monitoring delivery activities, and training employees to maximize equipment efficiency.	Monitor implementation and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Utilize Generators Utilizing Renewable Fuels	Enforce permit conditions that require generators utilizing renewable fuels to be used, where electrification is infeasible.	Electrify equipment to the maximum extent feasible with connections to the power grid, utilize renewable fuels everywhere else.	Monitor implementation and report any ongoing concerns.
WAREHOUSE FACILITY OPERATIONS			
Minimize Refrigerants	Condition permit approval of warehouse proposals that include cold storage facilities to use low Global Warming Potential (GWP) refrigerants.	Use low GWP refrigerants at cold storage facilities. (e.g. <150 GWP, ammonia, CO_2, Hydrocarbons).	Support proposals that use low GWP refrigerants at cold storage facilities; and monitor implementation.
Minimum Green Building Standards	Update or adopt design guidelines that require facility operations to exceed standard green building criteria for reducing on-site air pollution and nearby community exposure.	Incorporate green building features that demonstrably address on-site air pollution source or minimize nearby community exposure through design and modified operational activities.	Support proposals for applicable green building features, monitor implementation, and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Truck Service Efficiency	Support facility owners and operators to integrate new technologies for improving efficiency of trucking activities to minimize queuing and in-terminal waiting periods.	Coordinate techniques and methods to improve truck delivery and loading activities using available software packages; train service providers on methods to group, streamline, or otherwise maximize facility efficiency during heavy delivery periods.	Collaborate with facility owners and operators to implement technologies, monitor implementation, and report any ongoing concerns.
Container Yard Management Efficiency	Support facility owners and operators to incorporate technologies for operational activities or on-site practices that improve equipment management practices and increase goods movement efficiency.	Coordinate yard management techniques and methods using available software packages to virtualize container loading areas for improving on-site exchanges between import and export activities.	Monitor implementation and report any ongoing concerns.
Coordinate Neighboring Purchasing and Deliveries	Support facility logistics for minimizing duplicative supply deliveries to minimize daily truck visits.	Coordinate supply needs and delivery service contacts with neighboring facilities to maximize supply receiving and shipping activities.	Monitor implementation and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Freight Traffic Information Systems	Collaborate with public agencies to develop and implement a "push" freight traffic information system through a public platform for data sharing that improves logistics planning and truck delivery scheduling.	Support development and implementation of a "push" freight traffic information system by providing trucks servicing a facility with real-time traffic data.	Monitor implementation and report any ongoing concerns.
FINANCING, GRANTS, AND INCENTIVES			
Grants for Zero-Emission Infrastructure and Equipment, Renewable Fuels, and Efficiency	Utilize grants for zero-emission vehicles and equipment, renewable fuel production, charging, and hydrogen fueling infrastructure, and efficiency improvement technologies.	Maximize investments to integrate and deploy zero-emission vehicles and equipment, produce and store renewable fuels, provide charging and fueling infrastructure, and implement efficiency improvements.	Monitor implementation and report any ongoing concerns.

Practice	Local Governments and Air Districts	Warehouse Developers, Owners, or Operators	Public
Funding for Zero-Emission Technology	Support and fund zero-emission TRU and APU technology to modernize existing facilities and support integrating with proposals for new facilities.	Maximize investments in zero-emission technologies and incorporate contractual language for tenants and service providers to deploy vehicles with TRUs or APUs capable of integrating with electrified loading docks.	Monitor implementation and report any ongoing concerns.
Joint Public and Private Investment Opportunities	Identify local opportunity areas to support clean-technology investments through Property and Business Improvement Districts (PBID) or Enhanced Infrastructure Financing Districts (EIFD).	Collaborate with local agencies to establish and support PBIDs or EIFDs; coordinate with neighboring facilities to maximize investments in business opportunities that support fully zero-emission operations.	Support local agencies and facility owners and operators to establish PBIDs and EIFDs for financing fully zero-emission operations; monitor implementation and report any ongoing concerns.
Projects to Demonstrate Emerging Technologies	Support funding opportunities for demonstrating zero-emission technology technologies for existing and new freight facilities.	Maximize investment opportunities and implement zero-emission demonstration projects in all applicable facility operations.	Support local agency and facility owners and operators to identify opportunities; monitor implementation and report any ongoing concerns.

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LIST OF RESOURCE DOCUMENTS

CARB staff reviewed an extensive selection of resource documents to inform development of the Concept Paper for the Freight Handbook and identify practices for the siting, design, construction, and operation of freight facilities to minimize the resulting air pollution impacts on nearby communities. Some of these documents are listed below. In addition to these documents, this Concept Paper reflects public input CARB gathered through developing and implementing state-level programs related to freight. CARB has also considered the feedback received from local workshops to develop community monitoring and emission reduction plans, the Pathways to Zero and Near-Zero Emissions document, and the Sustainable Freight Action Plan, as well as updated information posted on State and local agency websites.

- Bay Area Air Quality Management District (BAAQMD). *California Environmental Quality Act Air Quality Guidelines* (2017).
- BAAQMD. *Improving Air Quality & Health in Bay Area Communities: Community Air Risk Evaluation Program Retrospect & Path Forward* [2004 - 2013] (2014).
- BAAQMD. *Planning Healthy Places: A Guidebook for Addressing Local Sources of Air Pollutants in Community Planning* (2016).
- BAAQMD. *Regulation 11, Rule 18: Reduction of Risk from Air Toxic Emissions at Existing Facilities* (2017).
- Bay Conservation and Development Commission, Metropolitan Transportation Commission (MTC). *San Francisco Bay Area Seaport Plan* (2017).
- CARB. *Air Quality and Land Use Handbook: A Community Health Perspective* (2005).
- CARB. *Let's Clear the Air: A Public Participation Guide to Air Quality Decision Making in California* (2005).
- CARB. *Sustainable Freight: Pathways to Zero and Near-Zero Emissions* (2015).
- CARB. *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways* (2017).
- California Department of Transportation (Caltrans). *California Freight Mobility Plan* (2014).
- Caltrans. *Mitigating Freight Impacts on Nearby Communities – Preliminary Investigation* (2015).
- Caltrans, CARB, *et. al. California Sustainable Freight Action Plan* (2016).
- California Air Pollution Control Officers Association. *Health Risk Assessments for Proposed Land Use Projects* (2009).
- California Governor's Office of Planning and Research (Cal OPR). *State of California General Plan Guidelines* (2017).
- Cal OPR. *The Planner's Guide to Specific Plans* (2001).
- City of Oakland. *West Oakland Truck Management Plan* (2018).
- City of Riverside. *Good Neighbor Guidelines for Siting New and/or Modified Warehouse Distribution Facilities* (2008).

- Biggs, D., Stansbery, S., and Nance, M. American Planning Association. *100 Great Community Engagement Ideas* (2018).
- Environmental Defense Fund. *Green Freight Handbook* (2014).
- Institute for Local Government. *Effective Public Engagement through Strategic Communication* (2015).
- Institute for Local Government. *What is Public Engagement and Why Should I Do It?* (2016).
- Los Angeles County Metropolitan Transportation Authority, Caltrans. *Healthy Communities and Healthy Economy* (2009).
- MTC, Bay Area Goods Movement Collaborative. *Community Collaborative for Sustainable Freight* (2014).
- MTC. *San Francisco Bay Area Goods Movement Plan* (2016).
- MTC, *et. al. Freight Emissions Reduction Action Plan* [for Plan Bay Area 2040] Final Supplemental Report (2017).
- MTC, *et. al. Plan Bay Area 2040, Draft Environmental Impact Report* (SCH# 2016052041) (2017).
- National Center for Sustainable Transportation. *Freight Efficiency Whitepapers* (2016).
- Natural Resources Defense Council. *Clean Cargo: A Guide to Reducing Diesel Air Pollution from the Freight Industry in Your Community* (2012).
- Natural Resources Defense Council. *Defend Your Air* (2012).
- PolicyLink. *The Sustainable Communities Initiative: The Community Engagement Guide for Sustainable Communities* (2012).
- Port of Long Beach. "Air Quality Programs" (website 2018).
- Port of Long Beach. *Port Master Plan, Update 1990* (As amended, 2005).
- Ports of Long Beach and Los Angeles. *San Pedro Bay Ports Clean Air Action Plan* (2017).
- Port of Los Angeles. *Port Master Plan* (2018).
- Port of Oakland. *Growth With Care: Port of Oakland Strategic Business Plan* 2018-2022 (2018).
- San Diego Unified Port District. *Port Master Plan* (2017).
- San Diego Association of Governments. *2050 Regional Transportation Plan/Sustainable Communities Strategy*, Draft Environmental Impact Report (SCH# 2010041061) (2011).
- San Diego Unified Port District. *Port Master Plan* (2017).
- San Joaquin Council of Governments. *2018 Regional Transportation Plan/Sustainable Communities Strategy*, Draft Environmental Impact Report (SCH# 2017032042) (2018).
- San Joaquin Valley Unified Air Pollution Control District (SJVAPCD). *Guidance for Assessing and Mitigating Air Quality Impacts* (2015).
- SJVAPCD. *Guidance for Assessing and Mitigating Air Quality Impacts* (2015).
- SJVAPCD. *Rule 3180: Administrative Fees for Indirect Source Review* (Adopted 2005, as amended 2018).

- SJVAPCD. *Rule 9150: Indirect Source Review* (Adopted 2005, as amended 2017).
- Transportation Research Board, National Cooperative Freight Research Program. *Guidebook for Understanding Goods Movement* (2012).
- Southern California Association of Governments (SCAG). *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*, Draft Environmental Impact Report (SCH# 2015031035) (2015).
- SCAG. *Industrial Warehousing in the SCAG Region* (2018).
- South Coast Air Quality Management District (SCAQMD). *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* (2005).
- SCAQMD. *Model Air Quality Element* (Reviewed, 2019).
- SCAQMD. *Rule 1402: Control of Toxic Air Contaminants from Existing Sources* (Adopted 1994, as amended 2016).
- Transportation Research Board, National Cooperative Highway Research Program. *Guide to Deploying Clean Truck Freight Strategies* (2017).
- Transportation Research Board, National Cooperative Freight Research Program. *Issues Identified and Lessons Learned from NCFRP 24 - Smart Growth and Urban Goods Movement* (2013).
- Transportation Research Board, National Cooperative Freight Research Program. *Background Research Material for Freight Facility Location Selection: A Guide for Public Officials* (2011).
- United States Department of Transportation, Federal Highway Administration. *Freight and Air Quality Handbook* (2012).
- United Sates Environmental Protection Agency, SmartWay. *Vision 2020: A New Era of Freight Sustainability* (2015).
- West Oakland Environmental Indicators Project. *Clearing the Air: Reducing Diesel Pollution in West Oakland* (2003).
- Western Riverside Council of Governments. *Transportation Uniform Mitigation Fee Program* (2019).

We the Meadows, Harrison Jiang, President

Letter Code: O-7
Date: September 15, 2025

Response to Comment O-7-1

This comment is an introductory letter that expresses opposition to the Project, and summarizes the key points of an attached letter prepared by Carstens, Black & Minteer (provided separately as Letter O-6). This comment states the opinion that the Draft EIR does not disclose, analyze and mitigate adverse impacts of the Project, that environmental superior alternatives are available and must be adopted, and that the City cannot support findings required for a statement of overriding considerations. This comment requests the Draft EIR revise the discussion on cumulative impacts and feasible and enforceable mitigation measures and consider alternative land uses that are both economically viable and compatible with nearby residential communities.

Please refer to the Response to Comment O-6 for specific responses to the points of opposition to the Project that are summarized in this letter.

The City of Lake Forest is an urbanized area with a wide variety of established land uses. The Project area has been developed with a variety of residential, business park, regional park/open space, commercial, and light industrial land uses. The General Plan's Land Use Element identifies how land will be used in the future—for housing, commercial, and business centers, public facilities, parks, open space, and transportation.

One of the primary objectives of the City's 2040 General Plan is to encourage economic development in areas adjacent to major roadways and transportation corridors, ensuring a diverse mix of land uses that supports the community's ability to thrive and be economically sustainable over time. City General Plan policies seek to balance economic development, fiscal stability, and land use compatibility. While the commenter selectively identifies policies related to community compatibility, policies addressing the need for economic development and fiscal stability are not referenced. The Project site has been zoned Light Industrial (LI) since 1987 and was vacant until the existing structure was developed in 1999. The City's latest General Plan Update (*2040 Lake Forest General Plan Update*) was approved in June 2020 and provides the long-term vision for land use development in the City. The land use designation and zoning for the Project and cumulative sites is the same as that considered in the City's most recent General Plan. As detailed in the Draft EIR (refer to Table 4.11.B, starting on page 4.11-10) and summarized in Master Response 7, the Project is consistent with the applicable land use compatibility policies established in the General Plan. Furthermore, by providing for the redevelopment of a currently underutilized site, the Project satisfies the goals and policies of the General Plan to promote economic development and support the fiscal health of the City.

Please refer further to Master Response 2 regarding the adequacy of the Draft EIR, Master Response 4 regarding the adequacy of the Draft EIR's proposed mitigation under CEQA, and Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project. Additionally, refer to Response to Comment O-6-13 regarding the City's adoption of Statements of Overriding Considerations. No further response and no revision to the Draft EIR is warranted.

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2.4 INDIVIDUALS

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From: Michael Ciauri
To: EnterpriseProjects
Subject: IPT Enterprise Business Center Draft EIR
Date: Thursday, July 17, 2025 2:44:09 PM
Attachments: image.png

Hi Amy,

I-1-1 I hope you're having a great day! I am curious about some items in the IPT Enterprise Draft EIR that I'm hoping you can help educate me on. I apologize for the many detailed questions, I hope it doesn't take too much of your (and/or your staff's) time.

The most negative part that I've noticed is how the draft EIR estimates the traffic impact. Specifically on page 370-371:

"However, as stated above, even with implementation of mitigation, the proposed project would result in a significant and unavoidable transportation impact related to VMT. Of the 13 cumulative projects listed in Table 4.A in Chapter 4.0, the Western Realco Projects (Projects 3 and 4 in Table 4.A) are located within the same TAZ as the proposed project. The TAZ zone associated with the proposed project and Projects 3 and 4 is above the countywide threshold for VMT, and all projects within this TAZ zone would contribute to higher VMT rates within the TAZ zone. The proposed project would have a significant project-specific impact on VMT and when considered with the other cumulative projects, particularly those within the same TAZ, the proposed project would have a cumulatively considerable impact on VMT. There are no feasible mitigation measures that can reliably guarantee that VMT can be reduced below the City's threshold; therefore, the proposed project would have a cumulatively significant and unavoidable transportation impact related to VMT even with implementation of mitigation."

I-1-2

Can you help me understand the preparer's method when they come up with the VMT estimates? It seems driven (no pun intended) by estimates of daily truck and passenger vehicle trips

I'm admittedly having trouble finding their assumptions on this. But it looks like they estimate "the project" will

Generate 187 employees
458 daily passenger vehicle trips
269 daily truck trips

For purposes of these estimates, what do they define as the project? Is it just the IPT building or the IPT + Western Realco buildings?

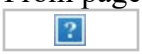
How do they determine the vehicle miles per passenger vehicle trip? Truck trip?

Are their assumptions the "maximum use" type assumptions, or the "typical use" type assumptions?

I ask because their assumptions seem really high based on the small amount of warehouse activities I've observed. Maybe the warehouses I see are just really under utilized :-)

Another item I'm curious about is the claimed 20% VMT reduction requirement which is not achievable.

From page 366:



Can you help me understand this one? I admittedly am not sure. My best guess is the target set to Orange County by SB 743 (which was implemented and adopted by the LF city council) is 20.5 VMT per employee and based on the estimates in the draft EIR this project exceeds it by 4.1 VMT per employee?

I-1-2 cont.

Do they take the entire project's VMT (regardless of whether it's generated by an employee or not) divided by estimated project employees? If that's the case, it seems like the project VMT rate gets skewed higher due to the VMTs generated by estimated truck trips.

If that's not the case, then is that VMT rate due to some other factor, like employees may live an above average distance from the project site? Something else?

Thanks again for any time you can take to teach me.

Respectfully,
Mike Ciauri

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The proposed project is located in LFTAM TAZ 45 and is considered a non-residential office/ employment project. Table 4.17.B shows the VMT reduction targets per the latest City TA Guidelines. As shown in Table 4.17.B, the project VMT rate exceeds the City's VMT threshold (Target VMT Rate) by 20 percent and, therefore, the proposed project is required to reduce its VMT by 20 percent.

Table 4.17.B: City of Lake Forest VMT Reduction Targets

VMT Analysis Scenario	VMT Rate	
	VMT	Metric
Countywide VMT Threshold[1]	20.5	VMT/Employee
Project VMT Rate[2]	24.6	VMT/Employee
Above or Below Citywide VMT Threshold	Above	
Significant Impact?	Yes	
VMT Reduction Required	4.1 (20%)	

Source: Compiled by LSA (2025).

[1] Per the City of Lake Forest Transportation Analysis Guidelines (July 2020).

[2] Project VMT rate was from City of Lake Forest SB 743 VMT Look-Up Table, as provided in Appendix G of the TIA.

SB = Senate Bill

VMT = vehicle miles traveled

MICHAEL CIAURI

Letter Code: I-1
Date: July 17, 2025

Response to Comment I-1-1

This comment is introductory and requests information on the Draft EIR that is highlighted in subsequent comments.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. No further response is required.

Response to Comment I-1-2

This comment expresses concern regarding the methodology for estimating VMT impacts, the definition of the Project in relation to trip generation estimates, and the methodology for determining VMT per passenger vehicle trip and per truck trip. In addition, this comment requests more information to address their comments regarding the 20 percent VMT reduction requirement and the methodology for determining VMT reduction.

Refer to Master Response 8 regarding VMT methodology, assumptions, and mitigation. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

To clarify, per the City's Transportation Analysis (TA) Guidelines, the VMT assessment metric for the proposed Project is "Home-Based Work VMT per employee," not "vehicle miles per passenger vehicle trip" or vehicle miles per truck trip."

Different from the traffic operational analysis (i.e., LOS and queuing), the VMT assessment is primarily focused on the VMT directly attributable to and generated by the proposed Project. In this situation, the Project is defined as the proposed IPT Enterprise Business Center LLC only. Since Project VMT should be evaluated in existing conditions based on the City's TA Guidelines, cumulative Projects (such as the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) are not required to be included in the VMT analysis.

As requested by the City, two methods were used in the Project TIA to assess VMT for the proposed Project: 1) the Lake Forest VMT Look-Up Table, and 2) the Orange County Transportation Analysis Model (OCTAM).

The City has adopted "20.5 Home-Based Work VMT per employee" as the threshold/target for non-residential office/employment Projects. Based on the Lake Forest VMT Look-Up Table, the Project VMT rate is 24.6 Home-Based Work VMT per employee, which exceeds the threshold by 4.1 VMT per employee. The limitation of the Lake Forest VMT Look-Up Table is that the VMT result is based on the project location and type; the size of the project is not taken into consideration. In other words, the increase or decrease in the project size would not change the VMT results from the Lake Forest VMT Look-Up Table.

The OCTAM, a regional travel demand model recommended in the City's TA Guidelines, was also used for the VMT analysis for the proposed Project. The OCTAM requires socioeconomic input in the number of employees rather than the proposed square footage for the proposed project land use. Therefore, the analysis estimated the number of employees based on the square footage of the proposed Project and trip rates from the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th edition) were used. The ITE Trip Generation Manual, the industry standard manual, represents the general and average condition. Since the VMT assessment metric for the proposed Project is "Home-Based Work VMT per employee," the total VMT generated by the Project employees was obtained from the OCTAM outputs to calculate VMT per employee.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: Haibo Jiang
Sent: Monday, July 21, 2025 10:35 AM
To: EnterpriseProjects <EnterpriseProjects@lakeforestca.gov>
Cc: Stonich, Amy <AStonich@lakeforestca.gov>; Ackerman, Gayle <GAckerman@lakeforestca.gov>; Diana Lees [redacted] Bin Zhou [redacted] Vivian Zhao <[redacted] Chao Huang [redacted]>; [redacted]
Subject: Draft EIR – IPT Enterprise Business Center LLC Project: Missing Chapter & Request for Correction

Hi Amy,

This is Harrison Jiang, a resident of The Meadows at Lake Forest. My address is:
Lake Forest, CA 92630
While reviewing the Draft EIR document posted on the City's website (https://www.lakeforestca.gov/en/environmental) over the weekend, I noticed that Chapter 4.3 on Air Quality appears to be entirely missing. This seems to be an administrative oversight. More specifically:
https://www.lakeforestca.gov/sites/default/files/IPT_Draft%20EIR_July%202025.pdf
Could you please review and confirm? If the Draft EIR is indeed incomplete, I respectfully request that the City:

I-2-1

Update the Draft EIR to include the missing chapter,
Republish the corrected version online,
Reissue the public notice to the community, and
Restart the 45-day public comment period from the date of reposting.

Thank you very much for your attention to this matter. Best regards,
Harrison Jiang

HARRISON JIANG

Letter Code: I-2
Date: July 21, 2025

Response to Comment I-2-1

This comment states that Section, 4.3, Air Quality of the Draft EIR was missing on the City's website and requests that the City update the Draft EIR to address their comments related to this section, republish the corrected version online, reissue the public notice to the community and restart the 45-day public comment period from the date of reposting.

Refer to Master Response 1 regarding the adequacy of the public review period for the proposed Project and circulation of Section 4.3, Air Quality, of the Draft EIR. This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: Haibo Jiang
To: Stonich, Amy; EnterpriseProjects
Cc: Ackerman, Gayle; Diana Lees; Bin Zhou; Vivian Zhao; Chao Huang; [redacted] Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeño, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Re: Draft EIR – IPT Enterprise Business Center LLC Project: Missing Chapter & Request for Correction
Date: Tuesday, July 22, 2025 6:56:55 AM

Hi Amy,

This Morning, I noticed that the Draft EIR for the IPT Enterprise Business Center LLC Project posted on the City's website has been updated to include the previously missing Chapter 4.3 on Air Quality (spanning more than 50 pages, with the corresponding Appendix C exceeding 1,700 pages):

I-3-1 https://www.lakeforestca.gov/sites/default/files/Compiled%20EIR%20OCRd.pdf

Given this correction and the significance of the proposed project, I respectfully request that the City consider extending the public comment period to allow the community sufficient time to review the complete and updated document and provide meaningful feedback.

Thank you for your attention and continued support of public engagement on this important matter.

Harrison Jiang
Cell: [redacted]

On Mon, Jul 21, 2025 at 10:55 AM Stonich, Amy <AStonich@lakeforestca.gov> wrote:

> Thank you for letting me know. I will have it fixed.
>
> **From:** Haibo Jiang [redacted]
> **Sent:** Monday, July 21, 2025 10:35 AM
> **To:** EnterpriseProjects <EnterpriseProjects@lakeforestca.gov>
> **Cc:** Stonich, Amy <AStonich@lakeforestca.gov>; Ackerman, Gayle <GAckerman@lakeforestca.gov>; Diana Lees [redacted] Bin Zhou [redacted] Vivian Zhao <[redacted] Chao Huang [redacted]>; [redacted]
> **Subject:** Draft EIR – IPT Enterprise Business Center LLC Project: Missing Chapter & Request for Correction
>
> Hi Amy,

This is Harrison Jiang, a resident of The Meadows at Lake Forest. My address is:
[redacted]
Lake Forest, CA 92630

While reviewing the Draft EIR document posted on the City's website (https://www.lakeforestca.gov/en/environmental) over the weekend, I noticed that Chapter 4.3 on *Air Quality* appears to be entirely missing. This seems to be an administrative oversight.

More specifically:

https://www.lakeforestca.gov/sites/default/files/IPT_Draft%20EIR_July%202025.pdf

Could you please review and confirm? If the Draft EIR is indeed incomplete, I respectfully request that the City:

- Update the Draft EIR to include the missing chapter,
- Republish the corrected version online,
- Reissue the public notice to the community, and
- Restart the 45-day public comment period from the date of reposting.

Thank you very much for your attention to this matter.

Best regards,

Harrison Jiang
Cell: ([redacted]

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HARRISON JIANG

Letter Code: I-3
Date: July 22, 2025

Response to Comment I-3-1

This comment acknowledges the updated Draft EIR on the City's website and requests the City consider extending the public comment period to address their comments regarding the sufficiency of the time afforded to the public to review and provide feedback on the document.

Refer to Master Response 1 regarding the adequacy of the public review period for the proposed Project. This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: Bin Zhou
To: Haibo Jiang; Stonich, Amy
Cc: Stonich, Amy; EnterpriseProjects; Ackerman, Gayle; Diana Lees; Vivian Zhao; Chao Huang; [redacted]; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Re: Draft EIR – IPT Enterprise Business Center LLC Project: Missing Chapter & Request for Correction
Date: Sunday, July 27, 2025 10:08:08 AM

Hi Amy,

I support Mr. Harrison Jiang's request for an extension of the public comment period for the IPT Enterprise Business Center Draft EIR, especially in light of the recent addition of Chapter 4.3 on Air Quality and the extensive Appendix C.

I-4-1

Given the volume and importance of the new material, additional time is essential to ensure the community has a fair opportunity to review and respond.

Thank you for your consideration.

Best regards,

Bin Zhou

On Jul 22, 2025, at 15:56, Haibo Jiang [redacted] wrote:

Hi Amy,

This Morning, I noticed that the Draft EIR for the IPT Enterprise Business Center LLC Project posted on the City's website has been updated to include the previously missing Chapter 4.3 on Air Quality (spanning more than 50 pages, with the corresponding Appendix C exceeding 1,700 pages):

https://www.lakeforestca.gov/sites/default/files/Compiled%20EIR%20OCRd.pdf

Given this correction and the significance of the proposed project, I respectfully request that the City consider extending the public comment period to allow the community sufficient time to review the complete and updated document and

provide meaningful feedback.

Thank you for your attention and continued support of public engagement on this important matter.

Harrison Jiang
Cell: [redacted]

On Mon, Jul 21, 2025 at 10:55 AM Stonich, Amy <AStonich@lakeforestca.gov> wrote:

> Thank you for letting me know. I will have it fixed.
>
> ---
>
> **From:** Haibo Jiang <[redacted]>
> **Sent:** Monday, July 21, 2025 10:35 AM
> **To:** EnterpriseProjects <EnterpriseProjects@lakeforestca.gov>
> **Cc:** Stonich, Amy <AStonich@lakeforestca.gov>; Ackerman, Gayle <GAckerman@lakeforestca.gov>; Diana Lees <[redacted]>; Bin Zhou [redacted]>; Vivian Zhao <[redacted]>; Chao Huang [redacted]>; [redacted]
> **Subject:** Draft EIR – IPT Enterprise Business Center LLC Project: Missing Chapter & Request for Correction
>
> Hi Amy,
>
> This is Harrison Jiang, a resident of The Meadows at Lake Forest. My address is:
> [redacted]
> Lake Forest, CA 92630
>
> While reviewing the Draft EIR document posted on the City's website (https://www.lakeforestca.gov/en/environmental) over the weekend, I noticed that Chapter 4.3 on *Air Quality* appears to be entirely missing. This seems to be an administrative oversight.
>
> More specifically:
>
> https://www.lakeforestca.gov/sites/default/files/IPT_Draft%20EIR_July%202025.pdf
>
> Could you please review and confirm? If the Draft EIR is indeed incomplete, I respectfully request that the City:

- Update the Draft EIR to include the missing chapter,
- Republish the corrected version online,
- Reissue the public notice to the community, and
- Restart the 45-day public comment period from the date of reposting.

Thank you very much for your attention to this matter.

Best regards,

Harrison Jiang
Cell: (

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BIN ZHOU

Letter Code: I-4
Date: July 27, 2025

Response to Comment I-4-1

This comment expresses concurrence with Comment Letter I-3 and requests an extension of the public comment period to address their comments.

Refer to Master Response 1 regarding the adequacy of the public review period for the proposed Project. This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: June
To: Stonich, Amy; Ackerman, Gayle
Subject: Re: Notice of Availability of Draft EIR for IPT Enterprise Business Center LLC Project
Date: Sunday, July 27, 2025 12:05:26 PM

Hi Amy,

Thank you for the email of the notice of availability of the IPT DEIR.

I am in studying of it and have the follow questions and concerns need your great help with when possible:

I-5-1

1) How many truck docks are in the other two projects which are under DEIR process and if these two projects operations have been taken into consideration in the DEIR, where can we see the details of its assumptions.
(Public Scoping Meeting for Proposed Western Realco Enterprise Way Industrial Project - January 15, 2025 (PowerPoint Presentation))

2) The scope of the project without the specific nature of the business, but with so many dock stations in design as in their original plan reviewed submitted on 12/12 2022, and indicate need of

On Thu, Jul 10, 2025 at 2:46 PM Stonich, Amy <AStonich@lakeforestca.gov> wrote:

> **The Draft Environmental Impact Report (EIR) is now available for public review.** Please see the attached document for more details.
>
> We appreciate your interest and participation in the environmental review process.
>
> Sincerely,
>
> Amy Stonich
>
> Assistant Director of Community Development
>
> City of Lake Forest

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JUNE BIAN

Letter Code: I-5
Date: July 27, 2025

Response to Comment I-5-1

This comment inquires as to the number of truck docks proposed under the Western Realco Enterprise Way Industrial Project (Projects 1 and 2), requests the location to view cumulative assumptions related to these two projects, and questions the scope of the Project without a specific tenant and the nature of the proposed business. The comment mentions dock stations but appears incomplete.

As discussed in the State Clearinghouse posting of the Notice of Preparation of a Draft EIR for the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) cited in this comment letter (https://ceqanet.lci.ca.gov/2024120646), a maximum of 18 usable dock doors would be provided under Western Realco Project 1, and a maximum of seven usable dock doors would be provided under Western Realco Project 2. Each section within Chapter 4.0, Environmental Impact Analysis, of the Draft EIR prepared for the proposed Project contains a dedicated cumulative impacts section which presents a cumulative impact analysis with respect to the specific environmental topic discussed in that section. Refer to Master Response 6 regarding the cumulative analysis included in the Draft EIR. Refer to Response to Comment O-1-10 regarding tenant uncertainty associated with the proposed Project.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: Lily Chu
To: Bin Zhou
Cc: Haibo Jiang; Stonich, Amy; EnterpriseProjects; Ackerman, Gayle; Diana Lees; Vivian Zhao; Chao Huang; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Re: Draft EIR – IPT Enterprise Business Center LLC Project: Missing Chapter & Request for Correction
Date: Sunday, July 27, 2025 1:40:47 PM

Dear Amy,

I strongly support the extension of the comment review date. Agree with Harrison and Bin, the draft EIR document is over 1000 pages, everyone needs a bit longer time to review and provide comments. Furthermore, it is summer time, families have vacation overseas, or parents need to spend more time on childcare in addition to work.

I-6-1

please give our neighbours more time for the critical review.

Best,
Lily

On Sun, Jul 27, 2025, 10:08 AM Bin Zhou <[redacted]> wrote:

> Hi Amy,
>
> I support Mr. Harrison Jiang's request for an extension of the public comment period for the IPT Enterprise Business Center Draft EIR, especially in light of the recent addition of Chapter 4.3 on Air Quality and the extensive Appendix C.
>
> Given the volume and importance of the new material, additional time is essential to ensure the community has a fair opportunity to review and respond.
>
> Thank you for your consideration.
>
> Best regards,
>
> Bin Zhou
>
> On Jul 22, 2025, at 15:56, Haibo Jiang <[redacted]> wrote:

Hi Amy,

This Morning, I noticed that the Draft EIR for the IPT Enterprise Business Center LLC Project posted on the City's website has been updated to include the previously missing Chapter 4.3 on Air Quality (spanning more than 50 pages, with the corresponding Appendix C exceeding 1,700 pages):

https://www.lakeforestca.gov/sites/default/files/Compiled%20EIR%20OCRd.pdf

Given this correction and the significance of the proposed project, I respectfully request that the City consider extending the public comment period to allow the community sufficient time to review the complete and updated document and provide meaningful feedback.

Thank you for your attention and continued support of public engagement on this important matter.

Harrison Jiang
Cell: [redacted]

On Mon, Jul 21, 2025 at 10:55 AM Stonich, Amy <AStonich@lakeforestca.gov> wrote:

> Thank you for letting me know. I will have it fixed.
>
> ---
>
> **From:** Haibo Jiang <[redacted]
> **Sent:** Monday, July 21, 2025 10:35 AM
> **To:** EnterpriseProjects <EnterpriseProjects@lakeforestca.gov>
> **Cc:** Stonich, Amy <AStonich@lakeforestca.gov>; Ackerman, Gayle <GAckerman@lakeforestca.gov>; Diana Lees <[redacted]; Bin Zhou [redacted]>; Vivian Zhao [redacted] Chao Huang [redacted]>; [redacted]
> **Subject:** Draft EIR – IPT Enterprise Business Center LLC Project: Missing Chapter & Request for Correction
>
> Hi Amy,
>
> This is Harrison Jiang, a resident of The Meadows at Lake Forest. My address

is:
[redacted]
Lake Forest, CA 92630

While reviewing the Draft EIR document posted on the City's website (https://www.lakeforestca.gov/en/environmental) over the weekend, I noticed that Chapter 4.3 on *Air Quality* appears to be entirely missing. This seems to be an administrative oversight.

More specifically:

https://www.lakeforestca.gov/sites/default/files/IPT_Draft%20EIR_July%202025.pdf

Could you please review and confirm? If the Draft EIR is indeed incomplete, I respectfully request that the City:

- Update the Draft EIR to include the missing chapter,
- Republish the corrected version online,
- Reissue the public notice to the community, and
- Restart the 45-day public comment period from the date of reposting.

Thank you very much for your attention to this matter.

Best regards,

Harrison Jiang
Cell: [redacted]

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LILY CHU

Letter Code: I-6
Date: July 27, 2025

Response to Comment I-6-1

This comment concurs with Comment Letters I-3 and I-4 and requests an extension of the public comment period to address their comments.

Refer to Master Response 1 regarding the adequacy of the public review period for the proposed Project. This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: sherry liu
To: Stonich, Amy; EnterpriseProjects
Cc: Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Public Comments on DEIR of IPT Enterprise Business Center Project
Date: Sunday, July 27, 2025 8:21:00 PM

Dear City of Lake Forest Planning Commission and City Council Members,

As a resident of The Meadows community in Lake Forest, I am writing to express my strong opposition to the proposed warehouse development adjacent to our neighborhood. This project poses serious and long-lasting harm to my family, our neighborhood, and the broader Lake Forest community.

Impact on My Family:
The Meadows was built as a peaceful, family-oriented residential community. Introducing a warehouse—along with the associated truck traffic, noise pollution, and potential 24/7 operations—would drastically alter the environment we chose to raise our family in. We are especially concerned about increased air pollution and safety risks for children due to heavy industrial vehicle traffic near our homes.

I-7-1

Impact on Our Neighborhood:
The proposed warehouse is entirely incompatible with the character and planning of The Meadows. Increased traffic congestion, noise, and pollution will diminish our quality of life and likely reduce property values. Our streets and infrastructure are not designed to support high volumes of commercial truck traffic. This project would disrupt the safety, tranquility, and residential nature of our neighborhood.

Impact on the Broader Lake Forest Community:
This development threatens to set a dangerous precedent for placing industrial projects adjacent to residential communities. There are more appropriate areas within the City of Lake Forest for such a facility that would not place this burden on a new, thriving neighborhood like The Meadows. The City has a responsibility to protect its residents and preserve the integrity of its residential planning.

We respectfully urge the City to reject this proposal and protect the well-being of families living in The Meadows and surrounding areas. Thank you for your attention and commitment to responsible community development.

Sincerely,
Amy Liu
Resident of The Meadows

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AMY LIU

Letter Code: I-7
Date: July 27, 2025

Response to Comment I-7-1

This comment expresses concerns related to truck traffic, noise pollution, air pollution, safety risks, quality of life, 24/7 operations, compatibility with surrounding land uses, alternative locations, and property values for the nearby Meadows community.

Refer to Master Response 8 regarding the proposed Project's impacts related to truck traffic and safety risks, Master Response 11 regarding the proposed Project's impacts related to noise pollution, Response to Comment O-1-4 and Master Response 9 regarding the proposed Project's impacts related to air pollution and potential health risks to the surrounding community, Response to Comment O-6-4 regarding 24/7 operations associated with the proposed Project, and Master Response 7 regarding the proposed Project's impacts related to the proposed Project's compatibility with surrounding land uses. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

Refer to Response to Comment O-1-12 regarding impacts to property values associated with the proposed Project.

Approval of the proposed Project's Site Development Permit is a discretionary action to be considered by the City as part of the proposed Project, independent of the CEQA environmental impact analysis. Further, the Site Development Permit is project site specific, and if approved, only applies to the Project site and is not transferrable to parcels in the surrounding area. As discussed on page 4.3-46 of Section 4.3, Air Quality, of the Draft EIR, cumulative projects including projects potentially similar in type and/or scale to the proposed Project, would be subject to their own project-specific environmental review and analysis pursuant to CEQA. Review and approval of future projects by the City would be based on their own project-specific environmental impacts and individual project merits. Therefore, the proposed Project would not contribute to a significant cumulative land use compatibility impact in the City by creating a precedent for similar future development.

Additionally, refer to Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From:	Alyssa
To:	Stonich, Amy; EnterpriseProjects
Cc:	Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject:	Public Comments on DEIR of IPT Enterprise Business Center Project
Date:	Sunday, July 27, 2025 8:29:12 PM

Dear Lake Forest Planning Commission and City Council,

I'm writing as a concerned resident of Lake Forest who lives in The Meadows. I urge you to reject the proposed warehouse development next to our community.

The Meadows was designed and marketed as a quiet, residential neighborhood—a place for families to grow and thrive. Approving a warehouse next door would be a major shift in how this area functions and feels. It's not just a matter of land use—it's about what kind of city we want Lake Forest to be.

I-8-1

We're worried about the constant flow of large trucks, noise at all hours, and declining air quality. The traffic alone is going to strain local roads, making it harder and more dangerous for kids walking to school or families out for a stroll. And let's be honest—warehouses don't just operate from 9 to 5. These are round-the-clock operations, and our neighborhood will bear the brunt of it.

There are better locations in Lake Forest for industrial facilities—places where they won't be directly next to homes. Let's plan wisely. Let's preserve the character of The Meadows and protect the people who live here.

Please listen to the families who call this area home. Please vote no.

Sincerely,
David Florence
Resident of The Meadows

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DAVID FLORENCE

Letter Code: I-8
Date: July 27, 2025

Response to Comment I-8-1

This comment expresses opposition to the proposed Project and expresses concerns regarding truck traffic, pedestrian safety, noise, declining air quality, and 24/7 operations associated with the proposed Project. In addition, this comment states the opinion that there are alternative locations for the proposed Project and urges the City to reject the proposed Project.

Refer to Master Response 8 regarding the proposed Project's impacts related to truck traffic and pedestrian safety, Master Response 11 regarding the proposed Project's impacts related to noise, Response to Comment O-1-4 and Master Response 9 regarding the proposed Project's impacts related to air quality impacts and potential health risks resulting from the proposed Project, Response to Comment O-6-4 regarding 24/7 operations associated with the proposed Project, and Master Response 7 regarding the proposed Project's compatibility with surrounding land uses. Additionally, refer to Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: lijie liu
To: Stonich, Amy; EnterpriseProjects
Cc: Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Public Comments on DEIR of IPT Enterprise Business Center Project
Date: Monday, July 28, 2025 8:14:27 AM

To the City of Lake Forest Planning Commission and City Council,

Many residents of The Meadows community have expressed deep concern regarding the proposed warehouse project near their neighborhood. This proposed development raises serious issues related to public safety, environmental impact, and community well-being.

The Meadows is a recently developed residential neighborhood that was designed to support family living, community connection, and a peaceful suburban environment. The introduction of a warehouse facility—likely to operate day and night—would undermine the quality of life residents expected when they chose to make The Meadows their home.

I-9-1

Increased truck traffic, industrial noise, and potential air pollution pose real threats to the health and safety of nearby families. These impacts would be felt especially by children, elderly residents, and others who spend a significant amount of time at home. Additionally, the added strain on local roads could create dangerous conditions and worsen traffic congestion throughout the area.

There are more suitable zones within Lake Forest for a warehouse development—areas that do not border residential communities and that are already planned for commercial or industrial use. Placing a warehouse next to The Meadows is incompatible with the city's stated goals of balanced, thoughtful development.

On behalf of the concerned residents of The Meadows, we respectfully urge the City to deny this proposal and protect the residential integrity of this growing community.

Sincerely,
Linda Liu
Representing Concerned Residents of The Meadows

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LINDA LIU

Letter Code: I-9
Date: July 28, 2025

Response to Comment I-9-1

This comment expresses concerns regarding public safety, quality of life, community character, truck traffic and congestion, noise, air pollution, sensitive receptors, strain on local roadways, and community well-being associated with the proposed Project. In addition, this comment expresses concern regarding the proposed Project's compatibility with surrounding land uses, states the opinion that alternative areas would be more suitable for development of the proposed Project, and urges the City to deny the proposed Project.

Refer to Master Response 8 regarding the proposed Project's impacts related to public safety and truck traffic and congestion, Master Response 11 regarding the proposed Project's impacts related to noise, Response to Comment O-1-4 and Master Response 9 regarding the proposed Project's impacts related to air pollution, potential health risks, and effects on sensitive receptors, and Master Response 7 regarding the proposed Project's impacts related to the compatibility of the proposed Project with surrounding land uses and the Project's effect on quality of life. Additionally, refer to Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From:	Anna Peng
To:	Stonich, Amy; EnterpriseProjects
Cc:	Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject:	Detailed Comments on the Draft Environmental Impact Report (DEIR) for the IPT Enterprise Business Center LLC Project (SCH No. 2024030755) – Critical Deficiencies Affecting the Meadows Community and our residents of the City of Lake Forest
Date:	Monday, July 28, 2025 10:05:48 AM
Attachments:	Comments on DEIR of IPT Enterprise Business Center Project - Anna Peng 28July2025.pdf

Anna Peng
[redacted]
Lake Forest, CA 92630

Email: [redacted]
Cell: [redacted]

July 28, 2025

Amy Stonich, Assistant Director of Community Development
City of Lake Forest Community Development Department
100 Civic Center Drive
Lake Forest, CA 92630

Dear Ms. Amy Stonich,

These comments are submitted in response to the Draft Environmental Impact Report (DEIR) for the IPT Enterprise Business Center LLC Project (SCH No. 2024030755). As a resident of the Meadows at Lake Forest community, situated less than 100 feet from the proposed industrial project's truck ingress/egress routes, I find the DEIR to be critically deficient in numerous areas, particularly concerning its analysis and mitigation of cumulative impacts on our sensitive residential neighborhood. My review, informed by CEQA guidelines, City of Lake Forest requirements, and principles of Social and Environmental Justice, reveals a pattern of insufficient analysis, understated impacts, and inadequate proposed mitigation.

Please refer to the attached document for a detailed breakdown of 39 distinct problematic areas, along with corresponding comment arguments.

I-10-1

The Draft Environmental Impact Report (DEIR) for the IPT Enterprise Business is a distinct point of concern. By further dissecting any of my comments, one can easily see how to expand into over hundreds of unique arguments. For instance, the discussion of the 78.6 in 1 million cancer risk can be separated into issues of inadequate mitigation, failure to explore alternatives, and environmental justice implications, each a distinct point. Similarly, the light and glare point can be broken into discrepancies with data, failure to account for dynamic sources, and inadequate mitigation specificity, etc.

In conclusion, the current DEIR, despite its volume, presents an insufficient analysis of the project's cumulative impacts, particularly on the health and quality of life of the Meadows at Lake Forest community and the residents of the City of Lake Forest. The documented "significant and unavoidable" impacts for Greenhouse Gas Emission (GHG) and VMT, alongside various other deficiencies, demonstrate a fundamental failure to comply with the spirit and intent of CEQA and environmental justice principles. I urge the City to critically re-evaluate my DEIR's findings, demand a comprehensive revision of DEIR that thoroughly addresses these concerns, proposes truly effective and enforceable mitigation measures,

I-10-1 cont.

or evaluates genuinely feasible alternatives to ensure the protection of our community.

Thank you for your time and consideration of these critical issues.

Please kindly reply to confirm receipt of this email and the attached comment document. Thank you!

Sincerely,

Anna Peng

CAUTION: Think Security! This email is not from someone at the City of Lake Forest. **Do not click any links or open any attachments you are not expecting.**

Public Comments on the Proposed Industrial Warehouse Project by IPT Enterprise Business Center LLC

Submitted By: Anna Peng, Concerned Resident, City of Lake Forest, California

Date: July 28, 2025

I-10-2

The Draft Environmental Impact Report (DEIR) for the IPT Enterprise Business Center LLC Project, along with its comprehensive appendices (A through J), presents an initial assessment of potential environmental impacts. However, a thorough analysis reveals numerous problematic areas and inconsistencies when evaluated against the California Environmental Quality Act (CEQA), general guidelines by the City of Lake Forest, and principles of Social and Environmental Justice. These issues range from insufficient cumulative impact analysis and inadequate mitigation measures to discrepancies in technical claims and a lack of explicit environmental justice considerations for the Meadows at Lake Forest community and the residents at the City of Lake Forest.

1. Overall Cumulative Impact Analysis Deficiencies

The DEIR generally acknowledges cumulative impacts but often falls short in its detailed analysis, especially concerning the combined effects of the IPT Enterprise Business Center LLC Project and the two adjacent Western Realco Projects on the Meadows at Lake Forest residential community and the residents at the City of Lake Forest.

1.1 Incomplete Cumulative Impact Modeling for All Relevant Factors

I-10-3

* Problem Area 1: Limited Scope of Combined Modeling: While the DEIR states it considers Western Realco projects, comprehensive combined modeling is explicitly detailed primarily for air quality and noise, often leading to conclusions of "less than significant" for other cumulative impacts without detailed justification. This raises concerns about whether the incremental effects of all three large industrial warehouses, when viewed together, are truly captured across all 20 environmental factors, as mandated by CEQA Guidelines Section 15130(a).

* My Comment 1: The DEIR's cumulative analysis, while identifying the Western Realco projects, lacks sufficient detailed modeling and quantification of combined effects across *all* environmental factors. This omission fails to provide a "sufficient degree of analysis" to comprehensively inform decision-makers on the true "cumulative considerable" impacts on the Meadows community, as required by

CEQA Guidelines Section 15151. The boilerplate conclusions of "less than significant" for numerous cumulative impacts without specific multi-project data are unacceptable.

1.2 Inadequate Cumulative Project List and Temporal Scope

* Problem Area 2: Absence of All Reasonably Foreseeable Projects: The DEIR's list of cumulative projects, while including the Western Realco projects, may not encompass all "probable future projects" as required by CEQA, particularly any other industrial or significant traffic-generating developments within the broader regional planning area that could interact with the proposed project's impacts (Compiled EIR OCRd.pdf, Section 4.A, Page 4.A-1).

One future project is the proposed Costco Warehouse at Foothill Town Center, anticipated in 2026–2027. Located just half a mile from the current project site, it would rely on the same major roadways and could contribute significantly to increased traffic in the surrounding community.

* My Comment 2: The cumulative project list provided in the DEIR needs to be expanded to ensure it includes all "probable future projects" that could contribute to environmental impacts affecting our community, as defined by CEQA Guidelines Section 15130(b). An incomplete list risks underestimating the true cumulative burden on our residential area.

I-10-3 cont.

1.3 Lack of Coherent Cross-Referencing for Cumulative Analysis

* Problem Area 3: Disjointed Cumulative Discussion: The cumulative analysis is scattered across various sections, often relying on high-level statements rather than consistently integrating detailed findings from appendices that might address multi-project scenarios. This makes it difficult to ascertain how thoroughly the "incremental effect" of each project is considered within the collective "whole" (CEQA Guidelines Section 15355(b)).

* My Comment 3: The DEIR's presentation of cumulative impacts is fragmented, making it challenging to trace a coherent analysis of the combined effects of all three projects on the Meadows community. A truly "well-organized" EIR, as implied by CEQA Guidelines Section 15121(a), would integrate cumulative findings more clearly and consistently across all relevant sections, particularly given the direct proximity to sensitive receptors.

2. Air Quality and Health Risk Deficiencies

The Air Quality and Health Risk Assessment (Appendix C) reveals critical and unmitigated cumulative impacts that pose significant threats to public health, especially for sensitive populations in the Meadows at Lake Forest.

I-10-4

2.1 Unacceptable Cumulative Cancer Risk

* Problem Area 4: Exceedance of SCAQMD Cancer Risk Threshold: The DEIR explicitly states that the cumulative construction-related maximum cancer risk for

residential areas would be 78.6 in 1 million, which is nearly eight times higher than the South Coast Air Quality Management District (SCAQMD) threshold of 10 in 1 million (Compiled EIR OCRd.pdf, Table 4.3.T, Page 4.3-47; C_IPT_AQ Report and HRA_OCR.pdf, Table A). This is declared a "significant and unavoidable impact."

* My Comment 4: The acknowledged cumulative construction-related cancer risk of 78.6 in 1 million for residential areas (Compiled EIR OCRd.pdf, Table 4.3.T, Page 4.3-47) is fundamentally unacceptable, as it dramatically exceeds the SCAQMD threshold of 10 in 1 million. This constitutes a "significant and unavoidable impact" that directly threatens the health of our community, contradicting CEQA's mandate to "avoid or substantially lessen significant environmental effects" where feasible, as per CEQA Guidelines Section 15126.4(a)(1).

* Problem Area 5: Insufficient Mitigation for Cumulative Cancer Risk: Mitigation Measures AQ-1 (Tier 4 Interim Construction Equipment) and AQ-3 (Tier 4 Final Construction Equipment) are proposed, yet the DEIR explicitly concludes that these measures are insufficient to reduce the cumulative health risk to sensitive receptors to a less than significant level (Compiled EIR OCRd.pdf, Table 1.A, Page 1-12).

* My Comment 5: The DEIR's declaration that proposed Mitigation Measures AQ-1 and AQ-3 are insufficient to reduce the cumulative cancer risk to below the SCAQMD threshold (Compiled EIR OCRd.pdf, Table 1.A, Page 1-12) is a critical flaw. This demonstrates a failure to mitigate a significant impact to the maximum extent feasible, a core requirement of CEQA Guidelines Section 15126.4(a)(1)(B). The City must demand more stringent or innovative mitigation, or consider project alternatives.

I-10-4 cont.

* Problem Area 6: Lack of Alternatives to Address Unavoidable Cancer Risk: The DEIR does not adequately explore or commit to alternatives that would truly reduce this significant and unavoidable cancer risk, such as alternative project designs, alternative locations, or a "no project" alternative, to levels below significance.

* My Comment 6: Given the "significant and unavoidable" cumulative cancer risk, the DEIR fails to adequately explore and analyze a range of "feasible alternatives...that would avoid or substantially lessen any significant effects," as required by CEQA Guidelines Section 15126.6(a). This omission suggests a lack of commitment to truly protecting public health.

2.2 Inadequate Operational Health Risk Assessment

* Problem Area 7: Reliance on General Models for Localized Hotspots: The DEIR concludes "less than significant" for operational health risks (Compiled EIR OCRd.pdf, Section 4.3.7, Page 4.3-31) despite the consistent public demand for detailed "hotspot" analyses from truck traffic in close proximity to residences (A_IPT_Scoping Summary Memorandum_OCR_Redacted_0.pdf, multiple comments). The use of general models like CalEEMod may not accurately capture microscale impacts at less than 100 feet.

* My Comment 7: The DEIR's conclusion of "less than significant impacts" for

operational health risks (Compiled EIR OCRd.pdf, Section 4.3.7, Page 4.3-31) is questionable without a granular, localized "hotspot" analysis of criteria pollutants and toxic air contaminants from daily truck operations. The general modeling is insufficient to assess the actual health burden on homes located less than 100 feet from truck routes, contradicting the need for accurate impact assessment per CEQA Guidelines Section 15151.

* Problem Area 8: Underestimation of Long-Term Exposure Effects: The DEIR appears to minimize the potential for long-term adverse health effects from continuous exposure to operational emissions, particularly from the aggregated emissions of multiple closely located warehouses.

* My Comment 8: The DEIR fails to adequately evaluate the long-term cumulative exposure burden on sensitive receptors from the continuous operation of all three adjacent industrial warehouses. Chronic exposure to even "below threshold" levels of pollutants, especially diesel particulate matter, can have significant public health consequences over time, a nuance not sufficiently explored or mitigated, challenging the "less than significant" conclusion for operational impacts.

I-10-4 cont.

2.3 Insufficient Mitigation for General Air Quality

* Problem Area 9: Vague Enforcement of MM AQ-1 and AQ-3: While MM AQ-1 and AQ-3 specify Tier 4 engines, the phrase "most effective Verified Diesel Emission Control Strategies (VDECS) available" (MM AQ-1) and the conditional implementation of MM AQ-3 ("If... will be under construction at the same time") introduce ambiguity, potentially weakening enforceability (Compiled EIR OCRd.pdf, Table 1.A, Page 1-7, 1-8).

* My Comment 9: Mitigation Measures AQ-1 and AQ-3, while generally positive, contain vague language such as "most effective VDECS available" and a conditional trigger for Tier 4 Final engines, which introduce uncertainty in their enforcement (Compiled EIR OCRd.pdf, Table 1.A, Page 1-7, 1-8). This vagueness undermines the "enforceable and verifiable" requirement for mitigation under CEQA Guidelines Section 15126.4(a)(2).

3. Light and Glare Deficiencies

The DEIR's claims regarding light and glare impacts, particularly "no illumination" at residential property lines, are problematic when cross-referenced with the photometric plan.

I-10-5

3.1 Contradiction of "No Illumination" Claim

* Problem Area 10: Discrepancy with Photometric Plan Data: The DEIR claims "no illumination at the residential property line" (Compiled EIR OCRd.pdf, Section 4.4, Page 4.4-17). However, Appendix B (Photometric Plan) shows measurable illumination (e.g., 0.1 to 0.4 foot-candles) at various points directly adjacent to the residential boundary (B_IPT_Photometric Plan_OCR.pdf).

* My Comment 10: The DEIR's claim of "no illumination at the residential property line" (Compiled EIR OCRd.pdf, Section 4.4, Page 4.4-17) is directly contradicted by the detailed data in Appendix B, which shows measurable illumination (e.g., 0.1 to 0.4 foot-candles) at points immediately adjacent to our residential properties (B_IPT_Photometric Plan_OCR.pdf). This discrepancy indicates an inaccurate assessment of impacts and a failure of "full disclosure" under CEQA Guidelines Section 15151.

* Problem Area 11: Insufficiently Low Illumination Levels: While 0.1-0.4 foot-candles might be considered low, any measurable illumination contradicts "no illumination" and can still be impactful in a dark residential setting, especially from multiple projects.

* My Comment 11: Even if numerically low (0.1 to 0.4 foot-candles), the presence of *any* illumination at the residential property line, contradicting a claim of "no illumination," can significantly affect sensitive receptors by introducing unwanted light pollution into a nighttime residential environment. The DEIR's analysis dismisses this impact as "less than significant" without adequate justification for residential quality of life.

I-10-5 cont.

3.2 Unaccounted for Dynamic Light Sources

* Problem Area 12: Omission of Truck Headlights and Glare: The DEIR fails to adequately analyze the cumulative light and glare impacts from dynamic sources such as headlights, brake lights, and reversing lights of hundreds of trucks operating 24/7, particularly given their proximity (<100 feet) to residential properties.

* My Comment 12: The DEIR's light and glare analysis is critically flawed by its omission of the cumulative impact from dynamic light sources, specifically the headlights, brake lights, and reversing lights of the numerous trucks operating continuously less than 100 feet from residential block walls. These sources can cause significant intrusive glare and light spill, constituting a "substantial adverse change to the physical environment" (CEQA Guidelines Section 15064(b)) not adequately assessed.

* Problem Area 13: Lack of Specific Mitigation for Truck Glare: No specific mitigation measures are proposed to address light and glare from truck operations, such as requiring truck pathways to be shielded or specific truck lighting requirements.

* My Comment 13: The DEIR provides no specific mitigation measures to address the significant glare and light intrusion from operational truck movements on residential properties. General compliance with City codes for fixed lighting (Compiled EIR OCRd.pdf, Section 4.1.6, Page 4.1-26) is insufficient for dynamic truck-related impacts.

I-10-6

4. Traffic and Vehicle Miles Traveled (VMT) Deficiencies

The DEIR acknowledges significant and unavoidable VMT impacts, but the proposed mitigation is explicitly insufficient, highlighting a major planning and environmental consistency issue.

4.1 Unmitigated Significant VMT Impacts

* Problem Area 14: VMT Exceedance and Insufficient Mitigation: The DEIR explicitly states that the project's VMT rate would exceed the City of Lake Forest's VMT threshold by 20 percent, leading to a "Significant and Unavoidable Impact" for both project-specific and cumulative VMT (Compiled EIR OCRd.pdf, Section 1.4.1, Page 1-3; Table 1.A, Page 1-17). MM TRA-1 (Bike Lanes) is acknowledged as insufficient, providing only a maximum 0.5% VMT reduction.

* My Comment 14: The DEIR's admission that the project's VMT rate will exceed the City of Lake Forest's threshold by 20 percent and that MM TRA-1 is explicitly "insufficient" (Compiled EIR OCRd.pdf, Section 1.4.1, Page 1-3; Table 1.A, Page 1-17) confirms a "Significant and Unavoidable Impact." This demonstrates a clear failure to mitigate a significant environmental effect as required by CEQA Guidelines Section 15126.4(a)(1)(B). The City cannot approve a project with such an acknowledged unmitigated impact.

* Problem Area 15: Conflict with Regional and State GHG Reduction Goals: The significant and unavoidable VMT directly conflicts with the goals of the 2022 Scoping Plan related to VMT reduction, which are intended to reduce Greenhouse Gas (GHG) emissions (Compiled EIR OCRd.pdf, Section 1.4.2, Page 1-3).

I-10-6 cont.

* My Comment 15: The project's "Significant and Unavoidable" VMT impact, despite proposed mitigation, represents a direct conflict with the City's and State's adopted plans and policies for reducing GHG emissions, specifically the 2022 Scoping Plan (Compiled EIR OCRd.pdf, Section 1.4.2, Page 1-3). CEQA requires projects to be consistent with such plans (CEQA Guidelines Section 15125(d)), a requirement this DEIR explicitly fails to meet.

4.2 Inadequate Truck Circulation Analysis for Residential Proximity

* Problem Area 16: Lack of Direct Analysis for Truck Route Proximity: Despite the user's statement of truck routes being less than 100 feet from residential block walls, Appendix J (Traffic Impact Analysis) lacks specific detailed analysis or visual representations of direct impacts from truck movements (noise, air quality, safety, glare) at such close proximity (J_IPT_Traffic Impact Analysis_OCR.pdf).

* My Comment 16: The Traffic Impact Analysis (Appendix J) is deficient in its failure to provide specific, granular analysis or visual overlays demonstrating the impacts of truck movements (noise, air quality, safety, glare) on residential properties located less than 100 feet from the truck ingress/egress routes. This omission means the DEIR fails to adequately assess the "environmental effects...on the physical environment" for sensitive receptors, as mandated by CEQA Guidelines Section 15126.2(a).

* Problem Area 17: Limited Scope of Truck Turning Templates: While truck turning templates are mentioned (J_IPT_Traffic Impact Analysis_OCR.pdf, Page 39), the analysis does not delve into the *frequency* or *cumulative effect* of such turns, especially if multiple trucks are stacking or queuing near residential entrances.

I-10-6 cont.

* My Comment 17: The Traffic Impact Analysis only superficially addresses truck turning feasibility, neglecting to quantify or assess the cumulative frequency and operational impacts of truck turns and queuing at the project ingress/egress, particularly at the highly sensitive location less than 100 feet from residential block walls. This lack of detail in Appendix J creates a significant data gap in the assessment of localized impacts.

5. Noise and Vibration Deficiencies

While the DEIR classifies noise impacts as "less than significant," the cumulative context and proximity to residential areas raise concerns.

5.1 Insufficient Cumulative Noise Analysis

* Problem Area 18: Absence of Consolidated Cumulative Noise Modeling: Appendix H (Noise and Vibration Report) primarily focuses on the proposed project's noise impacts and lacks a comprehensive, detailed, and modeled cumulative noise impact analysis for *all three* industrial projects (IPT and two Western Realco projects) at sensitive residential receptors (H_IPT_Noise and Vibration Report_OCR.pdf).

* My Comment 18: Appendix H, the Noise and Vibration Impact Analysis, critically lacks a detailed and modeled cumulative noise impact analysis for all three adjacent industrial warehouse projects (IPT and two Western Realco projects) on the Meadows at Lake Forest residential community (H_IPT_Noise and Vibration Report_OCR.pdf). This omission means the DEIR fails to properly evaluate the combined "incremental effect" of these projects, as required by CEQA Guidelines Section 15130, thus understating potential significant cumulative noise impacts.

I-10-7

* Problem Area 19: Unaccounted for Cumulative Operational Noise Sources: The DEIR's noise analysis focuses heavily on construction. However, cumulative operational noise from 24/7 truck traffic, idling trucks, and loading/unloading activities from *all three* projects is not adequately assessed in combination at the residential property lines.

* My Comment 19: The noise assessment overlooks the cumulative operational noise generated by 24/7 truck traffic, idling, and loading/unloading activities from all three large industrial warehouses. This persistent, combined noise burden on our residential community, particularly at night, has not been adequately modeled or deemed "significant" even if individual project impacts are deemed "less than significant."

5.2 Adequacy of Noise Mitigation

* Problem Area 20: Permitted Noise Levels During Operational Hours: While RCM NOI-1 limits construction hours, it does not mitigate noise levels during permitted hours, which could still be substantial for residents less than 100 feet away (Compiled EIR OCRd.pdf, Table 1.A, Page 1-15). The DEIR does not provide specific operational noise mitigation measures targeting localized impacts.

I-10-7 cont.

* My Comment 20: Although RCM NOI-1 restricts construction hours, it does not address the impact of potentially substantial noise levels during *permitted* operational hours for residents living less than 100 feet from the site (Compiled EIR OCRd.pdf, Table 1.A, Page 1-15). The DEIR fails to propose specific mitigation measures to reduce operational noise from trucks and facility operations to truly less than significant levels at our property lines, especially considering continuous activity.

6. Environmental Justice Deficiencies

Despite identifying sensitive receptors, the DEIR's environmental justice analysis is largely absent and fails to address the disproportionate burden on the Meadows at Lake Forest community.

6.1 Lack of Dedicated Environmental Justice Analysis

* Problem Area 21: No Explicit Environmental Justice Chapter/Section: The DEIR lacks a dedicated chapter or section explicitly evaluating environmental justice impacts, instead broadly referencing SCAQMD's AQMP mentioning "expanded environmental justice analysis" (Compiled EIR OCRd.pdf, Section 4.3, Page 4.3-15). This absence is a critical gap.

* My Comment 21: The DEIR's most egregious omission is the lack of a dedicated and comprehensive Environmental Justice analysis. Merely referencing the SCAQMD's AQMP (Compiled EIR OCRd.pdf, Section 4.3, Page 4.3-15) is insufficient. CEQA, consistent with California's environmental justice goals (e.g., Government Code Section 65302(h)(4)), demands explicit analysis of "disproportionate burdens" on communities, which is entirely absent here.

I-10-8

* Problem Area 22: Failure to Quantify Disproportionate Burden: The DEIR fails to quantify how the cumulative impacts of the three major industrial projects (air pollution, noise, traffic, light) disproportionately burden the "Meadows at Lake Forest community" as a sensitive, adjacent residential area.

* My Comment 22: The DEIR fails to quantify how the cumulative air pollution, noise, traffic, and light impacts from all three adjacent industrial warehouses disproportionately burden the Meadows at Lake Forest community. This omission is a direct challenge to the principles of environmental justice, which require the City to identify and prevent "disproportionately high and adverse human health or environmental effects" on specific populations.

6.2 Proximity of Truck Routes and Cumulative Exposure

* Problem Area 23: Direct Proximity and Unaddressed Exposure: The DEIR acknowledges residential areas as sensitive receptors (Compiled EIR OCRd.pdf, Section 4.3, Page 4.3-2), yet it does not adequately address the intensified exposure of these residents to pollution and hazards due to truck routes being less than 100 feet from residential block walls.

* My Comment 23: The extreme proximity of truck ingress and egress routes (less than 100 feet) to our residential properties places an unparalleled and unmitigated exposure burden on the Meadows community. The DEIR's general acknowledgment of sensitive receptors (Compiled EIR OCRd.pdf, Section 4.3, Page 4.3-2) is rendered meaningless without specific, enforceable mitigation measures tailored to this unique proximity.

I-10-8 cont.

* Problem Area 24: Unaddressed "Totality of Exposures": The DEIR does not sufficiently consider the "totality of exposures to combinations of chemical and non-chemical stressors and their effects on health, well-being" for the Meadows community, as defined by environmental justice literature.

* My Comment 24: The DEIR fails to analyze the "totality of exposures" to chemical (e.g., DPM) and non-chemical (e.g., noise, light, vibration from trucks) stressors on our community. This holistic assessment is crucial for understanding true cumulative impacts and achieving environmental justice, which the current DEIR does not adequately address.

7. Geotechnical and Hazardous Materials Deficiencies

The DEIR's handling of subsurface conditions and historical site use raises concerns about stability and potential contamination.

7.1 Undocumented "Engineered Fill"

* Problem Area 25: Lack of Records for Existing Fill: Appendix E (Geotechnical Investigation) explicitly states that the City of Lake Forest revealed "no such records" documenting the placement and compaction of existing "engineered fill" soils on the site (E_IPT_Geotechnical Investigation and Infiltration Report_OCR.pdf, Section 1, Page 2). This introduces significant uncertainty.

I-10-9

* My Comment 25: Appendix E (Geotechnical Investigation) reveals a critical lack of documentation for the existing "engineered fill" on site, as the City found "no such records" of its placement and compaction (E_IPT_Geotechnical Investigation and Infiltration Report_OCR.pdf, Section 1, Page 2). This uncertainty regarding soil stability and settlement undermines the DEIR's geotechnical analysis and necessitates additional, pre-construction verification and specific contingency plans beyond standard measures.

* Problem Area 26: Inadequate DEIR Acknowledgment of Fill Uncertainty: The

DEIR's main body does not appear to explicitly acknowledge or fully address the implications of this undocumented fill, potentially relying on an unsubstantiated assumption of its quality.

* My Comment 26: The DEIR fails to explicitly acknowledge and fully detail the implications of the undocumented "engineered fill" identified in Appendix E. This omission suggests an inadequate assessment of potential geotechnical risks, including differential settlement, which must be fully disclosed and mitigated per CEQA Guidelines Section 15126.2(a).

7.2 Hazardous Waste Facility History

I-10-9 cont.

* Problem Area 27: Unaddressed Historical Hazardous Waste Site: Appendix F (Phase I ESA) identifies the historical use of the site by "Panasonic Avionics Corporation," which is "identified as a hazardous waste facility," explicitly directing to "Section 7.1.1 for further discussion" (F_IPT_Phase I ESA_OCR.pdf, Section 7.0, Page 35). However, this Section 7.1.1 and its implications are not present in the provided DEIR or other appendices.

* My Comment 27: Appendix F (Phase I ESA) identifies the project site's prior use by Panasonic Avionics Corporation as a "hazardous waste facility" (F_IPT_Phase I ESA_OCR.pdf, Section 7.0, Page 35), yet the DEIR and other appendices lack any detailed discussion or specific mitigation measures for this critical historical contamination. This represents a severe oversight and a failure to assess "direct and indirect significant effects" from known site conditions, as required by CEQA Guidelines Section 15126.2(a). The public cannot adequately review impacts without this information.

8. Water Quality and Hydrology Deficiencies

The DEIR needs to demonstrate explicit adherence to the City's specific flow reduction requirements for Serrano Creek.

8.1 Unverified Serrano Creek Flow Reduction

I-10-10

* Problem Area 28: Lack of Explicit Confirmation for Flow Reduction: Appendix G (Water Quality Management Plan) highlights a critical City requirement for a 38% to 40% reduction in 100-year flows contributing to Serrano Creek, yet the DEIR's main body does not explicitly state how this specific target will be achieved and verified, or that it has been achieved (G_IPT_Water Quality Management Plan and Drainage Report_OCR.pdf).

* My Comment 28: Appendix G (Water Quality Management Plan) mandates a critical 38% to 40% reduction in 100-year flows to Serrano Creek, a specific City requirement. However, the DEIR fails to explicitly confirm how this precise reduction target will be achieved and verified (G_IPT_Water Quality Management Plan and Drainage Report_OCR.pdf). This lack of explicit demonstration of compliance with a key local hydrological standard is a significant deficiency in the DEIR's water quality

analysis.

8.2 Insufficient Detail for Construction Water Quality Management

I-10-10 cont.

* Problem Area 29: Generalized Haul Route Plans: Appendix G lists requirements for haul route plans, but the DEIR does not provide sufficient detail on specific strategies for managing potential impacts on water quality during demolition and grading, or ensuring consistency with existing drainage infrastructure during these phases.

* My Comment 29: While Appendix G lists the requirement for haul route plans, the DEIR lacks specific details on the strategies for managing potential water quality impacts during demolition and grading activities. Generalized compliance measures are insufficient; the DEIR must provide explicit methods for preventing runoff pollution during these phases, as required for a thorough SWPPP under RCM WQ-1 (Compiled EIR OCRd.pdf, Table 1.A, Page 1-13).

9. Public Comments and Scoping Deficiencies

The DEIR's responsiveness to public and agency comments during scoping, particularly regarding cumulative impacts and environmental justice, is insufficient.

9.1 Inadequate Addressing of Public Scoping Concerns

I-10-11

* Problem Area 30: Lack of Specific Responses to Scoping Comments: Appendix A (Scoping Summary) identifies key public and agency concerns (e.g., air quality for sensitive groups, environmental justice) (A_IPT_Scoping Summary Memorandum_OCR_Redacted_0.pdf). However, the DEIR often generally addresses these or concludes "less than significant" without explicit, detailed responses that show *how* the DEIR incorporated or definitively dismissed each specific concern.

* My Comment 30: Appendix A, the Scoping Summary Memorandum, clearly details critical public and agency concerns, including comprehensive air quality studies for sensitive groups and environmental justice considerations (A_IPT_Scoping Summary Memorandum_OCR_Redacted_0.pdf). However, the DEIR fails to provide explicit, detailed responses demonstrating *how* each of these specific concerns was addressed, leading to a perception of inadequate responsiveness and a violation of the spirit of CEQA Guidelines Section 15132, which mandates detailed responses to comments in the Final EIR.

10. City of Lake Forest General Plan and Zoning Code Consistency

I-10-12

While the DEIR claims consistency, the documented unmitigated impacts present a fundamental contradiction with the spirit of the City's planning goals.

10.1 Contradiction with General Plan Goals for Quality of Life

* Problem Area 31: Unmitigated Impacts vs. Quality of Life Goals: The "significant unavoidable" impacts (e.g., cumulative cancer risk from air quality, VMT) fundamentally conflict with the City of Lake Forest General Plan's implicit goals of protecting public health, safety, and enhancing the quality of life for its residents. The DEIR claims consistency with the General Plan (Compiled EIR OCRd.pdf, Section 1.4, Page 1-3), yet these unmitigated impacts contradict that claim for adjacent residents.

* My Comment 31: The DEIR's conclusion of "significant and unavoidable" cumulative cancer risks and VMT impacts directly contradicts the fundamental goals of the City of Lake Forest General Plan regarding the protection of public health, safety, and quality of life for its residents (Compiled EIR OCRd.pdf, Section 1.4, Page 1-3). The assertion of consistency is untenable when project impacts actively undermine core community welfare objectives.

I-10-12 cont.

10.2 Noise Standard Application

* Problem Area 32: Applicability of 2025 General Plan: The Noise and Vibration Report (Appendix H) references the "City of Lake Forest General Plan (2025)" (H_IPT_Noise and Vibration Report_OCR.pdf, Section 4.2.1, Page 4-2). While forward-looking, this highlights that current and immediate future plan consistency should be robustly demonstrated.

* My Comment 32: The Noise and Vibration Report (Appendix H) references the "City of Lake Forest General Plan (2025)" (H_IPT_Noise and Vibration Report_OCR.pdf, Section 4.2.1, Page 4-2). We urge the City to ensure that the project's long-term impacts, particularly regarding cumulative noise from all three projects, align with these future planning documents and protect our community's quality of life beyond the immediate review period.

11. Other Problematic Areas and Omissions

11.1 Light and Glare — Specificity of Code Compliance

* Problem Area 33: Generalized Compliance for Light and Glare: The DEIR states light and glare compliance with City Municipal Code Sections 7.08.095 and 9.72.085 (Compiled EIR OCRd.pdf, Section 4.1.6, Page 4.1-26). Without explicit explanation of *how* these general codes ensure "no illumination" at residential property lines, especially with high-intensity industrial lighting, the claim remains unsubstantiated.

I-10-13

* My Comment 33: The DEIR's reliance on general compliance with City Municipal Code Sections 7.08.095 and 9.72.085 for light and glare (Compiled EIR OCRd.pdf, Section 4.1.6, Page 4.1-26) is insufficient. The DEIR must explicitly detail *how* these broad codes will guarantee "no illumination" and prevent any noticeable light spill at residential property lines, given the intensity of industrial lighting.

I-10-14

11.2 Cumulative Solid Waste

* Problem Area 34: Vague Cumulative Solid Waste Analysis: While the DEIR

mentions cumulative impacts for solid waste, the analysis lacks specific projections for the combined waste generation of all three projects and its impact on landfill capacity, especially considering potential increased industrial waste streams (Compiled EIR OCRd.pdf, Section 4.16, Page 4.16-11).

I-10-14 cont.

* My Comment 34: The DEIR's cumulative solid waste analysis is overly generalized, lacking specific projections for the combined waste streams of all three adjacent industrial warehouse projects. This omission fails to adequately assess the collective burden on regional landfill capacity, as required by CEQA Guidelines Section 15130.

11.3 Cultural Resources — Native American Monitor Conclusion

* Problem Area 35: Ambiguous Conclusion of Tribal Monitoring: MM TCR-1 states tribal monitoring concludes "upon the later of... (1) written confirmation... that all ground-disturbing activities... are complete; or (2) prior to approval of final building permit, a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity... possesses the potential to impact Kizh TCRs" (Compiled EIR OCRd.pdf, Table 1.A, Page 1-18). The second condition is open to interpretation.

I-10-15

* My Comment 35: Mitigation Measure TCR-1 regarding Native American monitoring (Compiled EIR OCRd.pdf, Table 1.A, Page 1-18) includes an ambiguous trigger for the conclusion of monitoring, relying on a future "determination and written notification by the Kizh" for future activities. This creates an open-ended condition that needs clearer definition for full enforceability and to ensure continuous protection of Tribal Cultural Resources.

11.4 Hydrology and Water Quality — Off-Site Drainage Facilities

* Problem Area 36: Identification of All Drainage Facilities: Appendix G mentions the need to identify "all existing private and public drainage facilities" (G_IPT_Water Quality Management Plan and Drainage Report_OCR.pdf, Section 1.0, Page 1). The DEIR's discussion of hydrology should explicitly confirm that all such facilities potentially impacted by the project (direct or cumulative) have been identified and their capacity for accepting increased runoff from the proposed impervious surfaces has been assessed.

I-10-16

* My Comment 36: The DEIR's hydrology analysis must explicitly confirm that "all existing private and public drainage facilities" potentially impacted by the project have been thoroughly identified and assessed for their capacity to handle increased stormwater runoff from the proposed industrial development, particularly in a cumulative context (G_IPT_Water Quality Management Plan and Drainage Report_OCR.pdf, Section 1.0, Page 1). This is crucial to prevent downstream flooding and water quality degradation.

11.5 Phase I ESA - Scope and Depth

I-10-17

* Problem Area 37: Reliance on Phase I ESA for Full Contamination Risk: A Phase I ESA is generally a preliminary assessment. The DEIR’s reliance on it without clear

indication of Phase II if warranted (e.g., due to the hazardous waste facility history) might be insufficient for a comprehensive contamination risk assessment.

I-10-17 cont.

* My Comment 37: The DEIR's reliance solely on a Phase I ESA (Appendix F) to address contamination risks, especially given the site's history as a "hazardous waste facility" (F_IPT_Phase I ESA_OCR.pdf, Section 7.0, Page 35), is insufficient. A Phase II Environmental Site Assessment should be explicitly required to comprehensively characterize potential soil and groundwater contamination and outline specific remediation plans to protect public health and the environment.

11.6 Energy Consumption

* Problem Area 38: Inadequate Detail on Operational Energy Use: While MM GHG-1 addresses EV charging, the DEIR lacks robust detail on projected operational energy consumption for the industrial facility itself (lighting, HVAC, machinery, etc.) and specific measures to ensure energy efficiency beyond Title 24 compliance.

I-10-18

* My Comment 38: The DEIR's energy analysis, while including MM GHG-1 for EV charging (Compiled EIR OCRd.pdf, Table 1.A, Page 1-12), lacks comprehensive detail on projected operational energy consumption for the industrial facility. More robust measures are needed to minimize "wasteful, inefficient, and unnecessary energy consumption," as per CEQA Guidelines Appendix F, particularly for a large-scale industrial use.

11.7 Biological Resources

* Problem Area 39: Introductory Nature of Appendix D: The provided Appendix D is introductory and does not contain the substantive findings of the biological habitat assessment, survey results, or detailed analyses of project-specific or cumulative impacts on special-status species or sensitive habitats. This prevents a full review of whether impacts are truly "less than significant."

I-10-19

* My Comment 39: Appendix D, the Biological Resources Report, is only introductory and does not present the core findings of the habitat assessment or detailed analysis of impacts on special-status species or sensitive habitats. Without the full report, the public cannot verify the DEIR's conclusion of "less than significant impact" and whether all direct and cumulative impacts to biological resources have been adequately assessed and mitigated.

ANNA PENG

Letter Code: I-10
Date: July 28, 2025

Response to Comment I-10-1

This comment is introductory and expresses concerns regarding the analysis presented in the Draft EIR, including cumulative impacts, health, quality of life, cancer risk, light, and glare, mitigation, alternatives, environmental justice implications, data used, inclusion of dynamic sources, and significant and unavoidable impacts related to GHG and VMT. This comment requests the Draft EIR be revised to address their comments related to effective and enforceable mitigation and evaluation of feasible alternatives.

This introductory comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-10-2

This comment summarizes concerns in the following comments regarding cumulative impact analysis, mitigation measures, technical analyses and methodology, and omission of environmental justice-related considerations.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-10-3

This comment summarizes concerns regarding the cumulative analysis presented in the Draft EIR, including cumulative impact modeling, cumulative project list and temporal scope, and appropriate cross-referencing for cumulative analysis.

Refer to Master Comment 6 regarding the adequacy of the cumulative analysis prepared for the proposed Project. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

Per *State CEQA Guidelines*, Section 15125(1), "Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective." At the time NOP was issued, the Regal/Cinemark theater was still in operation. The theater operations ceased in September 2024,[16] well after the date the NOP for the Project was published. Therefore, it was not possible to include the proposed Costco Project in the list of cumulative projects considered.

[16] Cinema Treasures, see: https://cinematreasures.org/theaters/25449, site accessed October 28, 2025.

The Costco Project referenced by the commenter was submitted to the City for review on May 27, 2025 and approved by the Planning Commission on February 5, 2026. As the Costco Project was not known at the time the NOP was published, it could not have been considered in the cumulative analysis (*State CEQA Guidelines* Section 15125[a][1]).

Regarding the commenter's concerns related to the organization of the cumulative analysis, the commenter does not identify what, in their opinion, would constitute a "well organized EIR." *State CEQA Guidelines* Section 15120(a) states, "Environmental Impact Reports shall contain the information outlined in this article, but the format of the document may be varied." The Project's cumulative effects are consistently and conveniently provided immediately following the project specific analysis for every environmental issue topic required under CEQA, appropriately satisfying the requirement for disclosure of potential cumulative effects.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-10-4

This comment summarizes the commenter's concerns regarding the air quality and health risk analysis presented in the Draft EIR, including cumulative cancer risk, operational health risk assessment, and mitigation.

Refer to Master Response 6 regarding the cumulative analysis, Response to Comment O-1-4 regarding the air quality analysis, and Master Response 9 regarding the health risk assessment prepared for the proposed Project. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

The Draft EIR includes a construction and operational HRA that analyzes the cumulative impacts of the proposed Project in combination with the nearby Western Realco Enterprise Way Industrial Project (Projects 1 and 2). The commenter correctly identifies the maximally exposed individual cancer risk in Table 4.3.T, page 4.3-47 of the Draft EIR; however, as shown in Table 4.3.U, page 4.3-48 of the Draft EIR, the cancer risk from construction is mitigated through implementation of MM AQ-1, which requires all construction equipment to be equipped with Tier 4 Interim engines or the most effective Verified Diesel Emission Control Strategies (VDECS) available for the engine type as certified by the CARB to reduce cumulative cancer risks. As detailed in Table 4.3.U, with the implementation of MM AQ-1, the cumulative cancer risk for residents would be 5.47 in 1 million, which would not exceed the SCAQMD cancer risk threshold of 10 in 1 million; therefore, after mitigation, cumulative impacts were appropriately identified as less than significant with mitigation incorporated.

The citation referenced by the commenter (Compiled EIR OCRd.pdf, Table 1.A, page 1-12) appears incorrect as this reference refers to greenhouse gas impacts and the comment refers to cumulative health risk to sensitive receptors. Health risks are not addressed at this location. As detailed in the Draft EIR (refer to Table 1.A, pages 1-7 and 1-8), the Project specific health risk and cumulative air

quality impacts are reduced to a less than significant level through implementation of MM AQ-1 through MM AQ-3. Therefore, no revision of the Draft EIR is required.

Regarding alternatives to reduce health risk impacts, as stated above, implementation of mitigation measures sufficiently reduce potential health risks impacts to below established SCAQMD thresholds. The objective of Project alternatives is to reduce or eliminate significant environmental effects. CEQA does not require the development of alternatives specifically to further reduce impacts that are deemed less than significant. Refer to Master Response 5 regarding the adequacy of the range of the alternatives considered for the proposed Project.

Regarding the sufficiency of Mitigation Measure (MM) AQ-1 and MM AQ-3, the language used in these measures, "shall be equipped" and "shall equip," implies mandatory actions the developer must satisfy. The inclusion of the measures in the Project's Mitigation Monitoring and Reporting Program (MMRP), which will be maintained and overseen by the City should the Final EIR be certified and the Project approved, assures the appropriate mitigation will be fully implemented; therefore, no revision of these measures is required.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-10-5

This comment summarizes the commenter's concerns regarding the light and glare analysis presented in the Draft EIR, stating the opinion that it does not account for dynamic light sources.

Refer to Master Response 12 regarding lighting and glare associated with the proposed Project and Master Response 6 regarding the adequacy of the cumulative impact analysis prepared for the proposed Project. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

It should be noted that the Project property line does not extend along the entirety of the Meadows community (refer to Figure 3.2, page 3-5 of the Draft EIR). As measured in the photometric plan, illumination at the Project property boundary ranges from 0.0 to 0.1 Fc. Due to low level of lighting at the Project property boundary, and the separation between the Project boundary and the balance of the residential uses, the effect of lighting would be insignificant. In addition, vehicle lighting is typically directed straight out from the source. The truck access and loading areas are relatively level; therefore, the residential uses directly adjacent to the property are elevated above the typical level of vehicle lighting. Furthermore, the proposed 6-foot-high wall at the top of the slope and the 65-foot-long wall at the eastern end of the truck loading area would block vehicle lighting to the residential uses directly adjacent to the Project site. Per *State CEQA Guidelines* Section 15003(i), "CEQA does not require technical perfection in an EIR, but rather adequacy, completeness, and a good-faith effort at full disclosure." The information provided in the Draft EIR provides an accurate and adequate disclosure of potential illumination at the adjacent residential uses.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-10-6

This comment summarizes the commenter's concerns regarding the transportation analysis presented in the Draft EIR, including mitigation for significant VMT impacts and the truck circulation analysis in the vicinity of residential uses.

Refer to Master Response 10 regarding the proposed Project's consistency with the CARB's 2022 Scoping Plan and Master Response 8 regarding the VMT analysis and mitigation for the proposed Project. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted. The proposed Project would comply with two criterion related to natural gas usage and efficient energy usage. The proposed Project would also comply with the third criterion related to EV requirements with implementation of Mitigation Measure (MM) GHG-1. A proposed project that achieves a VMT reduction below the regional average (currently 15 percent) or meets a locally adopted Senate Bill 743 VMT target, would be consistent with the 2022 Scoping Plan. Additionally, a project must not include natural gas appliances or natural gas plumbing and should not result in any wasteful, inefficient, or unnecessary electrical usage. Lastly, a project must achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2. The proposed Project complies with the criteria related to natural gas usage, efficient energy usage, and EV requirements. The commenter correctly identifies the Project's significant and unavoidable impacts related to VMT, and its contribution to Project inconsistencies with the 2022 Scoping Plan.

Refer to Master Response 4 regarding the requirements for mitigation under CEQA. To fully mitigate a significant VMT impact, an individual project would likely need to develop local or regional transit infrastructure, which on an individual project basis, would be economically prohibitive. There is currently no City, regional, or Statewide program available (e.g., VMT mitigation banks) to individual projects that would sufficiently offset the Project's VMT impact. There are no feasible mitigation measures that can reliably guarantee that VMT can be reduced below the City's threshold; therefore, the proposed Project would have a cumulatively significant and unavoidable transportation impact related to VMT even with implementation of mitigation.

Refer to Master Response 2 regarding the purpose and adequacy of the Draft EIR, and CEQA guidelines for approval of a project with significant impacts on the environment. This Master Response thoroughly addresses the topic raised in this comment.

Project-related truck traffic is not anticipated to utilize minor roads within the residential neighborhoods. As shown in Table C of the Project TIA, (Draft EIR, Appendix J), the proposed Project is estimated to generate 269 daily trips, including 35 a.m. peak-hour and 36 p.m. peak-hour truck trips. The Project truck trips would travel to/from the Project site over the course of the day or peak hours, rather than occurring simultaneously.

The sight-distance analysis in the Draft EIR was based on the California Department of Transportation (Caltrans) Highway Design Manual (HDM), AutoTurns Pro (Computer-Aided Design [CAD]) program and Google Earth aerial photos were used to estimate the maneuverability of the inbound and outbound turning movements at the following study area. The queuing analysis was based on the Highway Capacity Model and a 95th percentile queuing analysis was conducted in Synchro (version 12) for the study area intersections in Existing (2024) without and with Project and Opening Year (2027) with Cumulative Projects without and with Project traffic conditions to determine whether the existing turn pocket storage lengths could accommodate the peak-hour queues.

As detailed in the Project TIA (refer to Tables F and G in Appendix J of the Draft EIR) inbound and outbound turning movements at studied intersections are considered feasible, except for the northbound right-turn (inbound) movement at Dimension Drive/Commercentre Drive – Enterprise Way. However, the proposed Project would include a curb radius modification at the southeast corner of Dimension Drive/Commercentre Drive – Enterprise Way to accommodate truck movement at this location. With implementation of this improvement, all inbound and outbound truck turning movements at the study area intersections are considered feasible and have been evaluated by the City's Traffic Engineer. The proposed Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); therefore, no revision of the Draft EIR is required.

Response to Comment I-10-7

This comment summarizes the commenter's concerns regarding the noise and vibration analysis presented in the Draft EIR, including the cumulative noise analysis and mitigation.

Refer to Master Response 11 regarding cumulative noise impacts. Section 4.13, Noise, of the Draft EIR, and supporting Noise and Vibration Impact Analysis (Appendix H), include an assessment of the construction noise, construction vibration, off-site traffic noise and vibration, and off-site operational noise and vibration impacts for the proposed Project.

The Noise and Vibration Impact Analysis also includes a cumulative assessment of the proposed Project along with the Western Realco Enterprise Way Industrial Project (Projects 1 and 2), and other nearby projects. As detailed in Section 4.13.7, Cumulative impacts, starting on page 4.13-21 of Section 4.13 Noise, of the Draft EIR, construction noise levels from the proposed Project and the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) (the referenced cumulative project) would be 71 dBA Leq and 68 dBA Leq, respectively, at the sensitive receptor. The cumulative construction noise levels from both the proposed Project and the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) would be 72.8 dBA L_{eq} at the sensitive receptor, which is below the construction noise level threshold of 80 dBA L_{eq}. Therefore, implementation of the proposed Project, when evaluated in combination with the Western Realco Enterprise Way Industrial Project (Projects 1 and 2), would not contribute to cumulatively considerable construction-related noise impacts in excess of standards established in the City's General Plan or Noise Ordinance. Therefore, there would be no cumulatively significant construction noise impact, and no mitigation is required.

The Noise and Vibration Impact Analysis was prepared by qualified technical experts with specific technical knowledge and credentials related to this subject area. Furthermore, the City's nighttime noise standards take into account the sensitivity of the nighttime hours which most people sleep, thus the analysis also considers this time of day which could be seen as potentially more impacted by industrial operations.

Refer to Master Response 4 regarding mitigation requirements under CEQA. As Project and cumulative noise impacts have been analyzed and determined to not exceed established standards, mitigation measures are not required.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-10-8

This comment expresses concerns regarding a dedicated environmental justice analysis, including disproportionate impacts associated with truck route proximity and cumulative exposure.

Refer to Master Response 14 regarding disproportionate environmental burdens and the requirements for an analysis of environmental justice impacts. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

Specifically for the evaluation of health impacts, only the geographic area in the immediate vicinity of the Project site (including the cumulative projects) is required to be assessed because impacts are localized and dissipate as the distance from the site increases. The significance thresholds for health risks are no different between the general population and disadvantaged communities. These thresholds have been established to protect the most vulnerable populations, which may include disadvantaged communities. The air quality analysis contained in Section 4.3.6, Project Impacts, starting on page 4.3-33 of Section 4.3, Air Quality of the Draft EIR found that the proposed Project would not expose any sensitive receptor, which includes receptors located in disadvantaged communities, to substantial concentrations of localized criteria pollutants or diesel particulate matter. According to CalEnviroScreen, the Meadows community is located within census tract 6059052422, which has a 45th percentile score[17]. The immediate area surrounding the Project site is not located within a Senate Bill 535 disadvantaged community.[18]

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[17] State of California, Office of Environmental Health Hazard Assessment , CalEnvironScreen 4.0, https://experience.arcgis.com/experience/11d2f52282a54ceebcac7428e6184203/page/CalEnviroScreen-4_0, October 29, 2025.

[18] State of California, Office of Environmental Health Hazard Assessment, https://oehha.ca.gov/calenviroscreen/sb535 accessed: October 25, 2025.[19] See Section 1.2, page 3. *Phase 1 Environmental Site Assessment conducted on Panasonic Avionics Corporation 26200 Enterprise Way Lake Forest, California 92630*, Apex Companies, LLC, March 21, 2021, (Draft EIR, Appendix F).

In addition, refer to Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses. This Master Response thoroughly addresses the topic raised in this comment.

Refer to Master Response 6 regarding the adequacy of the cumulative impacts analysis prepared for the proposed Project, Master Response 9 regarding cumulative health risks, and Master Response 12 regarding lighting impacts. As noted in Sections 4.3.7, Cumulative Impacts, starting on page 4.3-39, of Section 4.3 Air Quality; Section 4.13.7, Cumulative Impacts, starting on page 4.13-21 of Section 4.13 Noise; and Section 4.17.7, starting on page 4.17-16 of Section 4.17, Transportation and Traffic, of the Draft EIR, the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) are reasonably foreseeable projects that would be located in the immediate vicinity of the Project site. These Master Responses thoroughly address the topics raised in this comment.

Refer to Master Response 14 regarding disproportionate environmental burdens and the requirements for an analysis of environmental justice impacts. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-10-9

This comment summarizes the commenter's concerns regarding the geotechnical and hazardous materials analyses presented in the Draft EIR, including soil stability and potential contamination related to subsurface conditions and historical site use at the Project site.

According to the Geotechnical Investigation prepared for the proposed Project (included in Appendix E to the Draft EIR), the site is underlain by engineered fill soils and Capistrano formation sandstone bedrock. The bedrock generally consists of medium dense to very dense, poorly consolidated fine-grained sandstone. The fill soils possess relatively high strengths and favorable consolidation/collapse characteristics, which is an indication of engineered fill. The Geotechnical Investigation included a subsurface investigation of the Project site. This investigation included borings at six locations advanced to a depth of up to 30 feet below existing grade. Engineered fill soils were encountered at Boring Nos. B-1 and B-4 through B-6, extending to depths of 12 to more than 30 feet below grade. These fill materials consist of medium dense to very dense silty sands with varying clay content. The Geotechnical Investigation details the method and results of laboratory testing of all boring samples. Based on the testing, the Geotechnical Investigation concluded the Project is feasible from a geotechnical standpoint.

Refer to Master Response 3 regarding speculation without substantiation. The commenter provides only a general statement on the uncertainty of the geotechnical investigation. The Geotechnical Investigation was prepared by professional and registered geotechnical engineers. All recovered soil samples were classified using the Unified Soil Classification System (USCS), in accordance with ASTM

D-2488. The field identifications were then supplemented with additional visual classifications and/or by laboratory testing.

Further, according to the Geotechnical Investigation, the proposed Project's adherence to recommended grading practices, including remedial grading, would ensure that post-construction settlements would fall within acceptable limits. Pursuant to Mitigation Measure (MM) GEO-1 (described in Section 4.7, Geology and Soils under Threshold 4.7.1(ii), on page 4.7-12 and Section 4.7.9.2, Mitigation Measures, on page 4.7-19 of the Draft EIR), the proposed Project would comply with the recommendations of the Geotechnical Investigation, the most current CBC, and the City Building Code. MM GEO-1 also requires the submittal of a Final Testing and Observation Geotechnical Report for Rough Grading to the City of Lake Forest Director of Public Works/City Engineer, or designee, prior to issuance of the final grading permit.

The Geotechnical Investigation provides a sufficient level of detail to ascertain the geotechnical condition of the site, and its ability to accommodate the proposed uses. Based on the findings of the Geotechnical Investigation and with incorporation of MM GEO-1, potential impacts with respect to soil stability and settlement were found to be less than significant. The analysis and conclusions of the Draft EIR regarding evaluation of potential soil stability and settlement impacts remain valid, and no further mitigation is required.

Refer to Master Response 13 regarding the discussion of hazardous materials included in the Draft EIR. The Phase I Environmental Site Assessment (ESA) prepared for the Project (refer to Appendix F the Draft EIR) did not identify any recognized environment conditions (RECs), historic RECs, or controlled RECs in connection with the existing uses on or surrounding the Project site that would result in a potential release of hazardous materials into the environment during construction. In addition, the Phase I ESA determined that radon and visible fungal growth were not present at the Project site.

State CEQA Guidelines Section 15147 states, "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." Furthermore, *State CEQA Guidelines* Section 15150(a) states, "An EIR or Negative Declaration may incorporate by reference all or portions of another document which is a matter of public record or is generally available to the public. Where all or part of another document is incorporated by reference, the incorporated language shall be considered to be set forth in full as part of the text of the EIR or Negative Declaration." Finally, "Incorporation by reference is most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of the problem at hand." (*State CEQA Guidelines* Section 15150(f).

As the Phase I Environmental Site Assessment (ESA) was fully disclosed in the Draft EIR and was made available to the public during the entirety of the Draft EIR review period (as evidenced by the commenter's citation), the documentation represents a complete and thorough assessment of existing and potential future hazardous material impacts. This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in

the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revision assessment in the Draft EIR or investigation in the ESA is required.

Response to Comment I-10-10

This comment summarizes the commenter's concerns regarding the water quality and hydrology analyses presented in the Draft EIR, including flow reduction to Serrano Creek and construction water quality management.

The Draft EIR provides a detailed analysis of stormwater runoff and drainage impacts in Section 4.10.6, Project Impacts, starting on page 4.10-29 of Section 4.10 Hydrology and Water Quality, and under Threshold 4.19.1, starting on page 4.19-12 of Section 4.19, Utilities and Service Systems of the Draft EIR. As described in Section 4.10.3, Existing Environmental Setting, starting on page 4.10-1 of Section 4.10, Hydrology and Water Quality of the Draft EIR, under existing conditions, stormwater from the Project site currently drains to local curb inlets that connect to the municipal storm drain system and ultimately discharge into the Pacific Ocean. The Draft EIR explains that while the proposed Project would increase impervious surface area, it incorporates multiple design features to manage and treat stormwater on-site. Specifically, the Project includes three linear modular wetland systems and three underground detention systems to reduce site discharge volumes and improve water quality. Refer to Section IV.2 of the Water Quality Management Plan (WQMP) included as Appendix G of the Draft EIR. Please refer to Response to Comment I-10-9 regarding the incorporation by reference of highly technical data into the Draft EIR (refer to *State CEQA Guideline*s Section 15150).

Since the existing parking is being demolished and removed, new curb and gutter would be utilized to flow runoff to curb inlets leading to underground detention basins to reduce peak flows. Refer to Response to Comment O-1-5 regarding stormwater runoff. Therefore, the proposed Project's impact on stormwater runoff is adequately addressed in the Draft EIR, and no further response is required.

Response to Comment I-10-11

This comment expresses concerns regarding the Draft EIR's responsiveness to public and agency comments during the scoping period.

State CEQA Guidelines Section 15132 referred to in the comment addresses the content required in a Final EIR. As described in *State CEQA Guidelines* Section 15083*,* the scoping process is intended to assist the Lead Agency in "identifying the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in an EIR and in eliminating from detailed study issues found not to be important." *State CEQA Guidelines* Section 15083 does not specifically require written responses or explanations of how a Draft EIR addresses scoping comments.

As shown in the Scoping Summary prepared for the proposed Project (Appendix A to the Draft EIR), scoping comments that raised environmental issues covered under CEQA were incorporated into the Draft EIR. It should be noted that the City was not required to address comments that did not raise environmental issues covered under CEQA in the EIR.

Each section in Chapter 4.0, Environmental Impact Analysis, of the Draft EIR contains a dedicated sub-section describing the scoping comments received by the City pertaining to each particular environmental resource topic. Therefore, the Draft EIR discloses relevant scoping comments and incorporates these requests into the analysis where appropriate and consistent with the requirements of CEQA. The *State CEQA Guidelines* do not require the preparation of responses and/or explanations of how each scoping comment has been incorporated into the Draft EIR.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-10-12

This comment expresses concerns regarding the Draft EIR's unmitigated impacts, including air quality and VMT impacts, and consistency with the City's planning goals, including goals to protect resident health, safety, and quality of life.

Refer to Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses, including the Project's effect on quality of life.

The Project site is located within an urbanized area, previously developed with a variety of light industrial and office uses, vehicle access roads, parking areas, lighting, and landscaping. One of the primary objectives of the City's 2040 General Plan is to encourage economic development in areas adjacent to major roadways and transportation corridors, ensuring a diverse mix of land uses that supports the community's ability to thrive and be economically sustainable over time. City General Plan policies seek to balance economic development, fiscal stability, and land use compatibility. The Project site is located within the Pacific Commercentre Planned Community, which maintains the General Plan's Light Industrial designation and the LI – Light Industrial zoning district. The land use designation and zoning for the Project and cumulative sites is the same as that considered in the City's most recent General Plan. Consistency with the City's General Plan was demonstrated in the Draft EIR (refer to Table 4.11.B, page 4.11-10). By providing for the redevelopment of a currently underutilized site, the Project satisfies the goals and policies of the General Plan to promote economic development and support the fiscal health of the City.

Refer to Master Response 8 regarding the transportation and VMT analyses prepared for the proposed Project, Response to Comment O-1-4 and Master Response 9 regarding the potential air quality and health risk impacts resulting from the proposed Project, and Master Response 11, regarding the noise for the proposed Project. Pursuant to *State CEQA Guidelines* Section 15043, a public agency may approve a project even though a project would cause a significant impact on the environment provided there is no feasible way to lessen or avoid the significant impact, and specifically identified expected benefits from the project outweigh the policy of reducing or avoiding the significant environmental impacts of the project. In such instances, the lead agency must state in writing the specific reasons to support its action based on the Final EIR and/or other information in the record in a statement of overriding considerations supported by substantial evidence. The findings of fact and statement of overriding considerations will be circulated after the Final EIR is

published and when the public hearing for Final EIR certification is noticed. This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-10-13

This comment requests the Draft EIR be revised to include an explicit explanation regarding compliance with the relevant sections of the City Municipal Code Regulations related to light and glare and how the City will guarantee 'no illumination' and prevent any noticeable light spill at residential property lines.

Refer to Master Response 11 and the Response to Comment I-10-5 regarding the discussion of lighting impacts addressed in the Draft EIR. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-10-14

This comment expresses concerns regarding the specific projections for the combined waste generation of the cumulative industrial warehouse projects provided in the Draft EIR and the potential for the combined burden on regional landfill capacity as required by CEQA.

Refer to Master Response 6 regarding the cumulative impacts for the proposed Project. Utilities and service systems within the City are sized based on growth projections provided in the City's General Plan. The majority of the cumulative projects included in Table 4.A, page 4-5, of the Draft EIR would be consistent with existing General Plan land use designations and zoning designations; they have been considered in the projections used to determine appropriate sizing for utilities and service systems. The Project site and the referenced cumulative projects are located within an urbanized area. Refer to Response to Comment O-1-18 regarding cumulative impacts related to public services and utilities.

Therefore, the development of new or expansion of existing services is not required. Future private development and public works projects within the cumulative study area would be required to comply with CEQA, and potential impacts on utilities and service systems would be evaluated and mitigated, as necessary, by each individual private development or public works project. The analysis and conclusions of the Draft EIR regarding evaluation of cumulative solid waste generation impacts remain valid.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-10-15

This comment expresses concern related to tribal monitoring and the enforceability of Mitigation Measure TCR-1.

Mass grading of the site occurred during development of the Pacific Business Park Project, which was approved by the County of Orange in 1987. The Gabrieleño Band of Mission Indians – Kizh Nation was provided details regarding the grading activities that were completed during development of the existing building. The 'trigger' in the referenced mitigation relies on either 1) confirmation from a Native American Monitor from or approved by the Kizh Nation, or 2) written verification by the Kizh Nation that no future planned construction activity and/or development/ construction phase at the Project site possesses the potential to impact Kizh tribal cultural resources. The mitigation appropriately recognizes the expertise and judgement of the Kizh Nation relative to the conclusion of monitoring of grading activities and potential impacts to tribal cultural resources.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-10-16

This comment requests the Draft EIR be revised to address their comments regarding the identification and confirmation that all off-site drainage facilities are assessed for their capacity to handle increased stormwater runoff in both the Project and cumulative scenarios.

Refer to the Response to Comment I-10-10 regarding stormwater runoff, which thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-10-17

This comment expresses concern regarding the Draft EIR's reliance on a Phase I ESA to address contamination risks. This comment requests a Phase II ESA be required to address their comments regarding contamination and remediation.

Refer to Master Response 13 regarding the assessment of hazardous material impacts in the Draft EIR. This Master Response thoroughly addresses the topics raised in this comment. A Phase II ESA is required when a Phase I ESA identifies RECs or other factors that warrant further investigation.

Based on the results of the Phase I ESA, preparation of a Phase II ESA is not warranted[19]. This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-10-18

This comment expresses concerns related to the detail on projected operational energy consumption for the proposed Project provided in the Draft EIR and requests the Draft EIR be revised to include additional measures to address their comments regarding energy consumption impacts.

The commenter provides no substantiated evidence that the Project would result in wasteful, inefficient, or unnecessary energy consumption. A comprehensive Energy Impact Report was prepared for the proposed Project and found that the proposed Project complies with the criteria related to natural gas usage and efficiency energy usage and EV requirements. It should be noted that the Draft EIR already incorporates equivalent and enforceable measures that achieve compliance with applicable energy reduction objectives; no additional mitigation measures or revisions to the Draft EIR are required.

The Draft EIR acknowledges that the future tenant of the proposed Project has not yet been identified, and therefore conservatively evaluates all potential environmental impacts based on a reasonably foreseeable range of uses consistent with the property's Light Industrial (LI) zoning designation. The energy use analysis included in Section 4.6.6, Project Impacts, starting on page 4.6-7 of Section 4.6 Energy, of the Draft EIR was based on information from the California Emissions Estimator Model (CalEEMod) version 2022.1 modeling results prepared to support the Project's Air Quality/GHG/Energy Analysis (refer to Appendix C of the Draft EIR). Additionally, the mitigation measures and regulatory compliance measures provided in the Draft EIR would require discretionary permitting associated with future tenancy, ensuring conservation of energy resources at the time of tenant occupancy. This approach is consistent with *State CEQA Guidelines* Sections 15126 and 15144, which require CEQA analysis to be based upon reasonably foreseeable development assumptions.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

[19] See Section 1.2, page 3. *Phase 1 Environmental Site Assessment conducted on Panasonic Avionics Corporation 26200 Enterprise Way Lake Forest, California 92630*, Apex Companies, LLC, March 21, 2021, (Draft EIR, Appendix F).

Response to Comment I-10-19

This comment expresses concerns regarding the biological habitat assessment, survey results, and analyses of project-specific or cumulative impacts to biological resources included in Appendix D of the Draft EIR.

The Biological Resources Report (Appendix D to the Draft EIR) was prepared by qualified biologists and provides a detailed description of the report's methodology and findings. This report was then utilized to inform the significance conclusions presented in the Draft EIR. As discussed in Section 4.4.6, Project Impacts, starting on page 4.4-10 of Section 4.4, Biological Resources, of the Draft EIR, development of the proposed Project would result in less than significant impacts to biological resources with adherence to applicable regulatory measures.

Refer to Response to Comment O-1-5 regarding biological resources potentially impacted (Project-specific and cumulative) by the proposed Project. The entire Project site is developed and supports an existing office/industrial building and supporting infrastructure (i.e., parking lot, landscaped medians). The Project site is located within an urbanized area of the City, and is bound by existing residential and industrial developments, and roads to the immediate north, east, west, and south that already restrict wildlife movement in the Project vicinity. The biological survey conducted during preparation of the Biological Resources Report found no evidence of listed, candidate, non-listed sensitive, or special-status plant or wildlife species on the site, and these species are not expected to occur on site due to lack of suitable habitat. With implementation of Regulatory Compliance Measure BIO-1, which requires compliance with the Migratory Bird Treaty Act and the California Fish and Game Code, potential impacts to nesting birds would be avoided during construction of the proposed Project. As described in Section 4.4.7, Cumulative Impacts, starting on page 4.4-13 of Section 4.4, Biological Resources, of the Draft EIR, since all projects within the cumulative study area for the proposed Project would be required to implement appropriate regulatory compliance measures to avoid impacts to nesting birds, implementation of the proposed Project, when evaluated in combination with the development of projects listed in Table 4.A, Summary of Cumulative Projects, page 4-5, in Section 4.0 of the Draft EIR, would not contribute to a cumulatively considerable impact on biological resources.

This comment does not provide evidence that the analysis presented in the Biological Resources Report and Draft EIR is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. Therefore, the analysis and conclusions of the Draft EIR regarding evaluation of biological resource impacts remain valid.

From: sam.yu
To: Stonich, Amy; EnterpriseProjects
Cc: Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: To Whom It May Concern at the City Government
Date: Monday, July 28, 2025 6:20:29 PM

To Whom It May Concern at the City Government,

My name is Hu Yu and I am a resident of Meadows. I am writing to express my strong opposition to the proposed construction of a large warehouse near our residential neighborhood.

Building a warehouse so close to homes will significantly and negatively impact our community in the following ways:

I-11-1

1. Traffic Concerns: The operation of a warehouse will greatly increase the number of trucks and transport vehicles passing through our area, leading to traffic congestion and posing safety risks for residents.
2. Safety Risks: The frequent movement of large trucks near homes creates dangers for pedestrians, especially children and seniors.
3. Air Pollution and Noise: Increased vehicle emissions will degrade air quality, and the constant noise from loading, unloading, and vehicle operation will disturb the peace and rest of nearby families.
4. Decline in Quality of Life: A busy warehouse is not compatible with a quiet, residential neighborhood. It would disrupt the community and reduce the livability of our area.

I respectfully urge the city government to reconsider this project and find an alternative location. We value our right to live in a safe, healthy, and peaceful environment. For the long-term well-being of all residents, please do not allow the construction of a warehouse in our neighborhood.

Thank you for your attention and understanding.

Sincerely,

Hu Yu
07/28/28

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HU YU

Letter Code: I-11
Date: July 28, 2025

Response to Comment I-11-1

This comment expresses opposition to the proposed Project and expresses concerns regarding truck and vehicle traffic and congestion, pedestrian safety, air pollution, noise, sensitive receptors, land use incompatibility, and quality of life associated with the proposed Project. In addition, this comment requests the City address their comments regarding provision of an alternative location for the proposed Project.

Refer to Master Response 8 regarding the proposed Project's impacts related to truck and vehicle traffic and congestion and associated pedestrian safety, Master Response 11 regarding the proposed Project's impacts related to noise, Response to Comment O-1-4 and Master Response 9 regarding the proposed Project's impacts related to air pollution, potential health risks, and effects on sensitive receptors, and Master Response 7 regarding the proposed Project's impacts related to the compatibility of the proposed Project with surrounding land uses and the Project's effect on quality of life. Additionally, refer to Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: Yu, Benjamin
To: Yanbo Zhao
Cc: Stonich, Amy
Subject: Re: Public Comments on DEIR of IPT Enterprise Business Center Project – Receipt Confirmation Requested
Date: Monday, July 28, 2025 9:19:27 PM

Hi Mr. Zhao,

Thank you for your email. Your comment is informative.

God bless,

Benjamin Yu
Council Member

byu@lakeforestca.gov
[redacted]

On Jul 28, 2025, at 21:14, Yanbo Zhao <[redacted] wrote:

July 28 2025

Amy Stonich
Assistant Director of Community Development
City of Lake Forest
100 Civic Center Drive
Lake Forest CA 92630

Dear Ms. Stonich,

I am Ranbo Zhao, homeowner of [redacted] in Lake Forest, and my property sits less than one hundred feet from the truck entrance proposed for the IPT Enterprise Business Center. After studying the Draft Environmental Impact Report I must object to the project on the grounds that the document understates its true effects on nearby residents. The report never models the combined air pollution, noise, traffic, and health risk of this facility together with the two neighboring Western Realco warehouses even though the California Environmental Quality Act calls for a complete cumulative analysis. The limited data that are presented are already alarming: Table 4.3.T shows a construction cancer risk of 78.6 in one million, nearly eight times the South Coast Air Quality Management District threshold, while the vehicle miles traveled section concedes a twenty percent excess that a single bike lane cannot offset. Nighttime truck noise, diesel idling fumes, and continuous warehouse lighting are left out of the calculations, and there is no stand alone environmental justice discussion even though families like mine will face the greatest exposure. Without firm

I-12-1

commitments to zero emission trucks, buffer zones, sound walls, or rerouted haul paths, the report offers no realistic way to protect the health, safety, and property values of the Meadows community.

I-12-1 cont.

I respectfully ask the City to require a revised and recirculated draft that integrates all three projects in every technical study, evaluates alternatives that relocate or greatly reduce truck intensive uses, and proposes enforceable measures such as one hundred percent zero emission fleets, restricted truck hours, and meaningful setbacks from residential lots. Until that work is complete the project should not advance. Please confirm receipt of this message and include it in the official record. Thank you for your consideration.

Sincerely,

Ranbo Zhao
[redacted]
Lake Forest CA 92630

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RANBO ZHAO

Letter Code: I-12
Date: July 28, 2025

Response to Comment I-12-1

This comment expresses opposition to the proposed Project and concerns related to the air quality, noise, traffic, and health risk modelling combined air pollution, noise, traffic, and health risks of the proposed Project and the Western Realco Enterprise Way Industrial Project (Projects 1 and 2). This comment also expresses concern regarding the Draft EIR's significant and unavoidable cancer risk and VMT impacts, and impacts related to 24/7 truck noise, idling emissions, and lighting. Additionally, this comment expresses concerns regarding potential environmental justice impacts, commitments to zero emission trucks, buffer zones, sound walls, and re-routed paths, and impacts to the health, safety, and property values of the Meadows community. This comment requests the City revise and recirculate the Draft EIR to address comments related to the cumulative analysis, evaluation of alternatives, and mitigation measures.

Refer to Master Response 6 regarding the proposed Project's cumulative impacts analysis, Master Response 8 regarding the proposed Project's significant and unavoidable VMT impact, Response to Comment O-6-4 regarding 24/7 operations associated with the proposed Project, Master Response 11 regarding the proposed Project's impacts related to truck noise, Master Response 9 regarding the proposed Project's impacts related to cancer risk and idling emissions, and Master Response 12 regarding the proposed Project's impacts related to lighting.

Additionally, refer to Master Response 14 regarding the requirements for an environmental justice analysis under CEQA, Master Response 4 regarding the adequacy of the proposed Project's mitigation under CEQA, Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project, and Response to Comment O-1-12 regarding the proposed Project's impacts related to property values.

The responses noted above thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From:	Victor Zhao
To:	Stonich, Amy; EnterpriseProjects
Cc:	Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject:	Public Comments on DEIR of IPT Enterprise Business Center Project – Receipt Confirmation Requested
Date:	Monday, July 28, 2025 9:21:22 PM

Amy Stonich
Assistant Director of Community Development
City of Lake Forest
100 Civic Center Drive
Lake Forest CA 92630

Dear Ms. Stonich,

My name is Weidong Zhao, owner of [redacted] in Lake Forest, and my lot sits less than one hundred feet from the planned truck entrance for the IPT Enterprise Business Center. I have read the Draft Environmental Impact Report and find it inadequate on several critical points. The document treats this warehouse in isolation even though two Western Realco warehouses will operate next door, a shortcoming that ignores California Environmental Quality Act requirements for full cumulative review. The limited data that are offered already warn of a cancer risk of 78.6 in one million from diesel particulate matter, well above the ten in one million threshold set by the South Coast Air Quality Management District, yet the report relies on Tier 4 engines instead of requiring zero emission trucks. Noise and traffic studies omit idling, late night deliveries, and merged truck counts, and the vehicle miles traveled section admits a twenty percent excess with only token mitigation. The draft also lacks a stand alone environmental justice discussion despite the obvious fact that families in The Meadows, including my own, will be the first exposed to fumes, vibration, and round-the-clock lighting that will erode health, sleep, and property value.

I-13-1

For these reasons I ask the City to return the study for recirculation, this time integrating the emissions, traffic, and noise of all three projects, evaluating genuine alternatives that reduce or relocate heavy trucking, and adding firm protective measures such as one hundred percent zero emission fleets, truck curfews, sound walls, and meaningful setbacks from homes. Until such a revision is completed the project should not move forward.

Please confirm receipt of this comment and place it in the official record. Thank you for your consideration.

Sincerely,

Weidong Zhao
[redacted]
Lake Forest CA 92630

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WEIDONG ZHAO

Letter Code: I-13
Date: July 28, 2025

Response to Comment I-13-1

This comment expresses concerns regarding impacts associated with cancer risk, reliance on Tier 4 engines, noise and traffic projections omission of idling, VMT, late night deliveries, merged truck counts, and a lack of evaluation of the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) in the cumulative analysis. Additionally, this comment expresses concerns regarding the effects of air pollution, vibration, and 24/7 lighting to nearby residents' health, sleep, and property values and the inclusion of an environmental justice analysis. This comment requests the City revise and recirculate the Draft EIR to address comments related to the cumulative analysis, evaluation of alternatives, and mitigation measures including zero emission fleets, truck curfews, sound walls, and meaningful setbacks from homes.

Refer to Master Response 8 regarding the proposed Project's VMT impact, traffic projections, and truck counts, Master Response 11 regarding the proposed Project's impacts related to noise including late night deliveries, Master Response 9, regarding the proposed Project's impacts related to cancer risk, idling emissions, and Tier 4 engines, Master Response 6 regarding the proposed Project's cumulative impacts, Response to Comment O-6-4 regarding 24/7 operations associated with the proposed Project, and Master Response 12 regarding the proposed Project's impacts related to lighting.

Refer to Response to Comment O-1-12 regarding the proposed Project's impacts related to property values. Additionally, refer to Master Response 14, regarding the requirements for an environmental justice analysis under CEQA, Master Response 4 regarding the adequacy of the proposed Project's mitigation under CEQA, and Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project.

The responses noted above thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: shaoxia wu
To: Stonich, Amy; EnterpriseProjects
Subject: Subject: Public Comments on DEIR of IPT Enterprise Business Center Project, Receipt Confirmation Requested
Date: Monday, July 28, 2025 9:35:24 PM

Dear Ms. Stonich,

I-14-1 I am Vivian Wu, homeowner at [redacted] in Lake Forest. After reading the Draft Environmental Impact Report for the IPT Enterprise Business Center I must register my strong opposition to the project and to the adequacy of the document that claims to justify it.

I-14-2 First, the DEIR never provides a true cumulative study that combines the emissions, traffic, noise, and public health burdens of this warehouse with the two Western Realco facilities that are proposed on the same corridor. CEQA requires that analysis, yet the report treats each impact in a vacuum. As a result the numbers in the air quality and health sections greatly understate real world exposure to diesel particulate matter and fine particles. Children, older adults, and anyone with asthma who uses local parks or walks the nearby school routes would be placed at an unnecessary risk that the current mitigation plan does not resolve.

I-14-3 Second, the traffic analysis ignores critical intersections on Bake Parkway, Portola Parkway, and Rancho Parkway where trucks already queue at peak hours. The DEIR counts weekday averages yet fails to model the surge of weekend deliveries that many logistics operators now schedule. Without that data the promised level of service grades are unreliable.

I-14-4 Third, the draft is silent on light glare, stormwater runoff, and wildfire evacuation time. A project of this scale operating around the clock will flood adjacent neighborhoods with warehouse lighting, alter drainage patterns on a parcel that already slopes toward Alton Parkway, and increase the number of vehicles trying to exit the city in an emergency. All three topics deserve full study and mitigation.

I-14-5 Finally, the alternatives chapter offers only a modest square footage reduction rather than examining possibilities such as a clean technology campus, a zero emission distribution hub, or relocation to a site that is not bordered by thousands of residents.

I-14-6 For these reasons I ask the City to withhold certification, direct the applicant to prepare a revised and recirculated DEIR that addresses the gaps above, and require enforceable protections such as one hundred percent zero emission fleets, strict truck curfews, sound walls, and expanded setbacks. Please confirm receipt of this comment and include it in the record. Thank you for your attention.

Sincerely,

Vivian Wu
[redacted]
Lake Forest CA 92630
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VIVIAN WU

Letter Code: I-14
Date: July 28, 2025

Response to Comment I-14-1

This comment is introductory and expresses opposition to the proposed Project and general concerns related to the adequacy of the Draft EIR.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. No further response is required.

Response to Comment I-14-2

This comment states the opinion that the Draft EIR does not provide a cumulative study that combines the emissions, traffic, noise, and public health burdens of the proposed Project in combination with the Western Realco Enterprise Way Industrial Project (Projects 1 and 2).

Refer to Master Response 6 regarding the proposed Project's cumulative impacts. The Draft EIR adequately analyzes potential cumulative impacts in accordance with *State CEQA Guidelines*, and therefore the analysis and conclusions of the Draft EIR regarding the evaluation of cumulative impacts, including impacts related to traffic, noise, and air quality and health risks for sensitive receptors which are inherently cumulative, remain valid.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-14-3

This comment expresses concerns related to the traffic analysis prepared for the Draft EIR including the intersections included and modeling of weekend deliveries.

Refer to Master Response 8 regarding the adequacy of Traffic Impacts Analysis (TIA) conducted for the proposed Project. The purpose of the TIA is to identify the potential LOS impacts and transportation impacts under CEQA (e.g., VMT) resulting from the development of the proposed Project. The TIA focused on a study area that is adjacent to and most likely to be impacted by the proposed Project and was reviewed and approved by the City prior to preparation of the TIA. As indicated in the TIA, the proposed Project (including proposed off-site improvements at five study area intersections) is not expected to significantly affect the intersection operation (LOS and queuing) within the study area in either the Existing or Opening Year (cumulative) horizon. Therefore, the proposed Project is unlikely to cause any operational deficiencies at the regional level in either the Existing or Opening Year (cumulative) horizon.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-14-4

This comment expresses concern regarding the light and glare, stormwater runoff, and wildfire evacuation time analyses included in the Draft EIR as well as concerns regarding 24/7 lighting, altered drainage patterns, and emergency evacuation routes.

Refer to Master Response 12 regarding the DEIR's analysis of light and glare related to the proposed Project, Response to Comment O-6-4 regarding 24/7 operations associated with the proposed Project, and the Response to Comment I-10-10 regarding the Draft EIR's analysis of hydrology and water quality.

The proposed Project's impact on stormwater runoff is addressed under Threshold 4.10.3 (ii) and (iii), starting on page 4.10-33, of the Draft EIR.

In addition, refer to Master Response 13 regarding the proposed Project's potential impacts on emergency evacuation and emergency access related to wildfire. This Master Response thoroughly addresses the topic raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-14-5

This comment expresses concerns regarding the identification and evaluation of alternatives, including suggestions to evaluate alternatives that include a clean technology campus, a zero emission distribution hub, or relocation to an alternative site.

Refer to Master Response 5 regarding adequacy of the range of alternatives considered for the proposed Project. This Master Response thoroughly addresses the topic raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-14-6

This comment concludes the letter and requests the City provide a revised and recirculated Draft EIR that addresses the above concerns and incorporates measures including zero emission fleets, truck curfews, sound walls, and expanded setbacks.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses above. No further response is required.

From:	April W
To:	Stonich, Amy; EnterpriseProjects
Cc:	Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Stannard, Michael; Villwock, Jordan; Pequeno, Robert; Cirbo, Doug; Yu, Benjamin; Smith, Amy; Grable, Tom; Voigts, Scott; Tettemer, Mark
Subject:	Public Comment on Draft EIR – IPT Enterprise Business Center LLC (SCH No. 2024030755)
Date:	Tuesday, July 29, 2025 11:01:57 PM

Dear Ms. Amy Stonich,

As a resident of the Meadows at Lake Forest—located fewer than 100 feet from the proposed industrial truck routes—I am submitting comments regarding the Draft Environmental Impact Report (DEIR) for the IPT Enterprise Business Center LLC Project (SCH No. 2024030755).

The DEIR falls critically short in addressing the cumulative and localized impacts of the project, particularly on our residential neighborhood. After reviewing the document through the lens of CEQA, City of Lake Forest planning standards, and environmental justice principles, I am deeply concerned by the consistent lack of rigorous analysis and meaningful mitigation.

I-15-1

For example, the cited cancer risk of 78.6 in one million is alarming and reflects a broader issue: the DEIR fails to adequately explore alternatives or mitigation strategies to reduce such risks. This single figure alone highlights several separate deficiencies—each meriting independent scrutiny. Similarly, the analysis of light and glare is incomplete, overlooking variable sources and lacking enforceable measures.

Despite its length, the DEIR does not offer a thorough or responsible assessment of the project's cumulative impact on local communities. The acknowledgment of "significant and unavoidable" GHG emissions and VMT impacts further signals the document's inability to uphold the spirit and intent of CEQA and environmental justice protections.

I strongly urge the City to require a full revision of the DEIR—one that meaningfully incorporates community input, provides comprehensive analysis, and proposes enforceable, effective mitigation or viable alternatives.

Thank you for reviewing these important concerns.

Please reply to confirm receipt of this email.

Sincerely,

Emily Jiang

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EMILY JIANG

Letter Code: I-15
Date: July 29, 2025

Response to Comment I-15-1

This comment states the opinion that the Draft EIR does not adequately address the cumulative and localized impacts of the Project and expresses concerns regarding the range of alternatives considered for the proposed Project, identification and analysis of mitigation measures, light and glare, significant and unavoidable GHG and VMT impacts, and environmental justice. This comment requests the City revise the Draft EIR to address comments regarding the provision of a comprehensive analysis, enforceable, effective mitigation, and viable alternatives.

Refer to Master Response 6 regarding the adequacy of the cumulative analysis prepared for the proposed Project and Master Response 9 regarding the proposed Project's impacts related to cancer risk, including cumulative impacts. As shown in Table 4.3.U, page 4.3-48, of the Draft EIR, with implementation of MM AQ-1 for the proposed Project and implementation of the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) mitigation measures, the cumulative cancer risk would be reduced to 5.47 in one million, which is below the threshold of 10 in one million. Therefore, the cumulative cancer risk would be reduced to a less than significant impact.

In addition, refer to Master Response 14 regarding the requirements for an environmental justice analysis under CEQA, Master Response 12 regarding the proposed Project's impacts related to lighting, Master Response 8 regarding the proposed Project's significant and unavoidable VMT impact, and Master Response 10 regarding the proposed Project's significant and unavoidable GHG impact.

Master Response 4 discussed the adequacy of the proposed Project's mitigation under CEQA and Master Response 5 discusses the adequacy of the range of alternatives considered for the proposed Project.

The Master Responses noted above thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: Jeff Yu
To: Stonich, Amy; EnterpriseProjects
Cc: Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Public Comments on DEIR of IPT Enterprise Business Center Project
Date: Wednesday, July 30, 2025 7:30:32 AM

Hi All,

As a resident of the Meadows, I am concerned about the Enterprise Business Center Project for a number of reasons.

I-16-1 I am concerned about the sounds coming from the building site if companies move in. Trucks in the proposed building site at night wake me up, sometimes even at 5 AM. If there are trucks working at night, can it be guaranteed that they will not generate excessive noise, waking up citizens who live nearby?

I am concerned about congestion and high number of traffic accidents on Bake Parkway. The addition of the extra trucks from the warehouses will exacerbate this problem.

I am concerned about pollutants in the water and air living so close to a large industrial site.

Please confirm of receipt in this email, thank you.

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JEFF YU

Letter Code: I-16
Date: July 30, 2025

Response to Comment I-16-1

This comment expresses concern regarding 24/7 noise from operation of the proposed Project, truck traffic, traffic congestion, safety, and water and air pollutants associated with the proposed Project in close proximity to residences.

Refer to Master Response 11 regarding the proposed Project's impacts related to noise, Response to Comment O-6-4 regarding 24/7 operations associated with the proposed Project, Master Response 8 regarding the proposed Project's impacts related to truck traffic, traffic congestion, and safety, Response to Comment O-1-4 and Master Response 9 regarding the proposed Project's impacts related to air pollutants, potential health risks, and nearby sensitive receptors. In addition, refer to Response to Comment O-1-11 regarding the proposed Project's impacts related to water quality. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: jeong han
To: Stonich, Amy; EnterpriseProjects
Cc: Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Stannard, Michael; Villwock, Jordan; Pequeno, Robert; Cirbo, Doug; Yu, Benjamin; Smith, Amy; Voigts, Scott; Tettemer, Mark
Subject: Comments on DEIR for IPT Enterprise Business Center LLC Project (SCH No. 2024030755)
Date: Wednesday, July 30, 2025 1:13:32 PM

Dear Ms. Amy Stonich,

I am writing as a resident of the Meadows at Lake Forest community, which lies within 100 feet of the proposed truck ingress and egress routes for the IPT Enterprise Business Center LLC Project. I submit these comments in response to the Draft Environmental Impact Report (DEIR), SCH No. 2024030755.

Upon thorough review, I find the DEIR severely lacking in its evaluation and mitigation of cumulative impacts on nearby residential neighborhoods, including ours. The document fails to meet the standards set by CEQA, the City of Lake Forest, and basic principles of environmental and social justice. Key impacts are either understated or inadequately addressed, and the proposed mitigations fall short in substance and specificity.

The report's treatment of major concerns—such as the 78.6 in one million estimated cancer risk—underscores these shortcomings. This single data point can be further broken down into multiple issues including insufficient mitigation, lack of meaningful alternatives, and disregard for environmental justice considerations. Likewise, the discussion of light and glare contains inconsistencies and fails to properly account for dynamic sources or provide enforceable mitigation strategies.

I-17-1

In summary, while the DEIR is voluminous, it does not offer a meaningful or complete analysis of the project's cumulative effects—especially those affecting public health and quality of life in the surrounding community. The admission of "significant and unavoidable" impacts related to GHG emissions and VMT further illustrates a fundamental failure to meet CEQA's purpose.

I respectfully urge the City to demand a fully revised DEIR that accurately analyzes all cumulative impacts, considers feasible alternatives, and implements truly effective mitigation measures to protect the Lake Forest community.

Thank you for your time and attention to these serious concerns.

Please confirm receipt of this email at your earliest convenience.

Sincerely,

Hua Jiang

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HUA JIANG

Letter Code: I-17
Date: July 30, 2025

Response to Comment I-17-1

This comment expresses concerns regarding the evaluation and mitigation of cumulative impacts provided in the Draft EIR. Additionally, this comment expresses concern over the Draft EIR's treatment of cancer risk, mitigation, alternatives, environmental justice considerations, and of light and glare and concerns related to the significant and unavoidable GHG and VMT impacts included in the Draft EIR. This comment requests the Draft EIR be revised to address comments regarding cumulative impacts, consideration of feasible alternatives, and implementation of effective mitigation.

Refer to Master Response 6 regarding the adequacy of the proposed Project's cumulative impacts analysis, Master Response 9 regarding the proposed Project's impacts related to cancer risk, Master Response 12 regarding the proposed Project's impacts related to lighting, Master Response 8 regarding the proposed Project's significant and unavoidable VMT impact, and Master Response 10 regarding the proposed Project's significant and unavoidable GHG impact.

Additionally, refer to Master Response 14 regarding disproportionate environmental burdens and the requirements for an analysis of environmental justice impacts, Master Response 7 regarding compatibility of the proposed Project with surrounding land uses and the Project's effects on quality of life, Master Response 4 regarding the adequacy of the proposed Project's mitigation under CEQA, and Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project.

The Master Responses noted above thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: Chao Huang
To: Stonich, Amy; EnterpriseProjects
Cc: Bin Zhou; Haibo Jiang; Ackerman, Gayle; Diana Lees; Vivian Zhao; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy; Lily Chu
Subject: Re: Draft EIR – IPT Enterprise Business Center LLC Project: Missing Chapter & Request for Correction
Date: Wednesday, July 30, 2025 2:52:07 PM

Dear Amy,

Hope this email finds you well. I strongly echo my fellow neighbor's reasonable request for the extension of the public review period.

I-18-1 Given the significance of the proposed project and the recent addition to the overwhelming amount of information, I respectfully request that the City consider extending the public comment period to ensure that the community has adequate time to thoroughly review the updated document and provide feedback.

Thank you for your attention to this matter and for your continued support of public engagement in the review process.

Best regards,

Chao Huang

On Sun, Jul 27, 2025 at 1:40 PM Lily Chu [redacted] > wrote:

> Dear Amy,
>
> I strongly support the extension of the comment review date. Agree with Harrison and Bin, the draft EIR document is over 1000 pages, everyone needs a bit longer time to review and provide comments. Furthermore, it is summer time, families have vacation overseas, or parents need to spend more time on childcare in addition to work.
>
> please give our neighbours more time for the critical review.
>
> Best,
> Lily
>
> On Sun, Jul 27, 2025, 10:08 AM Bin Zhou <[redacted] > wrote:
>
> > Hi Amy,
> >
> > I support Mr. Harrison Jiang's request for an extension of the public comment period for the IPT Enterprise Business Center Draft EIR, especially in light of the recent addition of Chapter 4.3 on Air Quality and the extensive Appendix C.

Given the volume and importance of the new material, additional time is essential to ensure the community has a fair opportunity to review and respond.

Thank you for your consideration.

Best regards,

Bin Zhou

On Jul 22, 2025, at 15:56, Haibo Jiang <[redacted]> wrote:

Hi Amy,

This Morning, I noticed that the Draft EIR for the IPT Enterprise Business Center LLC Project posted on the City's website has been updated to include the previously missing Chapter 4.3 on Air Quality (spanning more than 50 pages, with the corresponding Appendix C exceeding 1,700 pages):

https://www.lakeforestca.gov/sites/default/files/Compiled%20EIR%20OCRd.pdf

Given this correction and the significance of the proposed project, I respectfully request that the City consider extending the public comment period to allow the community sufficient time to review the complete and updated document and provide meaningful feedback.

Thank you for your attention and continued support of public engagement on this important matter.

Harrison Jiang
Cell: [redacted]

On Mon, Jul 21, 2025 at 10:55 AM Stonich, Amy <AStonich@lakeforestca.gov> wrote:

> Thank you for letting me know. I will have it fixed.

From: Haibo Jiang <[redacted]
Sent: Monday, July 21, 2025 10:35 AM
To: EnterpriseProjects <EnterpriseProjects@lakeforestca.gov>
Cc: Stonich, Amy <AStonich@lakeforestca.gov>; Ackerman, Gayle <GAckerman@lakeforestca.gov>; Diana Lees <[redacted]; Bin Zhou [redacted]>; Vivian Zhao [redacted]; Chao Huang [redacted]>; [redacted]
Subject: Draft EIR – IPT Enterprise Business Center LLC Project: Missing Chapter & Request for Correction

Hi Amy,

This is Harrison Jiang, a resident of The Meadows at Lake Forest. My address is:
[redacted]
Lake Forest, CA 92630

While reviewing the Draft EIR document posted on the City's website (https://www.lakeforestca.gov/en/environmental) over the weekend, I noticed that Chapter 4.3 on *Air Quality* appears to be entirely missing. This seems to be an administrative oversight.

More specifically:

https://www.lakeforestca.gov/sites/default/files/IPT_Draft%20EIR_July%202025.pdf

Could you please review and confirm? If the Draft EIR is indeed incomplete, I respectfully request that the City:

- Update the Draft EIR to include the missing chapter,
- Republish the corrected version online,
- Reissue the public notice to the community, and
- Restart the 45-day public comment period from the date of reposting.

Thank you very much for your attention to this matter.

Best regards,

Harrison Jiang
Cell: [redacted]

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CHAO HUANG

Letter Code: I-18
Date: July 30, 2025

Response to Comment I-18-1

This comment concurs with Comment Letters I-3, I-4, and I-6, and requests an extension of the public comment period to address their comments.

Refer to Master Response 1 regarding the adequacy of the public review period for the proposed Project. This Master Response thoroughly addresses the topic raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From:	Cherie Liu
To:	Stonich, Amy; EnterpriseProjects
Cc:	Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject:	Comments on the Draft Environmental Impact Report (DEIR) for the IPT Enterprise Business Center LLC Project (SCH No. 2024030755)
Date:	Wednesday, July 30, 2025 9:59:48 PM

Dear Ms. Stonich,

I-19-1 I am writing as a resident of Lake Forest living adjacent to the proposed IPT Enterprise Business Center project at 26200 Enterprise Way. After reviewing the Draft Environmental Impact Report (EIR), I am submitting this formal comment to express my **strong opposition** to the project based on its flawed assumptions and significant environmental risks.

1. Noise Impact – Incorrectly Evaluated as "Less Than Significant"

I-19-2 The Draft EIR underestimates the noise impacts of a warehouse and manufacturing facility operating near a newly developed residential community. Warehousing operations frequently involve early morning and late-night truck deliveries, backup alarms, and general vehicle movement. These are highly disruptive to adjacent homes, particularly in the Meadows residential area to the east.

The assumption that a 16-ft wall will mitigate this impact is inadequate and unrealistic given the vertical elevation of idling trucks, the number of dock doors (23 proposed), and reflective noise patterns. There is insufficient analysis of cumulative and peak-hour noise exposure, and no guarantee regarding the hours of operation or tenant behavior.

2. Traffic and Vehicle Miles Traveled (VMT) – Significant and Unavoidable

I-19-3 The EIR concedes that the project will create **significant and unavoidable impacts** in terms of VMT. This is deeply concerning in a region already strained by congestion and air pollution. The proposed off-site intersection modifications are insufficient to absorb increased truck volumes, and the nearby residential areas will bear the brunt of this traffic.

Continuing with a project that knowingly creates unsustainable traffic burdens contradicts the city's responsibility to protect quality of life and public safety.

3. Greenhouse Gas Emissions – Significant and Unavoidable

I-19-4 The EIR also admits that GHG emissions remain significant even after mitigation. Proceeding with a project that fails to align with California's climate goals and local sustainability commitments is irresponsible. Approving this development sets a dangerous precedent for disregarding long-term environmental harm.

4. Lack of Clarity About Future Tenant and Use

I-19-5

The EIR claims a mix of warehouse, office, and manufacturing uses, but the actual tenant is **not yet known**. This introduces a dangerous level of uncertainty. Without knowing the type of business and hours of operation, how can the City accurately evaluate noise, traffic, and emissions?

At minimum, any such project should be deferred until a specific use case is defined and its exact operational profile is analyzed.

In Conclusion

The Draft EIR makes unsubstantiated conclusions about environmental effects and underestimates the impacts to nearby residents. Given the significant and unavoidable impacts already acknowledged — and the questionable "no significant impact" claims in areas like noise — I strongly urge the City of Lake Forest to **reject or significantly scale back** the proposed IPT project.

I-19-6

Government planning should prioritize **cost-effective, community-oriented development**. This project, by contrast, comes with **too high a cost** — not just environmentally, but politically and legally. Approving a development with known negative impacts risks damaging public trust, undermining the city's long-term planning credibility, and even provoking legal challenges from affected residents. The reputational and financial risks far outweigh any short-term economic gains. The City should invest in smarter growth strategies that serve both the economy and the community equitably.

Please ensure this comment is entered into the public record and considered as part of the environmental review process.

Sincerely,

Cherie Liu

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CHERIE LIU

Letter Code: I-19
Date: July 30, 2025

Response to Comment I-19-1

This comment is introductory, expresses opposition to the proposed Project, and describes the following comments to be addressed in response to the Draft EIR.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. No further response is required.

Response to Comment I-19-2

This comment expresses concerns regarding noise impacts and the potential disruption to nearby residential receptors associated with the 24/7 operations of the proposed Project.

Refer to Master Response 11 regarding the noise analysis conducted for the proposed Project and Response to Comment O-6-4 regarding 24/7 operations associated with the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-19-3

This comment expresses concerns regarding traffic and VMT and the sufficiency of the proposed off-site intersection modifications to absorb traffic burdens near residential receptors.

Refer to Master Response 8 regarding the proposed Project's traffic impacts, VMT impacts, and intersection modifications. Additionally, refer to Master Response 9 regarding the proposed Project's impacts on sensitive receptors. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-19-4

This comment expresses concerns regarding GHG emissions and that approval of the Project would set a precedent for approving projects which may not align with California's climate goals.

Refer to Master Response 10 regarding the proposed Project's GHG emissions. Additionally, refer to Response to Comment I-7-1 regarding the proposed Project's potential to set precedence. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-19-5

This comment expresses concerns regarding the Draft EIR's evaluation of noise, traffic, and emissions associated with the proposed Project given that the tenant is unknown. This comment requests the Project be deferred to address their comments regarding the definition of a specific use for the Project site.

Refer to Response to Comment O-1-10 regarding the proposed Project's tenant uncertainty. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-19-6

This comment concludes the letter and summarizes the above concerns regarding the Draft EIR, and requests the City reject or scale back the proposed Project to address their concerns stated above.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses above. No further response is required.

Weiss, Jennifer

From: Connie Ding [redacted]
Sent: Friday, August 1, 2025 12:23 PM
To: Stonich, Amy; EnterpriseProjects
Cc: Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Public Comments on DEIR of IPT Enterprise Business Center Project

Dear Ms. Amy Stonich,

My name is Connie Ding, a resident of the Meadows sub-community, which is located in immediate proximity to the proposed IPT Corporate Business Center project.

As a member of the Lake Forest community, I am submitting comments on the **Draft Environmental Impact Report (DEIR)** (State Clearinghouse **No. 2024030755**).

I-20-1 **After reviewing the Draft Environmental Impact Report (DEIR), I believe it contains significant deficiencies, particularly its failure to assess the cumulative impacts of this project combined with two adjacent projects on residents. I request that this project be evaluated jointly with the other two projects.**

Below, I outline critical issues and recommendations specific to SCH No. 2024030755, referencing relevant sections of the DEIR.

Thank you for your time.

Please confirm receipt of this email at your earliest convenience.

1. Traffic & Air Quality (Section 4.3 Air Quality)

Truck Traffic Impacts: The project anticipates **78 daily truck trips (792 total trips)**, but it lacks analysis of existing congestion on roads like Enterprise Way and Bake Parkway. Impacts on nearby residential areas (e.g., Meadows and senior housing) from noise and diesel emissions are unaddressed.

I-20-2

Inadequate CO "HotSpot" Analysis: The report claims no CO hot spots but provides no traffic flow data or simulations to support this, especially during peak hours.

Health Risks Underestimated: The cancer risk (0.36 per million) is below thresholds but ignores **long-term cumulative effects** or risks to sensitive groups (children, elderly).

I-20-3 **2. Construction Phase (Section 2.8 Project Construction)**

I-20-3 cont.

Dust Control: The project involves **8,889 tons of demolition material** and **13,373 cubic yards of earthwork**. Standard measures (e.g., watering) are mentioned, but **no monitoring plan or frequency** is specified, risking PM10/PM2.5 exposure to homes **85 feet away**.

Saturday Construction Allowed (7:00 AM–8:00 PM): Noise impacts on residents are unassessed. Stricter limits may be needed.

3. Land Use Compatibility (Sections 1.0 & 2.2)

I-20-4

Industrial-Residential Conflict: The Meadows Residential Development (east of the site) faces potential harm from nighttime truck noise and industrial activity. No mitigation details are provided.

Alternate Plan Flaws: Reducing warehouse space (155,803 → 50,803 sq ft) to add manufacturing (105,000 sq ft) may increase pollution/traffic, but this is unanalyzed.

4. Infrastructure & Drainage (Section 2.6)

I-20-5

Stormwater System: Three wetland modules will handle 68% of runoff, but **capacity for extreme rainfall** is undocumented, raising flood risks.

Aging Sewer Line: Reliance on an existing 8-inch VCP pipe without assessing its condition or upgrade needs is risky.

5. Sensitive Receptors (Section 4.3.c)

I-20-6

Proximity to Homes/Schools: Residential areas (**85 feet**) and Bella Montessori School (**733 feet**) lack adequate buffers. Noise/vibration impacts are unquantified.

Worker Health Risks: Cancer risk for CRC Cloud workers (0.11 per million) ignores **cumulative effects from nearby projects**.

6. Missing Emergency Plans

I-20-7

Fire/Chemical Spills: No details on hazardous materials storage, emergency response (e.g., OCFA coordination), or worst-case scenarios (e.g., lithium battery fires).

7. Data Inconsistencies

I-20-8

Outdated Construction Timeline: Air quality modeling uses 2022 data, but construction was delayed to 2023/24. Updated emissions standards may not apply.

---

8. Undisclosed Pollution Risks (Historical Site Use)

I-20-9

Electronics Manufacturing Legacy: Panasonic Avionics may have left **lead, cadmium, or chromium** in soil/groundwater (e.g., solder, plating residues).

Asbestos & Lead Paint: The 1999-built structure likely contains these materials. No testing or abatement plans are noted.

Underground Storage Tanks (USTs): Potential leaks of fuels/solvents (e.g., TCE) are uninvestigated. **Phase I ESA is absent.**

Recommendations:

I-20-9 cont.

Conduct **Phase I ESA** to review Panasonic's chemical use/waste records.

Pre-construction testing for heavy metals/VOCs in soil.

Include **emergency cleanup budgets** for unexpected contamination.

---

9. Loading Dock Overcapacity & Hidden Risks

23 Docks for 165,803 sq ft Warehouse is excessive (typical: 2–4 docks per 100,000 sq ft). Suggests high-intensity use (e.g., 24/7 logistics).

Undisclosed Tenants: Potential hazardous materials (e.g., batteries, chemicals) could require DTSC permits. **No emergency plans for nighttime incidents.**

I-20-10

Traffic Underestimation: PCE-adjusted truck traffic (194 trips/day) may worsen intersection LOS (e.g., Dimension Drive/Lake Forest Drive).

Recommendations:

Disclose tenant types (e.g., hazardous materials users).

Limit nighttime dock activity (e.g., 50% capacity after 11 PM).

Independent traffic simulation for peak dock usage.

---

10. Worst-Case Scenarios: A Looming Catastrophe

If the warehouse stores **lithium batteries or chemicals**:

Fire/Explosion:
Lithium fires reach **1,000°C+**, emitting toxic HF gas. OCFA lacks specialized suppression.

Evacuation failure: Toxic plumes could reach homes/schools in **5 minutes** (per SCAQMD models).

I-20-11

Traffic Gridlock = Delayed Emergencies:
Bake Parkway's **LOS F** congestion + 200+ trucks could block first responders (**8-minute delays** vs. 4-minute gold standard).

Legal Violations:
CEQA requires hazard disclosure (§15126.2). Developer's "unknown tenant" claim may violate **AB 2061** (1,000-ft battery warehouse buffer; this site is **733 ft from schools**).

I-20-12

Conclusion: The DEIR's omissions on **cumulative impacts, hazardous materials, and emergency preparedness** are unacceptable. We urge:

I-20-12 cont.

Immediate Phase I ESA and updated traffic/air modeling.
Public hearings to address community concerns.

Sincerely,

Connie Ding

Resident, The Meadows at Lake Forest

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CONNIE DING

Letter Code: I-20
Date: August 1, 2025

Response to Comment I-20-1

This comment is introductory and describes the following comments to be addressed in response to the Draft EIR, expressing concerns regarding the environmental impacts analysis and cumulative impacts.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-20-2

This comment expresses concerns regarding traffic and air quality impacts associated with the proposed Project, including existing congestion on nearby roadways and impacts on nearby residential areas from noise and diesel emissions. In addition, this comment expresses concerns regarding data that supports the statement in the Draft EIR that there are no CO hot spots, and that the identified cancer risk claim ignores long-term cumulative effects or risks to sensitive receptors.

Refer to Response to Comment O-1-4 and Master Response 9 regarding the proposed Project's impacts on air quality, cancer risk, and sensitive receptors and Master Response 11 regarding the proposed Project's impacts on noise. In addition, refer to Master Response 8 regarding the proposed Project's impacts on traffic and congestion on nearby roadways. The Project TIA demonstrates that the proposed Project (including proposed off-site improvements at five study area intersections) is not expected to significantly affect the intersection operation (LOS and queuing) within the study area in the existing condition. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-20-3

This comment expresses concerns related to construction impacts associated with the proposed Project, including the provision of a monitoring plan for dust control and assessment of Saturday construction noise on nearby residents.

As discussed in Section 4.3, Air Quality, of the Draft EIR (pages 4.3-14, 4.3-15, and 4.3-30), the proposed Project would be required to comply with SCAQMD's Rule 403, which requires the prevention, reduction, or mitigation of fugitive dust emissions from a project site during construction. Under Rule 403, the proposed Project would adhere to best available control

measures as feasible, including adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers, and/or ceasing all activities. In addition, the proposed Project would comply with SCAQMD Rule 403.1, which requires projects with 5,000 or more square feet of surface area disturbance to submit a Fugitive Dust Control Plan that would be approved by SCAQMD or an authorized local government agency prior to initiating any construction/earth-moving activity. Further specificity will be provided during the construction permitting phase, during which specific plans and procedures would be outlined in collaboration with the contractor(s), once known, and approved by the City and other applicable agencies. Furthermore, implementation of a separate monitoring plan for dust control is not warranted because modeled Project construction emissions do not exceed the applicable thresholds of significance for particulate matter (refer to Table 4.3.I, page 4.3-27, of the Draft EIR).

The analysis of construction-period noise presented in the Draft EIR assumes that construction activities would occur between the hours of 7:00 a.m. and 8:00 p.m., Monday through Saturday, as permitted under Section 11.16.080 of the City's Municipal Code. Therefore, the noise analysis presented in the Draft EIR already accounts for Saturday noise. Applicable noise impact thresholds do not vary by day of the week, and are not required for individual analysis under CEQA. Additionally, the construction noise assessment applied the City's 80 dBA L_{eq} noise level standard for impact determination. Because construction noise levels are expected to remain below 80 dBA L_{eq}, no further restrictions are necessary.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-20-4

This comment expresses concerns regarding nighttime truck noise and industrial activity on nearby residences including the reduced warehouse space alternative and the assessment of the potential for an increase in traffic and pollution.

Refer to Master Response 11 regarding the proposed Project's impacts related to truck noise, Master Response 8 regarding traffic associated with the proposed Project, and Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-20-5

This comment expresses concern regarding documentation of the capacity for extreme rainfall in the Draft EIR and the adequacy of the existing 8-inch VCP pipe to accommodate this rainfall.

Stormwater drainage is analyzed under Threshold 4.10.3, starting on page 4.10-32, of Section 4.10, Hydrology and Water Quality, and under Threshold 4.19.1, starting on page 4.19-12, of Section 4.19, Utilities and Service Systems, of the Draft EIR. As described in Response to Comment I-10-10, the proposed Project would include three modular wetland systems and three underground detention systems to reduce discharge volumes and improve water quality under the 100-year, 24-hour storm event, which is considered a reasonably foreseeable extreme rainfall event. The Project would comply with the North Orange County MS4 Permit and implement required BMPs (RCM WQ-3 and RCM WQ-4) to ensure runoff quantity and quality remain within regulatory standards.

The comment references an existing 8-inch vitrified clay pipe (VCP) in relation to stormwater drainage. As described under Threshold 4.19.1, starting on page 4.19-12, of Section 4.19, Utilities and Service Systems, of the Draft EIR, this VCP is part of the sanitary sewer system and would convey wastewater generated by Project operations. Stormwater would be managed through the Project's on-site detention and treatment systems, which are designed to accommodate local rainfall conditions. As noted in Section 4.5.3.1, Natural Setting, on page 4.5-2 of Section 4.5, Cultural Resources, of the Draft EIR, average annual rainfall in the Project area ranges from approximately 5 to 15 inches. Accordingly, the Project's stormwater design features provide sufficient capacity to manage potential storm events without relying on the existing VCP. The Draft EIR adequately demonstrates that stormwater facilities would be sufficient.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-20-6

This comment expresses concern regarding noise and vibration effects to nearby residential areas and the Bella Montessori School. This comment also expresses concerns regarding the cumulative impacts of cancer risks for workers.

Refer to Master Response 9 regarding the proposed Project's impacts related to cancer risk and Master Response 6 regarding the cumulative impacts analysis prepared for the proposed Project. In addition, refer to Master Response 11 regarding the proposed Project's noise and vibration impacts. Tables J, L, M, O, and P of the Noise and Vibration Impact Analysis (Appendix H of the Draft EIR) quantify potential noise impacts to nearest sensitive receptors. The results indicate there are no impacts to these receptors. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-20-7

This comment expresses concerns regarding the analysis of hazardous materials storage, emergency response, or worst-case scenarios provided in the Draft EIR.

Refer to Master Response 13 regarding hazardous materials storage and emergency response and Response to Comment O-1-17 regarding the analysis of worst-case scenarios. The proposed Project's impact on emergency evacuation routes is adequately addressed in the Draft EIR. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-20-8

This comment expresses concerns regarding the proposed construction schedule of 2023/2024 and the use of air quality monitoring data from 2022 in the Draft EIR.

Per *State CEQA Guidelines* Section 15125(a)(1), the time a Notice of Preparation is issued generally establishes the environmental baseline at the beginning of the CEQA process. An NOP for the proposed Project was distributed by the City via the State Clearinghouse on March 20, 2024 and the 2022 monitoring data was the latest data available at that time. Although monitoring data is typically updated every year, with the latest data being a year before the current calendar year, at the time the NOP was issued, the 2023 data had not yet been finalized (EPA typically releases updates after May). Therefore, the air quality analysis relied on 2022 data as the most current. Therefore, the analysis used the most recent Project information available at the time, which includes the construction timeline. Moreover, the analysis assumes construction to occur in 2026 and as the construction start date has not yet passed, the construction timeline is not considered to be outdated. Furthermore, if the proposed construction activities occur at a later timeframe, estimated emissions would be expected to decrease into the future due to technological advances and the implementation of increasingly stringent regulatory requirements. Therefore, the construction schedule represents a conservative scenario.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-20-9

This comment expresses concerns over potential hazardous materials on-site including but not limited to lead and asbestos, and requests a Phase I ESA be conducted to address their comments provided in this letter.
A site-specific Phase I ESA was prepared for the proposed Project (Apex Companies, LLC, 2021) and is included as Appendix F to the Draft EIR. As described in Master Response 13, the Phase I

Environmental Site Assessment (ESA) prepared for the Project identified no recognized environmental conditions that would create a risk of hazardous materials release, and compliance with existing regulations would prevent reasonably foreseeable upset or accident conditions involving hazardous materials during both construction and operation. Therefore, the Draft EIR adequately addresses hazardous materials storage, emergency response, and potential upset scenarios.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-20-10

This comment expresses concern regarding loading dock overcapacity and hidden risks, including the concern that the tenant is currently unidentified and the analysis of the use of potential hazardous materials and emergency plans for nighttime incidents. This comment also expresses concerns related to traffic associated with the proposed Project. This comment requests the City address their comments by identifying a tenant, limiting nighttime dock activity and providing an independent traffic simulation.

As described in Section 4.8, Greenhouse Gas Emissions; Section 4.13, Noise; and Section 4.16, Transportation and Traffic, of the Draft EIR, the proposed Project was analyzed conservatively to capture the full range of reasonably foreseeable operational conditions, including truck and loading dock activity throughout a 24-hour period. The number of loading docks is consistent with City zoning requirements and site development standards for industrial and warehouse uses within the Light Industrial Zoning designation of the Pacific Commercentre Planned Community.

Because a specific tenant has not been identified, the Draft EIR evaluates a representative industrial warehouse use consistent with the Project description and applicable zoning. This approach is consistent with *State CEQA Guidelines* Sections 15126 and 15144, as described in Response to Comment O-1-10. As discussed in Section 4.9.4, Regulatory Setting, starting on page 4.9-2 and Section 4.9.6, Project Impacts, starting on page 4.9-9 of Section 4.9, Hazards and Hazardous Materials, of the Draft EIR, compliance with existing federal, State, and local regulations—including requirements for Hazardous Materials Business Plans (HMBPs) and Risk Management Plans (RMPs)—would ensure that any future tenant storing or handling hazardous materials does so in accordance with established safety standards.

Emergency preparedness and response procedures would be implemented in accordance with Orange County Fire Authority (OCFA) requirements and the City's Emergency Operations Plan. These programs apply at all hours of operation, including nighttime.

Refer to Master Response 8 regarding the methodologies and modeling used for the traffic study. This Master Response thoroughly addresses the topic raised in this comment.

Given the information provided above, the Draft EIR adequately evaluates potential impacts related to loading dock capacity, hazardous materials handling, emergency response, and traffic operations, and no further analysis or independent traffic simulation is required.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-20-11

This comment expresses concern regarding worst-case scenarios related to fires/explosions, evacuation failure, traffic gridlock, and legal violations.

Refer to Master Response 13 regarding fire prevention, emergency response, and evacuation coordination. The Project would be required to comply with all applicable federal, State, and local regulations governing building fire codes, hazardous materials management, and emergency access, including review and approval by OCFA to ensure adequate fire flow, hydrant spacing, and site access for emergency vehicles.

As described in Response to Comment O-1-17, CEQA does not require evaluation of speculative or "worst-case" scenarios. Refer to Master Response 8 for more information on the analysis of traffic conditions during both routine operations and emergency conditions. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-20-12

This comment concludes the letter and summarizes the concerns noted above regarding cumulative impacts, hazardous materials, and emergency preparedness and reiterates the request for preparation of a Phase I ESA, updated traffic/air quality modeling, and public hearings to address their comments in this letter.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses above. No further response is required.

Weiss, Jennifer

From: Meadows <themeadowshomeowners@gmail.com>
Sent: Saturday, August 2, 2025 11:02 AM
To: Stonich, Amy; EnterpriseProjects
Cc: Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Public Comments on DEIR and Strong Opposition to the IPT Enterprise Business Center LLC Project
Attachments: Public Comments on the IPT Enterprise Business Center LLC Project - Harrison Jiang 02August2025.pdf; California Attorney General Letter to City of Lake Forest on Warehouse Project by IPT Enterprise Business Center LLC - Rob Bonta 05April2024.pdf

Dear Ms. Amy Stonich, Planning Commission Committee, and City Council,

I am writing to express my **strong and unequivocal opposition** to the proposed IPT Enterprise Business Center LLC Project, as detailed in the Draft Environmental Impact Report (DEIR) currently under review.

After conducting an in-depth evaluation of the DEIR and all 10 supporting appendices — along with rigorous CEQA research using various environmental, legal, and analytical tools — I have identified an **alarming volume of unresolved, severe deficiencies** that render the project legally and practically indefensible. The magnitude of flaws within the DEIR is not only overwhelming, but also deeply troubling in its implications for public health, safety, environmental justice, and city planning integrity.

Attached to this message is a document listing **115 unique, fully CEQA-compliant public comments** that I am submitting for the public record. These comments document **critical failures across nearly every chapter of the DEIR**, including:

I-21-1

- **Unmitigated health risks** from diesel particulate matter and toxic air contaminants
- **Grossly underreported traffic congestion, vehicle miles traveled, and noise exposure**
- **Omissions of appropriate cumulative impact analysis**, including for regional warehouse projects and long-term community exposure
- **Failure to protect sensitive populations** (children, elderly, medically vulnerable) and disregard for environmental justice mandates
- **Systematic inconsistencies** in the project description, mitigation measures, and operational assumptions
- **Lack of enforceability, oversight, and transparency** in key areas such as mitigation monitoring, hazard response, and tenant control

The breadth and severity of these issues demonstrate that the DEIR **fails to meet CEQA's core legal requirements** for disclosure, analysis, and mitigation. It is not a matter of minor technical oversights —

this document, as it stands, should not serve as the basis for approving a project with such long-lasting and irreversible consequences.

Also attached is a letter from California Attorney General Rob Bonta—submitted in response to the City's Notice of Preparation for this same warehouse project. The letter, issued by the Environmental Justice Bureau, directly acknowledges the **devastating consequences** warehouse developments impose on surrounding communities. It cites serious risks such as increased exposure to **cancer-causing pollutants, cardiovascular and respiratory illnesses, premature death, harmful noise levels, and unsafe traffic conditions**.

Importantly, the Attorney General's office emphasizes the need to **prioritize avoidance of land use conflicts** between warehouse developments and sensitive receptors, including homes, schools, and parks. Where conflicts are unavoidable, CEQA **mandates comprehensive and effective mitigation**—something **this DEIR wholly fails to deliver**.

I-21-1 cont.

It is my firm belief that this project is **not feasible** in its current form. Placing a massive, 24/7 industrial warehouse complex directly adjacent to family homes, parks, and schools — with truck entrances less than 100 feet from residential property lines — is a fundamental violation of responsible planning and public trust.

I strongly urge the City of Lake Forest and IPT Enterprise Business Center LLC to **reject this warehouse proposal and return to the table with alternative concepts** that align with community needs, environmental protection, and the City's long-term vision. Suitable alternatives may include:

- Mixed-use redevelopment incorporating residential, commercial, and green space
- Updated office and life sciences campuses
- Clean technology R&D centers with low-impact logistics
- Community-supportive, non-industrial uses that enhance rather than endanger quality of life

Please ensure this letter and the attached public comment document are formally included in the public record for the IPT DEIR review process. I and many other residents of Lake Forest are watching closely, and we are prepared to challenge this project through all legal and civic avenues necessary to protect our homes, our families, and our city.

Sincerely,

Harrison Jiang

Homeowner and Resident, Lake Forest
Address: [redacted], Lake Forest, CA 92630
Cell: [redacted]
Email: themeadowshomeowners@gmail.com

CAUTION: Think Security! This email is not from someone at the City of Lake Forest. **Do not click any links or open any attachments you are not expecting.**

Public Comments on IPT Enterprise Business Center LLC Project

Harrison Jiang, Homeowner and Resident of Lake Forest, California

Dated: August 2, 2025

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General

Comment 1: Inadequate Public Notice and Outreach Undermined Public Participation

Reference: DEIR Chapter 2.0 – Introduction and Public Process Documentation

Issue Summary:
The DEIR states that the Notice of Availability (NOA) was issued, but fails to document whether notices were delivered to all affected neighborhoods, including The Meadows. Additionally, no community workshops or non-English-language outreach were conducted despite large immigrant populations nearby.

I-21-2

CEQA Analysis:
CEQA Guidelines §15087(a) require the lead agency to provide meaningful notice and opportunities for public participation. Outreach is especially important for environmental justice communities. Failure to provide multilingual materials or hold public forums limits meaningful engagement.

Requested Action:
Extend the public comment period and reissue notices via direct mail to all households within 0.5 miles. Translate the NOA and DEIR executive summary into Spanish, Vietnamese, and Mandarin. Hold an additional in-person community workshop.

Community Impact:
Many residents of The Meadows learned about the DEIR late or not at all. This violates the spirit of CEQA and damages trust in the public process.

Comment 2: No Identification of Responsible Agencies for Environmental Oversight

Reference: DEIR Chapter 2.0 – Introduction

Issue Summary:

I-21-3

The DEIR lists regulatory frameworks but does not identify responsible agencies for enforcing environmental standards (e.g., South Coast AQMD, CalEPA, Regional Water Quality Control Board). Nor does it list permits required for air, water, or waste management.

CEQA Analysis:
CEQA §15124(d) requires identification of “agencies expected to use the EIR in their

decision-making process." Omission of this information hinders interagency coordination and public transparency.

Requested Action:

I-21-3 cont.

Add a table identifying all responsible and trustee agencies, permit types, and expected compliance actions. Provide contact information or review timelines, where possible.

Community Impact:

Residents deserve to know who is accountable for enforcing protections. Without this information, public trust and agency accountability are undermined.

Comment 3: Financial Incentives or Agreements with Developer Not Disclosed

Reference: DEIR Chapter 2.0 – Introduction

Issue Summary:

The DEIR does not disclose whether any financial incentives, tax credits, infrastructure reimbursements, or development agreements exist between the City and the applicant. This lack of transparency impedes public understanding of potential influence on project approval or design flexibility.

CEQA Analysis:

I-21-4

While not strictly required by CEQA statute, courts and State CEQA Guidelines (§15124, §15144) emphasize full transparency in describing the whole of the project — including relevant planning, financial, and approval context. Withholding this information raises fairness concerns.

Requested Action:

Disclose any Memoranda of Understanding (MOUs), tax incentives, or infrastructure agreements between the City of Lake Forest and the project applicant. Include a plain-language summary and identify all relevant public approvals.

Community Impact:

If the City is subsidizing this project or has already committed infrastructure resources, residents have the right to know — and to assess whether the trade-offs are justified.

Comment 4: Inconsistencies in Project Description Undermine DEIR Validity

Reference: DEIR Chapter 3.0 – Project Description

Issue Summary:
The project description includes conflicting statements about building square footage, land use intensity, and operational characteristics (e.g., hours, tenant type). For example, it is mentioned that two building sizes totaling 412,000 square feet, but later sections reference 400,000 or 435,000 square feet without explanation.

I-21-5

CEQA Analysis:
CEQA §15124 requires a stable, accurate, and consistent project description. Courts have held that inconsistencies in project description render an EIR invalid, as they impair public review and impact analysis (*County of Inyo v. City of Los Angeles*, 1977).

Requested Action:
Reconcile all inconsistencies in the project description. Provide a clear summary table stating proposed building sizes, uses, operational hours, number of truck bays, and square footage by tenant type.

Community Impact:
Without clarity on what's being built and how it will operate, the public cannot assess impacts or propose alternatives. The community deserves transparency before irreversible land use changes are approved.

Comment 5: Project Description Fails to Specify Warehouse Tenancy Structure or Leasing Model

Reference: DEIR Chapter 3.0 – Project Description

Issue Summary:
The DEIR is silent on whether the warehouse space will be leased to a single tenant, multiple tenants, or short-term logistics contractors. Different tenancy models affect parking demand, traffic patterns, waste generation, and air emissions — all of which are modeled generically.

I-21-6

CEQA Analysis:
CEQA §15124 requires a clear, stable, and complete project description. Omitting a core operational component like tenancy structure undermines the reliability of all downstream environmental analyses.

Requested Action:
Specify the leasing model (e.g., long-term lease, multi-tenant, third-party logistics staging) and adjust impact modeling accordingly. Include worst-case assumptions if uncertainty remains.

I-21-6 cont.

Community Impact:
Short-term or high-churn tenancy often results in higher noise, emissions, and waste due to lack of operational consistency. Residents should not face instability from revolving tenants with no oversight.

Comment 6: DEIR Fails to Address Emerging Freight Technologies like Delivery Robots or AVs

Reference: DEIR Chapter 3.0 – Project Description

Issue Summary:
The DEIR does not consider the use of automated delivery technologies such as sidewalk delivery robots, drones, or autonomous trucks — which are increasingly integrated into last-mile logistics. These technologies can create new safety risks, increase curbside conflicts, and generate environmental impacts not disclosed in the current analysis.

CEQA Analysis:
I-21-7 CEQA requires evaluation of reasonably foreseeable technology-related changes when they affect environmental conditions (§15126.2(a), §15144). Given the rapid adoption of these systems in warehouse logistics, omitting their future use violates CEQA's requirement to assess long-term project effects.

Requested Action:
Include a future operations scenario analysis involving delivery robotics, autonomous vehicles, or drone freight. Assess associated traffic safety, noise, energy demand, and right-of-way conflicts.

Community Impact:
Residents may face increased sidewalk congestion, curbside noise, or traffic conflicts if new delivery tech is adopted without safeguards. These changes are foreseeable and must be planned for now.

Comment 7: Inadequate Justification for Project Objectives and CEQA Alternatives Screening

Reference: DEIR Chapter 3.0 – Project Description

Issue Summary:
The stated project objectives are narrowly framed to limit the alternatives analysis. Objectives such as "maximize industrial floor space" and "ensure 24-hour truck access" exclude more environmentally responsible configurations from consideration. This self-limiting strategy violates CEQA.

I-21-8

CEQA Analysis:
Under CEQA §15124(b) and §15126.6(a), project objectives must be broad enough to allow a reasonable range of alternatives. Courts have struck down EIRs that define objectives so narrowly they preclude environmentally superior alternatives (*California Native Plant Society v. City of Santa Cruz*).

Requested Action:
Revise the project objectives to allow for scaled-down, less intense uses, or limited truck access. Reevaluate alternatives using these revised objectives and disclose why feasible, less impactful alternatives were not considered.

Community Impact:
Framing the project around developer profitability instead of public interest weakens CEQA's core purpose. The community should have a voice in shaping project design that fits the local context.

Comment 8: Failure to Consider Operational Impacts from Third-Party Subcontractors

Reference: DEIR Chapter 3.0 – Project Description; Chapter 4.17 – Transportation and Traffic

I-21-9

Issue Summary:
The DEIR does not address whether the facility will allow third-party subcontractors to operate on-site — including off-hours delivery crews, mobile service vendors, or staging contractors. These actors can introduce additional VMT, noise, and enforcement complexity not reflected in current modeling.

CEQA Analysis:
CEQA requires disclosure of all reasonably foreseeable operational activities (§15126.2). If tenant subcontractors are common to the logistics industry, their impacts must be analyzed — not excluded for simplicity.

I-21-9 cont.

Requested Action:
Expand operational modeling to include subcontractor vehicle trips, delivery schedules, and waste/service impacts. Require tenant lease agreements to regulate subcontractor behavior and reporting.

Community Impact:
Without clear rules, subcontractors can become the most disruptive actors on-site — and residents bear the burden. CEQA exists to prevent these hidden impacts.

Comment 9: Construction Phasing and Overlap with Nearby Projects Not Disclosed

Reference: DEIR Chapter 3.0 – Project Description

Issue Summary:
The DEIR does not provide a detailed construction schedule or analyze overlapping construction with adjacent Western Realco warehouse developments. Concurrent grading and truck activity from multiple sites could exponentially increase dust, noise, and congestion impacts — but this was not modeled.

I-21-10

CEQA Analysis:
CEQA §15130 requires cumulative analysis of simultaneous project impacts. Failure to analyze overlapping construction — particularly when timelines are publicly known — renders the DEIR's conclusion of "less than significant" impacts legally deficient.

Requested Action:
Provide a detailed construction schedule and model simultaneous construction scenarios with neighboring warehouse projects. Expand cumulative impact models accordingly and apply enhanced mitigation.

Community Impact:
If residents face months of nonstop diesel engines, bulldozers, and backup alarms from multiple directions, the health and mental toll will be far worse than the DEIR admits.

Comment 10: DEIR Ignores Psychological and Mental Health Impacts of 24/7 Industrial Intrusion

Reference: DEIR – Not Discussed Anywhere in Chapter 4.0 – Environmental Analysis

Issue Summary:
The DEIR focuses on physical environmental impacts but fails to assess the long-term psychological toll on residents who will live next to a 24/7 industrial facility. Chronic exposure to noise, light pollution, diesel exhaust, and visual blight — especially without breaks — contributes to stress, anxiety, and diminished quality of life. These impacts are real, cumulative, and measurable.

I-21-11

CEQA Analysis:
CEQA recognizes "health and safety" impacts broadly (Appendix G, §15126.2), and courts have acknowledged that quality-of-life effects are part of environmental analysis, particularly for projects located directly adjacent to homes. Ignoring the mental and emotional burden of industrial encroachment violates CEQA's duty to assess the whole of the project's effects.

Requested Action:
Include qualitative and community-reported data on mental health stressors caused by similar industrial developments. Consider buffer zones, time-based operational limits, and mitigation focused on restoring resident peace and quiet.

Community Impact:
Living next to a facility that never sleeps will wear people down over time. This comment is about dignity, rest, and the right to a peaceful home — and CEQA requires that these human impacts be part of the City's consideration.

Comment 11: Failure to Disclose Worst-Case Scenario "Impact Stacking"

Reference: DEIR Chapter 4.0 – Environmental Analysis

Issue Summary:
The DEIR evaluates each impact (e.g., noise, dust, traffic) in isolation and fails to model or discuss "impact stacking" — where multiple moderate impacts overlap to create a significant overall burden. For example, simultaneous exposure to noise + dust + truck congestion is qualitatively more disruptive than each impact on its own.

I-21-12

CEQA Analysis:
CEQA §15126.2 requires lead agencies to analyze "the whole of the action" and disclose

additive effects. Case law has emphasized the cumulative impact principle in evaluating real-world lived conditions (*Los Angeles Unified School District v. City of Los Angeles*).

Requested Action:
Model a representative "stacked impact" day including overlapping noise, air, and traffic conditions. Include mitigation that considers combined stressors, not just individual thresholds.

I-21-12 cont.

Community Impact:
The human body doesn't compartmentalize impacts. Residents don't experience noise, traffic, and pollution separately — they live them together, every day. CEQA demands that reality be acknowledged.

Comment 12: Failure to Assess Community Vulnerability in Cumulative Impact Analysis

Reference: DEIR Chapter 4.0 – Environmental Analysis

Issue Summary:
The DEIR provides cumulative impact summaries by resource area but fails to incorporate social vulnerability metrics (e.g., CalEnviroScreen scores, income data, linguistic isolation) into the cumulative analysis. CEQA requires special attention to cumulative burdens on already-impacted communities.

I-21-13

CEQA Analysis:
CEQA §15130(b) requires cumulative analysis "with consideration of the severity of the impacts and the likelihood of their occurrence." The omission of vulnerability or equity indicators results in an incomplete cumulative risk profile.

Requested Action:
Integrate CalEnviroScreen or similar tools into the cumulative analysis to determine whether the area surrounding the project qualifies as overburdened or vulnerable. Revise cumulative impact determinations accordingly.

Community Impact:
If The Meadows is already facing traffic, air quality, or housing strain, this project's cumulative effects must be judged through that lens — not based on general population averages.

Comment 13: Failure to Conduct Meaningful Cumulative Impact Analysis with Adjacent Projects

Reference: DEIR Chapter 4.0 – Environmental Analysis

Issue Summary:
The DEIR repeatedly references "cumulative impacts" in multiple sections but fails to conduct a meaningful cumulative analysis as required under CEQA. Specifically, it omits a quantitative or model-based evaluation of the combined environmental impacts of the IPT Enterprise Business Center Project and the two adjacent Western Realco warehouse developments. Instead, the DEIR acknowledges these nearby projects in narrative form without integrating them into modeling for traffic, air quality, noise, or health risk assessment.

CEQA Analysis:
Under CEQA Guidelines §15130(a), the DEIR must provide either a list of past, present, and probable future projects or a summary of projections in an adopted plan. The DEIR lists the Western Realco projects but fails to model or analyze their combined environmental impact. Additionally, CEQA Guidelines §15126.2(a) require that the DEIR evaluate significant cumulative effects resulting from "a project's incremental effect when viewed in connection with the effects of past, current, and probable future projects." The current DEIR falls short of this requirement.

I-21-14

Requested Action:
The City must revise and recirculate the DEIR to include a quantitative cumulative impact analysis across all applicable environmental domains (Air Quality, GHG, HRA, Noise, Traffic). The revised DEIR should include a table and model outputs showing combined emissions, VMT, noise contours, and cancer burden levels from the IPT and the two Western Realco projects. Failing to do so violates CEQA's mandate for disclosure of reasonably foreseeable cumulative impacts.

Community Impact:
The Meadows neighborhood is directly adjacent to all three warehouse projects, separated in some areas by less than 100 feet. Without a valid cumulative analysis, residents cannot assess the combined health and safety risks from diesel truck traffic, 24/7 noise exposure, and toxic air contaminants. The omission of this analysis unfairly hides the real environmental burden facing families, seniors, and children living in The Meadows. Full CEQA compliance demands transparency, disclosure, and mitigation.

Comment 14: No Evaluation of Project Inconsistency with California Sustainable Freight Action Plan

Reference: DEIR – Statuary Compliance with 2016 California Sustainable Freight Action Plan (Omitted)

Issue Summary:
The DEIR fails to assess the project's consistency with the 2016 California Sustainable Freight Action Plan, which outlines state goals to reduce emissions, increase efficiency, and prioritize zero-emission vehicles in freight corridors.

I-21-15

CEQA Analysis:
Under CEQA §15125(d), EIRs must evaluate consistency with relevant plans and policies. The Sustainable Freight Action Plan is an official interagency policy directive with GHG, NOx, and PM reduction goals — none of which are mentioned.

Requested Action:
Include a policy consistency table analyzing how the project aligns (or conflicts) with freight system goals. Address emissions, zero-emission truck readiness, and fleet electrification planning.

Community Impact:
If the project is undermining state freight goals, local residents will bear the pollution while state policies are quietly ignored. Transparency and consistency are non-negotiable.

Comment 15: No Public Health Section Despite Multiple Air, Noise, and Traffic Impacts

Reference: Entire DEIR – No Chapter on Public Health

Issue Summary:
Despite known concerns about health effects from warehouses — including air quality, diesel PM, noise stress, and injury risk — the DEIR contains no public health chapter or integrated analysis of health impacts.

I-21-16

CEQA Analysis:
Although CEQA has no mandated "Public Health" section, several California courts and agencies have endorsed public health impact assessments (PHIA) for industrial projects near residential communities. A combined health analysis aligns with §15126.2's requirement to disclose "significant effects on the environment," which includes human health.

Requested Action:
Add a new Public Health chapter or appendix that summarizes exposure risks, cumulative burdens, vulnerable populations, and recommended mitigation across air, noise, water, and traffic categories.

I-21-16 cont.

Community Impact:
Residents shouldn't have to piece together health impacts from 10 different chapters. The City owes them a consolidated, honest evaluation of how this project may affect their health.

Comment 16: DEIR Fails to Analyze Property Value Impacts as a Source of Environmental Justice Concern

Reference: DEIR – Environmental Justice (Omitted)

Issue Summary:
The DEIR does not include an Environmental Justice section and fails to analyze whether the proximity of a 24/7 warehouse facility to homes could devalue property — potentially trapping low- and middle-income residents in depreciated housing near health risks.

CEQA Analysis:
While CEQA does not directly regulate property values, it does require disclosure of disproportionate burdens on disadvantaged communities (§15126.2(a), SB 1000). Property value suppression tied to proximity to industrial pollution is a recognized environmental justice issue.

I-21-17

Requested Action:
Add an Environmental Justice chapter evaluating whether residents of The Meadows and surrounding communities may face economic harm without the mobility to relocate. Include qualitative data or literature review on property value trends near logistics corridors.

Community Impact:
If environmental burdens reduce home equity, residents may become involuntary hostages of a degraded quality of life — a scenario CEQA is meant to help prevent.

Comment 17: Inconsistent Use of Significance Thresholds Across CEQA Topics

I-21-18

Reference: Multiple DEIR Chapters – Air Quality, GHG, Traffic, Noise

Issue Summary:
The DEIR uses thresholds of significance inconsistently. For example, GHG uses SCAQMD 10,000 MT CO_2e/year, while Energy and Traffic impacts rely on qualitative comparisons without numeric thresholds. This inconsistency clouds the reader's ability to evaluate what is truly significant.

CEQA Analysis:
I-21-18 cont.
CEQA Guidelines require thresholds to be consistent, transparent, and based on substantial evidence (§15064.7). Mixing quantitative and qualitative thresholds across topics without justification invites confusion and legal challenge.

Requested Action:
Standardize and clearly document all thresholds of significance used in the DEIR. Provide a comparison matrix in the introduction to the Environmental Analysis section (Chapter 4).

Community Impact:
If residents can't understand what's "significant" or not, they can't provide meaningful comments or know what impacts the City is accepting. This hurts public participation and weakens accountability.

Aesthetics

Comment 18: Failure to Address Psychological Impacts from Long-Term Visual Blight

Reference: DEIR Chapter 4.1 – Aesthetics

Issue Summary:
I-21-19
The DEIR asserts that no "scenic views" will be obstructed, but this ignores the psychological and emotional toll of living adjacent to a massive warehouse wall, especially for residents of The Meadows whose second-story views will permanently shift from natural skyline to industrial façade.

CEQA Analysis:
CEQA recognizes that aesthetic impacts are contextual and may be significant in residential areas (§15126.2). Courts have acknowledged that visual impacts are not limited to formal "scenic vistas," especially when affecting quality of life near homes (*Pocket Protectors v. City of Sacramento*).

Requested Action:
Provide visual simulations from second-story homes in The Meadows and assess long-

term psychological effects from visual encroachment. Consider façade variation, green walls, or step-backs to reduce visual dominance.

I-21-19 cont.

Community Impact:
Constant exposure to an industrial backdrop instead of open sky degrades the sense of place and mental wellness for families — especially children and seniors.

Comment 19: Lack of Visual Impact Study from Elevated Warehouse Massing

Reference: DEIR Chapter 4.1 – Aesthetics

Issue Summary:
The DEIR claims there are no scenic vistas affected but fails to analyze the impact of the large, tall warehouse buildings directly visible from two-story homes in The Meadows. No visual simulations or shade-and-shadow diagrams are provided.

I-21-20

CEQA Analysis:
CEQA §15126.2 requires discussion of visual character impacts, particularly in developed residential areas. Courts have found that visual degradation qualifies as an aesthetic impact even if no official scenic corridor is affected.

Requested Action:
Include visual renderings of the project from backyard and second-story viewpoints in The Meadows. Include analysis of visual massing, shade impacts, and proposed landscaping buffers.

Community Impact:
Residents will no longer have sky views — they'll face warehouse walls and loading areas. Visual intrusions like this reduce quality of life and home value, and should not be dismissed without evidence.

Comment 20: No Analysis of Green Infrastructure or Urban Heat Island Mitigation

Reference: DEIR Chapter 4.1 – Aesthetics; Appendix G – WQMP

I-21-21

Issue Summary:
The DEIR fails to evaluate whether the project will implement green infrastructure (e.g., shade trees, vegetated swales, cool roofs) to mitigate urban heat island effects. With extensive impervious surfaces, rooftops, and paving, the site is likely to elevate ambient temperatures — especially during heatwaves.

CEQA Analysis:
CEQA Guidelines §15126.2 and Appendix G require evaluation of energy consumption and heat island effects when relevant. The California Environmental Protection Agency and OPR recommend green infrastructure to reduce climate and health burdens from development.

I-21-21 cont.

Requested Action:
Include a green infrastructure plan with minimum vegetative coverage targets, reflective surface standards, and tree canopy requirements. Evaluate whether the project contributes to regional urban heat stress.

Community Impact:
The Meadows already experiences hot summers. If this warehouse radiates heat onto nearby homes and sidewalks, the City is failing to protect vulnerable populations from preventable climate stress.

Comment 21: Failure to Disclose Impact of Warehouse Lighting on Adjacent Homes

Reference: Appendix B – Photometric Plan, Page B-18

Issue Summary:
The DEIR does not assess the intensity or hours of operation of exterior lighting, particularly loading dock and perimeter lights that may impact The Meadows residents. The photometric plan shows foot-candle levels but lacks context on glare, light trespass, or visual mitigation.

I-21-22

CEQA Analysis:
CEQA requires disclosure of aesthetic impacts (CEQA §15126.2), including nighttime lighting that may affect residential quality of life. Glare and light pollution are acknowledged adverse effects and must be evaluated when lighting operates overnight.

Requested Action:
Include a full lighting impact study with photometric readings at residential fence lines. Recommend shielding, motion sensors, directional lighting, and dusk-to-dawn timers as mitigation measures.

Community Impact:
Residents backing the warehouse will see lights through windows at all hours unless properly mitigated. The lack of this analysis disrespects the well-being of nearby families.

Comment 22: Lack of Nighttime Light Pollution Analysis for Residential Adjacency

Reference: Appendix B – Photometric Plan

Issue Summary:
While the DEIR includes photometric plans, it fails to analyze night lighting impacts on adjacent residential properties. There is no discussion of light trespass, glare through second-story windows, or cumulative illumination from security and truck activity lights, especially during overnight hours.

I-21-23

CEQA Analysis:
CEQA Guidelines §15126.2 require analysis of aesthetic and nuisance impacts, including lighting. Courts have held that light trespass into neighboring homes constitutes a significant environmental impact when not addressed (*Pocket Protectors v. City of Sacramento*).

Requested Action:
Provide a light trespass analysis for all fixtures located within 200 feet of residential property lines. Include night renderings and glare diagrams, and require shielded LED fixtures with motion sensors.

Community Impact:
The Meadows backs directly against the project. Nighttime light exposure disrupts sleep, reduces privacy, and diminishes residents' ability to enjoy their property — and is easily preventable with proper design and mitigation.

Comment 23: No Consideration of Light Trespass During Fog or Low Visibility Conditions

Reference: Appendix B – Photometric Plan

Issue Summary:
The lighting analysis in Appendix B does not account for light dispersion during fog or mist conditions, which are common in early mornings and evenings in inland Orange County. During fog, unshielded light scatters more broadly, amplifying glare and visibility intrusion.

I-21-24

CEQA Analysis:
CEQA requires evaluation of light and glare impacts under realistic environmental conditions (§15126.2). Ignoring atmospheric light scattering creates a false sense of mitigation effectiveness.

I-21-24 cont.

Requested Action:
Revise the lighting analysis to include fog and high-humidity conditions. Require warm-spectrum lighting with full cut-off shields and automatic dimming sensors during low visibility hours.

Community Impact:
Increased light scatter will reduce nighttime privacy and visibility for The Meadows residents, particularly in second-story bedrooms and backyards.

Comment 24: Lighting Analysis Omits Second-Story Residential Windows

Reference: Appendix B – Photometric Plan

Issue Summary:
The DEIR evaluates horizontal foot-candle spread at ground level but does not assess light trespass into second-story windows of The Meadows homes. Elevated warehouse lighting, security poles, and truck activity will likely cause direct glare and sleep disturbance.

I-21-25

CEQA Analysis:
CEQA §15126.2 and Appendix G require analysis of visual impacts, including glare and nighttime illumination. Courts have upheld glare and light pollution as valid CEQA impacts, particularly in urban and residential contexts.

Requested Action:
Add vertical photometric analysis to simulate lighting intensity at a height of 15–20 feet (typical second-story window). Require shielding, motion sensors, and curfews for all perimeter fixtures.

Community Impact:
If lighting disrupts families' ability to sleep, relax, or enjoy their homes, it is a real and avoidable harm — not a trivial nuisance.

Air Quality

Comment 25: DEIR Fails to Address Impact on Air Quality Monitoring Coverage

I-21-26

Reference: DEIR Chapter 4.3 – Air Quality

Issue Summary:
The DEIR cites the nearest ambient air monitoring station but does not disclose whether

new emissions from the project will affect regional air quality coverage adequacy. Additional industrial emissions may require closer monitoring, especially near residential receptors.

CEQA Analysis:
CEQA requires agencies to disclose gaps in baseline data and consider the adequacy of environmental monitoring (§15125(a)). Without robust local data, cumulative and operational impacts may be underestimated.

I-21-26 cont.

Requested Action:
Coordinate with SCAQMD to evaluate whether additional mobile or fixed air quality monitors are warranted near the project site. Include this as a mitigation measure where sensitive receptors are nearby.

Community Impact:
Residents should not have to rely on air readings from miles away while living next to diesel operations. Accurate monitoring is a basic right and regulatory necessity.

Comment 26: DEIR Fails to Assess Impacts on Future Sensitive Land Uses

Reference: DEIR Chapter 4.3 – Air Quality

Issue Summary:
The DEIR only analyzes current land uses around the project and does not consider the possibility of future schools, daycares, or senior facilities being developed nearby. CEQA requires the analysis of foreseeable sensitive receptor locations over the project's lifetime, especially when approving long-term industrial use.

I-21-27

CEQA Analysis:
CEQA §15126.2(a) and case law (e.g., *Communities for a Better Environment v. South Coast AQMD*) require consideration of foreseeable future impacts. Failing to evaluate potential exposure to future sensitive land uses within 1,000 feet constitutes an incomplete risk disclosure.

Requested Action:
Update the air quality and HRA modeling to include potential future land uses within 1,000 feet, based on the City's zoning and General Plan. Provide conservative estimates and adaptive mitigation if land use conversion occurs.

I-21-27 cont.

Community Impact:
What's undeveloped today could be a preschool tomorrow. Families shouldn't discover 10 years later that this warehouse was greenlit without protecting their children.

Comment 27: Tenant-Specific Operational Emissions Variability Not Analyzed

Reference: DEIR Chapter 4.3 – Air Quality

Issue Summary:
The DEIR models air emissions assuming average industrial warehouse operations, but does not account for tenant-specific variations such as cold storage, hazardous materials handling, or e-commerce logistics — all of which have different emission profiles and vehicle mix assumptions.

I-21-28

CEQA Analysis:
CEQA §15126.2(a) requires disclosure of all likely operations and their impacts. Courts have found that EIRs must consider a range of reasonably foreseeable tenant uses when site-specific permits are being granted (*Sierra Club v. County of Fresno*).

Requested Action:
Model air and traffic impacts using a range of operational profiles — including cold storage, e-commerce fulfillment, and chemical warehousing. Require conditional use permits for high-impact tenants and tiered mitigation measures.

Community Impact:
Different tenants will create different environmental burdens. Residents should not bear the brunt of unregulated tenant variations hidden behind a one-size-fits-all model.

Comment 28: Inadequate Disclosure of Construction Contractor Requirements or Oversight

Reference: DEIR Chapter 4.3 – Air Quality; Chapter 7 – Mitigation Monitoring and Reporting Program

I-21-29

Issue Summary:
The DEIR states that contractors will implement dust, noise, and runoff controls, but does not identify how they will be selected, trained, or monitored. Without detailed contractor compliance procedures, mitigation may exist only on paper.

CEQA Analysis:
CEQA §15126.4(a)(2) requires enforceable and measurable mitigation. Relying on

contractors without oversight mechanisms has been rejected by courts (*Sundstrom v. County of Mendocino*).

Requested Action:
Specify contractor qualification standards, mandatory environmental training, and regular third-party audits during construction. Include violation penalties and public reporting mechanisms.

I-21-29 cont.

Community Impact:
Residents don't want excuses — they want accountability. If the wrong contractor cuts corners, the community pays the price in health and quality of life.

Comment 29: No Evaluation of Odor or VOC Emissions from Warehouse Cleaning Chemicals

Reference: DEIR Chapter 4.3 – Air Quality

Issue Summary:
The DEIR does not evaluate emissions or odors from cleaning agents commonly used in warehouse maintenance. Janitorial activities may involve solvents, bleach, and VOC-rich cleaners, which can create localized air quality and odor impacts — especially near loading docks or entryways.

I-21-30

CEQA Analysis:
CEQA Appendix G requires evaluation of objectionable odors and air toxics. Warehouse cleaning operations are predictable, regular activities and must be included in operational modeling.

Requested Action:
Identify cleaning chemical categories and potential VOC contributions. Require the use of low-VOC or CARB-certified cleaning products and specify disposal and ventilation practices to minimize emissions.

Community Impact:
Even low-level odors or chemical smells are disruptive when they drift into backyards or through windows. These are quality-of-life issues that deserve attention.

Comment 30: Construction Worker Exposure to Dust and Diesel Not Addressed

I-21-31

Reference: DEIR Chapter 4.3 – Air Quality; Appendix C – AQ Report and HRA

Issue Summary:
While the DEIR includes construction-period emissions modeling, it fails to analyze health impacts to on-site construction workers, who will face prolonged exposure to diesel exhaust, fugitive dust, and PM2.5 in confined work zones. This is particularly concerning given the multi-month grading and earthwork schedules.

CEQA Analysis:
I-21-31 cont.
CEQA §15126.2(a) and Appendix G require evaluation of impacts to human health, including reasonably foreseeable receptors. While OSHA regulates occupational exposure, CEQA still requires disclosure of known environmental health risks to temporary workers on-site.

Requested Action:
Include a health risk assessment specific to construction-phase workers based on proximity, exposure duration, and PM concentration. Require diesel equipment to meet Tier 4 standards and implement mandatory PPE and dust suppression protocols.

Community Impact:
These workers are part of our broader community. If their health risks are ignored, it reflects a lack of care for everyone who must live or work near this project.

Comment 31: Failure to Analyze Air Quality Impacts from Construction Equipment at Property Line

Reference: DEIR Chapter 4.3 – Air Quality

Issue Summary:
The DEIR's construction air emissions analysis relies on CalEEMod assumptions but does not model actual staging areas for diesel construction equipment. It also omits modeling
I-21-32
at the property line where construction may occur within 50–100 feet of The Meadows residences. This leads to significant underestimation of localized construction-phase PM2.5 and NOx impacts.

CEQA Analysis:
CEQA Guidelines §15126.2(a) require consideration of short-term construction impacts, particularly those affecting sensitive receptors. The omission of equipment-specific location data and worst-case emission zones violates CEQA's standard for adequate disclosure and modeling.

Requested Action:
Revise the construction air quality analysis to include precise staging locations and mobile

source emission factors for construction vehicles. Add receptor locations at the actual wall separating the site from The Meadows.

I-21-32 cont.

Community Impact:
The closest homes could experience elevated emissions from diesel generators, excavators, and graders for months. This must be disclosed so families can prepare, especially those with respiratory conditions.

Comment 32: DEIR Does Not Address Air Filtration Requirements for Adjacent Residential Units

Reference: DEIR Chapter 4.3 – Air Quality

Issue Summary:
Although diesel PM is identified as a significant source of exposure, the DEIR does not consider mitigation for adjacent homes, such as high-efficiency filtration (MERV 13+) or incentive programs to upgrade existing HVAC systems.

I-21-33

CEQA Analysis:
CEQA allows and encourages mitigation for nearby receptors if direct reduction at the source is insufficient (§15126.4(a)(2)). Some jurisdictions require air filtration offsets when warehouses are sited near homes.

Requested Action:
Offer an incentive or reimbursement program to The Meadows residents for MERV 13 air filter upgrades. Include this as a mitigation requirement, administered by the City or project sponsor.

Community Impact:
If residents have to breathe worse air because of a nearby warehouse, the least the developer can do is help them filter it. This is not just fair — it's good policy.

Comment 33: Unsubstantiated Statement of "Less than Significant" Impact for Diesel Emissions

Reference: DEIR Chapter 4.3 – Air Quality

I-21-34

Issue Summary:
The DEIR concludes diesel emissions from warehouse operations are "less than significant" without modeling peak-hour diesel concentrations or accounting for cumulative background sources. No justification or threshold comparison is provided.

CEQA Analysis:
CEQA requires conclusions be supported by substantial evidence (§15064). Simply stating an impact is not significant without numerical modeling, health-based comparison, or mitigation rationale is inadequate.

Requested Action:
I-21-34 cont.
Recalculate diesel PM emissions using peak-hour operations and compare results to OEHHA's health benchmarks. If mitigation is needed, identify specific technology (e.g., electric trucks, filtered HVAC systems) to reduce risk.

Community Impact:
Residents live less than 100 feet from loading docks. Without real data, they are left guessing whether the project will harm their lungs or shorten their lives. CEQA was designed to prevent that.

Comment 34: DEIR Ignores Impact on Medically Vulnerable Populations

Reference: DEIR Chapter 4.3 – Air Quality

Issue Summary:
The DEIR discusses general residential exposure but does not evaluate potential disproportionate impacts on medically vulnerable residents, including those with asthma, COPD, heart conditions, or immunocompromised status. These groups face increased risk from diesel PM and ozone precursors.

I-21-35
CEQA Analysis:
CEQA requires that agencies "consider the context of the impact," including the vulnerability of affected populations (§15126.2(a)). The California Air Resources Board (CARB) and OEHHA both require extra caution near high-risk groups.

Requested Action:
Amend the HRA to identify and map medically vulnerable populations based on available census and health data. Where present, apply more conservative receptor modeling and propose additional health-protective mitigation.

Community Impact:
Ignoring medically vulnerable residents near the project erases the lived reality of many families. This is an environmental justice issue as well as a CEQA violation.

Comment 35: Inadequate Air Quality Modeling Near Sensitive Receptors

Reference: DEIR Chapter 4.3 – Air Quality

Issue Summary:
The DEIR's air dispersion modeling assumes receptor distances and terrain that fail to reflect the true proximity of sensitive residential receptors. Specifically, the modeling grid does not include receptor points along the shared wall with The Meadows, despite the project's truck route and loading docks being less than 100 feet from that location. This omission materially understates local PM2.5 concentrations and cancer risk.

CEQA Analysis:
I-21-36
Under CEQA Guidelines §15126.2(a), the EIR must disclose and evaluate significant impacts on human health, particularly at sensitive receptor locations. The California Air Resources Board (CARB) guidance requires receptor placement at the fenceline when residential communities are within 500 feet of diesel sources. The DEIR's air model violates CEQA and CARB siting guidance by excluding worst-case exposure locations, thereby masking significant health risks.

Requested Action:
Revise the air quality and HRA modeling to include receptor points along the actual property boundary with The Meadows. Recalculate PM2.5 concentration, cancer burden, and chronic hazard index using refined grid resolution and fence-line receptor locations.

Community Impact:
Families, children, and seniors living in The Meadows are among the closest populations to the warehouse's diesel activity. By excluding their homes from the air quality model, the DEIR fails to disclose risks to those most vulnerable. This undermines the community's ability to assess and respond to long-term health hazards.

Comment 36: No Evaluation of Air Quality Buffer Zone for Nearby Homes

Reference: DEIR Chapter 4.3 – Air Quality; Appendix C – Air Quality and Health Risk Assessment
I-21-37

Issue Summary:
The DEIR does not evaluate whether a physical or operational buffer zone is needed between high-intensity diesel activity and adjacent residences. CARB recommends a 500-

foot buffer between warehouse truck operations and homes, yet this project places docks and circulation areas less than 100 feet from The Meadows property line.

CEQA Analysis:
CEQA requires that lead agencies incorporate regulatory agency recommendations and best practices (§15126.4(a)(1)(D)). The failure to analyze a buffer zone contradicts CARB's Air Quality and Land Use Handbook (2005) and OEHHA's exposure modeling guidance.

I-21-37 cont.

Requested Action:
Add a mitigation measure establishing a 500-foot operational buffer or equivalent emission control zone. Where infeasible, require full enclosure of docks and electric truck infrastructure to minimize diesel PM dispersion toward residences.

Community Impact:
Without a protective buffer, residents — especially children and elderly — face unnecessary health risk from airborne toxics. This should never be allowed next to homes.

Comment 37: Failure to Analyze Long-Term Diesel PM Exposure for Outdoor Recreation Areas

Reference: DEIR Chapter 4.3 – Air Quality

Issue Summary:
The DEIR models indoor residential risk but fails to account for chronic exposure in outdoor locations like backyards, patios, and playgrounds in The Meadows. Diesel PM risk is highest where people spend time outdoors, especially children and seniors.

I-21-38

CEQA Analysis:
CEQA requires that EIRs analyze sensitive receptor locations where people actually reside and recreate. Outdoor exposure zones must be explicitly modeled and disclosed (§15126.2, OEHHA 2015 guidance).

Requested Action:
Re-run the HRA with receptor nodes representing typical outdoor use locations in The Meadows — including play areas and walking paths — and report cancer risk, hazard index, and recommended setbacks.

Community Impact:
Backyards and outdoor spaces are where families relax, host guests, and let children play. Ignoring these areas excludes real-world health exposures from the City's analysis.

Comment 38: Incomplete Odor Impact Analysis from Trash, Diesel, and Operations

Reference: DEIR Chapter 4.3 – Air Quality

Issue Summary:
The DEIR claims that "no significant odor impacts are anticipated" but offers no odor modeling or operational odor control plan. Trash bins, diesel truck activity, and loading dock operations are all known odor sources and are proposed within 100 feet of homes.

I-21-39

CEQA Analysis:
CEQA requires a good-faith effort to analyze odors where residences are nearby (Appendix G, §15126.2). Many agencies apply a 500-foot buffer between odor-generating uses and residential zones. The DEIR's conclusory statement is insufficient.

Requested Action:
Provide an odor impact assessment, including odor source inventory, expected intensity/duration, and complaint response procedures. Consider odor control equipment and mandatory trash enclosure design.

Community Impact:
Uncontrolled odors reduce residents' ability to use outdoor space, open windows, or sleep comfortably. This everyday impact deserves meaningful attention and mitigation.

Comment 39: No Analysis of Odor from Trash Compactors or Organic Waste Bins

Reference: DEIR Chapter 4.3 – Air Quality

Issue Summary:

I-21-40

The DEIR states that odor impacts are "less than significant" but does not evaluate site-specific odor sources such as trash compactors, uncovered bins, or organic waste (as required under SB 1383). Without proper enclosure and pickup frequency, these can cause localized odor issues.

CEQA Analysis:
CEQA requires agencies to identify and mitigate odor-generating sources near sensitive receptors (§15126.2, Appendix G). Relying on general statements without site-specific mitigation is not compliant.

Requested Action:
Specify odor control measures for trash areas, including compactor enclosures, daily pickup for organic bins, and mandatory sealing of waste containers.

I-21-40 cont.

Community Impact:
No resident wants their backyard to smell like a loading dock. These are small but very real quality-of-life issues — and easy to fix if addressed early.

Comment 40: Failure to Disclose Truck Idling Emissions in Health Risk Assessment

Reference: Appendix C – Air Quality and Health Risk Assessment

Issue Summary:
The HRA omits diesel emissions from trucks idling at loading docks and staging areas. While the DEIR includes average vehicle trip emissions, it does not capture localized idling, which is a major source of toxic diesel PM near sensitive receptors. The omission leads to underestimation of acute and chronic health risks.

I-21-41

CEQA Analysis:
CEQA requires a full accounting of a project's reasonably foreseeable emissions (CEQA §15126.2(a), §15144). CARB and the Office of Environmental Health Hazard Assessment (OEHHA) guidance both identify diesel idling as a priority risk source. The DEIR's failure to include site-specific idling patterns violates CEQA's disclosure and analysis mandates.

Requested Action:
Amend the HRA to include truck idling emissions using site-specific assumptions for staging duration, frequency, and distance from residences. Include this in the emissions table and recalculate risk metrics accordingly.

Community Impact:
Without accounting for idling, the DEIR masks peak exposure events for nearby residents — especially children and elderly residents living directly behind the site. These moments of prolonged idling pose significant health risks and deserve full analysis.

Comment 41: No Mitigation for Wind-Driven Dust During High Gust Conditions

I-21-42

Reference: Appendix C – Air Quality and Health Risk Assessment

Issue Summary:
The DEIR models fugitive dust emissions during construction using average wind speed

conditions, but fails to evaluate high-wind events (e.g., Santa Ana winds) common in Orange County. Without emergency dust control protocols, such events can carry particulate matter into residential zones.

CEQA Analysis:
CEQA requires modeling of reasonably foreseeable worst-case conditions (§15126.2, Appendix G). SCAQMD Rule 403 emphasizes the importance of dust control on windy days. The absence of site-specific wind mitigation violates this guidance.

I-21-42 cont.

Requested Action:
Add a mitigation measure requiring enhanced dust control (e.g., water trucks, tarping, work stoppage) when sustained winds exceed 25 mph. Provide a wind contingency plan approved by SCAQMD or a certified air consultant.

Community Impact:
The Meadows homes are within direct wind paths. One poorly controlled dust event could cause respiratory distress, property dusting, or health effects — and should not be left to chance.

Comment 42: Omission of Diesel Back-Up Generator Emissions in Air Modeling

Reference: Appendix C – Air Quality and Health Risk Assessment

Issue Summary:
The DEIR briefly references diesel generators for emergency power but does not include emissions from testing or backup operations in the air quality or health risk modeling. These sources can release substantial PM and NOx near homes when operated.

I-21-43

CEQA Analysis:
CEQA requires modeling of all foreseeable emissions sources (§15126.2, Appendix G). Diesel backup power is a regulated emissions category under SCAQMD Rule 1470, and its omission violates disclosure obligations.

Requested Action:
Revise the emissions inventory and HRA to include generator test cycles, maintenance emissions, and emergency use scenarios. Include diesel particulate filters (DPFs) as a required mitigation measure.

Community Impact:
Generators running near homes — even once a month — can release concentrated diesel exhaust. This impact is entirely foreseeable and must be addressed up front.

Comment 43: Health Risks to Outdoor Workers Not Addressed in Air Quality Modeling

Reference: Appendix C – Air Quality and Health Risk Assessment

Issue Summary:
The DEIR's air quality and health risk assessment (HRA) models only residential receptors but omits evaluation of on-site outdoor workers, such as security personnel, loading dock staff, and groundskeepers. These individuals may spend hours daily in diesel-impacted zones.

CEQA Analysis:
I-21-44 CEQA requires disclosure of impacts to all sensitive receptors — including future on-site workers (§15126.2, Appendix G). While occupational standards may apply, outdoor worker exposure to toxic air contaminants (TACs) should still be modeled as a cumulative and foreseeable risk.

Requested Action:
Add receptor points for on-site personnel in TAC dispersion modeling. Include analysis of chronic and acute exposure at loading docks, truck courts, and security perimeters.

Community Impact:
While residents are important, so are the people who will work at this site. Ignoring their exposure risks downplays the full environmental burden and contradicts CEQA's goal of comprehensive disclosure.

Comment 44: Inadequate Assessment of Cumulative Cancer Burden from Truck Corridors

Reference: Appendix C – Air Quality and Health Risk Assessment

Issue Summary:
I-21-45 The HRA models project-specific cancer risk but does not evaluate cumulative cancer burden from existing truck routes (e.g., Bake Parkway, Rancho Parkway) already serving multiple industrial centers. There is no multi-source receptor modeling.

CEQA Analysis:
CEQA §15130 requires analysis of cumulative health risks. OEHHA's 2015 HRA guidelines state that multiple diesel sources within a receptor zone must be modeled cumulatively. The DEIR's approach omits background mobile source risk.

Requested Action:
Expand the HRA to include cumulative cancer burden from all diesel truck routes within 1 km of the project, including existing warehouses. Include a map of cumulative receptor zones and add up individual risk contributions.

I-21-45 cont.

Community Impact:
The Meadows already experiences truck traffic from other facilities. A cumulative cancer risk over 10 in a million — from multiple sources — could trigger regulatory thresholds and must be disclosed.

Comment 45: Diesel Exhaust Dispersion Modeling Does Not Account for Crosswinds

Reference: Appendix C – Air Quality and Health Risk Assessment

Issue Summary:
The air quality modeling assumes default meteorological patterns but fails to account for crosswinds from canyon airflow and afternoon gusts, which can blow diesel PM horizontally into nearby homes. Without localized wind pattern simulation, real exposure may be undercounted.

I-21-46

CEQA Analysis:
CEQA requires air modeling to use localized, accurate meteorological data and account for sensitive receptor impacts (§15126.2(a), OEHHA 2015 Guidance). Simplified vertical plume models are insufficient when lateral dispersion is likely.

Requested Action:
Revise the HRA to use high-resolution wind rose data and simulate crosswind diesel plume drift from truck courts into The Meadows' residential area. Adjust receptor impact zones accordingly.

Community Impact:
Air doesn't rise and vanish — it flows laterally, especially during windy afternoons. The DEIR's modeling shortcuts downplay real-world exposure and fail to protect nearby residents.

Comment 46: Omission of Health Risk Assessment for Nearby Schools and Daycares

I-21-47

Reference: Appendix C – Air Quality and Health Risk Assessment

Issue Summary:
The HRA does not include receptor locations or cancer risk estimates for local schools, child care centers, or playgrounds within 0.5 miles of the project. Children are among the most vulnerable to diesel PM and long-term exposure.

CEQA Analysis:
CEQA requires analysis of sensitive receptors (CEQA §15126.2 and OEHHA guidelines). The California Supreme Court has recognized the need to identify and evaluate impacts on vulnerable populations when siting industrial projects (*Communities for a Better Environment v. South Coast AQMD*).

I-21-47 cont.

Requested Action:
Amend the HRA to include receptor points at all nearby schools and daycares. Include estimated cancer risk, hazard index, and mitigation measures for child-specific exposure factors.

Community Impact:
Children walk, bike, and play outdoors near this project every day. Omitting them from the health risk model ignores the very people CEQA was written to protect.

Biological Resources

Comment 47: DEIR Omits Impact on Potential Wildlife Movement Corridor

Reference: DEIR Chapter 4.4 – Biological Resources; Appendix D – Biological Resources Report

I-21-48

Issue Summary:
The DEIR and Appendix D mention regional wildlife movement but do not analyze whether the project blocks any corridor or contributes to habitat fragmentation. The site is within a half-mile of Whiting Ranch and other open spaces, and may act as a pinch point for terrestrial species movement.

CEQA Analysis:
Appendix G of the CEQA Guidelines requires evaluation of habitat connectivity and wildlife corridors. Courts have affirmed the need to study indirect fragmentation impacts even on urban fringe parcels (*Center for Biological Diversity v. County of San Bernardino*).

Requested Action:
Assess whether the project disrupts species movement from the Santiago foothills to

regional parkland. If so, include wildlife-friendly fencing, light shielding, and vegetated buffer zones.

I-21-48 cont.

Community Impact:
The residents of The Meadows value natural open space. Fragmenting wildlife habitat not only harms species — it also degrades the ecological identity of the community.

Comment 48: DEIR Does Not Assess Bird Strike Risk from Nighttime Lighting

Reference: DEIR Chapter 4.4 – Biological Resources

Issue Summary:
The DEIR does not evaluate the risk that warehouse lighting will disorient nocturnal birds, which use celestial navigation and are attracted to bright artificial lights. This is a well-documented phenomenon, particularly in migratory corridors.

CEQA Analysis:
I-21-49
CEQA requires that wildlife hazards be assessed where lighting may cause mortality or behavioral changes (§15126.2(a), Appendix G). Several agencies, including the California Department of Fish and Wildlife, recommend "dark sky" standards to reduce bird strike risk.

Requested Action:
Include mitigation to reduce upward light spillage, such as full cut-off LED fixtures, motion sensors, and reduced lumen output between 10 p.m. and sunrise. Conduct a lighting hazard analysis in coordination with CDFW.

Community Impact:
The Meadows backs into open sky. At night, many residents enjoy seeing birds or stargazing — and want assurance that this project won't contribute to wildlife deaths.

Comment 49: Biological Resources Section Omits Tree Removal and Nesting Bird Protections

I-21-50

Reference: DEIR Chapter 4.4 – Biological Resources

Issue Summary:
The DEIR acknowledges vegetation removal but fails to disclose the number or type of trees being removed, nor does it address mitigation for nesting birds under the Migratory Bird Treaty Act (MBTA) or California Fish and Game Code §3503.

CEQA Analysis:
CEQA requires disclosure of impacts to biological resources, including nesting birds and native trees (§15125, §15126.4). Mitigation must be specific and enforceable. Failure to quantify tree impacts or require nesting surveys violates these requirements.

I-21-50 cont.

Requested Action:
Revise the biological resources section to specify tree removal count and species. Require pre-construction nesting bird surveys within the nesting season and buffer zones around active nests.

Community Impact:
Bird activity is common along the boundary between the project and The Meadows. Improper removal could result in habitat destruction or wildlife mortality. Transparency and mitigation matter to residents who value open space and biodiversity.

Culture Resources

Comment 50: No Evaluation of Cultural Landscape Impacts

Reference: DEIR Chapter 4.5 – Cultural Resources

Issue Summary:
The DEIR evaluates archaeological and historic resources but does not consider whether the proposed warehouse would impact the cultural landscape or long-standing sense of community identity in the area. While the site is industrial, the region has cultural significance tied to ranching, open space, and evolving suburban settlement.

I-21-51

CEQA Analysis:
CEQA recognizes “cultural landscapes” as potentially significant cultural resources (Public Resources Code §21084.1; §15064.5(a)(3)). Failure to consult with local historical societies or tribal groups on landscape-level values omits an important CEQA dimension.

Requested Action:
Consult with local historical and tribal representatives to determine whether cultural landscape features or community character are impacted. If so, recommend mitigation (e.g., interpretive signage, design integration of historic motifs).

Community Impact:
Industrial warehouse walls replacing open foothill views erase more than scenery — they sever a link to place and memory that residents have lived with for decades.

Energy

Comment 51: Failure to Consider Energy Use from 24/7 Refrigerated Warehouse Operations

Reference: DEIR Chapter 4.6 – Energy

Issue Summary:
The DEIR models energy demand using default warehouse parameters but fails to disclose that the tenant may include cold storage or refrigerated logistics, which drastically increases electricity and fuel use. This underestimates peak demand and associated GHG impacts.

I-21-52

CEQA Analysis:
CEQA §15126.2 and Appendix F require analysis of energy consumption patterns, including operational assumptions. Where project design may include high-load uses, they must be analyzed explicitly (*California Clean Energy Committee v. City of Woodland*).

Requested Action:
Update the energy section to include scenarios for refrigerated operations, with revised electricity and backup generator modeling. Disclose peak load and demand charges to evaluate sustainability.

Community Impact:
Energy-intensive operations increase grid strain and emissions. If backup generators are used during outages, the result could be diesel emissions not captured in the air analysis — right next to homes.

Comment 52: Electric Grid Capacity for EV Infrastructure Not Evaluated

Reference: DEIR Chapter 4.6 – Energy

Issue Summary:
The DEIR encourages future EV truck charging and solar panels but does not assess whether the regional electric grid has capacity to serve the site's long-term electrification needs. It also omits discussion of utility upgrades or peak load management strategies.

I-21-53

CEQA Analysis:
Under Appendix F and §15126.2(b), CEQA requires evaluation of energy system capacity and efficiency. If a project proposes future electrification, it must also analyze grid reliability and cumulative demand implications.

Requested Action:
Assess Southern California Edison's grid capacity at the project site. Provide a load profile for full EV truck operation and model grid resilience under worst-case demand.

I-21-53 cont.

Community Impact:
If grid demand spikes without planning, nearby neighborhoods could face brownouts, infrastructure strain, or deferred service upgrades. Electrification is only sustainable if it's responsibly managed.

Comment 53: No Disclosure of Green Infrastructure or Sustainable Design Features

Reference: DEIR Chapter 4.6 – Energy

Issue Summary:
The DEIR omits any discussion of green building practices, LEED standards, or sustainable construction and operational features such as solar panels, rainwater harvesting, or electric vehicle (EV) infrastructure. This undermines the City's stated sustainability goals.

I-21-54

CEQA Analysis:
Appendix F of the CEQA Guidelines encourages analysis of green building strategies, energy conservation, and water efficiency. Their omission may result in the loss of mitigation opportunities and fails to disclose feasible energy reductions.

Requested Action:
Add a section summarizing the project's green design features or explaining their absence. Require Tier 2 CALGreen compliance or LEED Silver minimum certification as mitigation.

Community Impact:
Without green infrastructure, the project imposes more pollution, waste, and energy demand than necessary. This is especially unacceptable for a community already burdened by multiple environmental risks.

Geology and Soils

Comment 54: Geotechnical Hazards from Soil Liquefaction Not Fully Mitigated

I-21-55

Reference: Appendix E – Geotechnical Investigation and Infiltration Report

Issue Summary:
The Geotechnical Investigation identifies portions of the site as having liquefaction-prone

soils due to shallow groundwater and alluvial material. However, the DEIR does not explain how foundation design will mitigate this hazard or whether future tenants will be subject to post-construction settlement, risking structural failure.

CEQA Analysis:

I-21-55 cont.

CEQA requires disclosure of geologic hazards and mitigation where feasible (§15126.2(a); Appendix G, Item VI(a)). The DEIR refers to standard engineering practices but provides no geotechnical-specific mitigation measures tailored to the site's known liquefaction risks.

Requested Action:

Include a specific liquefaction mitigation plan, foundation reinforcement design, and soil stabilization protocols based on the site's boring log data. Require peer review of final structural drawings by a licensed geotechnical engineer.

Community Impact:

A structural failure during an earthquake could endanger workers and release hazardous materials or fire hazards near residential zones. This is preventable with full geotechnical disclosure and mitigation.

Comment 55: No Analysis of Soil Off-Gassing or Vapor Intrusion Risks

Reference: Appendix F – Phase I Environmental Site Assessment

Issue Summary:

I-21-56

The Phase I ESA notes historical industrial activity in the project vicinity, yet the DEIR fails to evaluate whether any subsurface contamination could result in soil vapor migration or off-gassing into future buildings. Vapor intrusion is a known risk in industrial-to-industrial reuse without adequate subsurface investigation.

CEQA Analysis:

CEQA requires evaluation of health risks from hazardous materials, including those below ground (§15126.2(a); Appendix G). Vapor intrusion assessments are standard best practice per DTSC and US EPA guidelines and should have been completed or ruled out based on Phase II sampling — which is absent.

Requested Action:

Conduct a vapor intrusion risk screening and, if needed, a Phase II ESA. Require vapor barriers or sub-slab depressurization if contaminant levels exceed risk thresholds. Delay final approval pending confirmation of subsurface safety.

I-21-56 cont.

Community Impact:
Unidentified chemical vapors could affect warehouse workers or off-site residents if migration occurs. It's not enough to say the site "looks clean" — proper testing and disclosure are essential.

Greenhouse Gas Emissions

Comment 56: Project Lifetime Emissions Inconsistently Represented in GHG Analysis

Reference: DEIR Chapter 4.8 – Greenhouse Gas Emissions

Issue Summary:
I-21-57 The DEIR reports GHG emissions for a single year but does not evaluate total emissions over the project's expected 50+ year operational life. Claims of "net zero" or sustainability are unsupported by a cumulative analysis.

CEQA Analysis:
CEQA requires analysis of long-term and cumulative impacts (§15130). Courts have determined that projects with significant GHG impacts must evaluate long-term footprint and disclose feasible mitigation across a reasonable planning horizon.

Requested Action:
Recalculate and report total GHG emissions over 30-, 50-, and 75-year timelines. Adjust mitigation accordingly or disclose why long-term offsets are not required under City or regional policies.

Community Impact:
The community will live with this facility for generations. A one-year snapshot hides the true scale of its climate impact — and violates CEQA's disclosure principles.

Comment 57: No Discussion of Resilience or Climate Adaptation for Project Infrastructure

Reference: DEIR Chapter 4.8 – Greenhouse Gas Emissions

I-21-58 **Issue Summary:**
The DEIR assesses GHG emissions but does not address climate resilience or adaptation. This omission fails to explain whether the project can withstand future climate conditions such as extreme heat, flooding, supply disruptions, or regulatory change.

CEQA Analysis:
CEQA requires analysis of a project's potential to exacerbate environmental hazards and its vulnerability to climate change impacts (§15126.2(a), PRC §21083.3). A GHG-focused analysis alone is insufficient without a resilience or adaptation component.

I-21-58 cont.

Requested Action:
Include a climate adaptation subchapter or appendix evaluating the project's vulnerability to extreme heat, drought, regulatory evolution (e.g., CARB zero-emission mandates), and freight industry transition. Recommend adaptation strategies (e.g., heat-resilient landscaping, battery storage).

Community Impact:
Residents should not inherit a stranded or failing industrial site 20 years from now. Building resilience protects not only investors, but surrounding communities as well.

Comment 58: Lack of Enforceable Mitigation for Greenhouse Gas (GHG) Emissions

Reference: DEIR Chapter 4.7 – Greenhouse Gas Emissions

Issue Summary:
While the DEIR identifies GHG emissions and includes mitigation measures (e.g., use of Tier 4 equipment, high-efficiency lighting), none are tied to specific enforceable conditions or performance targets. The DEIR does not explain how mitigation will be monitored, reported, or verified after construction and during operations.

I-21-59

CEQA Analysis:
CEQA §15126.4(c) requires that GHG mitigation be quantifiable, enforceable, and monitored. Generic or advisory language without clear metrics and oversight does not satisfy CEQA, especially when emissions are considered significant but "reduced."

Requested Action:
Revise the GHG mitigation section to include quantifiable reduction targets (e.g., MT CO_2e/year), a monitoring schedule, and a responsible agency for enforcement. Include penalties or correction procedures for noncompliance.

Community Impact:
If GHG mitigation exists only on paper, the warehouse may operate far above its stated emissions levels. Residents of The Meadows deserve enforceable safeguards, not unverifiable claims.

Comment 59: Greenhouse Gas (GHG) Emissions Thresholds Do Not Reflect Local Climate Action Plan

Reference: DEIR Chapter 4.8 – Greenhouse Gas Emissions

Issue Summary:
The DEIR applies regional GHG thresholds from SCAQMD but does not evaluate the project against the City of Lake Forest's own Climate Action Plan (CAP) targets. This omission fails to disclose whether the project aligns with the City's adopted climate goals for transportation, energy use, and industrial development.

CEQA Analysis:
I-21-60 CEQA Guidelines §15064.4(b) require lead agencies to consider consistency with "adopted plans or regulations for the reduction of GHG emissions." Courts have held that EIRs must explain whether a project aligns with a jurisdiction's CAP (*Golden Door Properties v. County of San Diego*).

Requested Action:
Revise the GHG analysis to evaluate project emissions against the Lake Forest CAP. If no consistency exists, identify mitigation measures or CAP amendments and discuss their feasibility.

Community Impact:
The Meadows community expects the City to enforce its own climate targets. Letting industrial developers bypass local climate rules undermines public trust and regional climate resilience.

Hazards and Hazardous Materials

Comment 60: Inadequate Analysis of Hazardous Materials Spill Risk and Response

I-21-61 **Reference:** DEIR Chapter 4.9 – Hazards and Hazardous Materials

Issue Summary:
The DEIR notes that hazardous materials may be used on-site but fails to assess the risk of accidental spills during delivery, storage, or disposal — particularly in proximity to residential neighborhoods and storm drains. There is no site-specific spill response plan disclosed, nor any coordination described with local emergency services.

CEQA Analysis:
CEQA Guidelines Appendix G (Item IX(a)–(d)) require evaluation of potential for accidental release of hazardous materials and emergency response adequacy. The absence of a Hazardous Materials Business Plan (HMBP) or incident modeling violates CEQA's requirement to analyze reasonably foreseeable hazards.

Requested Action:
I-21-61 cont.
Include a spill scenario matrix (type, quantity, location, response time) and require preparation and public disclosure of a complete HMBP prior to project approval. Coordinate with OCFA and ETWD on joint response protocols.

Community Impact:
A chemical or fuel spill on-site or along ingress/egress routes could reach storm drains or impact nearby homes. The Meadows residents deserve full transparency and a tested response plan before approval.

Comment 61: DEIR Omits Hazardous Waste Hauling Routes and Spill Risk

Reference: DEIR Chapter 4.9 – Hazards and Hazardous Materials

Issue Summary:
The DEIR discusses hazardous materials storage but omits details about hazardous waste hauling routes or potential spill risks during off-site transport. Industrial tenants are likely to generate hazardous waste requiring removal under DOT and DTSC regulations — and this transport will pass through local streets.

I-21-62

CEQA Analysis:
CEQA requires analysis of reasonably foreseeable transport-related impacts (§15126.2(a)). Courts have upheld the need for haul route disclosure and risk evaluation, especially when toxic materials may travel near schools or residential areas.

Requested Action:
Identify likely waste transport routes and assess risks for spills, collisions, or exposure. Require containment procedures, emergency response training, and routing that avoids proximity to homes, schools, or parks.

Community Impact:
A hazardous spill on a residential road would create panic and risk. The City must know what's moving through our neighborhoods and how it will be made safe.

Comment 62: Lack of Analysis on Fueling Infrastructure and Mobile Fuel Truck Impacts

Reference: DEIR Chapter 4.9 – Hazards and Hazardous Materials

Issue Summary:
The DEIR fails to disclose whether on-site truck fueling stations or mobile fueling services will be used. These facilities increase the risk of fuel spills, fire, and ground contamination. Mobile fueling trucks also increase VMT and introduce new routing impacts.

I-21-63

CEQA Analysis:
CEQA requires that all foreseeable activities tied to a project be analyzed (§15126.2, §15124). Fueling infrastructure is a standard operational feature for logistics hubs and must be explicitly evaluated.

Requested Action:
Disclose whether permanent fueling stations or mobile fuel trucks will be used. Model their emissions, spill risk, and routing impacts. Require secondary containment and stormwater protection for any fueling activity.

Community Impact:
A single diesel spill can contaminate soil and affect stormwater systems. The City and residents deserve assurance that fueling will be done safely, or not allowed on-site at all.

Comment 63: Fire Hazard from On-Site Diesel Fuel Storage Not Evaluated

Reference: DEIR Chapter 4.9 – Hazards and Hazardous Materials

Issue Summary:
The DEIR fails to analyze fire risks associated with on-site diesel fuel storage for emergency generators and heavy truck operations. Diesel is classified as a combustible liquid, and without detailed fire load analysis or fuel containment design, this constitutes a major oversight.

I-21-64

CEQA Analysis:
Appendix G of the CEQA Guidelines (Item IX(b)) requires analysis of fire risk related to hazardous materials use or storage. Projects located near residential areas and open space must assess ignition risk and suppression capability. This analysis is missing from both the DEIR and Appendix I (OCFA Letter).

Requested Action:
Provide a fuel storage plan including maximum quantities, tank construction standards (e.g., UL-142), fire containment systems, and setback distances. Coordinate with OCFA and revise the Fire Safety section accordingly.

I-21-64 cont.

Community Impact:
If diesel fuel storage is mishandled or breached during an earthquake or fire, it could ignite and threaten nearby homes in The Meadows. This hazard must be disclosed and mitigated before project approval.

Comment 64: No Analysis of Worker Safety Impacts from Warehouse Operations

Reference: DEIR Chapter 4.9 – Hazards and Hazardous Materials

Issue Summary:
The DEIR mentions hazardous material storage but does not analyze safety risks to warehouse employees from diesel exhaust, truck accidents, or chemical spills. Worker safety is a foreseeable operational risk in this setting.

I-21-65

CEQA Analysis:
Although CEQA typically focuses on off-site receptors, agencies must disclose significant on-site environmental hazards that could harm future site occupants (§15126.2(a), Appendix G). Ignoring worker exposure in an intensive logistics facility is a glaring omission.

Requested Action:
Include a safety risk analysis for employees, including truck and forklift collision risk, indoor air exposure, and chemical handling protocols. Require engineering controls and OSHA consultation as part of mitigation.

Community Impact:
Unsafe working conditions affect everyone — from employee well-being to community reputation. A transparent and safe project is in the public's interest.

Comment 65: No Discussion of PFAS Risk from Construction Materials and Fire Suppression Systems

I-21-66

Reference: DEIR Chapter 4.9 – Hazards and Hazardous Materials; Appendix E – Geotechnical Investigation and Infiltration Report

Issue Summary:
The DEIR does not evaluate whether materials used in construction (e.g., sealants,

coatings, waterproofing) or fire suppression systems may contain PFAS ("forever chemicals") — which can contaminate soil and groundwater and pose long-term health risks.

CEQA Analysis:

I-21-66 cont.

CEQA requires identification of hazardous materials risks and potential releases to soil or water (§15126.2, Appendix G). Given growing regulatory scrutiny of PFAS, omitting this analysis constitutes a significant legal and scientific oversight.

Requested Action:

Screen proposed materials and fire systems for PFAS content. If applicable, include mitigation requiring PFAS-free product substitution and long-term soil/water monitoring.

Community Impact:

Once PFAS enters the water table, it's nearly impossible to remove. The community should not face exposure to a chemical class now recognized as a top-tier public health threat.

Comment 66: Failure to Address Emergency Preparedness Drills and Community Coordination

Reference: DEIR Chapter 4.9 – Hazards and Hazardous Materials

Issue Summary:

The DEIR lacks any discussion of how the warehouse project will coordinate with the City, OCFA, or residents in conducting emergency preparedness drills for earthquakes, fires, or hazardous spills. Industrial sites adjacent to homes require robust joint preparedness strategies — especially in high-risk Southern California.

I-21-67

CEQA Analysis:

CEQA §15126.2(a) and Appendix G require evaluation of significant risk and emergency response needs. Preparedness drills are standard mitigation measures in EIRs for high-risk facilities, particularly those near residential areas or with on-site hazardous materials.

Requested Action:

Add a mitigation measure requiring annual emergency preparedness drills in coordination with OCFA and City staff. Notify The Meadows and surrounding neighborhoods of procedures, alerts, and safety zones.

Community Impact:

In a real emergency, coordination delays cost lives. Without proactive drills, residents will be left confused, unprotected, and unprepared. This planning failure must be corrected now.

Comment 67: No Emergency Egress Modeling for Adjacent Residential Neighborhoods

Reference: DEIR Chapter 4.9 – Hazards and Hazardous Materials; Appendix I – OCFA Letter

Issue Summary:
The DEIR discusses fire department access but does not model emergency egress for residents of The Meadows and nearby neighborhoods in the event of a major fire, chemical spill, or traffic-blocking incident. Warehouse traffic could obstruct outbound lanes during evacuation scenarios.

I-21-68

CEQA Analysis:
CEQA requires analysis of emergency evacuation and access (§15126.2(a), Appendix G). Where a project could block or impair evacuation routes, it must be disclosed and mitigated.

Requested Action:
Model emergency egress times and routing for The Meadows assuming full warehouse traffic volumes. Include emergency lane preservation and contingency planning as enforceable mitigation.

Community Impact:
In a wildfire or chemical emergency, seconds matter. The City must not approve a project that compromises neighborhood evacuation without rigorous modeling and safeguards.

Comment 68: No Analysis of Industrial Fire Smoke Drift into Residential Neighborhoods

Reference: DEIR Chapter 4.9 – Hazards and Hazardous Materials; Appendix I – OCFA Letter

Issue Summary:

I-21-69

The DEIR discusses fire response times but does not analyze the drift and dispersion of smoke from a potential industrial fire — especially involving hazardous materials — into nearby homes. Smoke from warehouse fires can contain PM, VOCs, and carcinogens and drift for miles.

CEQA Analysis:
CEQA requires that reasonably foreseeable hazards be evaluated for both direct and indirect impacts (§15126.2(a)). Smoke dispersion is a quantifiable exposure pathway, not a speculative risk.

Requested Action:
Model smoke drift under typical wind conditions and identify evacuation, notification, and shelter-in-place procedures for The Meadows. Require chemical-specific fire suppression training and coordination with South Coast AQMD.

I-21-69 cont.

Community Impact:
If a warehouse fire exposes residents to airborne toxics with no warning or protection plan, the City will be liable — and CEQA offers the tool to prevent that today.

Hydrology and Water Quality

Comment 69: Inadequate Analysis of Stormwater Runoff into Downstream Drainage Channels

Reference: DEIR Chapter 4.10 – Hydrology and Water Quality; Appendix G – Water Quality Management Plan and Drainage Report

Issue Summary:
The DEIR asserts that the proposed warehouse site will not increase off-site runoff beyond existing conditions but fails to model the potential overloading of downstream drainage infrastructure. The Appendix G WQMP only analyzes on-site stormwater collection and does not evaluate downstream hydrologic capacity or potential erosion impacts to natural channels during peak flow conditions.

I-21-70

CEQA Analysis:
CEQA Guidelines §15126.2(a) and Appendix G require disclosure of flood risks and impacts on existing drainage patterns. By failing to model downstream conveyance systems or cumulative flow impacts from adjacent warehouses, the DEIR does not comply with CEQA's requirements for impact disclosure.

Requested Action:
Expand the hydrology analysis to include downstream capacity modeling for the combined IPT and nearby Western Realco projects. Provide 10- and 100-year post-construction runoff estimates and mitigation for any flow increases or erosion risks.

Community Impact:
The Meadows is downhill from the project site. If new impervious surfaces overload drainage infrastructure, residents may face yard flooding, street pooling, or storm drain overflows — especially during intense storm events.

Comment 70: Incomplete Drainage and Flooding Analysis for Downstream Properties

Reference: Appendix G – Water Quality Management Plan and Drainage Report

Issue Summary:
The DEIR's hydrology section discusses on-site detention but does not evaluate the impact of concentrated runoff on downstream neighborhoods, including those downhill of the project site. Flooding risk from impervious surfaces and altered flow regimes is not quantified beyond the project boundary.

I-21-71

CEQA Analysis:
CEQA §15126.2(a) requires disclosure of off-site impacts, including potential flooding or drainage system overloading. The failure to study downstream impacts is a common EIR deficiency and has been cited in multiple CEQA cases (e.g., *Neighbors for Smart Rail*).

Requested Action:
Expand the hydrologic analysis to model peak flows beyond project limits, particularly during 100-year storm events. Identify mitigation for any downstream impact zones, including public infrastructure and residential areas.

Community Impact:
If runoff increases flood risk to neighboring properties, The Meadows and surrounding communities will bear the cost and risk. This impact must be disclosed and mitigated — not buried.

Land Use and Planning

Comment 71: Inadequate Discussion of Land Use Compatibility with Surrounding Residential Zoning

Reference: DEIR Chapter 4.11 – Land Use and Planning

I-21-72

Issue Summary:
The DEIR asserts that the warehouse project is consistent with City zoning but does not address the incompatibility of 24/7 industrial use immediately adjacent to single-family residential neighborhoods. There is no analysis of General Plan policies protecting neighborhood character, health, or safety.

CEQA Analysis:
CEQA §15125(d) requires EIRs to evaluate a project's consistency with applicable land use

plans and policies. Courts have ruled that land use compatibility is not satisfied by zoning alone — it requires consideration of actual operational conflict (*Friends of Lagoon Valley v. City of Vacaville*).

Requested Action:

I-21-72 cont.

Revise the DEIR to include a compatibility matrix comparing project operations (noise, hours, lighting, traffic) against General Plan goals for residential protection and buffering.

Community Impact:

Residents of The Meadows are not just adjacent — they are separated by a block wall. A true compatibility assessment would show this warehouse is out of scale and character with the surrounding community.

Comment 72: Project Conflicts with Lake Forest General Plan Land Use Goals

Reference: DEIR Chapter 4.11 – Land Use and Planning

Issue Summary:

The DEIR asserts that the project is "consistent" with the General Plan without analyzing conflicts with key policies promoting residential protection, land use buffering, and neighborhood character preservation. For example, Policy LU-1.3 and LU-4.1 emphasize compatibility and land use transition — neither of which are satisfied here.

CEQA Analysis:

I-21-73

Under CEQA §15125(d), an EIR must describe and analyze inconsistencies with applicable plans. Courts have held that superficial claims of consistency without policy-by-policy evaluation are inadequate (*Friends of Lagoon Valley v. City of Vacaville*).

Requested Action:

Provide a matrix comparing the project to all applicable General Plan policies, including those related to buffer zones, neighborhood compatibility, and 24-hour use near residential. Address inconsistencies and offer mitigation or justification.

Community Impact:

Allowing this warehouse adjacent to The Meadows sets a dangerous precedent that ignores the City's own planning principles. The public has a right to see how and why policies are being bent or bypassed.

Comment 73: Lack of Analysis of Industrial Precedent for Surrounding Neighborhoods

Reference: DEIR Chapter 4.11 – Land Use and Planning

Issue Summary:
The DEIR evaluates this warehouse in isolation but does not acknowledge the precedent it sets for further industrial encroachment into residential buffers. This kind of land use conflict, once permitted, tends to expand.

I-21-74

CEQA Analysis:
CEQA requires consideration of indirect and reasonably foreseeable future impacts (§15126.2(d)). The DEIR fails to account for land use precedent-setting, which has long been recognized in environmental planning law.

Requested Action:
Add a cumulative planning impact discussion about precedent-setting for land use zoning, truck corridors, and industrial project approvals near existing housing.

Community Impact:
If this warehouse is approved, others will follow. The Meadows may be permanently bordered by warehouses, which will degrade residential character, air quality, and property value unless this concern is addressed now.

Comment 74: No Evaluation of Site Abandonment Risk or Long-Term Vacancy Impacts

Reference: DEIR Chapter 4.11 – Land Use and Planning

Issue Summary:
The DEIR assumes continuous and successful occupancy but does not evaluate the risk that the site may go partially or fully vacant due to market shifts, economic downturns, or obsolescence. Vacant industrial sites become hotspots for vandalism, blight, and reduced property values.

I-21-75

CEQA Analysis:
CEQA requires evaluation of reasonably foreseeable indirect effects (§15126.2(d)). If a project becomes functionally obsolete or abandoned, it may create new environmental, economic, and safety impacts — especially near residential zones.

Requested Action:
Include an analysis of vacancy and abandonment risk over a 25-year period. Require site

management protocols for underuse or closure, including perimeter security and landscape maintenance.

I-21-75 cont.

Community Impact:
Residents of The Meadows should not be left with a hulking, decaying warehouse if the project fails. The City must plan for responsible stewardship, not just speculative development.

Noise

Comment 75: Construction Vibration Impacts to Adjacent Residences Not Analyzed

Reference: DEIR Chapter 4.13 – Noise

Issue Summary:
The DEIR does not evaluate the potential for construction-related vibration impacts on adjacent homes in The Meadows, some of which are less than 100 feet from the project boundary. Heavy equipment (e.g., compactors, pile drivers) can cause structural damage or nuisance vibration exceeding federal and Caltrans thresholds.

CEQA Analysis:
I-21-76
CEQA requires analysis of both construction noise and vibration where adjacent sensitive receptors are present (Appendix G, Item XIII(d)). The omission of vibration monitoring, thresholds, or equipment-specific evaluation violates this standard.

Requested Action:
Perform a vibration assessment for typical construction equipment operating within 200 feet of homes. Adopt a vibration threshold (e.g., 0.2 in/sec PPV), monitor during peak activity, and cease work when exceedance occurs.

Community Impact:
Vibration can crack drywall, damage foundations, and trigger complaints — especially among elderly residents or those with medical sensitivities. This is preventable and must be transparently analyzed.

Comment 76: Construction Noise Impacts on Nearby Childcare Centers Not Evaluated

I-21-77

Reference: DEIR Chapter 4.13 – Noise

Issue Summary:
The DEIR discusses residential noise impacts but fails to identify or evaluate nearby childcare centers, which may be sensitive to prolonged daytime construction noise. Early childhood education centers are recognized as noise-sensitive receptors under CEQA.

CEQA Analysis:
CEQA Appendix G and §15126.2 require identification and protection of all sensitive receptors — including schools and childcare centers. Omitting this analysis violates both CEQA and general best practices for land use compatibility.

I-21-77 cont.

Requested Action:
Identify all licensed childcare centers within 0.5 miles and evaluate construction-period noise impacts. Apply enhanced noise mitigation (e.g., temporary sound walls, schedule adjustments) if impacts exceed thresholds.

Community Impact:
Young children are more sensitive to noise-induced stress and distraction. The City must ensure these facilities are identified and protected from harm.

Comment 77: Noise Impact Analysis Omits Effects on Shift Workers and Caregivers

Reference: DEIR Chapter 4.13 – Noise

Issue Summary:
The DEIR evaluates noise based on standard 7 a.m.–10 p.m. metrics but fails to consider shift workers, night nurses, caregivers, or others who rely on daytime sleep. Warehouse activity beginning at 5 a.m. or continuing past 10 p.m. may disrupt these vulnerable populations disproportionately.

I-21-78

CEQA Analysis:
CEQA requires analysis of sensitive receptor groups, not just average residents (§15126.2(a)). Courts have acknowledged that EIRs must consider unique vulnerabilities when analyzing health and nuisance impacts.

Requested Action:
Add a sub-section evaluating noise disruption to non-traditional schedules. Consider restrictions on early morning truck activity or installing sound barriers along the wall adjacent to The Meadows.

Community Impact:
I-21-78 cont. Many residents sleep during non-standard hours. Failure to account for their needs ignores a large segment of the population and undermines public health protections.

Comment 78: Lack of Operational Hours Limitation to Reduce Nighttime Impacts

Reference: DEIR Chapter 4.13 – Noise

Issue Summary:
The DEIR assumes 24/7 operations but does not evaluate alternative operational schedules or consider limiting truck movements to daytime hours. Allowing unrestricted nighttime logistics without mitigation undermines community livability.

CEQA Analysis:
I-21-79 CEQA requires evaluation of alternatives and feasible mitigation to reduce significant impacts (§15126.4, §15126.6). Reasonable restrictions on operating hours are commonly applied to industrial projects adjacent to residential zones and should have been considered.

Requested Action:
Include a mitigation measure to prohibit heavy-duty truck operations between 10 PM and 6 AM. Evaluate a reduced-hours operational alternative in the alternatives analysis section.

Community Impact:
The sound of trucks backing, air brakes, and diesel engine idle will disrupt sleep and well-being unless constrained. Residents deserve a reasonable buffer from nighttime industrial noise.

Comment 79: Inadequate Disclosure of Off-Hour Warehouse Servicing and Noise

Reference: DEIR Chapter 4.13 – Noise

Issue Summary:
I-21-80 The DEIR describes 24/7 operations but fails to evaluate off-hour maintenance activities like parking lot sweeping, HVAC servicing, trash pickup, or pest control — all of which generate high-decibel, sharp noise and often occur between midnight and 6 a.m. for warehouse sites.

CEQA Analysis:
CEQA §15126.2 requires modeling of operational noise sources that are reasonably

foreseeable. Routine servicing of large warehouse facilities is an acknowledged source of nighttime disturbance and must be disclosed.

Requested Action:

I-21-80 cont.

Include these non-transportation service operations in the noise model and assign time-based mitigation (e.g., time-of-day restrictions, silenced equipment, scheduled servicing during daytime hours).

Community Impact:

The Meadows residents could be subjected to irregular and intrusive noises at all hours — not just from trucks, but from industrial upkeep. This is preventable with proper planning.

Comment 80: No Evaluation of Power Generator Noise Under Emergency Conditions

Reference: DEIR Chapter 4.13 – Noise

Issue Summary:

The DEIR does not evaluate noise generated by diesel backup generators operating during power outages — even though generators are referenced in the air quality report. Generator noise can exceed 70–80 dB at close range and will impact adjacent residential properties.

I-21-81

CEQA Analysis:

CEQA requires modeling of all foreseeable operational noise sources (§15126.2). Emergency generators are predictable in frequency and volume, and must be disclosed, especially where their use could affect sensitive receptors.

Requested Action:

Model generator noise at property lines and during nighttime operation. Require enclosure, mufflers, and placement as far as possible from The Meadows property line.

Community Impact:

Power outages are increasingly common. Without proper generator noise control, residents may endure sleep disruption and chronic stress during emergency events — exactly when they are already vulnerable.

Comment 81: No Analysis of Cumulative Long-Term Noise Fatigue

Reference: DEIR Chapter 4.13 – Noise

I-21-82

Issue Summary:

The DEIR uses 24-hour Leq averages to analyze noise, which masks the real-world impact of frequent disruptive sounds like air brakes, backup alarms, and engine revving. The

document fails to consider “noise fatigue” or long-term mental and physiological stress from chronic exposure.

CEQA Analysis:
CEQA §15126.2 requires EIRs to analyze effects that are “individually limited but cumulatively considerable.” Chronic low-level noise is known to contribute to stress, sleep disturbance, and reduced cognitive function — particularly in children and older adults.

I-21-82 cont.

Requested Action:
Supplement the noise section with a discussion of cumulative health effects from daily exposure to unpredictable industrial noise. Propose nighttime operational restrictions, acoustic fencing, or designated quiet hours.

Community Impact:
Residents of The Meadows will hear these noises every day — not just in decibels, but in how it makes them feel. The DEIR must recognize and respond to that reality.

Comment 82: No Evaluation of Impacts from Potential Rooftop HVAC System Noise

Reference: Appendix H – Noise and Vibration Report

Issue Summary:
The DEIR omits evaluation of noise from rooftop HVAC systems, which are standard for large commercial warehouses. These systems can emit steady low-frequency noise and may exceed local noise ordinances, especially when operating at night.

I-21-83

CEQA Analysis:
CEQA requires analysis of all operational noise sources (§15126.2). Courts have found that cumulative or continuous mechanical equipment must be disclosed and mitigated if located near homes or sensitive receptors.

Requested Action:
Model rooftop HVAC noise at the nearest property line, especially during nighttime operation. Require acoustic screens or low-noise equipment as mitigation.

Community Impact:
Low-frequency noise can travel far and penetrate walls. Without HVAC mitigation, residents in The Meadows may experience constant hums or vibrations disrupting rest and concentration.

Comment 83: Inconsistent Noise Modeling Between Day and Night Scenarios

Reference: Appendix H – Noise and Vibration Report

Issue Summary:
The DEIR noise study uses average hourly Leq values for both daytime and nighttime scenarios but does not adjust for the higher sensitivity and lower background noise levels at night. This causes significant underestimation of Lmax events like truck startups, gate clatter, or brake releases after 10 p.m.

I-21-84

CEQA Analysis:
CEQA requires accurate baseline and impact modeling based on context and receptor sensitivity (§15125(a), Appendix G). Nighttime modeling must reflect real conditions, not just adjusted Leq assumptions.

Requested Action:
Use nighttime background ambient noise levels (L90) as the basis for impact modeling after 10 p.m. Include Lmax exceedance frequency and consider sleep disturbance standards from WHO and EPA.

Community Impact:
Residents don't experience "average" noise at night — they wake up from sudden, high-volume sounds. Without modeling that reality, the DEIR underrepresents actual harm.

Comment 84: No Quantitative Analysis of Truck Brake Noise on Slopes

Reference: Appendix H – Noise and Vibration Report

Issue Summary:
The noise report does not model the distinctive brake and downshift noise of heavy trucks navigating slope grades at ingress and egress points. These noises are sharp, high-amplitude, and likely to exceed local noise standards — particularly during early morning deliveries.

I-21-85

CEQA Analysis:
CEQA §15126.2(a) requires modeling of reasonably foreseeable noise sources. Omitting one of the most intrusive and characteristic sources of warehouse noise undermines the accuracy of the analysis.

I-21-85 cont.

Requested Action:
Model Lmax and SEL values from heavy trucks using compression brakes on slopes leading to the docks. Apply Caltrans noise coefficients and adjust mitigation accordingly.

Community Impact:
Residents living on or near truck routes shouldn't be jolted awake by diesel engines roaring downhill at 4 a.m. This impact is real, measurable, and needs disclosure.

Comment 85: Noise Study Fails to Model Cumulative 24/7 Truck Noise at Property Line

Reference: Appendix H – Noise and Vibration Report

Issue Summary:
The DEIR's noise model uses single-trip truck events and averages them over time, failing to reflect worst-case cumulative noise impact from nighttime operations and back-to-back truck arrivals. The model also does not simulate truck maneuvering near The Meadows' wall or backup beeper noise.

I-21-86

CEQA Analysis:
CEQA requires that noise studies analyze peak events and reasonably foreseeable worst-case scenarios (CEQA §15126.2(a)). Courts have found that an EIR fails when it "averages away" impact intensity that would occur in real-world use (e.g., *Berkeley Keep Jets Over the Bay v. Board of Port Commissioners*).

Requested Action:
Recalculate noise levels assuming truck arrivals in back-to-back 10-minute intervals and include maneuvering and reverse alarm signals near the property line. Include modeled Lmax values and duration of exceedance of local noise thresholds.

Community Impact:
Residents of The Meadows will be exposed to 24-hour industrial noise, with potential to disrupt sleep and reduce quality of life. The current analysis masks these effects through improper averaging.

Population and Housing

I-21-87

Comment 86: No Discussion of Equity and Disproportionate Impact on Environmental Justice Communities

Reference: DEIR Chapter 4.14 – Population and Housing

Issue Summary:
The DEIR does not discuss the demographics of nearby communities or analyze whether pollution, noise, and safety impacts will disproportionately affect low-income or minority residents — a growing CEQA concern under SB 1000 and the state's EJ framework.

CEQA Analysis:
While CEQA does not currently mandate environmental justice analysis, case law and agency guidance now encourage agencies to consider disproportionate burdens (*Communities for a Better Environment v. South Coast AQMD*). Failure to even mention demographic impact is a glaring omission.

I-21-87 cont.

Requested Action:
Add a new section analyzing potential disproportionate impact on vulnerable or historically overburdened populations. Consult CalEnviroScreen and SB 1000 guidance.

Community Impact:
Many residents of The Meadows and surrounding areas are middle-class families, immigrants, or renters without access to legal advocacy or mitigation resources. Their interests deserve equal protection under CEQA.

Comment 87: DEIR Ignores Displacement Risk for Adjacent Small Businesses

Reference: DEIR Chapter 4.14 – Population and Housing

Issue Summary:
The DEIR does not evaluate whether the project will displace nearby small or family-run businesses due to increased traffic, loss of visibility, or incompatible land uses. Large industrial uses often overshadow or economically isolate adjacent commercial zones.

I-21-88

CEQA Analysis:
CEQA requires discussion of indirect displacement effects if they may cause physical or socioeconomic consequences (§15126.2(d)). While not strictly housing-related, displacement of commercial tenants is a valid land use and economic concern.

Requested Action:
Survey nearby businesses and assess potential for economic displacement. Include outreach and mitigation measures, such as signage, shared parking protections, or traffic control adjustments to preserve access.

I-21-88 cont.

Community Impact:
Longstanding local shops are part of the community fabric. If this project pressures them out, residents lose not just convenience — they lose identity and connection.

Comment 88: No Discussion of Warehousing Sector Automation and Future Job Displacement

Reference: DEIR Chapter 4.14 – Population and Housing

Issue Summary:
The DEIR claims the project will not induce population growth or job-related impacts, but it also fails to assess the role of automation in the warehousing sector. As logistics operators increasingly shift to automated systems (e.g., robotics, AI routing, automated forklifts), actual job creation may be minimal or temporary.

I-21-89

CEQA Analysis:
CEQA requires an honest assessment of socioeconomic effects when tied to environmental changes (CEQA §15131, §15126.2(d)). While CEQA does not regulate job loss directly, it does require disclosure if socioeconomic changes may result in secondary environmental effects, such as reduced housing demand or regional economic displacement.

Requested Action:
Include a discussion on potential automation within tenant operations, its effect on long-term employment, and whether reduced workforce needs alter projected traffic, energy, or utility impacts.

Community Impact:
If job creation is being used to justify environmental impacts, but those jobs may not materialize due to automation, the public deserves full transparency.

Comment 89: Emergency Access Plan Does Not Address Fire Apparatus Turnaround Constraints

Reference: Appendix I – OCFA Fire Access Letter

I-21-90

Issue Summary:
The OCFA letter confirms preliminary compliance with basic access width but does not include an operational analysis of fire truck maneuverability, turnaround zones, or simultaneous truck activity during emergencies. Loading docks, truck courts, and trailers may block key ingress points during a fire event.

CEQA Analysis:
CEQA requires analysis of emergency response access and coordination with responsible agencies (§15126.2(a)). Where industrial sites overlap with active logistics operations, turnaround and clearance diagrams are standard practice. This was not provided in the DEIR.

I-21-90 cont.

Requested Action:
Include a Fire Apparatus Movement and Access Plan (FAMAP) with swept path diagrams for engines and ladder trucks. Demonstrate unobstructed 360° access to all warehouse structures under normal and high-traffic conditions.

Community Impact:
Any delay in emergency response puts workers and neighboring residents at risk. OCFA's preliminary letter is not a substitute for full access design and scenario testing.

Public Services

Comment 90: Public Services Chapter Omits School District Impact from Employee Families

Reference: DEIR Chapter 4.15 – Public Services

Issue Summary:
The DEIR evaluates fire and police impacts, but it does not evaluate potential indirect impacts to local school districts if new warehouse employees move into the area with school-age children. Given the housing affordability constraints in the region, this is a foreseeable scenario.

I-21-91

CEQA Analysis:
CEQA Guidelines §15131 allow evaluation of indirect socioeconomic effects if they cause physical environmental changes — such as overcrowded schools. Local agencies often collect developer fees, but CEQA still requires disclosure of potential impacts and mitigation.

Requested Action:
Add an analysis of potential student generation from warehouse employees, including district enrollment trends and capacity. Recommend payment of applicable school mitigation fees per Government Code §65995.

Community Impact:
If The Meadows' schools become overcrowded or under-resourced due to unplanned

I-21-91 cont.

enrollment changes, local families will suffer — especially those with special needs or limited mobility.

Recreation

Comment 91: DEIR Fails to Evaluate Recreational Resource Impact Due to Traffic and Noise

Reference: DEIR Chapter 4.16 – Recreation

Issue Summary:
The DEIR concludes "no impact" to recreational resources but does not analyze the project's indirect effects on local parks, trails, or open spaces. Increased diesel traffic, air pollution, and noise near The Meadows Greenbelt and other community amenities will degrade their use and enjoyment.

I-21-92

CEQA Analysis:
CEQA requires that EIRs analyze indirect effects on the physical condition of recreation areas (§15126.2(a), Appendix G Item XV(b)). Simply stating no new park space is required does not satisfy this requirement when project operations may degrade nearby recreational areas.

Requested Action:
Reevaluate the project's impact on The Meadows Greenbelt and nearby parks (e.g., Cherry Park, Serrano Creek Trail) with respect to ambient noise, traffic intrusion, and pollution levels. Include mitigation such as tree buffers or funding for park upgrades.

Community Impact:
Families rely on these recreational spaces for daily well-being. If the warehouse impairs their usability, it constitutes a real and unfair burden — and must be mitigated under CEQA.

Transportation and Traffic

Comment 92: Truck Trip Modeling Conflicts with Land Use Assumptions in DEIR

I-21-93

Reference: DEIR Chapter 4.17 – Transportation and Traffic; Appendix J – Traffic Impact Analysis

Issue Summary:
The DEIR assumes a certain number of daily truck trips based on a generic warehouse

profile but does not align this assumption with the operational scope described in Chapter 2. For example, it does not clarify whether both warehouse buildings will operate 24/7 or at partial capacity, yet it models full peak traffic.

CEQA Analysis:
CEQA requires consistency between the project description and all impact analyses (§15124, §15126.2). Courts have invalidated EIRs where traffic models rely on assumptions that conflict with land use design or operational constraints (*Bakersfield Citizens for Local Control v. City of Bakersfield*, 2004).

I-21-93 cont.

Requested Action:
Clarify operational assumptions for each building, including tenant type, working hours, and fleet composition. Update truck trip projections and model sensitivity scenarios accordingly.

Community Impact:
If truck trip numbers are based on unrealistic or misleading assumptions, The Meadows residents could be blindsided by far more traffic and pollution than disclosed.

Comment 93: DEIR Ignores Parking Demand from Large-Scale Delivery Driver Workforce

Reference: DEIR Chapter 4.17 – Transportation and Traffic

Issue Summary:
The DEIR models employee trips but does not account for independent contractor delivery drivers (e.g., Amazon Flex, DoorDash logistics), who often park in surrounding neighborhoods or double-park near docks. No mitigation is proposed for overflow parking or staging.

I-21-94

CEQA Analysis:
CEQA requires agencies to consider all reasonably foreseeable users and associated impacts (§15126.2, Appendix G). Ignoring contractor-based fleet traffic and parking needs omits a significant impact category.

Requested Action:
Model parking demand from independent drivers and require designated off-street parking, staging, and wayfinding signage. Prohibit on-street parking on adjacent residential roads.

Community Impact:
Overflow parking and idling in The Meadows will erode quality of life, increase traffic conflicts, and degrade the community fabric — especially without enforcement.

Comment 94: DEIR Fails to Address Induced Demand from New Truck Infrastructure

Reference: DEIR Chapter 4.17 – Transportation and Traffic

Issue Summary:
The DEIR treats truck traffic as static and project-generated, without considering the induced demand effect of new warehouse infrastructure — a well-documented phenomenon where added capacity draws additional regional logistics operations and pass-through traffic.

CEQA Analysis:
I-21-95
Under CEQA §15126.2(d), the EIR must evaluate indirect and growth-inducing effects. Courts have interpreted this to include infrastructure-induced demand (*Friends of the Eel River v. North Coast Railroad Authority*). The DEIR does not disclose whether additional warehousing, fleet staging, or logistics services will be encouraged by this project's proximity to the highway and available land.

Requested Action:
Revise the DEIR to evaluate whether the proposed project would catalyze further industrial development or truck-heavy land use conversions nearby. Consider zoning compatibility, truck trip spillover, and land speculation trends as part of the growth-inducing impacts.

Community Impact:
What begins as one warehouse can quickly grow into a corridor. Without acknowledging this, the City may be opening the door to a full-scale logistics district with lasting consequences for traffic, air quality, and neighborhood character.

Comment 95: No Evaluation of Transit and Active Transportation Infrastructure Impacts

Reference: DEIR Chapter 4.17 – Transportation and Traffic

Issue Summary:
I-21-96
The DEIR does not evaluate whether nearby OCTA bus stops or pedestrian/bicycle infrastructure will be impacted by truck activity. The site fronts Rancho Parkway and Bake Parkway — both of which include multi-modal infrastructure used by students, workers, and seniors.

CEQA Analysis:
CEQA requires analysis of transit and non-motorized transportation impacts (Appendix G,

Item XVII). Warehousing is a known conflict land use when placed along active transportation corridors. This conflict was not addressed in the DEIR or TIA.

Requested Action:

I-21-96 cont.

Map and evaluate transit routes, bike lanes, sidewalks, and school crossings within 0.5 miles. Assess safety and operational impacts and recommend mitigation (e.g., curb extensions, signal timing, relocated stops).

Community Impact:

Without this analysis, The Meadows residents — especially youth and elderly — face elevated risk as they navigate infrastructure not designed to safely coexist with heavy truck traffic.

Comment 96: No Analysis of Project-Specific Contribution to Regional VMT Goals

Reference: DEIR Chapter 4.17 – Transportation and Traffic

Issue Summary:

The DEIR states the project will have "less than significant" VMT impacts but does not analyze its compatibility with SCAG's regional transportation plan goals to reduce VMT per capita under SB 743. The analysis stops at project-level metrics without assessing policy alignment.

I-21-97

CEQA Analysis:

CEQA requires evaluation of VMT impacts under both quantitative thresholds and policy consistency (§15064.3). The omission of SCAG RTP/SCS consistency violates CEQA's requirement for cumulative and long-range transportation planning analysis.

Requested Action:

Compare the project's VMT profile to SCAG's 2045 goals and disclose whether the project impedes or supports regional VMT reduction. Require mitigation if thresholds are exceeded.

Community Impact:

Warehouses that undermine regional climate mobility goals pass hidden costs onto the public — in the form of congestion, emissions, and missed climate targets.

Comment 97: Incomplete Vehicle Miles Traveled (VMT) Assessment

I-21-98

Reference: DEIR Chapter 4.17 – Transportation and Traffic

Issue Summary:
The VMT analysis uses lookup tables based on land use averages and fails to incorporate actual routing and trip lengths of heavy-duty trucks. These assumptions underestimate VMT, and by extension, underestimate associated GHG and air quality impacts.

CEQA Analysis:
Per CEQA Guidelines §15064.3(b), VMT analysis must reflect the actual project operations, including trip length and vehicle type. Relying on average warehouse trip profiles from other geographies violates CEQA's requirement for a project-specific analysis of impacts.

I-21-98 cont.

Requested Action:
Revise the VMT analysis using actual regional routing assumptions for Class 8 diesel trucks accessing major highways (e.g., I-5, SR-241). Include distribution of daily trip lengths and truck types in the updated model.

Community Impact:
Understating VMT undermines the environmental review of traffic, emissions, and energy use. The Meadows residents face traffic and pollution daily from these vehicles — proper analysis is essential for mitigation planning.

Comment 98: Omission of Pedestrian and School Safety Impacts from Increased Truck Traffic

Reference: DEIR Chapter 4.17 – Transportation and Traffic

Issue Summary:
The DEIR does not assess the safety impact of hundreds of new truck trips near school crossings, bus stops, and walking routes used by students and families. Key locations like Rancho Parkway, Bake Parkway, and Lake Forest Drive serve both school traffic and truck ingress/egress.

I-21-99

CEQA Analysis:
CEQA §15126.2(a) requires discussion of significant transportation safety risks, particularly for vulnerable road users. California Vehicle Code §21949 also mandates prioritizing pedestrian safety in planning decisions. Ignoring school zone impacts violates both.

Requested Action:
Conduct a detailed pedestrian and school zone safety analysis, including truck conflict points, crossing time delays, and sightline reductions. Consider signage, traffic calming, and rerouting alternatives.

I-21-99 cont.

Community Impact:
The Meadows includes many families with school-age children. Residents have the right to walk, bike, and send their children to school without facing semi-truck traffic at crosswalks. This analysis is essential to protect lives.

Comment 99: DEIR Relies on Pre-Pandemic or Outdated Traffic Data

Reference: Appendix J – Traffic Impact Analysis

Issue Summary:
The TIA uses traffic volume counts collected in 2023 but fails to adjust for pandemic-related traffic reductions, seasonal variation, or school-year congestion. This results in an artificially low baseline that underestimates project impact on local intersections.

CEQA Analysis:
I-21-100
CEQA requires use of accurate, up-to-date baseline conditions that reflect typical existing conditions (§15125(a)). Courts have held that agencies must not cherry-pick low-impact snapshots to minimize impact conclusions (*Neighbors for Smart Rail v. Exposition Metro Line Construction Authority*).

Requested Action:
Update the traffic counts using current (2025) data collected during typical school-year peak periods. Adjust VMT and intersection impact models accordingly.

Community Impact:
The Meadows residents already deal with congestion during school drop-offs and commutes. Understating traffic makes proper mitigation impossible and shifts future burdens onto local families.

Comment 100: Flawed Baseline for Traffic Volume and LOS Evaluation

Reference: Appendix J – Traffic Impact Analysis

Issue Summary:
I-21-101
The traffic analysis uses a pre-pandemic baseline and does not adjust for ongoing remote work, post-COVID traffic rebound, or current congestion levels. The traffic count dates (2023) do not reflect peak conditions or school-year variability.

CEQA Analysis:
A project's impact must be evaluated relative to a realistic, existing baseline (§15125(a)). Courts have struck down EIRs that use unrepresentative or outdated baselines, as in *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority*.

I-21-101 cont.

Requested Action:
Update traffic volume data using current-year counts during peak school and commute hours. Adjust LOS modeling to reflect real-world congestion levels and evaluate significant new impacts.

Community Impact:
If outdated baselines are used, The Meadows residents may be exposed to worsening congestion, cut-through traffic, and delays — without the City or community even being warned.

Comment 101: Lack of Truck Turning and Sight Distance Analysis at Site Access Points

Reference: Appendix J – Traffic Impact Analysis

Issue Summary:
The TIA does not include turning radius diagrams or sight line visibility studies at project driveways and intersections. Given the use of large semi-trailers, this omission is significant. Turning trucks may cross lanes or obstruct sightlines, creating safety hazards for passenger vehicles, cyclists, and pedestrians.

I-21-102

CEQA Analysis:
CEQA requires evaluation of traffic safety risks (Appendix G, Item XVII(a)) and disclosure of design features that may result in hazards. The absence of turning and visibility analysis violates CEQA's requirement for a good-faith, evidence-based safety evaluation.

Requested Action:
Include AutoTURN or equivalent diagrams showing turning paths for trucks entering and exiting the site. Perform sight distance measurements against Caltrans and AASHTO standards and recommend mitigation where necessary (e.g., mirror placement, driveway relocation).

Community Impact:
A near-miss or collision at an access point could endanger families using nearby roadways, including residents of The Meadows. These design flaws must be addressed before project approval.

Comment 102: DEIR Fails to Analyze Spillover Traffic into Residential Streets

I-21-103

Reference: Appendix J – Traffic Impact Analysis

Issue Summary:
The TIA focuses exclusively on major arterials but does not assess whether overflow traffic, cut-through routes, or off-route truck maneuvers may occur on local streets near The Meadows. Industrial projects often generate Waze- or GPS-guided detours that bypass main access points.

CEQA Analysis:
CEQA requires EIRs to evaluate traffic impacts on all potentially affected roadways (§15126.2, Appendix G). Courts have upheld the need to study spillover and secondary traffic effects in urban and residential areas (*Protect the Historic Amador Waterways v. Amador Water Agency*).

I-21-103 cont.

Requested Action:
Evaluate cut-through potential on local streets (e.g., Foxborough, Cherry, Indian Hill) using trip distribution models and delivery behavior studies. Implement truck routing signage, enforcement, and traffic calming where warranted.

Community Impact:
Residents are already burdened with speeding and cut-throughs. If delivery trucks or employee vehicles begin using residential streets, safety and quality of life will be compromised — and CEQA demands that possibility be addressed.

Comment 103: No Evaluation of Off-Site Staging or Overnight Truck Parking

Reference: Appendix J – Traffic Impact Analysis

Issue Summary:
The DEIR fails to identify where trucks will queue if they arrive early or park overnight when gates are closed. Industrial projects of this scale routinely lead to off-site parking in residential or public right-of-way areas — a well-documented issue across California.

I-21-104

CEQA Analysis:
CEQA requires evaluation of "reasonably foreseeable indirect impacts" (§15126.2(d)). Truck staging and off-site parking is foreseeable, particularly with 24/7 operations and high-volume logistics tenants. This omission undermines the traffic and safety analysis.

Requested Action:
Update the DEIR to analyze off-site parking and staging impacts, and require a Truck Staging and Parking Plan with designated queue areas, driver rest policies, and enforcement mechanisms.

I-21-104 cont.

Community Impact:
If truckers idle or park near The Meadows, residents will face late-night diesel exposure, traffic obstruction, and safety hazards. This is avoidable with better planning and disclosure.

Tribal Cultural Resources

Comment 104: Inadequate Tribal Cultural Resources Consultation Documentation

Reference: DEIR Chapter 4.18 – Tribal Cultural Resources

Issue Summary:
The DEIR asserts that no known tribal cultural resources exist on the site and that consultation occurred. However, no record of outreach dates, tribal responses, or consultation outcomes is provided. This makes it impossible for the public to confirm whether Assembly Bill 52 obligations were fulfilled.

I-21-105

CEQA Analysis:
CEQA §21080.3.1 requires formal consultation with California Native American Tribes on potentially affected cultural resources. If consultation was offered and declined, the DEIR must provide a record. If declined to comment, that must also be documented. Silence is not compliance.

Requested Action:
Include a detailed log of tribal consultation efforts, including letters sent, responses received, and any agreements or objections. If no tribes responded, provide a formal statement of non-response from the City.

Community Impact:
The public has a right to know whether tribal communities were respectfully consulted. Transparency and cultural sensitivity are essential to building public trust and legal defensibility.

Utilities and Service Systems

Comment 105: No Evaluation of Peak Seasonal Water Demand and Drought Resilience

I-21-106

Reference: DEIR Chapter 4.19 – Utilities and Service Systems

Issue Summary:
The DEIR only discusses average daily water demand, failing to analyze peak summer usage when landscaping, cooling systems, and cleaning needs may coincide with regional drought conditions. There is no resilience analysis under long-term water stress scenarios.

CEQA Analysis:
CEQA requires disclosure of demand under worst-case or peak load scenarios (§15126.2, Appendix G). Water supply assessments must be grounded in the Urban Water Management Plan (UWMP) and evaluate availability during dry years and drought.

I-21-106 cont.

Requested Action:
Revise the utilities section to model peak-day and peak-month water usage under various operational scenarios. Clarify whether any water-intensive processes (e.g., evaporative cooling, truck washing) are planned. Confirm system adequacy during dry years per UWMP projections.

Community Impact:
If this project contributes to local water shortages during drought years, residents may face cutbacks, higher bills, or degraded service. The City must ensure new industrial users are resilient and responsible.

Comment 106: Inadequate Capacity Evaluation for Sewer Infrastructure Serving the Project

Reference: DEIR Chapter 4.19 – Utilities and Service Systems

Issue Summary:
The DEIR states that existing sewer lines are “adequate” for the proposed development but does not provide flow projections, line capacity data, or confirmation from the El Toro Water District (ETWD). Warehouse wastewater can include non-domestic flows from floor washing, refrigeration systems, and employee restrooms.

I-21-107

CEQA Analysis:
CEQA Guidelines §15126.2 and Appendix G require analysis of utility demand and infrastructure adequacy. Without system modeling or confirmation from ETWD, the claim of adequacy lacks evidentiary support.

Requested Action:
Obtain and disclose a will-serve letter and hydraulic modeling report from ETWD confirming adequate capacity for peak flow scenarios. Include infrastructure improvement requirements if shortfalls are identified.

I-21-107 cont.

Community Impact:
If the project overwhelms local sewer lines, backflow or surcharge events could occur downstream — potentially affecting homes or public infrastructure near The Meadows.

Comment 107: No Analysis of Potential for Increased Litter and Waste in Residential Areas

Reference: DEIR Chapter 4.19 – Utilities and Service Systems

Issue Summary:
The DEIR does not evaluate whether wind-blown packaging, warehouse refuse, or unsecured trash from delivery vehicles could increase litter in surrounding neighborhoods, particularly in The Meadows and along Rancho Parkway.

I-21-108

CEQA Analysis:
CEQA requires evaluation of solid waste handling, disposal, and environmental impact (§15126.2, Appendix G). Indirect waste dispersal and neighborhood litter are foreseeable secondary effects of large logistics operations and must be evaluated.

Requested Action:
Add a solid waste containment plan for outdoor operations, trash enclosures, and truck cleaning procedures. Require visual inspections and community reporting protocols.

Community Impact:
No one wants to see warehouse packaging debris blowing into their yards, gutters, or parks. This simple problem becomes a major nuisance if ignored.

Comment 108: Solid Waste Disposal and Landfill Capacity Not Fully Evaluated

Reference: DEIR Chapter 4.19 – Utilities and Service Systems

Issue Summary:

I-21-109

The DEIR claims that waste from the warehouse will be "within regional landfill capacity" but provides no estimate of total waste volume, types of waste generated (e.g., packaging, industrial), or how diversion goals under AB 341 will be met. There is also no documentation of consultation with OC Waste & Recycling.

CEQA Analysis:
CEQA Guidelines Appendix G (Item XIX) require evaluation of solid waste impacts and compliance with applicable regulations. The DEIR fails to provide a waste profile or discuss recycling and landfill diversion targets.

I-21-109 cont.

Requested Action:
Quantify total projected solid waste tonnage, classify waste types, and identify receiving facilities. Include a Waste Management and Diversion Plan consistent with AB 341 and SB 1383 requirements.

Community Impact:
Landfill strain affects the entire county, and warehouse uses often generate large volumes of mixed waste. Without planning, the project could undercut regional diversion efforts — and the environmental burden will eventually reach residential ratepayers.

Comment 109: Utility Pole Clearance Not Addressed for High-Profile Truck Traffic

Reference: DEIR Chapter 4.19 – Utilities and Service Systems

Issue Summary:
The DEIR does not evaluate the clearance of overhead utility lines and poles along truck ingress/egress routes. Given that heavy-duty logistics vehicles often exceed 13–14 feet in height, clearance conflicts may result in line damage, traffic interruptions, or risk of downed wires.

I-21-110

CEQA Analysis:
CEQA requires evaluation of foreseeable hazards from infrastructure conflicts (§15126.2(a)). Overhead utility conflicts with large vehicles are a recognized risk in warehouse corridors and must be analyzed, especially where clearance is less than 16 feet.

Requested Action:
Survey all truck routes within 0.5 miles of the site and map overhead utility conflicts. Require mitigation such as pole relocation, undergrounding, or clear zone signage to prevent equipment collisions.

Community Impact:
Downed lines can cause power outages and fire risk. Residential areas adjacent to the project may be affected if these risks are not proactively mitigated.

Wildfire

Comment 110: Failure to Evaluate Emergency Evacuation Impacts under Wildfire Conditions

Reference: DEIR Chapter 4.20 – Wildfire

Issue Summary:
The DEIR fails to consider how the proposed warehouse project, with its truck traffic and 24/7 operations, may impair evacuation routes during a wildfire or other emergency. The project is located within 1,000 feet of high-risk WUI zones and shares key collector roads (Rancho Parkway, Lake Forest Drive) with evacuation paths for The Meadows and other residential areas.

CEQA Analysis:
I-21-111 CEQA §15126.2(a) requires disclosure of conditions that may impede emergency response or evacuation. CalFire and the Governor's Office of Emergency Services both stress that industrial uses with high traffic volumes near WUI zones must consider impacts to evacuation times. The DEIR lacks such analysis.

Requested Action:
The DEIR must include a transportation and evacuation model simulating wildfire scenarios with peak warehouse truck volumes. The City should consult with OCFA to determine acceptable congestion thresholds for evacuation during emergency conditions.

Community Impact:
Any delay in evacuation could place lives at risk. The DEIR's failure to address this issue ignores the vulnerability of nearby residents, particularly elderly individuals, children, and those with limited mobility.

Alternatives

Comment 111: Inadequate Alternatives Analysis Violates CEQA §15126.6

I-21-112 **Reference:** DEIR Chapter 5.0 – Alternatives

Issue Summary:
The DEIR only considers two alternatives — No Project and Reduced Building Size — and dismisses other feasible options without study. It fails to evaluate alternatives that could

reduce environmental harm, such as an all-electric fleet condition, nighttime truck curfews, or relocation to a less sensitive site.

CEQA Analysis:
CEQA §15126.6 requires a reasonable range of alternatives that "would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects." Courts have consistently found that an EIR that omits feasible alternatives is legally inadequate (e.g., *In re Bay-Delta Programmatic EIR*).

I-21-112 cont.

Requested Action:
Expand the alternatives analysis to include at least two feasible and environmentally superior options: (1) warehouse project with all-electric vehicle requirement, and (2) relocation to a light industrial zone farther from residential areas.

Community Impact:
By failing to consider options that reduce traffic, emissions, and 24/7 operational conflict, the City has denied residents the opportunity to weigh less harmful alternatives. This is not transparent governance, and it undermines CEQA's purpose.

Mitigation Monitoring and Reporting Program (MMRP)

Comment 112: Inadequate Mitigation Monitoring and Enforcement Plan

Reference: DEIR Chapter 7.0 – Mitigation Monitoring and Reporting Program

Issue Summary:
The MMRP includes vague implementation language and lacks specific performance standards or enforcement mechanisms. For example, measures related to construction noise and dust are phrased as "to the extent feasible," with no metrics, timelines, or responsible parties clearly assigned.

I-21-113

CEQA Analysis:
CEQA §15097 requires that mitigation measures be enforceable and clearly defined. Courts have found mitigation plans invalid where measures are vague, deferred, or unenforceable (*Sundstrom v. County of Mendocino*).

Requested Action:
Revise all mitigation measures to include: (1) responsible party, (2) performance criteria, (3) monitoring frequency, and (4) enforcement penalties for noncompliance. Adopt a standalone, auditable MMRP appendix.

I-21-113 cont.

Community Impact:
Without real accountability, residents are left to absorb the impacts when mitigation fails. An empty MMRP undermines the promise of protection under CEQA.

Comment 113: Lack of Maintenance and Replacement Plan for Noise and Light Mitigation Measures

Reference: DEIR Chapter 7.0 – Mitigation Monitoring and Reporting Program; Appendix B – Photometric Plan

Issue Summary:
The DEIR requires some light shielding and possible sound attenuation but fails to describe how these features will be maintained, tested, or replaced over the facility's lifespan. Lighting shields, acoustic panels, and tree buffers degrade over time, reducing effectiveness.

I-21-114

CEQA Analysis:
CEQA §15097 requires that all mitigation be enforceable, sustained, and monitored. Failing to provide a lifecycle plan for physical mitigation infrastructure undermines long-term compliance.

Requested Action:
Include a 20-year light and sound mitigation maintenance plan, with inspection frequency, responsible parties, and replacement triggers. Require annual reporting to the City with compliance certification.

Community Impact:
A broken lighting hood or missing tree row five years from now will still affect The Meadows. Without maintenance, mitigation is meaningless — and that's not what CEQA allows.

Comment 114: No Disclosure of How Community Complaints Will Be Managed Post-Construction

Reference: DEIR Chapter 7.0 – Mitigation Monitoring and Reporting Program

Issue Summary:
The DEIR does not explain how post-construction community complaints (e.g., noise, traffic, light, odor) will be logged, tracked, or resolved. This omission makes mitigation unenforceable and undermines public confidence.

I-21-115

CEQA Analysis:
CEQA §15097 requires clear accountability for monitoring and mitigation. A project that

generates environmental complaints must include a transparent and accessible resolution mechanism.

Requested Action:
Establish a public-facing complaint portal or hotline monitored by the City or a neutral third party. Include reporting timelines, resolution procedures, and annual summaries of community concerns.

I-21-115 cont.

Community Impact:
Residents deserve to be heard after the ribbon-cutting. Without a system for follow-up, mitigation loses meaning — and so does public trust.

Comment 115: Long-Term Enforcement of Mitigation Measures Not Guaranteed

Reference: DEIR Chapter 7.0 – Mitigation Monitoring and Reporting Program

Issue Summary:
Many mitigation measures are written vaguely or assigned to "the contractor" or "project applicant" without identifying who will monitor compliance, how enforcement will occur, or what penalties exist for violations after project approval.

I-21-116

CEQA Analysis:
CEQA §15097 requires that mitigation measures be enforceable and monitored throughout the life of the project. Courts have invalidated EIRs that use vague language or lack oversight mechanisms (*Sundstrom v. County of Mendocino*, 1988).

Requested Action:
Revise the MMRP to include specific timelines, responsible departments (e.g., City of Lake Forest Planning, Public Works, OCFA), and penalties for noncompliance. Require annual public reporting for the first 5 years of operation.

Community Impact:
Without enforcement, mitigation becomes a broken promise. Residents of The Meadows need assurance that protections will be real, measurable, and maintained long after ribbon-cutting.

ROB BONTA
Attorney General

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April 5, 2024

Amy Stonich, Assistant Director of Community Development
City of Lake Forest
100 Civic Center Drive
Lake Forest, CA 92630

RE: IPT Enterprise Business Center LLC, SCH #2024030755

Dear Ms. Stonich:

Thank you for the opportunity to provide comments on the Notice of Preparation for the IPT Enterprise Business Center LLC project. While the logistics industry is an important component of our modern economy, warehouses can bring various environmental impacts to the communities where they are located. For example, diesel trucks visiting warehouses emit nitrogen oxide (NO_x)—a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation—and diesel particulate matter (a subset of fine particular matter that is smaller than 2.5 micrometers)—a contributor to cancer, heart disease, respiratory illnesses, and premature death.[1] Trucks and on-site loading activities can also be loud, bringing disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure.[2] The hundreds, and sometimes thousands, of daily truck and passenger car trips that warehouses generate can contribute to traffic jams, deterioration of road surfaces, traffic accidents, and unsafe conditions for pedestrians and bicyclists. Depending on the circumstances of an individual project, warehouses may also have other environmental impacts.

To help lead agencies avoid, analyze, and mitigate warehouses' environmental impacts, the Attorney General Office's Bureau of Environmental Justice has published a document containing best practices and mitigation measures for warehouse projects. We have attached a

[1] California Air Resources Board, Nitrogen Dioxide & Health, https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health (NOx); California Air Resources Board, Summary: Diesel Particular Matter Health Impacts, https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts; Office of Environmental Health Hazard Assessment and American Lung Association of California, Health Effects of Diesel Exhaust, https://oehha.ca.gov/media/downloads/calenviroscreen/indicators/diesel4-02.pdf (DPM).

[2] Noise Sources and Their Effects, https://www.chem.purdue.edu/chemsafety/Training/PPETrain/dblevels.htm (a diesel truck moving 40 miles per hour, 50 feet away, produces 84 decibels of sound).

copy of this document to this letter, and it is also available online.[3] We encourage you to consider the information in this document as you prepare the draft environmental impact report for this project.

Priority should be placed on avoiding land use conflicts between warehouses and sensitive receptors and on mitigating the impacts of any unavoidable land use conflicts. However, even projects located far from sensitive receptors may contribute to harmful regional air pollution, so you should consider measures to reduce emissions associated with the project to help the State meet its air quality goals. A distant warehouse may also impact sensitive receptors if trucks must pass near sensitive receptors to visit the warehouse.

The Bureau will continue to monitor proposed warehouse projects for compliance with the California Environmental Quality Act and other laws. We are available to discuss as you prepare the draft environmental impact report and consider how to guide warehouse development in your jurisdiction. Please do not hesitate to contact the Environmental Justice Bureau at ej@doj.ca.gov if you have any questions.

Sincerely,



CHRISTIE VOSBURG
Supervising Deputy Attorney General

For ROB BONTA
Attorney General

[3] https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf.

ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE

Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act

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In carrying out its duty to enforce laws across California, the California Attorney General's Bureau of Environmental Justice (Bureau)[1] regularly reviews proposed warehouse projects for compliance with the California Environmental Quality Act (CEQA) and other laws. When necessary, the Bureau submits comment letters to lead agencies regarding warehouse projects, and in rare cases the Bureau has filed litigation to enforce CEQA.[2] This document builds upon the Bureau's work on warehouse projects, collecting information gained from the Bureau's review of hundreds of warehouse projects across the state.[3] It is meant to help lead agencies pursue CEQA compliance and promote environmentally-just development as they confront warehouse project proposals.[4] While CEQA analysis is necessarily project-specific, this document provides information on feasible best practices and mitigation measures, nearly all of which have been adapted from actual warehouse projects in California.

I. Background

In recent years, the proliferation of e-commerce and rising consumer expectations of rapid shipping have contributed to a boom in warehouse development.[5] California, with its ports, population centers, and transportation network, has found itself at the center of this trend. In 2020, the Ports of Los Angeles, Long Beach, and Oakland collectively accounted for over 34% of all United States international container trade.[6] The Ports of Los Angeles and Long Beach alone generate about 35,000 container truck trips every day.[7] Accordingly, the South Coast Air Basin now contains approximately 3,000 warehouses of over 100,000 square feet each, with a total warehouse capacity of approximately 700 million square feet, an increase of 20 percent over the last five years.[8] This trend has only accelerated, with e-commerce growing to

[1] https://oag.ca.gov/environment/justice.
[2] https://oag.ca.gov/environment/ceqa; *People of the State of California v. City of Fontana* (Super. Ct. San Bernardino County, No. CIVSB2121829); *South Central Neighbors United et al. v. City of Fresno et al.* (Super. Ct. Fresno County, No. 18CECG00690).
[3] This September 2022 version revises and replaces the prior March 2021 version of this document.
[4] Anyone reviewing this document to determine CEQA compliance responsibilities should consult their own attorney for legal advice.
[5] As used in this document, "warehouse" or "logistics facility" is defined as a facility consisting of one or more buildings that stores cargo, goods, or products on a short- or long-term basis for later distribution to businesses and/or retail customers.
[6] Data from the Bureau of Transportation Statistics, Container TEUs (Twenty-foot Equivalent Units) (2020), https://data.bts.gov/stories/s/Container-TEU/x3fb-aeda/ (Ports of Los Angeles, Long Beach, and Oakland combined for 14.157 million TEUs, 34% of 41.24 million TEUs total nationwide) (last accessed September 18, 2022).
[7] U.S. Dept. of Transportation, Federal Highway Administration, *FHWA Operations Support – Port Peak Pricing Program Evaluation* (2020), available at https://ops.fhwa.dot.gov/publications/fhwahop09014/sect2.htm (last accessed September 18, 2022).
[8] South Coast Air Qual. Mgmt. Dist., *Final Socioeconomic Assessment for Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program and Proposed Rule 316 – Fees for Rule 2305*, at 7-8, 41 (May 2021).

13% of all retail sales and 2021 being a second consecutive record year for new warehouse space leased.[9] The latest data and forecasts predict that the next wave of warehouse development will be in the Central Valley.[10]

When done properly, these activities can contribute to the economy and consumer welfare. However, imprudent warehouse development can harm local communities and the environment. Among other pollutants, diesel trucks visiting warehouses emit nitrogen oxide (NO_x)—a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation—and diesel particulate matter (a subset of fine particular matter that is smaller than 2.5 micrometers)—a contributor to cancer, heart disease, respiratory illnesses, and premature death.[11] Trucks and on-site loading activities can also be loud, bringing disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure.[12] The hundreds, and sometimes thousands, of daily truck and passenger car trips that warehouses generate contribute to traffic jams, deterioration of road surfaces, and traffic accidents.

These environmental impacts also tend to be concentrated in neighborhoods already suffering from disproportionate health impacts and systemic vulnerability. For example, a comprehensive study by the South Coast Air Quality Management District found that communities located near large warehouses scored far higher on California's environmental justice screening tool, which measures overall pollution and demographic vulnerability.[13] That

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[9] U.S. Census Bureau News, Quarterly Retail E-Commerce Sales 4th Quarter 2021 (February 22, 2022), https://www.census.gov/retail/mrts/www/data/pdf/ec_current.pdf (last accessed September 18, 2022); CBRE Research, *2022 North America Industrial Big Box Report: Review and Outlook*, at 2-3 (March 2022), *available at* https://www.cbre.com/insights/reports/2022-north-america-industrial-big-box#download-report (last accessed September 18, 2022).

[10] CBRE Research, *supra note* 9, at 4, 36; New York Times, *Warehouses Are Headed to the Central Valley, Too* (Jul. 22, 2020), *available* at https://www.nytimes.com/2020/07/22/us/coronavirus-ca-warehouse-workers.html.

[11] California Air Resources Board, Nitrogen Dioxide & Health, https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health (last accessed September 18, 2022) (NOx); California Air Resources Board, Summary: Diesel Particular Matter Health Impacts, https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts (last accessed September 18, 2022); Office of Environmental Health Hazard Assessment and American Lung Association of California, Health Effects of Diesel Exhaust, https://oehha.ca.gov/media/downloads/calenviroscreen/indicators/diesel4-02.pdf (last accessed September 18, 2022) (DPM).

[12] Noise Sources and Their Effects, https://www.chem.purdue.edu/chemsafety/Training/PPETrain/dblevels.htm (last accessed September 18, 2022) (a diesel truck moving 40 miles per hour, 50 feet away, produces 84 decibels of sound).

[13] South Coast Air Quality Management District, "Final Socioeconomic Assessment for Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program and Proposed Rule 316 – Fees for Rule 2305" (May 2021), at 4-5.

study concluded that, compared to the South Coast Air Basin averages, communities in the South Coast Air Basin near large warehouses had a substantially higher proportion of people of color; were exposed to more diesel particulate matter; had higher rates of asthma, cardiovascular disease, and low birth weights; and had higher poverty and unemployment rates.[14] Each area has its own unique history, but many of these impacts and vulnerabilities reflect historic redlining practices in these communities, which devalued land and concentrated poverty, racial outgroups, and pollution into designated areas.[15]

II. Proactive Planning: General Plans, Local Ordinances, and Good Neighbor Policies

To systematically guide warehouse development, we encourage local governing bodies to proactively plan for logistics projects in their jurisdictions. Proactive planning allows jurisdictions to prevent land use conflicts before they materialize and direct sustainable development. Benefits also include providing a predictable business environment, protecting residents from environmental harm, and setting consistent expectations jurisdiction-wide.

Proactive planning can take many forms. Land use designation and zoning decisions should channel development into appropriate areas. For example, establishing industrial districts near major highway and rail corridors but away from sensitive receptors[16] can help attract investment while avoiding conflicts between warehouse facilities and residential communities. Transition zones with lighter industrial and commercial land uses may also help minimize conflicts between residential and industrial uses.

In addition, general plan policies, local ordinances, and good neighbor policies should set minimum standards for logistics projects. General plan policies can be incorporated into existing economic development, land use, circulation, or other related general plan elements. Many jurisdictions alternatively choose to consolidate policies in a separate environmental justice element. Adopting general plan policies to guide warehouse development may also help

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[14] *Id*. at 5-7.

[15] Beginning in the 1930s, federal housing policy directed investment away from Black, immigrant, and working-class communities by color-coding neighborhoods according to the purported "riskiness" of loaning to their residents. In California cities where such "redlining" maps were drawn, nearly all of the communities where warehouses are now concentrated were formerly coded "red," signifying the least desirable areas where investment was to be avoided. *See* University of Richmond Digital Scholarship Lab, Mapping Inequality, https://dsl.richmond.edu/panorama/redlining/#loc=12/33.748/-118.272&city=los-angeles-ca (Los Angeles), https://dsl.richmond.edu/panorama/redlining/#loc=13/32.685/-117.132&city=san-diego-ca (San Diego), https://dsl.richmond.edu/panorama/redlining/#loc=11/37.81/-122.38&city=oakland-ca (Oakland), https://dsl.richmond.edu/panorama/redlining/#loc=13/37.956/-121.326&city=stockton-ca (Stockton), https://dsl.richmond.edu/panorama/redlining/#loc=12/36.751/-119.86&city=fresno-ca (Fresno) (all last accessed September 18, 2022).

[16] In this document, "sensitive receptors" refers to residences, schools, public recreation facilities, health care facilities, places of worship, daycare facilities, community centers, or incarceration facilities.

jurisdictions comply with their obligations under SB 1000, which requires local government general plans to identify objectives and policies to reduce health risks in disadvantaged communities, promote civil engagement in the public decision making process, and prioritize improvements and programs that address the needs of disadvantaged communities.[17]

Local ordinances and good neighbor policies that set development standards for all warehouses in the jurisdiction are a critical and increasingly common tool that serve several goals. When well-designed, these ordinances direct investment to local improvements, provide predictability for developers, conserve government resources by streamlining project review processes, and reduce the environmental impacts of industrial development. While many jurisdictions have adopted warehouse-specific development standards, an ordinance in the City of Fontana provides an example to review and build upon.[18] Good neighbor policies in Riverside County and by the Western Riverside Council of Government include additional measures worth consideration.[19]

The Bureau encourages jurisdictions to adopt their own local ordinances that combine the strongest policies from those models with measures discussed in the remainder of this document.

III. Community Engagement

Early and consistent community engagement is central to establishing good relationships between communities, lead agencies, and warehouse developers and tenants. Robust community engagement can give lead agencies access to community residents' on-the-ground knowledge and information about their concerns, build community support for projects, and develop creative solutions to ensure new logistics facilities are mutually beneficial. Examples of best practices for community engagement include:

- Holding a series of community meetings at times and locations convenient to members of the affected community and incorporating suggestions into the project design.
- Posting information in hard copy in public gathering spaces and on a website about the project. The information should include a complete, accurate project description, maps and drawings of the project design, and information about how the public can provide input and be involved in the project approval process. The

[17] For more information about SB 1000, *see* https://oag.ca.gov/environment/sb1000.
[18] https://oag.ca.gov/system/files/attachments/press-docs/Final%20Signed%20Fontana%20Ordinance.pdf (last accessed September 18, 2022).
[19] For example, the Riverside County policy requires community benefits agreements and supplemental funding contributions toward additional pollution offsets, and the Western Riverside Council of Governments policy sets a minimum buffer zone of 300 meters between warehouses and sensitive receptors. https://www.rivcocob.org/wp-content/uploads/2020/01/Good-Neighbor-Policy-F-3-Final-Adopted.pdf (last accessed September 18, 2022) (Riverside County); http://www.wrcog.cog.ca.us/DocumentCenter/View/318/Good-Neighbor-Guidelines-for-Siting-Warehouse-Distribution-Facilities-PDF?bidId= (last accessed September 18, 2022) (Western Riverside Council of Governments).

information should be in a format that is easy to navigate and understand for members of the affected community.

- Providing notice by mail to residents and schools within a certain radius of the project and along transportation corridors to be used by vehicles visiting the project, and by posting a prominent sign on the project site. The notice should include a brief project description and directions for accessing complete information about the project and for providing input on the project.
- Providing translation or interpretation in residents' native language, where appropriate.
- For public meetings broadcast online or otherwise held remotely, providing for access and public comment by telephone and supplying instructions for access and public comment with ample lead time prior to the meeting.
- Partnering with local community-based organizations to solicit feedback, leverage local networks, co-host meetings, and build support.
- Considering adoption of a community benefits agreement, negotiated with input from affected residents and businesses, by which the developer provides benefits to the affected community.
- Creating a community advisory board made up of local residents to review and provide feedback on project proposals in early planning stages.
- Identifying a person to act as a community liaison concerning on-site construction activity and operations, and providing contact information for the community liaison to the surrounding community.
- Requiring signage in public view at warehouse facilities with contact information for a local designated representative for the facility operator who can receive community complaints, and requiring any complaints to be answered by the facility operator within 48 hours of receipt.

IV. Warehouse Siting and Design Considerations

The most important consideration when planning a logistics facility is its location. Warehouses located in residential neighborhoods or near sensitive receptors expose community residents and those using or visiting sensitive receptor sites to the air pollution, noise, traffic, and other environmental impacts they generate. Therefore, placing facilities away from sensitive receptors significantly reduces their environmental and quality of life harms on local communities. The suggested best practices for siting and design of warehouse facilities does not relieve lead agencies' responsibility under CEQA to conduct a project-specific analysis of the project's impacts and evaluation of feasible mitigation measures and alternatives; lead agencies' incorporation of the best practices must be part of the impact, mitigation and alternatives analyses to meet the requirements of CEQA. Examples of best practices when siting and designing warehouse facilities include:

- Per California Air Resources Board (CARB) guidance, siting warehouse facilities so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive receptors.[20]
- Providing adequate amounts of on-site parking to prevent trucks and other vehicles from parking or idling on public streets and to reduce demand for off-site truck yards.
- Establishing setbacks from the property line of the nearest sensitive receptor to warehouse dock doors, loading areas, and truck drive aisles, and locating warehouse dock doors, loading areas, and truck drive aisles on the opposite side of the building from the nearest sensitive receptors—e.g., placing dock doors on the north side of the facility if sensitive receptors are near the south side of the facility.
- Placing facility entry and exit points from the public street away from sensitive receptors—e.g., placing these points on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Ensuring heavy duty trucks abide by the on-site circulation plans by constructing physical barriers to block those trucks from using areas of the project site restricted to light duty vehicles or emergency vehicles only.
- Preventing truck queuing spillover onto surrounding streets by positioning entry gates after a minimum of 140 feet of space for queuing, and increasing the distance by 70 feet for every 20 loading docks beyond 50 docks.
- Locating facility entry and exit points on streets of higher commercial classification that are designed to accommodate heavy duty truck usage.
- Screening the warehouse site perimeter and onsite areas with significant truck traffic (e.g., dock doors and drive aisles) by creating physical, structural, and/or vegetative buffers that prevent or substantially reduce pollutant and noise dispersion from the facility to sensitive receptors.
- Planting exclusively 36-inch box evergreen trees to ensure faster maturity and four-season foliage.
- Requiring all property owners and successors in interest to maintain onsite trees and vegetation for the duration of ownership, including replacing any dead or unhealthy trees and vegetation.
- Posting signs clearly showing the designated entry and exit points from the public street for trucks and service vehicles.
- Including signs and drive aisle pavement markings that clearly identify onsite circulation patterns to minimize unnecessary onsite vehicle travel.
- Posting signs indicating that all parking and maintenance of trucks must be conducted within designated on-site areas and not within the surrounding community or public streets.

[20] CARB, Air Quality and Land Use Handbook: A Community Health Perspective (April 2005), at ES-1. CARB staff has released draft updates to this siting and design guidance which suggests a greater distance may be warranted in some scenarios. CARB, Concept Paper for the Freight Handbook (December 2019), *available at* https://ww2.arb.ca.gov/sites/default/files/2020-03/2019.12.12%20-%20Concept%20Paper%20for%20the%20Freight%20Handbook_1.pdf (last accessed September 18, 2022).

V. Air Quality and Greenhouse Gas Emissions Analysis and Mitigation

Emissions of air pollutants and greenhouse gases are often among the most substantial environmental impacts from new warehouse facilities. CEQA compliance demands a proper accounting of the full air quality and greenhouse gas impacts of logistics facilities and adoption of all feasible mitigation of significant impacts. Although efforts by CARB and other authorities to regulate the heavy-duty truck and off-road diesel fleets have made excellent progress in reducing the air quality impacts of logistics facilities, the opportunity remains for local jurisdictions to further mitigate these impacts at the project level. Lead agencies and developers should also consider designing projects with their long-term viability in mind. Constructing the necessary infrastructure to prepare for the zero-emission future of goods movement not only reduces a facility's emissions and local impact now, but it can also save money as demand for zero-emission infrastructure grows. In planning new logistics facilities, the Bureau strongly encourages developers to consider the local, statewide, and global impacts of their projects' emissions.

Examples of best practices when studying air quality and greenhouse gas impacts include:

- Fully analyzing all reasonably foreseeable project impacts, including cumulative impacts. In general, new warehouse developments are not ministerial under CEQA because they involve public officials' personal judgment as to the wisdom or manner of carrying out the project, even when warehouses are permitted by a site's applicable zoning and/or general plan land use designation.[21]
- When analyzing cumulative impacts, thoroughly considering the project's incremental impact in combination with past, present, and reasonably foreseeable future projects, even if the project's individual impacts alone do not exceed the applicable significance thresholds.
- Preparing a quantitative air quality study in accordance with local air district guidelines.
- Preparing a quantitative health risk assessment in accordance with California Office of Environmental Health Hazard Assessment and local air district guidelines.
- Refraining from labeling compliance with CARB or air district regulations as a mitigation measure—compliance with applicable regulations is required regardless of CEQA.
- Disclosing air pollution from the entire expected length of truck trips. CEQA requires full public disclosure of a project's anticipated truck trips, which entails calculating truck trip length based on likely truck trip destinations, rather than the distance from the facility to the edge of the air basin, local jurisdiction, or other truncated endpoint. All air pollution associated with the project must be considered, regardless of where those impacts occur.

[21] CEQA Guidelines § 15369.

- Accounting for all reasonably foreseeable greenhouse gas emissions from the project, without discounting projected emissions based on participation in California's Cap-and-Trade Program.

Examples of measures to mitigate air quality and greenhouse gas impacts from construction are below. To ensure mitigation measures are enforceable and effective, they should be imposed as permit conditions on the project where applicable.

- Requiring off-road construction equipment to be hybrid electric-diesel or zero-emission, where available, and all diesel-fueled off-road construction equipment to be equipped with CARB Tier IV-compliant engines or better, and including this requirement in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.
- Prohibiting off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day.
- Using electric-powered hand tools, forklifts, and pressure washers, and providing electrical hook ups to the power grid rather than use of diesel-fueled generators to supply their power.
- Designating an area in the construction site where electric-powered construction vehicles and equipment can charge.
- Limiting the amount of daily grading disturbance area.
- Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.
- Forbidding idling of heavy equipment for more than three minutes.
- Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.
- Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.
- Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.
- Providing information on transit and ridesharing programs and services to construction employees.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees.

Examples of measures to mitigate air quality and greenhouse gas impacts from operation include:

- Requiring all heavy-duty vehicles engaged in drayage[22] to or from the project site to be zero-emission beginning in 2030.

[22] "Drayage" refers generally to transport of cargo to or from a seaport or intermodal railyard.

- Requiring all on-site motorized operational equipment, such as forklifts and yard trucks, to be zero-emission with the necessary charging or fueling stations provided.
- Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.
- Forbidding trucks from idling for more than three minutes and requiring operators to turn off engines when not in use.
- Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the local air district, and the building manager.
- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity that is equal to or greater than the building's projected energy needs, including all electrical chargers.
- Designing all project building roofs to accommodate the maximum future coverage of solar panels and installing the maximum solar power generation capacity feasible.
- Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project.
- Running conduit to designated locations for future electric truck charging stations.
- Unless the owner of the facility records a covenant on the title of the underlying property ensuring that the property cannot be used to provide refrigerated warehouse space, constructing electric plugs for electric transport refrigeration units at every dock door and requiring truck operators with transport refrigeration units to use the electric plugs when at loading docks.
- Oversizing electrical rooms by 25 percent or providing a secondary electrical room to accommodate future expansion of electric vehicle charging capability.
- Constructing and maintaining electric light-duty vehicle charging stations proportional to the number of employee parking spaces (for example, requiring at least 10% of all employee parking spaces to be equipped with electric vehicle charging stations of at least Level 2 charging performance)
- Running conduit to an additional proportion of employee parking spaces for a future increase in the number of electric light-duty charging stations.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel.
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of

trucks.

- Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.
- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.
- Designing to LEED green building certification standards.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations.
- Posting signs at every truck exit driveway providing directional information to the truck route.
- Improving and maintaining vegetation and tree canopy for residents in and around the project area.
- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.
- Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants who own, operate, or hire trucking carriers with more than 100 trucks to use carriers that are SmartWay carriers.
- Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.

VI. Noise Impacts Analysis and Mitigation

The noise associated with logistics facilities can be among their most intrusive impacts to nearby sensitive receptors. Various sources, such as unloading activity, diesel truck movement, and rooftop air conditioning units, can contribute substantial noise pollution. These impacts are exacerbated by logistics facilities' typical 24-hour, seven-days-per-week operation. Construction noise is often even greater than operational noise, so if a project site is near sensitive receptors, developers and lead agencies should adopt measures to reduce the noise generated by both construction and operation activities.

Examples of best practices when studying noise impacts include:

- Preparing a noise impact analysis that considers all reasonably foreseeable project noise impacts, including to nearby sensitive receptors. All reasonably foreseeable project noise impacts encompasses noise from both construction and operations, including stationary, on-site, and off-site noise sources.
- Adopting a lower significance threshold for incremental noise increases when baseline noise already exceeds total noise significance thresholds, to account for the cumulative impact of additional noise and the fact that, as noise moves up the decibel scale, each decibel increase is a progressively greater increase in sound

pressure than the last. For example, 70 dBA is ten times more sound pressure than 60 dBA.

- Disclosing and considering the significance of short-term noise levels associated with all aspects of project operation (i.e. both on-site noise generation and off-site truck noise). Considering only average noise levels may mask noise impacts sensitive receptors would consider significant—for example, the repeated but short-lived passing of individual trucks or loading activities at night.

Examples of measures to mitigate noise impacts include:

- Constructing physical, structural, or vegetative noise barriers on and/or off the project site.
- Planning and enforcing truck routes that avoid passing sensitive receptors.
- Locating or parking all stationary construction equipment as far from sensitive receptors as possible, and directing emitted noise away from sensitive receptors.
- Verifying that construction equipment has properly operating and maintained mufflers.
- Requiring all combustion-powered construction equipment to be surrounded by a noise protection barrier
- Limiting operation hours to daytime hours on weekdays.
- Paving roads where truck traffic is anticipated with low noise asphalt.
- Orienting any public address systems onsite away from sensitive receptors and setting system volume at a level not readily audible past the property line.

VII. Traffic Impacts Analysis and Mitigation

Warehouse facilities inevitably bring truck and passenger car traffic. Truck traffic can present substantial safety issues. Collisions with heavy-duty trucks are especially dangerous for passenger cars, motorcycles, bicycles, and pedestrians. These concerns can be even greater if truck traffic passes through residential areas, school zones, or other places where pedestrians are common and extra caution is warranted.

Examples of measures to mitigate traffic impacts include:

- Designing, clearly marking, and enforcing truck routes that keep trucks out of residential neighborhoods and away from other sensitive receptors.
- Installing signs in residential areas noting that truck and employee parking is prohibited.
- Requiring preparation and approval of a truck routing plan describing the facility's hours of operation, types of items to be stored, and truck routing to and from the facility to designated truck routes that avoids passing sensitive receptors. The plan should include measures for preventing truck queuing, circling, stopping, and parking on public streets, such as signage, pavement markings, and queuing analysis and enforcement. The plan should hold facility operators responsible for violations of the truck routing plan, and a revised plan should be required from any new tenant that occupies the property before a business license

is issued. The approving agency should retain discretion to determine if changes to the plan are necessary, including any additional measures to alleviate truck routing and parking issues that may arise during the life of the facility.
- Constructing new or improved transit stops, sidewalks, bicycle lanes, and crosswalks, with special attention to ensuring safe routes to schools.
- Consulting with the local public transit agency and securing increased public transit service to the project area.
- Designating areas for employee pickup and drop-off.
- Implementing traffic control and safety measures, such as speed bumps, speed limits, or new traffic signs or signals.
- Placing facility entry and exit points on major streets that do not have adjacent sensitive receptors.
- Restricting the turns trucks can make entering and exiting the facility to route trucks away from sensitive receptors.
- Constructing roadway improvements to improve traffic flow.
- Preparing a construction traffic control plan prior to grading, detailing the locations of equipment staging areas, material stockpiles, proposed road closures, and hours of construction operations, and designing the plan to minimize impacts to roads frequented by passenger cars, pedestrians, bicyclists, and other non-truck traffic.

VIII. Other Significant Environmental Impacts Analysis and Mitigation

Warehouse projects may result in significant environmental impacts to other resources, such as to aesthetics, cultural resources, energy, geology, or hazardous materials. All significant adverse environmental impacts must be evaluated, disclosed and mitigated to the extent feasible under CEQA. Examples of best practices and mitigation measures to reduce environmental impacts that do not fall under any of the above categories include:

- Appointing a compliance officer who is responsible for implementing all mitigation measures, and providing contact information for the compliance officer to the lead agency, to be updated annually.
- Creating a fund to mitigate impacts on affected residents, schools, places of worship, and other community institutions by retrofitting their property. For example, retaining a contractor to retrofit/install HVAC and/or air filtration systems, doors, dual-paned windows, and sound- and vibration-deadening insulation and curtains.
- Sweeping surrounding streets on a daily basis during construction to remove any construction-related debris and dirt.
- Directing all lighting at the facility into the interior of the site.
- Using full cut-off light shields and/or anti-glare lighting.
- Requiring submission of a property maintenance program for agency review and approval providing for the regular maintenance of all building structures, landscaping, and paved surfaces.
- Using cool pavement to reduce heat island effects.

- Planting trees in parking areas to provide at least 35% shade cover of parking areas within fifteen years to reduce heat island impacts.
- Using light colored roofing materials with a solar reflective index of 78 or greater.
- Including on-site amenities, such as a truck operator lounge with restrooms, vending machines, and air conditioning, to reduce the need for truck operators to idle or travel offsite.
- Designing skylights to provide natural light to interior worker areas.
- Installing climate control and air filtration in the warehouse facility to promote worker well-being.

IX. Conclusion

California's world-class economy, ports, and transportation network position it at the center of the e-commerce and logistics industry boom. At the same time, California is a global leader in environmental protection and environmentally just development. The guidance in this document furthers these dual strengths, ensuring that all can access the benefits of economic development. The Bureau will continue to monitor proposed projects for compliance with CEQA and other laws. Lead agencies, developers, community advocates, and other interested parties should feel free to reach out to us as they consider how to guide warehouse development in their area.

Please do not hesitate to contact the Environmental Justice Bureau at ej@doj.ca.gov if you have any questions.

HARRISON JIANG

Letter Code: I-21
Date: August 2, 2025

Response to Comment I-21-1

This comment is introductory and expresses opposition to the proposed Project and expresses concerns related to CEQA requirements, unmitigated health risks, traffic congestion, vehicle miles traveled, noise exposure, cumulative impacts analysis, impacts to sensitive populations, systematic inconsistencies, enforceability, oversight, and transparency. This comment also references California Attorney General's NOP comment letter (*IPT Enterprise Business Center LLC, SCH #2024030755*, April 5, 2024; located in Appendix A of the Draft EIR), which acknowledges potential consequences of warehouse developments, and expresses concerns regarding provision of effective mitigation. The comment requests the City address their comments by rejecting the proposed Project and providing alternatives including mixed-use developments, office and life sciences campuses, clean technology R&D center, or non-industrial uses.

This comment does not contain any substantive comments or questions regarding the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-21-2

This comment expresses concern regarding inadequate public notice and outreach, including the methodology used to distribute notices and provision of community workshops or non-English-language outreach. This comment requests their comments be addressed regarding the extension of the public comment period, translation of materials, and the provision of an in-person community workshop.

The *State CEQA Guidelines* referenced in the comment letter states, "Notice shall be mailed to the last known name and address of all organizations and individuals who have previously requested such notice in writing, and shall also be given by at least one of the following procedures: (1) Publication at least one time by the public agency in a newspaper of general circulation in the area affected by the proposed Project. If more than one area is affected, the notice shall be published in the newspaper of largest circulation from among the newspapers of general circulation in those areas (2) Posting of notice by the public agency on and off the site in the area where the project is to be located. (3) Direct mailing to the owners and occupants of property contiguous to the parcel or parcels on which the project is located. Owners of such property shall be identified as shown on the latest equalized assessment roll." As detailed in Master Response 1, the Notice of Availability of (NOA) was Draft EIR was posted and available for public review for a period exceeding the mandatory 45-day review period and was adequately and appropriately noticed in compliance with the City's procedures and CEQA requirements.

Refer to Master Response 14. The Project site is not located within 0.5 mile of a disadvantaged community. The City did not receive any requests for the Project's CEQA notices to be translated. Therefore, no revision or reissuance of the Draft EIR is warranted.

Response to Comment I-21-3

This comment expresses concerns over identification of responsible agencies and the enforcement of environmental standards or required permits for air, water, or waste management. This comment requests the Draft EIR be revised to address comments related to the identification of all responsible and trustee agencies, permit types, and expected compliance actions with timelines where possible.

Table 3.A: Probable Future Actions by Responsible Agencies on page 3-21 of Section 3.0, Project Description, of the Draft EIR provides a list of Responsible Agencies, though the accompanying text notes that this list is not necessarily exhaustive. Each section within Chapter 4.0, Environmental Impact Analysis, of the Draft EIR prepared for the proposed Project contains a dedicated Regulatory Setting section that discusses applicable laws, regulations, and permits, as well as the agencies and organizations responsible for enforcement of these provisions. Therefore, the Draft EIR properly discloses applicable regulatory agencies and permits associated with the proposed Project. In addition, refer to Master Response 4 which includes details related to the MMRP and expected compliance actions.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-21-4

This comment expresses concerns over undisclosed financial incentives or agreements with the developer and requests any agreements be disclosed to address their comments in this letter.

Per *State CEQA Guidelines* Section 15121, "An EIR is an informational document which will inform public agency decision makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information which may be presented to the agency." The information and assessment to be included in an EIR is detailed in *State CEQA Guidelines* Sections 15122 through 1510. The referenced agreements between the City and the project applicant are not relative to the disclosure of environmental impacts. As necessary and appropriate, should the City and the Applicant enter into such agreements, they would be subject to review and approval by the City during subsequent public hearings. The commenter's reference of *State CEQA Guidelines* Section 15144 applies to the use of "some degree of forecasting" necessary as it applies to environmental conditions, not agreements between the City and a project applicant.

This comment speculates on potential City commitment to support the Project. In the absence of any substantiated evidence or specific comment, this comment does not raise questions about the environmental analysis or conclusions contained in the Draft EIR. No further response is required.

Response to Comment I-21-5

This comment expresses concern regarding perceived inconsistencies in the Draft EIR project description, stating the opinion that the project description contains conflicting statements about building square footage, land use intensity, and operational characteristics, and requests these items be reconciled to address their comments regarding the information provided in the summary table, including sizes, uses, hours, number of truck bays, and square footage.

Section 3.3, Project Characteristics, starting on page 3-9 of Chapter 3.0, Project Description, of the Draft EIR states that the proposed Project would result in the development of a single warehouse building totaling 165,803 square feet. This comment claims that later sections of the Draft EIR describe two buildings totaling either 400,000, 412,000, or 435,000 square feet. However, these descriptions are not found anywhere within the Draft EIR. The Draft EIR consistently describes the proposed Project as a single, 165,803-square foot building to be occupied by a tenant unknown at this time. The comment does not identify any other specific instances of inconsistencies within the project description beyond general assertions. Because this comment does not provide evidence that the project description contains discrepancies, no revisions to the Draft EIR are necessary, and no further response is required.

Response to Comment I-21-6

This comment expresses concern related to the project description, stating the opinion that since the Draft EIR does not specify future tenancy, there could be undisclosed impacts related to parking demand, traffic patterns, waste generation, and air emissions, and requests the Draft EIR be revised to address their comments by specifying the leasing model and including a worst-case assumption if uncertainty remains.

Refer to Response to Comment O-1-10 regarding tenant uncertainty and Response to Comment O-1-17 regarding the requirements under CEQA for analysis of speculative or "worst-case" scenarios.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. As the Draft EIR considers impacts that may result from development of a project consistent with the site's existing zoning, no revision of the EIR is warranted.

Response to Comment I-21-7

This comment expresses concern that the Draft EIR does not directly address emerging freight technologies, stating that the Draft EIR does not consider the use of automated delivery technologies such as sidewalk delivery robots, drones, or autonomous trucks which, in the opinion of the commenter, could alter identified environmental impacts. This comment requests the Draft EIR be revised to address their comments by including a future operations scenario analysis including emergency freight technologies.

While new technological advances continue to emerge both within and beyond the logistics industry, these advances are generally in the early stages and have not necessarily undergone the

rigorous testing necessary to guarantee safe and efficient operations in practice. No regulations currently exist that would mandate the use of such technologies by the future tenant of the proposed warehouse building. Further, the future tenant's decision to utilize such technologies would be based on a variety of factors, including employment and feasibility considerations. Therefore, the consideration of these technologies and their potential effect would be highly speculative. Refer to Response to Comment O-1-17 regarding the requirements under CEQA for analysis of speculative scenarios.

As automated delivery technology improves in the future and regulations shift accordingly, the automation activities associated with operation of the proposed Project may be revisited at that time. In addition, the Project does not preclude the future use of automated delivery technologies or other technological improvements.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-21-8

This comment expresses concern regarding the justification for project objectives and alternatives, and states the opinion that the proposed Project objectives are narrowly framed to limit the alternatives analysis, and requests the Draft EIR be revised to address their comments regarding a scaled down project alternative, less intense uses, or limited truck access.

The objectives established for the proposed Project, provided in Section 3.9, starting on page 3-20 of Chapter 3.0, Project Description, of the Draft EIR do not contain the phrases "maximize industrial floor space" and "ensure 24-hour truck access" as quoted in this comment. Rather, the project objectives convey the "…underlying purpose of the project and… the project benefits", consistent with *State CEQA Guidelines* Section 15124(b). These objectives prioritize including economic demand, environmental sustainability, minimal conflicts with surrounding land uses, employment opportunities, fiscal benefits, and traffic congestion reduction. None of these objectives require a certain building size or operational schedule and do not otherwise limit the development of alternatives to the proposed Project. Refer to Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project.

The City of Lake Forest is an urbanized area with a wide variety of established land uses. The Project area has been developed with a variety of residential, business park, regional park/open space, commercial, and light industrial land uses. The General Plan's Land Use Element identifies how land will be used in the future: for housing, commercial, and business centers, public facilities, parks, open space, and transportation. One of the primary objectives of the City's 2040 General Plan is to encourage economic development in areas adjacent to major roadways and transportation corridors, ensuring a diverse mix of land uses that supports the community's ability to thrive and be economically sustainable over time. General Plan policies seek to balance economic development, fiscal stability, and land use compatibility.

Refer to Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses. The Project site has been zoned Light Industrial (LI) since 1987 and was vacant until the existing structure was developed in 1999. The City's latest General Plan Update (2040 Lake Forest General Plan Update) was approved in June 2020 and provides the long-term vision for land use development in the City. The land use designation and zoning for the Project and cumulative sites is the same as that considered in the City's most recent General Plan. As detailed in the Draft EIR (refer to Table 4.11.B, page 4.11-10), the Project is consistent with the applicable land use compatibility policies established in the General Plan. Furthermore, by providing for the redevelopment of a currently underutilized site, the Project satisfies the goals and policies of the General Plan to promote economic development and support the fiscal health of the City. Therefore, the Project objectives and alternatives presented in the Draft EIR remain valid.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-21-9

This comment expresses concern regarding future operational impacts from third-party subcontractors and requests the Draft EIR be revised to address their comments by expanding operational modeling for environmental factors to include subcontractor trips, delivery schedules, and waste service impacts.

As required under CEQA, the Draft EIR analyzes the potential foreseeable operational impacts associated with the proposed building, including potential office, manufacturing, and warehouse uses. The operational characteristics of the proposed Project will comply with the site's zoning and general plan land use designations and permitted uses. Therefore, the analysis included in the Draft EIR considers the range of potential operations that could be used during operation of the proposed Project. As stated throughout the Draft EIR, the future tenant of the proposed building has not yet been determined. The use of third-party subcontractors would depend upon tenant preferences and needs; therefore, this condition would not be determined until after the tenant is established.

The analysis of the proposed Project contained in the Draft EIR is based upon reasonably foreseeable office, manufacturing, and warehouse operations based on information provided by the Project Applicant. As stated in *State CEQA Guidelines* Section 15064(d)(3), "An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable." The use of third-party subcontractors, including the type of services provided, and the need for employees and equipment, cannot be determined prior to identification of a tenant. Therefore, the potential use of third-party subcontractors under the proposed Project is speculative and cannot be considered reasonably foreseeable at this time. Therefore, the analysis of reasonably foreseeable project characteristics presented in the Draft EIR remain valid, and no revisions are necessary.

Response to Comment I-21-10

This comment expresses concerns regarding construction phasing and overlap, states the opinion that the Draft EIR does not provide a detailed construction schedule or analyze overlapping construction with the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) which could reveal dust, noise, and congestion impacts, and requests the Draft EIR be revised to address their comments regarding the provision of a detailed construction schedule and modeling simultaneous construction scenarios, expanding cumulative impact models, and applying enhanced mitigation.

As stated in Chapter 3.0, Project Description, page 3-19, of the Draft EIR, construction of the proposed Project is tentatively scheduled to commence in January 2026, for a duration of approximately one year. In addition, Table 4.3.G (page 4.3-26) in Section 4.3, Air Quality, of the Draft EIR provides a tentative Project construction schedule by phase, including estimated start and end dates, number of work days per week, and total number of work days per phase. These tentative schedules represent the highest feasible degree of accuracy at the time the Draft EIR was prepared given that construction schedules depend on a variety of factors, including funding, weather, labor availability, material availability, and economic conditions. Refer to Master Response 6 regarding the cumulative impacts analysis provided in the Draft EIR, which included the adjacent cumulative industrial warehouse projects.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-21-11

This comment expresses concern regarding psychological and mental health impacts, stating that the Draft EIR does not assess the long-term psychological toll on nearby residents from exposure to noise, light pollution, diesel exhaust, and visual blight, which can contribute to stress, anxiety, and diminished quality of life, and requests a qualitative report on mental health stressors and mitigation be provided to address their comments.

State CEQA Guidelines Section 15204(a) further states, "…CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR."

The referenced citation to *State CEQA Guidelines* Section 15126.2(a) states, "…In assessing the impact of a proposed project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published, or where no notice of preparation is published, at the time environmental analysis is commenced." Further, "the discussion should include relevant specifics of the area, the resources involved, physical changes, alterations to ecological systems, and

changes induced in population distribution, population concentration, the human use of the land (including commercial and residential development), health and safety problems caused by the physical changes, and other aspects of the resource base such as water, historical resources, scenic quality, and public services." The standard for adequacy in a Draft EIR is what is reasonably feasible and does not require an exhaustive evaluation of environmental effects. As the Draft EIR includes an appropriate and thorough assessment of potential impacts (e.g., air quality, noise, health risk) that may result from physical changes in the environment, no revision is required.

This comment, which does not raise concerns regarding the adequacy of the information or analysis provided in the Draft EIR, is noted. California Public Resources Code Section 21082.2(c) limits evaluation of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-21-12

This comment expresses concerns regarding disclosure of worst-case scenarios, stating that the Draft EIR does not evaluate "impact stacking" such as simultaneous exposure to noise, dust, and truck congestion, and requests the EIR address their comments by modeling a representative "stacked impact" including overlapping impacts and mitigation for combined stressors.

Refer to Response to Comment O-1-17 regarding the analysis of a "worst-case" scenario. Per State *CEQA Guidelines* Section 15003(a)(i), CEQA does not require technical perfection in an EIR, but rather adequacy, completeness, and a good-faith effort at full disclosure. A court does evaluate the correctness of an EIR's environmental conclusions, but only determines if the EIR is sufficient as an informational document (*State CEQA Guidelines*, Section 15003[i]). Consistent with the requirements set forth in the *State CEQA Guidelines*, the Draft EIR individually evaluates each resource topic listed in Appendix G to the *State CEQA Guidelines* using applicable thresholds of significance. CEQA does not require the analysis of overlapping impacts across resource topics. Given that the topics cited by the commenter (noise, air quality, and traffic) are each subject to different modeling programs and quantitative measures, a standard basis for comparison and interaction between these topics does not exist. Even a qualitative analysis of these potential impacts would be speculative as there are no thresholds of significance for "stacked impact" analysis.

Further, California Public Resources Code Section 21082.2(c) limits evaluation of social or economic impacts, such as stress, that do not contribute to, or are not caused by, physical impacts on the environment. Therefore, the analysis and conclusions of the Draft EIR regarding evaluation of individual impacts remain valid, and no further response is required.

Response to Comment I-21-13

This comment expresses concerns regarding assessment of community vulnerability, stating that the Draft EIR does not incorporate social vulnerability metrics into the cumulative analysis, and requests the Draft EIR be revised to address their comments regarding integration of CanEnviroScreen or similar data to determine whether the Project area is overburdened or vulnerable.

Refer to Master Response 6 regarding the cumulative impacts analysis provided in the Draft EIR, Master Response 9 regarding Project-related and cumulative health risks, and Master Response 11 relative to potential noise impacts. Refer to Master Response 14 regarding disproportionate environmental burdens and the requirements for an analysis of environmental justice impacts. This comment, which does not raise concerns regarding the adequacy of the information or analysis provided in the Draft EIR, is noted. California Public Resource Code Section 21082.2(c) states "…evidence of social or economic impacts which do not contribute to, or are not caused by, physical impacts on the environment, is not substantial evidence." These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-21-14

This comment expresses concern regarding the Draft EIR's cumulative analysis, stating the opinion that the Draft EIR does not conduct a meaningful cumulative analysis as required by CEQA by omitting quantitative or model-based combined impacts with the Western Realco Enterprise Way Industrial Project (Projects 1 and 2), and requests the Draft EIR be revised and recirculated to address their comments regarding provision of a quantitative cumulative impact analysis of all environmental areas including the Western Realco Enterprise Way Industrial Project (Projects 1 and 2).

Refer to Master Response 6 regarding the assessment of cumulative impacts provided in the Draft EIR. Also, refer to Master Responses 8, 9, 10 and 11 regarding discussion of transportation, health risk, greenhouse gas, and noise impacts relative to the proposed Project. The Draft EIR and these responses provide appropriate and thorough disclosure of the Project-specific and cumulative effects resulting from project development.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-21-15

This comment expresses concern regarding project inconsistency with the 2016 California Sustainable Freight Action Plan, stating the opinion that the Draft EIR does not assess the Project's consistency with the plan, and requests the Draft EIR be revised to address their comments by including a policy consistency table analyzing how the Project aligns with the Plan.

As stated in *State CEQA Guidelines* Section 15125(d), "The EIR shall discuss any inconsistencies between the proposed Project and applicable general plans, specific plans, and regional plans."[20] While the 2016 California Sustainable Freight Action Plan provides a useful framework for achieving long-term goals, this document is not a legally binding plan adopted by an agency with jurisdiction over the proposed Project.[21] Instead, as described in Section 3.7, Sustainability Features, on page 3-19 of Chapter 3.0 Project Description of the Draft EIR, the proposed Project is analyzed within the context of other legally binding and enforceable plans, including SCAQMD's 2022 AQMP and Warehouse Indirect Source Rule (Rule 2305). Under Rule 2305, the proposed Project would reduce emissions from day-to-day warehouse operations where feasible, including trucks transporting goods to and from warehouses. Warehouse operators are required to earn a certain number of points for actions and investments in clean technologies annually (called WAIRE, or Warehouse Actions and Investments to Reduce Emissions, points) depending on the number of trucks visiting their facility. Examples of actions and investments that can generate WAIRE points under this rule include acquisition and use of near-zero-emission (NZE) and zero-emission (ZE) trucks, acquisition and use of ZE yard tractors, acquisition and use of ZE fueling infrastructure for on-road vehicles, and acquisition and use of solar panels for on-site electricity generation. Therefore, although the Draft EIR does not directly reference the 2016 California Sustainable Freight Action Plan, the proposed Project would include actions and design features that are consistent with the document's objectives for increasing the sustainability of California's freight system.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

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[20] For example, an air quality attainment or maintenance plan or State Implementation Plan, area-wide waste treatment and water quality control plans, regional transportation plans, regional housing allocation plans, regional blueprint plans, plans for the reduction of greenhouse gas emissions, habitat conservation plans, natural community conservation plans and regional land use plans.

[21] The Action Plan is a framework of aspirational targets and strategies set by an Executive Order to guide state agencies. The underlying mandates for emission reductions and technology shifts in the freight sector may be legally required through other statutes and regulations (e.g. CARB's Zero-Emission Forklift Regulation, which phases out internal combustion forklifts). The Action Plan is the beginning of a process, and signals State government's interest in collaborating with stakeholders on defining the actions necessary to make the vision for a sustainable freight transport system a reality. This Action Plan is not intended to replace other planning processes and documents, but rather is intended to inform those efforts by providing a new perspective regarding the sustainability of the freight system and framework for ongoing collaborative processes. (see California Sustainable Freight Action Plan, California Air Resources Board, July 2016 (website: https://ww2.arb.ca.gov/sites/default/files/2019-10/CSFAP_FINAL_07272016.pdf accessed October 20, 2025.)

Response to Comment I-21-16

This comment expresses concern regarding the absence of a public health section in the Draft EIR and requests the Draft EIR address their comments by adding a new public health chapter or appendix.

The Draft EIR is structured in a manner consistent with the *State CEQA Guidelines*. All sections provided in Chapter 4.0, Environmental Impact Analysis, are based on Appendix G of the *State CEQA Guidelines*, which covers a range of environmental resource topics. Public health is not included in the list of Appendix G topics and, as acknowledged in the comment, inclusion of a dedicated public health chapter is not required under CEQA. Nevertheless, potential impacts to human health are analyzed where relevant throughout the Draft EIR. Section 4.3.6, Project Impacts, starting on page 4.3-22 of Section 4.3, Air Quality, of the Draft EIR provides a detailed analysis of the nexus between air pollutants and health effects in the context of the proposed Project. This analysis is supported by substantial evidence presented in the Project-specific Health Risk Assessment (included as Appendix C to the Draft EIR). Refer to Master Response 9 for more information on the Health Risk Assessment prepared for the proposed Project. Refer to Master Response 13 regarding hazards and hazardous waste resulting from the proposed Project. Threshold 4.9.1, starting on page 4.9-9 of Section 4.9, Hazards and Hazardous Materials, of the Draft EIR also discusses construction worker and future site occupant health with respect to hazardous materials on site. This analysis is supported by substantial evidence presented in the Project-specific Phase I Environmental Site Assessment (Appendix F to the Draft EIR). Further, refer to Master Response 11; Section 4.13.6, Project Impacts, starting on page 4.13-17 of Section 4.13, Noise; and Appendix H of the Draft EIR regarding potential noise impacts resulting from the proposed Project. Therefore, the Draft EIR's analysis of public health impacts complies with applicable CEQA requirements.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-21-17

This comment expresses concern regarding the absence of analyses related to property values and environmental justice in the Draft EIR and requests the Draft EIR be revised to address their comments by including an environmental justice chapter and data or literature on property value trends.

Refer to Response to Comment O-1-12 regarding property values. The commenter presents no evidence that an effect on property values would occur. On the contrary, as the current building is vacant and underutilized, the redevelopment of the site may actually eliminate a potential for conditions (e.g., blight, vagrancy,) that could actually have a negative effect on property values.

Refer to Master Response 7 regarding the proposed Project's compatibility with existing General Plan and zoning regulations, Master Response 14 regarding disproportionate environmental burdens and the requirements for an analysis of environmental justice impacts. These Master

Responses thoroughly address the topics raised in this comment. As CEQA does not require the assessment of economic or social impacts in the Draft EIR, no revisions to the document are required.

Response to Comment I-21-18

This comment expresses concern regarding the Draft EIR's use of significance thresholds and requests the document address their comments regarding standardization with a comparison matrix in Chapter 4.0.

The *State CEQA Guidelines* do not mandate the use of quantitative thresholds of significance for every resource topic. In cases where quantitative thresholds have been established by regulatory agencies with jurisdiction over the proposed Project (e.g., SCAQMD), the Draft EIR utilizes these thresholds. In other cases, the analysis is more qualitative and dependent upon a number of factors related to the Project's circumstances, existing and future conditions, and the applicable regulatory context. In some cases, and in the absence of an established qualitative threshold, quantitative data may be used to support the qualitative analysis. In the case of energy and traffic impacts as cited in the comment, data is provided quantitatively, but the significance conclusion is qualitative. For example, Threshold 4.6.1, starting on page 4.6-7 in Section 4.6, Energy, of the Draft EIR reads "Would the project… result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?". This question requires quantification of the Project's potential energy use in the context of local, regional, and State energy consumption in order to determine whether the Project's energy use can be considered wasteful, inefficient, or unnecessary in the broader context. In this and similar instances, professional judgement is applied based on the Project's potential energy consumption, measured quantitatively, in the context of the region and energy service providers.

In summary, the Draft EIR's use of significance thresholds is consistent with the *State CEQA Guidelines*, case law, and widely accepted best practices. Therefore, no revisions to the Draft EIR are necessary, and no further response is required.

Response to Comment I-21-19

This comment expresses concern regarding long-term psychological impacts from aesthetic impacts, stating that the aesthetics analysis does not address the shift in second-story residence views and the potential psychological and emotional toll of living adjacent to a warehouse wall. This comment requests the Draft EIR be revised to address their comments by including visual simulations from second-story homes and assessing of psychological effects from visual encroachment.

The citation referenced by the comment states, "… In assessing the impact of a proposed Project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published, or where no notice of preparation is published, at the time environmental analysis is

commenced." Of note, the existing building predates the issuance of the NOP for the Project and the commencement of environmental review. [22]

The proposed Project would result in the demolition of the existing 144,906-square-foot two-story office/industrial building. This building is approximately 35 feet in height. A new 35-foot-tall, 165,803-square-foot tilt-up concrete industrial building would be developed on site. The proposed building would be constructed of architecturally enhanced tilt-up concrete panels and would be painted different shades of gray with a blue accent. The building architecture utilizes scoring, color transitions, and windows to provide articulation to the facades of the building. The truck doors, which would be painted to match the building, would be located on the south elevation of the building, and would not be visible from the surrounding streets or residential properties. Figure 4.1-1, page 4.1-3, of the Draft EIR provides post-development visual simulations of the proposed Project. The simulations of the façade detail the articulation and enhancements that are provided for the proposed structure. Furthermore, the proposed Project includes the installation of landscaping and mature trees along the northeastern corner of the proposed building and Project site to reduce the visibility of the Project site from adjacent residential uses and to improve the overall visual quality of the site (refer to Figure 4.1-1, page 4.1-3). As the Project proposes to replace an existing office/industrial building with a structure of similar height and provides an appropriate level of articulation and buffering, no revisions of the Draft EIR are required.

This comment, which does not raise concerns regarding the adequacy of the information or analysis provided in the Draft EIR, is noted. California Public Resources Code Section 21082.2(c) limits evaluation of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment. Further, CEQA does not require the analysis or protection of views from private properties, as upheld by recent case law[23] [24]. No further response is required.

Response to Comment I-21-20

This comment expresses concern regarding the absence of a visual impact study, stating that no visual simulations or shade-and-shadow diagrams are provided, and requests the Draft EIR be revised to address their comments regarding inclusion of visual renderings and provisions of an analysis of visual massing, shade impacts, and landscaping buffers.

Refer to Master Response 12 regarding the discussion of lighting impacts provided in the Draft EIR and Master Response 6 regarding the cumulative impacts analysis prepared for the proposed

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22 The existing building predates the development and occupation of the Meadows community.

23 The California Court of Appeals concluded in its *Mira Mar Mobile Community v. Oceanside* decision that potential impacts related to views from private lands are not considered impacts under CEQA unless the lead agency has specifically adopted a standard or policy relevant to the project site specifically protecting a private landowner's views. The City of Lake Forest as the CEQA lead agency for the proposed project, has not adopted any such policy or standard.

24 Of note, the case cited by the commenter *Pocket Protectors v City of Sacramento*, addressed impacts addressed in a Mitigated Negative Declaration. The court found that the project in this case violated the objectives of the Planned Unit Development adopted by the City to mitigate the possible environmental effects of uncontrolled development; thereby ruling that preparation of an EIR was required. There is no reasonable comparison between the case cited and the proposed Project.

Project. The existing urbanized condition of the Project site and Project vicinity includes parking and street lighting, as well as vehicle lighting. The proposed 35-foot building would replace an existing 35-foot building. The Draft EIR includes conceptual post-development visual simulations which integrate renderings of the proposed Project based on the current site plan into photographs of the existing Project site taken from public vantage points (refer to Appendix B of the Draft EIR). A Draft EIR does not require an exhaustive evaluation of environmental effects[25], nor is the City required to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors.[26] The assessment of aesthetic impacts in the Draft EIR appropriately discloses the potential aesthetic effects that may result from Project development; therefore, no revision of the Draft EIR or additional technical assessment is required.

Response to Comment I-21-21

This comment expresses concern regarding analysis of green infrastructure and urban heat islands and requests the Project address their comments by including a green infrastructure plan and evaluating whether the Project contributes to regional urban heat stress.

The Project site consists of a developed structure and surrounding parking areas, which includes a variety of landscape material. The *State CEQA Guidelines* do not mandate the analysis of the potential for projects to create or contribute to urban heat islands. The proposed Project would seek Leadership in Energy and Environmental Design (LEED) certification through the applicant's LEED Volume program. Some of the Project design features would include, but not be limited to, drought-tolerant landscaping, low-flow fixtures, high-efficiency lighting, solar, and infrastructure for EV charging. In California, all new or replacement low-slope roofs are required by the building energy efficiency standards (Title 24, Part 6, California Energy Code [CEC]) to be cool roofs. Furthermore, for industrial projects, the CEC requires industrial settings to include a requirement to provide 20 percent shade coverage over hardscape areas within 15 years of construction, with exceptions for areas already covered by other structures or solar panels. As discussed in Section 3.4.3, Landscaping, on page 3-14 of the Draft EIR, the proposed Project would include approximately 66,559 square feet of landscaping, including a variety of trees, shrubs, and groundcover, often overlapping with or adjacent to pervious surfaces, that would assist in reducing the potential for an urban heat island (refer to Figure 3-5, page 3-15) of the Draft EIR for the proposed Project's conceptual landscaping plan). Through LEED certification, the Project would incorporate a variety of design features that would assist with reducing heat absorption of the proposed structure and other impervious surfaces. Further adherence to applicable provisions of the California Energy Code would ensure adequate provisions are made to reduce the potential for an urban heat island effect.

In summary, the Draft EIR's description of green infrastructure is adequate to demonstrate that feasible design features and practices have been incorporated into the proposed Project, such that the potential for urban heat island would not be substantially increased beyond what currently exists. Therefore, no revisions to the Draft EIR are necessary, and no further response is required.

25 *State CEQA Guidelines* Section 15151.
26 *State CEQA Guidelines* Section 15204(a).

Response to Comment I-21-22

This comment expresses concern regarding impacts of warehouse lighting on adjacent homes, stating the opinion that the Draft EIR does not assess the intensity or hours of operation of exterior lighting, and requests the Draft EIR be revised to address their comments by including a full lighting impact study and lighting mitigation.

Refer to Master Response 12 and Response to Comment O-6-4 regarding the potential impacts of the proposed Project from lighting. These responses thoroughly address the topics raised in this comment.

Response to Comment I-21-23

This comment expresses concern regarding the absence of nighttime light pollution analysis for adjacent residents and requests the Draft EIR be revised to address their comments by including a light trespass analysis for fixtures located within 200 feet of residential property lines.

Refer to Master Response 12 and Response to Comment O-6-4 regarding the potential for lighting impacts resulting from the proposed Project. These responses thoroughly address the topics raised in this comment.

The commenter misrepresents the referenced case (*Pocket Protectors v. City of Sacramento*), in which a court ruled that project violated the objectives of the Planned Unit Development adopted by the City of Sacramento to mitigate the possible environmental effects of uncontrolled development. As the proposed Project is consistent with the existing land use and zoning designations (refer to Master Response 7) and would comply with applicable City lighting guidelines to prevent light pollution onto adjacent properties; there is no reasonable comparison between the case cited and the proposed Project.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-21-24

This comment expresses concern regarding the analysis of light trespass during low visibility conditions, stating that the lighting analysis does not account for light dispersion during fog or mist conditions, and requests the lighting analysis be revised to address their comments regarding fog and high-humidity conditions.

The existing Project area is urbanized; and contains existing levels of lighting consistent with urban areas. Refer to Master Response 12 and Response to Comment O-6-4 regarding the potential for lighting impacts resulting from the proposed Project. During fog conditions, unshielded light scatters more broadly, amplifying glare and visibility intrusion. However, as noted in Table 4.1.B on page 4.1-22 of Section 4.1, Aesthetics, of the Draft EIR, lighting fixtures associated with the proposed Project would be shielded and compliant with Sections 7.08.095 and 9.72.085 of the City's Municipal Code,

which requires that lighting would be confined to the Project site and that adjacent properties are protected from glare.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-21-25

This comment expresses concerns regarding omission of second-story residential windows from the lighting analysis and requests their comments regarding provision of a vertical photometric analysis and mitigation/minimization for lighting impacts to second-story windows.

Refer to Master Response 12 and Response to Comment O-6-4 regarding the potential for lighting impacts resulting from the proposed Project.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-21-26

This comment expresses concerns regarding air quality monitoring coverage, stating the opinion that the Draft EIR does not disclose whether new emissions from the Project will affect regional air quality coverage adequacy, and requests the lead agency address their comments regarding coordination with SCAQMD to evaluate whether additional mobile or fixed air quality monitors are warranted near the Project site.

The SCAQMD uses air quality monitoring data to provide real-time information to the public, forecast future air quality, identify pollution sources, and develop plans for reducing air pollution. This data is used to calculate the Air Quality Index (AQI), issue public health warnings, track the effectiveness of pollution control measures, and enforce air quality. SCAQMD decides where to place air quality monitors based on a combination of **regulatory requirements, air quality data needs, population exposure, emission sources, and practical considerations**. An annual review of the Air Quality Monitoring Network is required by federal regulations as a means to identify and report needs for additions, relocations, or terminations of monitoring sites or instrumentation. The monitoring network is further assessed every five years in consultation with the U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB).

The comment does not provide substantial evidence that data from the air quality monitoring network established and managed by the SCAQMD does not provide 'coverage adequacy' or 'robust local data.' Refer to Master Response 3 regarding speculation without substantiation. As the data used in the air quality analysis is based on SCAQMD data collected from a system that is appropriately maintained and assessed on an annual basis, no revision of the Draft EIR is required.

Response to Comment I-21-27

This comment expresses concern regarding impacts on future sensitive land uses, stating that the Draft EIR does not consider the possibility of future schools, daycares, or senior facilities, and requests their comments be addressed by updating the air quality and HRA modeling to include future land uses.

As described in *State CEQA Guidelines* Section 15125(a)(1), the environmental setting should describe the "physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective". Further, *State CEQA Guidelines* Section 15125(a)(3) states "An existing conditions baseline shall not include hypothetical conditions, such as those that might be allowed, but have never actually occurred, under existing permits or plans, as the baseline". *State CEQA Guidelines* Section 15126.2(a) further states, "…An EIR shall identify and focus on the significant effects of the proposed project on the environment. In assessing the impact of a proposed project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published, or where no notice of preparation is published, at the time environmental analysis is commenced."

In the cited case (*Communities for a Better Environment v. South Coast AQMD*), the court held that CEQA requires an environmental review to measure a project's potential impacts against the actual physical conditions existing at the time of the review, not the "hypothetical" maximum levels allowed by former and outdated permits. The methodology suggested by the commenter would require the City to unnecessarily speculate on the number, type, and location of potential future sensitive receptors. The Draft EIR's description of the existing environmental setting is consistent with the preceding provisions of the *State CEQA Guidelines* in that it describes the current conditions at the time the Notice of Preparation was published (March 20, 2024). The inclusion of potential future land uses that could be developed nearby would be hypothetical in nature and therefore would violate the requirements of CEQA. Reasonably foreseeable future projects that are supported by substantial evidence (for example, those that are currently undergoing the environmental review process) have been included in the list of cumulative projects provided in Table 4.A, page 4-5, of the Draft EIR. These projects have been analyzed in conjunction with the proposed Project for the potential to result in cumulatively considerable environmental impacts. No revisions to the Draft EIR are necessary, and no further response is required.

Response to Comment I-21-28

This comment expresses concern regarding tenant uncertainty, stating that the Draft EIR does not account for tenant-specific variations which have different emission profiles and vehicle mix assumptions, and requests the Draft EIR address their comments regarding revisions to the air quality and traffic modeling to include a range of operational profiles.

Refer to Response to Comment O-1-10 regarding tenant uncertainty and Response to Comment O-1-17 regarding the CEQA requirements for the analysis of speculative or "worst-case" scenarios. As

the Draft EIR considers impacts that may result from development of a project consistent with the site's existing zoning, no revision of the EIR is warranted.

Response to Comment I-21-29

This comment expresses concern over construction dust, noise, and runoff control mitigation, and requests the Draft EIR be revised to address their comments by specifying contractor qualification standards, mandatory environmental training and requiring regular third-party audits during construction.

The construction dust, noise, and runoff rules and regulations referenced throughout the Draft EIR generally represent procedures that are standardized and enforceable under applicable jurisdictions and/or agencies (SCAQMD, the City, and NPDES, respectively). These regulations are commonly required for development projects, and the contractor(s) selected for construction of the proposed Project would be familiar with these requirements and the proper procedures to ensure compliance with these regulations.

Refer to Master Response 4 regarding mitigation requirements under CEQA. The implementation strategy and timing for all mitigation measures is provided in the Mitigation Monitoring and Reporting Program (MMRP) (refer to Chapter 7.0 of the Draft EIR).

State CEQA Guidelines Section 15126.4(c) further state in part, "….Compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards." Therefore, the construction-period measures described in the Draft EIR are compliant with the *State CEQA Guidelines* as written. No revisions to the Draft EIR are necessary, and no further response is required.

Response to Comment I-21-30

This comment expresses concern regarding odor and VOC emissions evaluation, stating that the Draft EIR does not evaluate emissions or odors from cleaning agents commonly used in warehouse maintenance, and requests the Draft EIR be revised to address their comments by identifying chemical categories and potential VOC contributions and prescribing disposal and ventilation practices.

Refer to Master Response 13 and Section 4.9, Hazards and Hazardous Materials, of the Draft EIR, regarding hazards and hazardous materials related to the proposed Project. Operation of the proposed Project is anticipated to utilize solvents, cleaning agents and sanitizing solutions. The probable frequency and severity of consequences from the routine transport, use, or disposal of hazardous materials are affected by the type of substance, the quantity used or managed, and the nature of the activities and operations.

These cleaning products would be consistent with commercial cleaning products already in general and wide use throughout the City and in the vicinity of the Project site. The handling and use of

these products would be routine and consistent with all applicable federal, State, local, and manufacturer regulations, which are enacted to minimize emissions from such products.

Regarding the potential strength or potential substances that may be used during the operation of the proposed Project, the closest sensitive receptors to the Project site are residential uses including single-family homes approximately 82 feet from the Project site's eastern boundary, and further from the proposed building itself (which is the most likely source of the referenced odors) In the event that the future tenant utilizes the proposed manufacturing space for odor-generating (i.e., chemical or food) manufacturing activities, the tenant would adhere to standard industry practices for minimizing the potential for adverse odor effects. SCAQMD Regulation XI and Rule 2305 limit doses and exposures, reducing potential odors related to gasoline vapors. Further, the proposed Project would also comply with CARB's In-Use Off-Road Diesel Vehicles regulation, which would also contribute to a reduction in diesel vehicle exhaust emissions.

Generally, odor molecules either spread out and mix with the air, moving from an area of high concentration to one of low concentration. This disperses the scent across a wider area, decreasing its intensity until it's undetectable. Reactions of some odors in the air, through contact with sunlight or moisture, can also reduce typical concentrations into simpler, odorless compounds. Operational activities would be located away from sensitive receptors and public right of way to the extent feasible, further reducing the potential for odors to reach a substantial number of people. Trash enclosures have also been incorporated into the design of the proposed Project in order to ensure the containment of odors associated with waste receptacles throughout the Project site.

The quantity of cleaning products utilized during maintenance of the proposed structure would be relatively low and would not be expected to result in long-lasting odors, especially given that the proposed structure would be properly ventilated. Given the anticipated downtime between application of these products and the proposed structure's ventilation systems, it is anticipated that any odors associated with cleaning products would dissipate relatively quickly and would not represent a strong, persistent, or noxious odor that would warrant further discussion under CEQA. Therefore, the discussion of potential odor impacts contained in the Draft EIR remains valid. No revisions to the Draft EIR are necessary, and no further response is required.

Response to Comment I-21-31

This comment expresses concern regarding construction worker exposure to dust and diesel exhaust, stating the opinion that the Draft EIR does not analyze health impacts to on-site construction workers, and requests the Draft EIR address their comments regarding inclusion of a Health Risk Assessment specific to construction-phase workers.

Refer to Master Response 9 regarding the assessment of health risks in the Draft EIR. As stated in Table 4.3.G, page 4.3-16, of the Draft EIR, the tentative Project construction schedule assumes construction would occur within a 13-month period. The Draft EIR (Table 4.3.I, page 4.3-27) determined that emissions of particulate matter during construction would not exceed established SCAQMD thresholds. Requiring the use of Tier 4 Interim equipment or most effective Verified Diesel Emission Control Strategies (VDECS) available for engine types is a common method of substantially reducing construction emissions attributed to construction equipment and is applied to

development projects throughout the State. This equipment is readily available across fleet sizes, equipment types, and horsepower bins. Since 2015, newly manufactured engines across all horsepower sizes are required to meet Tier 4 final emissions standards. Further, as stated in the HRA prepared for the proposed Project, (refer to Draft EIR, Appendix C, page 8), the majority of the estimated health risks from toxic air contaminants (TACs) can be attributed to relatively few compounds, the most important being particulate matter from diesel-fueled engines (diesel particulate matter [DPM]). The purpose of the HRA is to document the project-related increase in cancer and noncancer health risk levels; the potential for worker exposure to emissions of TACs (include DPM) on existing nearby sensitive receptors, including residents and/or workers; therefore, the Draft EIR provides an appropriate and thorough assessment of potential impacts to on-site construction workers. No revision of the Draft EIR is required.

Response to Comment I-21-32

This comment expresses concern over the analysis of air quality impacts from construction equipment, stating that the Draft EIR does not model actual staging areas for diesel construction equipment and omits modeling at the property line, and requests the construction air quality analysis be revised to address their comments regarding precise staging locations and mobile source emission factors.

Refer to Response to Comment O-1-4 regarding the air quality analysis conducted for the proposed Project. Emissions are often estimated using general data, such as equipment type, horsepower, and operating hours for the entire Project, and then modeled across the entire site area. Construction emissions (like dust and exhaust from mobile equipment) are often fugitive and variable. They are better represented using volume or area source modeling techniques that account for the dispersion and mixing of pollutants as they move downwind from the entire construction area. As described in Section 4.3, Air Quality, pages 4.3-31 through 4.3-32 of the Draft EIR, a construction HRA was conducted for the proposed Project using air dispersion modeling tools to evaluate potential health risks to sensitive receptors from diesel exhaust emissions generated by construction equipment throughout the Project site, including the property line. For additional details on the HRA methodology, refer to Master Response 9. As the modeling for the proposed Project follows accepted methodologies for the assessment of construction-related air quality impacts, no revision of the Draft EIR is required.

Response to Comment I-21-33

This comment expresses concern over air filtration requirements, stating the opinion that the Draft EIR does not consider mitigation for adjacent homes, and requests the lead agency address their comments by offering an incentive or reimbursement program to nearby residents for air filter upgrades.

Refer to Master Response 4 regarding mitigation requirements under CEQA. As discussed in Section 4.3.9.2, Mitigation Measures, starting on page 4.3-50 of Section 4.3, Air Quality, of the Draft EIR, and Response to Comment O-1-4, all potentially significant impacts of the proposed Project with respect to air quality would be reduced to a less than significant level with implementation of Mitigation Measure (MM) AQ-1, MM AQ-2, and MM AQ-3. Therefore, further mitigation, including an incentive

or reimbursement program to nearby residents for air filter upgrades, is not required. No further response is necessary.

Response to Comment I-21-34

This comment expresses concern over the Draft EIR's less than significant conclusion for diesel emissions, stating the opinion that the Draft EIR does not model peak-hour diesel concentrations or account for cumulative background sources, and requests their comments be addressed by re-calculating the diesel PM emissions.

Refer to Master Response 9 regarding the health risk assessment prepared for the Project. Toxic air contaminants (TACs) are injurious in small quantities and are regulated by USEPA, CARB, and SCAQMD. Some examples of TACs include benzene, butadiene, formaldehyde, and hydrogen sulfide. The identification, regulation, and monitoring of TACs is relatively recent compared to that for criteria pollutants. TACs do not have ambient air quality standards. The consideration of TACs (including diesel particulate matter) was appropriately and thoroughly addressed in Section 4.3.6, Project Impacts, starting on page 4.3-22 in Section 4.3, Air Quality, of the Draft EIR and in the Health Risk Assessment included as Appendix C to the Draft EIR; Therefore, no revision of the Draft EIR or additional modeling is required.

Response to Comment I-21-35

This comment expresses concern over medically vulnerable populations, stating that the Draft EIR does not evaluate potential disproportionate impacts on medically vulnerable residents, and requests the HRA be amended to address their comments regarding identification and mapping of medically vulnerable populations.

Refer to Master Response 9 regarding the assessment of health risks related to the proposed Project and Master Response 14 regarding disproportional impacts on vulnerable communities. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

Threshold 4.3.3, starting on page 4.3-30 of Section 4.3, Air Quality, of the Draft EIR provides an analysis of potential impacts to sensitive receptors in the Project site vicinity. Additionally, as discussed in Section 4.3.3.1, Air Pollutants and Health Effects, page 4.3-3, of Section 4.3, Air Quality, of the Draft EIR, "occupants of facilities such as schools, daycare centers, parks and playgrounds, hospitals, and nursing and convalescent homes are considered to be more sensitive than the general public to air pollutants because these population groups have increased susceptibility to respiratory disease" (page 4.3-3). Therefore, medically vulnerable populations have already been considered within the Draft EIR's analysis of whether the proposed Project would expose sensitive receptors to substantial pollutant concentrations as presented under Threshold 4.3.3. Therefore, the discussion of potential impacts to sensitive receptors, including medically vulnerable populations, contained in the Draft EIR remains valid. No revisions to the Draft EIR are necessary, and no further response is required.

Response to Comment I-21-36

This comment expresses concerns related to air quality modeling near sensitive receptors, stating the opinion that the Draft EIR does not reflect the true proximity of sensitive residential receptors, and requests that the air quality and HRA modeling be revised to address their comments regarding inclusion of receptor points along the property boundary with the Meadows community.

Threshold 4.3.3, starting on page 4.3-30 of Section 4.3, Air Quality of the Draft EIR states, "The closest sensitive receptors to the Project site are residential uses, including single-family homes, which are located adjacent to the east property line at approximately 82 feet from the Project site's eastern boundary limit to the residential building façade." The Draft EIR appropriately assesses vehicle access at this location. Based on the configuration of the site (refer to Draft EIR Figure 4.13.1, page 4.13-3), residential properties along the "shared wall" are located more distant from the site than the nearest sensitive receptor identified (82 feet.) As natural air dispersion of pollutants in the atmosphere generally results in lower air pollutant levels the further a sensitive receptor is from the site; it is appropriate and reasonable that the receptor modeled in the HRA represents the highest level of pollutants resulting from construction and operation of the proposed Project; therefore, no revision of the Draft EIR or air quality or health risk modeling is required.

Response to Comment I-21-37

This comment expresses concern regarding air quality buffer zones, stating that the Draft EIR does not evaluate whether a physical or operational buffer zone is needed between the proposed Project and nearby residences, and requests mitigation be added to address their comments regarding the establishment of a 500-foot operational buffer zone.

Refer to the Responses to Comments O-1-4, I-21-15, I-21-35, and I-21-36. As stated in the Draft EIR, the potential air quality impacts resulting from construction of the proposed Project would be reduced to below SCAQMD significance thresholds through the implementation of MM AQ-1, MM AQ-2, and MM AQ-3. These measures have been determined to be feasible and appropriate and would be implemented pursuant to the MMRP (refer to Draft EIR, Section 7.0) prepared for the proposed Project. As these measures sufficiently mitigate the impact identified in the Draft EIR, consideration of other mitigation schemes is not warranted. No revision of the Draft is required.

Response to Comment I-21-38

This comment expresses concern regarding analysis of long-term diesel PM exposure, stating the opinion that the Draft EIR fails to account for chronic exposure in outdoor locations, and requests the HRA be re-run to address their comments regarding inclusion of receptor nodes representing typical outdoor use locations in the Meadows community.

Refer to Master Response 9 regarding the assessment of health risk resulting from the proposed Project. Refer also to Responses to Comments I-10-15, I-21-35, and I-21-36. The HRA included in the Draft EIR (refer to Appendix C of the Draft EIR) uses air dispersion modeling that considers emission data from the proposed Project to calculate the concentration of pollutants in the ambient air at various receptor locations, including outdoor locations such as backyards, patios, and playgrounds

over a period of time. The model includes factors such as wind speed, atmospheric stability, and terrain. As described on page 4.3-32 of the Draft EIR, the HRA model assumes sensitive receptors would be subject to DPM 24 hours per day, 350 days per year.

As discussed in 4.3.3.1, Air Pollutants and Health Effects, page 4.3-3, of Section 4.3, Air Quality, of the Draft EIR, "occupants of facilities such as schools, daycare centers, parks and playgrounds, hospitals, and nursing and convalescent homes are considered to be more sensitive than the general public to air pollutants because these population groups have increased susceptibility to respiratory disease" (page 4.3-3). Therefore, medically vulnerable populations have already been considered in the Draft EIR and supporting technical reports, and no revision of the Draft EIR or air quality or health risk modeling is required.

Response to Comment I-21-39

This comment expresses concern regarding the Draft EIR's odor analysis, stating that the Draft EIR does not offer odor modeling or operational odor control plan, and requests that the Draft EIR be revised to address their comments by including an odor impact assessment and potential mitigation.

Potential odor impacts during construction and operation of the proposed Project are analyzed under Threshold 4.3.4, starting on page 4.3-38 of Section 4.3, Air Quality, of the Draft EIR. As stated in this analysis, land use types that are typically known to generate considerable odors are wastewater treatment plants, compost facilities, landfills, solid-waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. By contrast, potential odors generated by operation of the proposed Project are anticipated to be standard of warehouse, office, and manufacturing land uses throughout the city. As previously stated, a tenant for the proposed building has not yet been determined.

Refer to Response to Comment I-21-30 regarding potential odors that may result from the proposed Project.

Given the nature of the proposed land uses and consistency with applicable regulations and design features for odor reduction, the discussion of potential odor impacts contained in the Draft EIR remains valid. This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions to the Draft EIR are necessary, and no further response is required.

Response to Comment I-21-40

This comment expresses concern regarding the Draft EIR's odor analysis, stating the opinion that the Draft EIR does not evaluate site-specific odor sources and requests that the Draft EIR address their comments by specifying odor control measures for trash areas.

Refer to Response to Comment I-21-39 above regarding odors from the proposed Project. As discussed on pages 4.3-38 and 4.3-39 of the Draft EIR, trash enclosures have been incorporated into the Project's design in order to contain odors associated with solid waste generated by the

proposed Project. As discussed in Section 4.19.3.5, Solid Waste, on page 4.19-4 of Section 4.19, Utilities and Service Systems, of the Draft EIR, the pickup of waste, recyclables, and green waste generated by the proposed Project would occur on a regular basis under the City's existing contract with CR&R, Inc. Therefore, solid waste generated by the proposed Project would be disposed of, enclosed, and regularly collected to minimize the potential for adverse odor effects. Given the nature of the proposed land uses and consistency with applicable regulations and design features for odor reduction, the discussion of potential odor impacts contained in the Draft EIR remains valid. This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions to the Draft EIR are necessary, and no further response is required.

Response to Comment I-21-41

This comment expresses concern regarding truck idling emissions, stating the opinion that the HRA omits diesel emissions from trucks idling at loading docks and staging areas, and requests the HRA be revised to address their comments regarding truck idling emissions using site-specific assumptions.

Refer to Master Response 9 regarding the Health Risk Assessment provided in the Draft EIR (Appendix C). As described on pages 10 through 14 of the HRA, the analysis included all sources of mobile emissions, including daily vehicle and truck trips, number of loading dock doors, truck idling, and on-site queuing to determine the potential risk to all nearby sensitive receptors, ("…For the truck unloading locations, individual point sources represent the trucks idling at each loading dock. For all the idling sources, the release parameters were set to the SCAQMD default parameters. Receptors were placed at the nearest sensitive receptor locations"). As the HRA appropriately included idling trucks in the assessment of potential health risks impacts, no revision to the Draft EIR or Health Risk Assessment is required.

Response to Comment I-21-42

This comment expresses concern over dust-control mitigation, stating that the Draft EIR does not evaluate high-wind events, and requests the Draft EIR be revised to address their comments by including mitigation requiring enhanced dust control.

Refer to Response to Comment I-20-3 regarding dust control. As discussed under Threshold 4.3.2, starting on page 4.3-24 in Section 4.3, Air Quality, of the Draft EIR, the proposed Project would be required to comply with SCAQMD's Rule 403, which requires the prevention, reduction, or mitigation of fugitive dust emissions from a Project site during construction, including during "high wind conditions when instantaneous wind speeds exceed 25 miles per hour."[27] Under Rule 403, the proposed Project would adhere to best available control measures as feasible, including adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers, and/or ceasing all activities. Because a range of control measure options are available,

[27] 1997. South Coast Air Quality Management District Rule 403, website: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf Accessed: November 3, 2025.

the construction contractor can adjust their approach during periods of high winds, including the Santa Ana winds. Further specificity will be provided during the construction permitting phase, during which specific plans and procedures would be outlined in collaboration with the contractor(s), once known, and approved by the City and other applicable agencies.

As discussed on page 11 of the Health Risk Assessment prepared for the proposed Project (Appendix C to the Draft EIR), the AERMOD model was utilized to assess emissions dispersion under the proposed Project, including particulate matter (dust) emissions. Consistent with USEPA recommendations, 5 years of data from SCAQMD's Mission Viejo Meteorological Station was utilized to provide a representation of local weather conditions, including wind patterns. CEQA case law upholds the principle that in-depth analysis of speculative or unlikely events is not required. (*Refer to Santa Rita Union School Dist. v. City of Salinas*, 94 Cal.App.5th 298, 331 [2023]). The Santa Ana winds are generally seasonal, but do not necessarily conform to a particular pattern or schedule and therefore can be difficult to predict. Therefore, it cannot be definitively stated that high wind, including Santa Ana wind, events would occur during construction of the proposed Project. Further, given that the AERMOD model utilized data over a 5-year range, Santa Ana wind events that occurred during this period were accounted for in the model's output.

The flexibility of Rule 403 to address varying weather conditions during construction is therefore adequate to address potential impacts with respect to high wind events, including the Santa Ana winds. Therefore, the discussion and mitigation of fugitive dust impacts contained in the Draft EIR remains valid. *State CEQA Guidelines* Section 15126.4(c) states in part, "….Compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards." As the Draft EIR fully considers applicable SCAQMD dust control measures which address high wind conditions; no additional dust specific modeling or revision of the Draft EIR is required.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions to the Draft EIR are necessary, and no further response is required.

Response to Comment I-21-43

This comment expresses concern regarding diesel back-up generator emissions in air modeling, stating the opinion that the Draft EIR does not include emissions from testing or backup operations in the air quality or health risk modeling, and requests the emissions inventory and HRA address their comments by including specific mitigation.

By definition, back-up generators would only be used on a limited basis in the case of emergency power failure or for routine testing and maintenance. Such intermittent use would not generate substantial emissions, since the use would be short-term, intermittent, and infrequent. The air quality and health risk analysis anticipates the use of a 300 horsepower (hp) diesel fire pump, which is estimated to run for approximately 50 hours per year and the use of two 200 hp diesel powered

cargo handling equipment units.[28] This equipment was included in the CalEEMod assumptions used in the Air Quality, Greenhouse Gas, and Energy Impact Report and Health Risk Assessments.

Furthermore, under State law and SCAQMD rules, every piece of equipment which emits or controls air pollution must have a Permit to Operate (PO). Per the SCAQMD, common types of applications filed at SCAQMD are for Permit to Construct (PC) or PO. Prior to installation of new or relocated equipment, or prior to modification of existing equipment, the operator of the equipment is required to obtain a PC. Once a piece of equipment is installed, modified and/or operated, SCAQMD would process the application for a PO. SCAQMD may further require permits where/when changes occur in the equipment, conditions, or operator occur. Permit applications are evaluated for compliance with applicable rules, criteria, and regulations and must meet appropriate public noticing requirements. Emergency diesel generators and fire pumps are required to comply with SCAQMD permitting and regulatory requirements, which would establish Project-specific health protective requirements for the operation of a back-up generator and/or fire pump. Therefore, the analysis presented in the Draft EIR is adequate and accurately reflects Project-specific information in the CalEEMod outputs; therefore, additional analysis or revision to the Draft EIR or supporting technical analyses is not required.

Response to Comment I-21-44

This comment expresses concern regarding health risks for outdoor workers, stating the opinion that the Draft EIR's air quality and HRA omit evaluation of on-site outdoor workers, and requests the modeling address their comments regarding the addition of receptor points for on-site personnel.

Refer to Master Response 9 regarding the potential health risk effects to workers. The HRA, included as Appendix C to the Draft EIR, was prepared in accordance with the methodologies outlined by the Office of Environmental Health Hazard Assessment (OEHHA) and implemented by the South Coast Air Quality Management District (SCAQMD). These methodologies prioritize the evaluation of sensitive receptors, which OEHHA defines as including residences, schools, daycare centers, hospitals, and similar facilities where individuals may be more vulnerable to air toxics due to age or health status.

The SCAQMD's CEQA Air Quality Handbook and Risk Assessment Procedures do not require modeling of on-site workers unless there is substantial evidence that such workers would experience exposure levels exceeding established thresholds. The Draft EIR's HRA conservatively modeled diesel particulate matter (DPM) emissions using worst-case assumptions and found that the maximum individual cancer risk at the nearest off-site residential receptor was below the SCAQMD's significance threshold of 10 in one million with implementation of MM AQ-1 (refer to Table 4.3.M, page 4.3-34). Given that on-site workers would be exposed for shorter durations (typically 8 hours per day, 250 days per year) and over shorter exposure periods (e.g., 25 years), their risk would be proportionally lower than that of a residential receptor. Additionally, all workers are required to wear appropriate personal protective equipment (PPE) while performing their

[28] Note, this equipment would be located along the southern boundary of the Project site, at a much greater distance from the nearest sensitive receptor identified in the Health Risk Assessment; therefore, it is reasonable that the infrequent and limited use of this equipment would have correspondingly greater reduction effects than the impacts identified in the Draft EIR.

duties. Depending on the nature of the task and associated hazard, PPE may include (but would not be limited to): safety goggles, gloves, respirators, hard hats, high-visibility clothing, and hearing protection. The use of PPE is mandatory to ensure the health and safety of all personnel and to comply with occupational safety regulations. Supervisors are responsible for enforcing PPE requirements and ensuring that all employees are properly trained in the use and maintenance of such equipment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions to the Draft EIR are necessary, and no further response is required.

Response to Comment I-21-45

This comment expresses concern regarding cumulative cancer burden, stating the opinion that the HRA does not evaluate cumulative cancer burden from existing truck routes, and requests the HRA be expanded to address their comments by including cumulative cancer burden from all diesel truck routes within 1 km of the Project site.

Refer to Master Response 9 regarding the potential health risk effects to workers. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions to the Draft EIR are necessary, and no further response is required.

Response to Comment I-21-46

This comment expresses concern regarding dispersion modeling, stating the opinion that the air quality modeling fails to account for crosswinds from canyon airflow and afternoon gusts, and requests the HRA be revised to address their comments by including high-resolution wind rose data.

Refer to Response to Comment O-1-4 and Master Response 9 regarding the air quality and health risk effects resulting from the construction and operation of the proposed Project. The nearest representative meteorological station that provides the American Meteorological Society/ Environmental Protection Agency Regulatory Model (AERMOD) ready meteorological data is the Mission Viejo Meteorological Station. As detailed in Appendix C of the Draft EIR (refer to Figure 3), the wind patterns[29] at this station were appropriately considered and assessed in the preparation of the health risk assessment. Using this information and other information, the HRA utilized three models to determine how the TACs would move through the atmosphere after release from sources both on site and along the truck routes; and the pollutant concentration's individual health risks at the nearby sensitive receptor locations. As the HRA was prepared pursuant to applicable OEHHA

[29] A windrose (as detailed in the referenced Figure 3) provides a succinct view of how wind speed and direction are typically distributed at a particular location. Presented in a circular format, the windrose shows the frequency of winds blowing from particular directions.

guidance, the commenter's unsubstantiated suggested modeling is not required; therefore, no revision of the Draft EIR or the technical analyses is warranted.

Response to Comment I-21-47

This comment expresses concern regarding the HRA, stating the opinion that it does not include receptor locations or cancer risk estimates for local schools, childcare centers, or playgrounds, and requests the HRA be amended to address their comments by including receptor points at all nearby schools and daycares.

Refer to Response to Comment O-1-4 and Master Response 9 regarding the air quality and health risk effects resulting from the construction and operation of the proposed Project. As stated in the Health Risk Assessment (page 5 of Appendix C to the Draft EIR), sensitive receptors for the purpose of the analysis included residences, schools, daycare centers, hospitals, parks, and similar uses which are sensitive to air quality. Sensitive receptors were selected on a basis of proximity to the Project site, and the HRA ultimately found that the nearest sensitive receptors to the Project site were residential communities and a nature park. Local schools, childcare centers, and playgrounds beyond the radius provided in Figure 4 were not included in the analysis given their distance from the Project site. For the evaluation of health impacts, emissions dissipate as the distance from the source of emission increases. Threshold 4.3.3, starting on page 4.3-30 of Section 4.3, Air Quality and Appendix C of the Draft EIR provide an analysis of potential impacts to sensitive receptors in the Project site vicinity. Additionally, as discussed in Section 4.3.3.1, Air Pollutants and Health Effects, starting on page 4.3-2 of Section 4.3, Air Quality, of the Draft EIR, "…occupants of facilities such as schools, daycare centers, parks and playgrounds, hospitals, and nursing and convalescent homes are considered to be more sensitive than the general public to air pollutants because these population groups have increased susceptibility to respiratory disease" (page 4.3-3). The Draft EIR and supporting technical analyses appropriately identify the nearest sensitive receptors to on-site emission sources.

The sensitive maximally exposed individual (MEI), which is the individual with the highest probability of contracting cancer as a result of exposure, was determined to be the residences located approximately 82 feet from the Project site's eastern boundary limit. As shown in Table 4.3.M, page 4.3-34, with implementation of MM AQ-1, the cancer risk at the sensitive MEI was determined to be 5.12 in 1 million during construction and 3.06 in 1 million during operation of the Project, which would not exceed the SCAQMD cancer risk threshold of 10 in 1 million. The nearest playground, school, and childcare center are all located farther away than the identified sensitive MEI. Therefore, health risk at these locations would be lower than the risks identified for the sensitive MEI and would also be considered to be below established thresholds.

Therefore, the sensitive receptor methodology contained in the Draft EIR remains valid. This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions to the Draft EIR are necessary, and no further response is required.

Response to Comment I-21-48

This comment expresses concern regarding impacts to wildlife movement corridors, stating the opinion that the Draft EIR does not analyze whether the Project blocks any corridor or contributes to habitat fragmentation, and requests the Draft EIR be revised to address their comments by assessing whether the Project disrupts species movement.

The entire Project site is developed and supports an existing office/industrial building and supporting infrastructure (i.e., parking lot, landscaped medians). The Project site is located within an urbanized area of the City, and is bound by existing residential and industrial developments, and roads to the immediate north, east, west, and south that already restrict wildlife movement in the Project vicinity.

As discussed on page 4.4-2 of the Draft EIR, preparation of the Biological Resources Report (Draft EIR Appendix D) included review of aerial photography of the Project site and surrounding area to identify potential wildlife corridors and linkages. Potential corridors and linkages identified during this review were investigated by a qualified biologist during the field investigation conducted on December 20, 2024 and concluded that there are no riparian corridors, creeks, or useful patches of habitat within or connecting the Project site to any identified wildlife corridors or linkages. Based on this conclusion, and with implementation of RCM BIO-1, the Draft EIR found that the proposed Project would not interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.

This comment does not provide evidence that the analysis presented in the Biological Resources Report and Draft EIR is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. Therefore, the analysis and conclusions of the Draft EIR regarding evaluation of wildlife corridor impacts remain valid. No revisions to the Draft EIR are necessary, and no further response is required.

Response to Comment I-21-49

This comment expresses concern regarding bird strike risk, stating the opinion that the Draft EIR does not evaluate the risk that warehouse lighting will disorient nocturnal birds, and requests the Draft EIR be revised to address their comments regarding inclusion of mitigation to reduce light spillage.

Please refer to Master Response 3 regarding speculation without substantiation. The main factors that affect bird collisions include the height of a building, the reflective glass to surface ratio, vegetation along buildings that may be reflected in windows, and nighttime lighting. According to analysis performed by BirdCast[30], bird flights in Washington, Oregon, and California average

[30] A partnership between the Cornell Lab of Ornithology, Colorado State University, and the University of Massachusetts Amherst, that used weather radar to monitor and predict bird migrations,

approximately 2,600 feet high, with many birds flying as high as 6,000 feet in altitude.[31] Therefore, any bird traversing the Project site along their migration routes are likely to migrate at altitudes higher than the proposed 35-foot-tall building.

In addition, the existing urban character of the Project site and surrounding area is already developed with a mixture of office, light industrial, and residential uses. Lighting sources are located on every developed use in the Project area with no reported increased incidence that such lighting has disoriented nocturnal birds. There is no indication in the comment that such an instance would occur as a result of the proposed Project. As discussed in Section 4.1, Aesthetics, of the Draft EIR (page 4.1-26), and Master Response 12, all Project lighting would be hooded or shielded to focus the light downward and prevent light spillage onto adjacent properties. Further, sources of light and glare associated with the proposed Project would be consistent with and not contribute to a substantial increase in the existing surrounding uses, such as industrial uses, vehicle headlights, and streetlights, during both daytime and nighttime hours. Therefore, the proposed Project would not create a substantial source of nighttime lighting that could disorient birds or lead to collisions. Therefore, the analysis and conclusions of the Draft EIR regarding evaluation of potential impacts to birds remain valid. No revisions to the Draft EIR are necessary, and no further response is required.

Response to Comment I-21-50

This comment expresses concern regarding tree removal and nesting bird protections, stating that the Draft EIR does not disclose the number or type of trees being removed or mitigation for nesting birds, and requests the biological resources section be revised to address their comments by specifying the numbers of trees to be removed and including pre-construction nesting bird surveys.

Refer to Response to Comment O-1-5 regarding potential impacts to nesting birds. The Draft EIR provides a conceptual overview of proposed landscaping removal and replacement based upon the information available at the time. Further specificity would be provided during the construction permitting phase, during which specific plans and procedures would be outlined in collaboration with the contractor(s), once known, and approved by appropriate regulatory agencies. It should be noted that the trees present on the Project site under existing conditions generally consist of non-native, ornamental trees and are not subject to local tree protections or conditions. Further, under the proposed Project, the existing landscaping around the eastern, western, and southern perimeters of the Project site would remain in place and would not be removed.

As discussed under Threshold 4.4.1, starting on page 4.4-10 of Section 4.4, Biological Resources, of the Draft EIR, the proposed Project would comply with the MBTA and California Fish and Game Code and avoid impacts to nesting birds through required pre-construction nesting bird surveys prior to removal of any landscaped vegetation during nesting bird season, as detailed in RCM BIO-1. In the event that an active avian nest is discovered during this survey, a no-disturbance buffer would be established in order to prevent nest disturbance. Therefore, pre-construction nesting bird surveys, as requested in this comment, are already required under the proposed Project.

[31] The Cornell Lab of Ornithology. October 13, 2021. New BirdCast Analysis Shows How High Migrating Birds Fly. Website: https://www.allaboutbirds.org/news/new-birdcast-analysis-shows-how-high-migrating-birds fly/ (accessed October 8, 2025).

Refer to Master Response 4 regarding the requirements for mitigation in CEQA documents.

This comment does not provide evidence that the analysis presented in the Biological Resources Report and Draft EIR is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. Therefore, the analysis and mitigation contained in the Draft EIR related to vegetation removal and nesting birds remain valid. No revisions to the Draft EIR are necessary, and no further response is required.

Response to Comment I-21-51

This comment expresses concern regarding cultural landscape impacts, stating the opinion that the Draft EIR does not consider whether the proposed Project would impact the cultural landscape or community identity, and requests the lead agency address their comments by consulting with local historical and tribal representatives to determine whether there are cultural landscape or community character impacts.

Cultural landscapes may be defined as broad geographic area that have been shaped by human activity and show the interplay between nature and culture. These landscapes may include visible, tangible elements like buildings, agriculture, and land use patterns, as well as intangible aspects such as traditional knowledge, beliefs, and associations with a place.

As defined in *State CEQA Guidelines* Section 15064.5, a "historical resource" includes, but is not limited to, any object, building, site, area, place, record, or manuscript that is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. CEQA also mandates that lead agencies consider a resource "historically significant" if it meets the criteria for listing in the California Register or the National Register, consisting of the following:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;

2. It is associated with the lives of persons important to local, California, or national history;

3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values; or

4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

The Project site does not qualify as a cultural landscape with historical or tribal significance. Refer to Response to Comment O-1-6 regarding tribal cultural resources and compliance with AB 52.

Refer to Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses.[32] The Project site is located in an urbanized area, previously developed with office, light industrial and residential uses. The existing land use pattern of the Project site has been established by its long-term designation of industrial and office uses in the City's General Plan. Further, the Project site is already developed with a two-story office/industrial building under existing conditions. Therefore, development of the proposed Project would not introduce a substantially different land use with the potential to alter the sense of character within the community. Therefore, the analysis and conclusions contained in the Draft EIR related to cultural resources remain valid. No revisions to the Draft EIR are necessary, and no further response is required.

Response to Comment I-21-52

This comment expresses concern regarding energy use, stating the Draft EIR fails to disclose whether the tenant may include cold storage or refrigerated logistics, and requests the energy section be updated to address their comments by including scenarios for refrigerated options.

As required under CEQA, the Draft EIR analyzes the potential operational impacts associated with the proposed building, including potential office, manufacturing, and warehouse uses. As stated throughout the Draft EIR, the future tenant of the proposed building has not yet been determined. The Draft EIR did not analyze the project for impacts associated with cold storage or large scale refrigeration. Therefore, City staff will be recommending a condition of approval for the project restricting these uses from the building.

As stated in *State CEQA Guidelines* Section 15144, when preparing an EIR, "an agency must use its best efforts to forecast, disclosing all that it reasonably can, even though predicting the unforeseeable is not possible." The commenter requests consideration of energy usage based on potential future uses. As stated in Response to Comment O-1-10, the analysis evaluates all potential environmental impacts based on a reasonably foreseeable range of uses consistent with the property's Light Industrial (LI) zoning designation within the Pacific Commercentre Planned Community and Business Park (BP) General Plan land use designation. Additionally, the mitigation measures and regulatory compliance measures provided in the Draft EIR would require discretionary permitting associated with future tenancy, ensuring environmental protection at the time of tenant occupancy. This approach is consistent with *State CEQA Guidelines* Sections 15126 and 15144, which require CEQA analysis to be based upon reasonably foreseeable development assumptions.

Refer to Master Response 3 regarding speculation without substantiation. The analysis of the proposed Project contained in the Draft EIR is based upon reasonably foreseeable office, manufacturing, and warehouse operations based on information provided by the Project Applicant. As noted above, staff will be recommending a condition of approval restricting cold storage uses at the Project site. Therefore, the analysis of reasonably foreseeable Project characteristics presented in the Draft EIR remain valid, and no revisions are necessary. No further response is required.

Response to Comment I-21-53

[32] The EIR prepared for development of the Nakase nursery site (which became the Meadows community) recognized the proximity of "…of a mix of land uses, including commercial, office, open space, industrial, and residential uses" adjacent to that site. "

This comment expresses concern regarding electric grid capacity for EV infrastructure, stating the Draft EIR does not assess whether the regional electric grid has capacity to serve the site's long-term electrification needs, and requests the Draft EIR be revised to address their comments regarding Southern California Edison's grid capacity.

Refer to Response to Comment O-1-7 regarding the negligible increased demand for electricity resulting from the construction and operation of the proposed Project. Generally, if electricity intensity factors for the selected utility are not available, CalEEMod will default to the Statewide grid average intensity. As analyzed in Section 4.6.6, Project Impacts, starting on page 4.6-7 of Section 4.6, Energy, of the Draft EIR, projected electricity demand associated with operation of the proposed Project would increase the annual electricity consumption in Orange County by a minimal amount (less than 0.01 percent). Similarly, projected fuel demand associated with vehicle trips generated during operation of the proposed Project would increase the annual fuel usage in Orange County by a minimal amount (less than 0.01 percent). All new commercial and industrial buildings in California must now have solar photovoltaic (PV) systems installed, along with battery storage, under the 2023 updates to Title 24, (California's energy code). This requirement, effective January 1, 2023, extends to a wide range of building types including offices, retail stores, warehouses, and hotels.[33] As the Project would develop solar generation and truck charging capability pursuant to California Energy Code requirements; it is reasonable that such required project features have already been appropriately considered by the utility providers and grid operators.

As discussed on pages 4.8-19, 4.8-21 and 4.9-22 of Section 4.8, Greenhouse Gas Emissions, of the Draft EIR, MM GHG-1 would require provisions to be made on the Project site for future electric truck technology, including electric truck charging stations. However, the Draft EIR notes that this technology is still emerging and has yet to be commercially deployed and available on a wide scale. The analysis of the proposed Project contained in the Draft EIR is based upon reasonably foreseeable office, manufacturing, and warehouse operations based on information provided by the Project Applicant. As stated in *State CEQA Guidelines* Section 15064(d)(3), "An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable." Because electric truck charging technology is still in the developing stages, its energy needs cannot be accurately predicted at this time. Similarly, it is not yet known when and to what extent utility upgrades would occur under the proposed Project. Therefore, the potential electricity demand associated with future electric truck charging, as well as future utility upgrades, are speculative and cannot be considered reasonably foreseeable at this time. Therefore, the analysis of reasonably foreseeable project characteristics presented in the Draft EIR remain valid, and no revisions are necessary. No further response is required.

[33] California Energy Commission, *2025 Building Energy Efficiency Standards*, Section 140.10, https://www.energy.ca.gov/sites/default/files/2025-07/CEC-400-2025-010-F_0.pdf#page=380 website accessed: November 3, 2025.

Response to Comment I-21-54

This comment expresses concern regarding green infrastructure or sustainable design features, stating the opinion that the Draft EIR omits discussion of green building practices, and requests the Draft EIR be revised to address their comments by adding a section summarizing the Project's green design.

Refer to page 3-19 of Chapter 3.0, Project Description, of the Draft EIR, for an overview of the sustainability features to be incorporated into the proposed Project. As described in Chapter 3.0, the proposed Project would be consistent with the California Green Building Standards Code (CALGreen Code), AB 1881 water efficient landscape requirements, California's Building Energy Efficiency Standards (Energy Code), and SCAQMD's Warehouse Indirect Source Rule. The proposed Project would also seek LEED certification through the Applicant's LEED Volume program. Sustainable features included in the proposed Project to achieve consistency with the programs described above would include, but not be limited to, drought-tolerant landscaping, low-flow fixtures, high-efficiency lighting, solar, and infrastructure for EV charging. Therefore, the discussion of sustainability features presented in the Draft EIR is sufficient, and no revisions are necessary. No further response is required.

Response to Comment I-21-55

This comment expresses concern regarding geotechnical hazards from soil liquefaction, stating the opinion that the Draft EIR does not explain how foundation design will mitigate liquefaction hazards, and requests the Draft EIR be revised to address their comments by including a specific liquefaction mitigation plan.

The Project site was evaluated for liquefaction potential as part of the Geotechnical Investigation prepared for the proposed Project (Appendix E to the Draft EIR). As summarized in Section 4.7.3.6, Geologic and Seismic Hazards, on page 4.7-5 of Section 4.7, Geology and Soils, of the Draft EIR, the conditions encountered at the boring locations were not considered conducive to liquefaction. Further, mapping performed by the California Geologic Survey (CGS) indicates that the Project site is not located within a designated liquefaction hazard zone. Based on this substantial evidence, the Geotechnical Investigation determined that liquefaction is not considered a significant design concern at the Project site.

Further, the Geotechnical Investigation provides a list of recommended design and grading practices to address other geotechnical concerns and ensure the stability of the Project site in order to support development of the proposed Project. Pursuant to MM GEO-1 (refer to Section 4.7, Geology and Soils, pages 4.7-12, 4.7-13, 4.7-18, and 4.7-19 of the Draft EIR), the proposed Project would comply with the recommendations of the Geotechnical Investigation, the most current CBC, and the City Building Code. MM GEO-1 also requires the submittal of a Final Testing and Observation Geotechnical Report for Rough Grading to the City of Lake Forest Director of Public Works/City Engineer, or designee, prior to issuance of the final grading permit.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more

severe than those identified in the Draft EIR. Therefore, there is no nexus to require additional mitigation; refer to Master Response 4 regarding CEQA mitigation requirements. Therefore, the analysis of geotechnical hazards characteristics presented in the Draft EIR remains valid, and no revisions are necessary. No further response is required.

Response to Comment I-21-56

This comment expresses concern regarding soil-off-gassing or vapor intrusion risks, stating the opinion that the Draft EIR fails to evaluate whether any subsurface contamination could result in soil vapor migration or off-gassing into future buildings, and requests the Draft EIR be revised to address their comments by including a vapor intrusion risk screening.

A Phase I ESA was prepared for the proposed Project in accordance with the standards and procedures outlined in the American Society for Testing and Materials E 1527-05. The Phase I ESA included a review of official government databases concerning the locations of known hazardous materials releases, a search of standard environmental record sources for listings of the Project site and sites within the surrounding area, a review of Cortese List databases to identify recognized environmental conditions or historical recognized environmental conditions, and a site reconnaissance survey.

A vapor encroachment screening (VES) was completed as part of the Phase I ESA in order to determine if any chemicals of concern vapors exist in the subsurface of the Project site due to contaminated soil or groundwater either on or near the Project site (refer to Draft EIR, Appendix F, Section 7.0). The VES was conducted in accordance with ASTM E2600-15, *Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions*. Based on substantial evidence, the screening determined that a vapor encroachment condition does not exist at the Project site. Therefore, Section 4.9.6, Project Impacts, starting on page 4.9-9 of Section 4.9, Hazards and Hazardous Materials, of the Draft EIR found that the proposed Project would result in less than significant impacts related to hazards and hazardous materials, including vapor-related hazards.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. Therefore, there is no nexus to require additional mitigation; refer to Master Response 4 regarding CEQA mitigation requirements. Therefore, the analysis of vapor-related hazards presented in the Draft EIR remains valid, and no revisions are necessary. No further response is required.

Response to Comment I-21-57

This comment expresses concern regarding Project lifetime greenhouse gas emissions, stating the opinion that the Draft EIR does not evaluate total emissions over the Project's lifetime and requests emissions be recalculated and mitigation adjusted accordingly to address their comments.

Refer to Master Responses 6 and 10 regarding the assessment of the proposed Project's cumulative and GHG impacts, respectively. The GHG analysis included in the Draft EIR presents operational emissions estimated in accordance with air district guidelines, and the conclusion was determined

using adopted thresholds of significance. The SCAQMD has identified the average operational lifespan of buildings to be 30 years.[34] CEQA does not require a discussion of why City or regional policies do or do not exist. Remodeling over speculative project timelines is not warranted.

Further, California has several EV requirements, including a mandate for new car sales to be 100 percent electric by 2035. Building codes require new construction to include EV-capable or EV-ready parking spaces, as well as the provision of solar generation capability on non-residential buildings. Additional requirements include the electrification of truck fleets.[35] SB 100 sets Statewide goals for the use of renewable sources for power generation with 60 percent of retail electricity coming from renewable sources by 2030, and 100 percent from renewable and zero-carbon sources by 2045.

As implied, the emission of GHGs is not a local issue. The regulatory actions referenced above, as well as energy-efficiency and GHG reduction measures mandated under the CBC and CEC, as applied to the proposed Project, would contribute to the Statewide goal of reducing GHG emissions to 40 percent below 1990 levels by 2030 and to achieve carbon neutrality by 2045.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. Therefore, there is no nexus to require additional mitigation; refer to Master Response 4 regarding CEQA mitigation requirements. Therefore, the analysis of vapor-related hazards presented in the Draft EIR remains valid, and no revisions are necessary. No further response is required.

Response to Comment I-21-58

This comment expresses concern regarding climate resilience and adaptation, stating the opinion that the Draft EIR does not assess these issues, and requests that the Draft EIR address their comments by including a climate adaptation subchapter or appendix evaluating the proposed Project's vulnerability to extreme heat, drought, regulatory evolution, and freight industry transition.

Refer to Master Response 10 regarding the GHG analysis prepared for the proposed Project. CEQA requires the analysis of GHG impacts in the context of a proposed Project's contribution to climate change and consistency with related plans rather than a proposed Project's vulnerability to environmental changes related to climate change. Consistent with CEQA requirements, Section 4.8.6, Project Impacts, starting on page 4.8-14 of Section 4.8, Greenhouse Gas Emissions, of the

[34] 2008b. South Coast Air Quality Management District, *Interim CEQA GHG Significance Threshold for Stationary* Sources, Rules and Plans.

[35] CARB's Advanced Clean Truck (ACT) Rule is intended to, "…accelerate a large-scale transition of zero emission medium-and heavy-duty vehicles from Class 2b to Class 8." Manufacturers would be required to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales would need to be 55% of Class 2b – 3 truck sales, 75% of Class 4 – 8 straight truck sales, and 40% of truck tractor sales." Pursuant to the Advanced Clean Fleet (ACF) Rule, fleet owners will, "…have the option to transition a percentage of their vehicles to meet expected zero-emission milestones, which gives owners the flexibility to continue operating combustion -powered vehicles as needed during the move toward cleaner technology.

Draft EIR quantifies projected GHG emissions associated with the proposed Project and presents a comparison with established thresholds of significance, including consistency with applicable plans, policies, and regulations pertaining to emissions reductions. Refer to Response to Comment I-21-21 regarding the LEED certification the proposed Project would acquire through the Applicant's LEED Volume program. These features would function to reduce GHG emissions of the proposed Project, subsequently reducing the Project's contribution to climate change and associated environmental changes.

The City's vulnerability to long-term climate-related hazards is addressed through the Safety Element of the City's General Plan and other long-range planning documents. Further, the analysis of the proposed Project contained in the Draft EIR is based upon reasonably foreseeable climate conditions. As stated in *State CEQA Guidelines* Section 15064(d)(3), "An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the Project. A change which is speculative or unlikely to occur is not reasonably foreseeable."

Future climate conditions with the potential to affect the Project site or greater geographical areas, including extreme heat, flooding, supply disruptions, or regulatory change, are not able to be accurately predicted at this time and are not solely conditions applicable to or adequately addressed by individual projects. Therefore, any potential effects to the proposed Project are speculative and cannot be considered reasonably foreseeable at this time. Therefore, the analysis of GHG emissions presented in the Draft EIR remain valid, and no revisions are necessary. No further response is required.

Response to Comment I-21-59

This comment expresses concern regarding GHG mitigation, stating the opinion that the Draft EIR does not explain how GHG mitigation will be monitored, reported, or verified, and requests the Draft EIR be revised to address their comments by including quantifiable reduction targets, a monitoring schedule, and responsible agencies for GHG mitigation.

Refer to Master Response 10 regarding the discussion of GHG impacts provided in the Draft EIR. As noted in Table 4.8.B, page 4.8-16, operation of the proposed Project would not exceed the established SCAQMD GHG significance threshold; therefore, mitigation was not required for impacts related to quantity of GHG emissions generated.

However, MM GHG-1 was identified to contribute to the Project's "fair share" of GHG emissions reductions required to support SB 743 and the goals of the 2022 Scoping Plan. The implementation strategy and timing for all mitigation measures is provided in the Mitigation Monitoring and Reporting Program (MMRP) (refer to Chapter 7.0 of the Draft EIR). Refer to Master Response 4 regarding mitigation requirements under CEQA and the MMRP.

As implementation of the MMMP provides an enforceable and verifiable method to ensure completion of the stated mitigation, no revisions of the Draft EIR is required.

Response to Comment I-21-60

This comment expresses concern with the Draft EIR's GHG thresholds, stating the opinion that the Draft EIR does not evaluate the Project against the City of Lake Forests' Climate Action Plan (CAP) targets, and requests the Draft EIR be revised to address their comments by evaluating Project emissions against the Lake Forest CAP.

The City of Lake Forest has not adopted a Climate Action Plan. However, the Public Safety Element of the City's General Plan outlines the City's climate change and resiliency planning strategies. Threshold 4.11.2, starting on page 4.11-8 of Section 4.11, Land Use and Planning, of the Draft EIR provides an analysis of the proposed Project's consistency with applicable planning documents, including the City's General Plan and Zoning Ordinance and SCAG's 2020 and 2040 RTP/SCS documents. The Draft EIR found that the proposed Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Refer to Master Response 7 regarding the compatibility of the proposed Project with local and regional plans.

In addition, Threshold 4.8.2, starting on page 4.8-16 of Section 4.8, Greenhouse Gas Emissions, of the Draft EIR addresses the proposed Project's consistency with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of greenhouse gases. Plans analyzed in this section included CARB's 2022 Scoping Plan, EO B-30-15, SB 32, AB 197, and AB 1279, and the SCAG's RTP/SCS. The Draft EIR ultimately found that, even with implementation of the TDM measure (addition of bike lanes), the proposed Project's VMT impact would be significant and unavoidable. While the proposed Project would be consistent with SCAG's 2020 and 2024 RTP/SCS documents, the proposed Project would not be consistent with the policies or goals of the 2022 Scoping Plan related to VMT. Therefore, as indicated in the Draft EIR, the proposed Project would conflict with a plan or policy adopted for the purpose of reducing GHG emissions and would result in a significant and unavoidable impact. Therefore, the analysis of greenhouse gas emissions presented in the Draft EIR remains valid, and no revisions are necessary. No further response is required.

Response to Comment I-21-61

This comment expresses concern regarding hazardous materials spill risk, stating the opinion that the Draft EIR does not assess the risk of accidental spills during Project operation, and requests the Draft EIR be revised to address their comments by including a spill scenario matrix and a complete Hazardous Materials Business Plan (HMBP) prior to Project approval.

Threshold 4.9.1, starting on page 4.9-9 of Section 4.9, Hazards and Hazardous Materials, of the Draft EIR requires an analysis of whether the proposed Project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Threshold 4.9.2 requires the analysis of whether the proposed Project would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions, including spills, involving the release of hazardous materials into the environment.

Refer to Master Response 13 regarding hazards and hazardous materials impacts related to the proposed Project. As described in Section 4.9.6, Project Impacts, page 4.9-10 of Section 4.9, Hazards

and Hazardous Materials, of the Draft EIR, the specific materials present on the Project site during operation of the proposed Project would depend upon the needs of the future building tenant, which has yet to be determined. However, the Draft EIR anticipates that Project operations may include the use of solvents, cleaning agents, sanitizing solutions, paints, fertilizers, and pesticides, depending on the type of future industrial use. Future activities at the Project site, including both construction and operation, would be subject to existing federal, State, and local regulatory programs for hazardous materials.

The Environmental Health Division of the Orange County Health Care Agency is designated as the Certified Unified Protection Agency (CUPA) for the City of Lake Forest, and coordinates the regulation of hazardous materials and hazardous wastes in the City of Lake Forest. Businesses that store or use hazardous materials in the city limits of Lake Forest are required to submit chemical and facility information on the California Environmental Reporting System (CERS), which is a Statewide web-based system to support CUPAs in electronically collecting and reporting various hazardous materials-related data as mandated by the California Health and Safety Code and 2008 legislation (AB 2286). Chapter 6.95 of Division 20 of the California Health and Safety Code requires a HMBP be submitted to the local CUPA if on-site hazardous materials exceed in aggregate any of the following: 55 gallons for liquids; 500 pounds for solids; or 200 cubic feet of gases at standard temperature and pressure. HMBPs are required to be submitted electronically to the CERS and must include facility information, a Hazardous Materials Inventory Statement, an Emergency Response Plan, and an Emergency Response Training Plan. The HMBP must be re-certified for completeness and accuracy every year, or updated and revised, as necessary. Therefore, once a tenant for the proposed building has been identified, proposed operations would be evaluated to determine whether preparation of a HMBP is required.

Therefore, the commenter's recommendation to prepare a HMBP is consistent with regulatory requirements, and a HMBP would be required for the proposed Project in the event that the proposed Project meets the criteria for preparation of this plan. Further, the proposed Project would be subject to the CalARP program, which aims to reduce the likelihood and impact of accidental releases of regulated toxic and flammable substances, such as the fuels mentioned in this comment. CalARP conducts facility evaluations, develops administrative and operational procedures, prepares emergency preparedness programs, and establishes facility design requirements. Facilities regulated under the CalARP Program must file a written Risk Management Plan (RMP) with the Environmental Health Division of the Orange County Health Care Agency.

State CEQA Guidelines Section 15204(a) further states, "…CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors". The proposed Project's compliance with requirements for HMBPs and RMPs for handling significant quantities of hazardous materials, OSHA and Cal/OSHA regulations, CCR Title 8; the CGP; and USDOT, RCRA, and State regulations, would ensure that the proposed Project would not create a significant hazard to the public or the environment from potential spills of hazardous materials associated with the proposed Project. Therefore, the analysis of hazards and hazardous materials presented in the Draft EIR provides an appropriate and comprehensive assessment of potential hazardous materials impacts. As the analysis provided in the Draft EIR remains valid; therefore, no revisions are necessary. No further response is required.

Response to Comment I-21-62

This comment expresses concern regarding hazardous waste hauling routes and spill risk, stating the opinion that the Draft EIR omits details about hazardous waste hauling routes or potential spill risks during off-site transport and requests the Draft EIR address their comments regarding identification of likely waste transport routes and assessment of risks for spills, collisions, or exposure.

Refer to Master Response 13 regarding hazards and hazardous materials impacts resulting from the proposed Project and Response to Comment I-21-61, which provides a detailed response to concerns regarding the potential for hazardous materials spill risk. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-21-63

This comment expresses concern regarding fueling infrastructure and mobile fuel truck impacts, stating that the Draft EIR fails to disclose whether on-site truck fueling stations or mobile fueling will be used, and requests the Draft EIR be revised to address their comments by disclosing whether permanent fueling stations or mobile fuel trucks would be used.

The analysis of the proposed Project contained in the Draft EIR is based upon reasonably foreseeable office, manufacturing, and warehouse operations based on information provided by the Project Applicant. As stated in *State CEQA Guidelines* Section 15064(d)(3), "An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the Project. A change which is speculative or unlikely to occur is not reasonably foreseeable."

A diesel fuel storage plan is required for facilities that store more than 1,320 gallons of petroleum products in aboveground tanks or containers, with specific requirements stemming from the Aboveground Petroleum Storage Act (APSA). Facilities are subject to a Spill Prevention Control and Countermeasure (SPCC)[36] plan if they exceed these thresholds, along with other requirements like CERS reporting and annual fees. The specific plan needed depends on the amount and type of material, and the local jurisdiction may have more stringent rules.[37] The fueling patterns of trucks associated with the proposed Project would depend on a variety of factors, including tenant preferences, origin and destination, pricing, convenience, and need. Therefore, the specific fueling stations to be utilized under the proposed Project is speculative and cannot be considered reasonably foreseeable at this time. As adherence to this regulation is mandatory, should a

[36] In accordance with the oil pollution prevention guidelines established in 40 CFR 112 (Oil Pollution Prevention)

[37] 2025. Orange County Health Care Agency, *Above Ground Petroleum Storage Act*, website: https://www.ochealthinfo.com/services-programs/environmental-health/hazardous-materials/aboveground-petroleum-storage-act-apsa, accessed November 4, 2025.

subsequent future use store or dispense diesel fuel, it is reasonable that such use would adhere to the requirements for the preparation, maintenance, and update of petroleum handling reports. Therefore, the analysis of reasonably foreseeable operational characteristics presented in the Draft EIR remain valid, and no revisions are necessary.

Response to Comment I-21-64

This comment expresses concern regarding fire hazards from diesel fuel storage, stating that the Draft EIR fails to analyze fire risks associated with on-site diesel fuel storage for emergency generator and heavy truck operations, and requests that the Draft EIR be revised to address their comments by including a fuel storage plan.

Refer to Master Response 13 regarding the potential for fire hazards related to the proposed Project and Responses to Comments I-21-61 and I-21-63 above. As discussed previously, a HMBP would be required if on-site hazardous materials, including fuels, exceed 55 gallons for liquids. Therefore, once a tenant and associated fueling plans for the proposed building have been identified, proposed operations would be evaluated to determine whether preparation of a HMBP and/or SPCC is required. Further, the proposed Project would be subject to the CalARP program, and therefore would be required to file a written Risk Management Plan (RMP) with the Environmental Health Division of the Orange County Health Care Agency.

As adherence to these regulations are mandatory, it is reasonable that such use would adhere to the requirements for the preparation, maintenance, and update of hazardous materials The proposed Project's compliance with requirements for HMBPs and RMPs for facilities handling significant quantities of hazardous materials, OSHA and Cal/OSHA regulations, CCR Title 8; the CGP; and USDOT, RCRA, and State regulations, would ensure that potential on-site fuel storage under the proposed Project would not create a significant hazard to the public or the environment. Therefore, the analysis of hazards and hazardous materials presented in the Draft EIR remain valid, and no revisions are necessary. No further response is required.

Response to Comment I-21-65

This comment speculates on future worker safety impacts, stating the opinion that the Draft EIR does not analyze safety risks to warehouse employees from diesel exhaust, truck accidents, or chemical spills, and requests the Draft EIR be revised to address their comments by including a safety risk analysis for employees.

Refer to Master Response 13 regarding worker safety related to hazards and hazardous materials from the proposed Project. In addition, as discussed in Section 4.9.6, Project Impacts, page 4.9-10 of Section 4.9, Hazards and Hazardous Materials, of the Draft EIR, worker health and safety is regulated at the federal level by OSHA. The Federal Occupational Safety and Health Act of 1970 authorizes states to establish their own safety and health programs with OSHA approval. Worker health and safety protections in California are regulated by the California Department of Industrial Relations (DIR). The DIR includes the Division of Occupational Safety and Health (DOSH), which acts to protect workers from safety hazards through its Cal/OSHA program. Cal/OSHA regulations include requirements for protective clothing, training, and limits on exposure to hazardous materials.

California standards for workers dealing with hazardous materials are contained in CCR Title 8 and include practices for all industries (General Industrial Safety Orders), and specific practices for construction, and other industries. Refer to the Responses to Comments I-21-61 and I-21-63 above regarding potential hazardous material impacts. The routine transport, use, and disposal of hazardous materials at the Project site would be required to comply with a Project Health and Safety Plan (HASP) prepared by the Construction Contractor in accordance with CCR Title 8. Compliance with the regulations discussed above would mitigate potential health hazards for workers related to the routine transport, use, or disposal of hazardous materials to a less than significant level.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. Therefore, the analysis of hazards to workers presented in the Draft EIR remains valid, and no revisions are necessary. No further response is required.

Response to Comment I-21-66

This comment expresses concern regarding chemical risk, stating the opinion that the Draft EIR does not evaluate whether construction materials or fire suppression systems utilize per- and polyfluoroalkyl substances (PFAS), and requests the Draft EIR be revised to address their comments regarding screening of proposed materials and fire systems for PFAS content.

While it is acknowledged that PFAS are under increasing scrutiny, there are currently no specific federal, state, or local regulations requiring the analysis of PFAS in construction materials for new development projects. As stated by the United States Environmental Protection Agency, "…There are thousands of PFAS chemicals, and they are found in many different consumer, commercial, and industrial products. This makes it challenging to study and assess the potential human health and environmental risks."[38] Currently disclosure of PFAS are required in selected consumer products (e.g., food packaging, textile articles, 'juvenile' products, cosmetics, carpeting) in California; disclosure of intentionally added PFAS in building materials is not yet mandated. CEQA does not require the disclosure of PFAS in construction materials. Further, the PFAS content of building materials is determined during the manufacturing stage on a basis of efficacy and could not be changed at the request of the Project Applicant or the City.

The proposed Project would utilize standard construction materials common among other industrial development projects in the region. The specific construction materials to be utilized have not yet been acquired and would be selected prior to construction based on cost, availability, and other factors that are subject to change. The Project would also be required to comply with the California Building Code and the California Fire Code (Section 7) requirements that mandate building materials to meet fire resistant standards to reduce urban wildfire potential. This is a requirement for all construction projects throughout the State.

[38] 2025. United States Environmental Protection Agency, *PFAS Explained*, https://www.epa.gov/pfas/pfas-explained website accessed: November 4, 2025.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. Therefore, the analysis of chemical risk presented in the Draft EIR remains valid, and no revisions are necessary. No further response is required.

Response to Comment I-21-67

This comment expresses concern regarding emergency preparedness, stating the opinion that the Draft EIR does not include discussion of how the proposed Project will conduct emergency preparedness, and requests the Draft EIR be revised to address their comments by adding a mitigation measure requiring annual emergency preparedness drills in coordination with OCFA and City staff.

Refer to Master Response 13 regarding emergency preparedness related to the Project site and Master Response 4 regarding mitigation requirements under CEQA. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

The discussion of emergency conditions contained in the Draft EIR is limited to the scope of analysis required by CEQA, including potential impacts to fire protection services or emergency response capabilities. As discussed throughout the Draft EIR, coordination with OCFA and other agencies with jurisdiction over the proposed Project is required and would ensure the proposed Project's compliance with applicable fire codes, including provisions for emergency access, fire flow requirements, and fire suppression systems. Specifically, Action PF-8a in the Public Facilities Element of the City's General Plan states "The Orange County Fire Authority and City Engineer will review proposed development projects and street networks to evaluate the accessibility for fire engines and other emergency response functions."

Through coordination with OCFA, the City, and other relevant agencies during final design and permitting stages of the proposed Project, the appropriate emergency preparedness measures will be identified and will be incorporated into the proposed Project. This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. Therefore, the analysis of emergency response and preparedness presented in the Draft EIR remains valid, and no revisions are necessary. No further response is required.

Response to Comment I-21-68

This comment expresses concern regarding emergency egress modeling, stating that the Draft EIR does not model emergency egress for residents of the Meadows community and nearby neighborhoods, and requests the Draft EIR be revised to address their comments by modeling emergency egress times and routing for the Meadows community.

Refer to Master Response 13 regarding the proposed Project's potential impacts on emergency access. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

The topic of emergency egress is discussed under Threshold 4.9.6, starting on page 4.9-15 of Section 4.9, Hazards and Hazardous Materials; Threshold 4.17.4, starting on page 4.17-15 of Section 4.17, Transportation and Traffic; and Threshold 4.20.1, starting on page 4.20-8 of Section 4.20, Wildfire, of the Draft EIR. As stated on page 4.20-9 of the Draft EIR, the City's General Plan Public Safety Element does not officially designate any specific evacuation routes within the City. Similar to during construction, in the event an evacuation of all or part of the City occurs during operation of the proposed Project, the City would implement procedures contained in the Emergency Operations Plan (EOP) to notify residents and business owners of evacuation orders in affected areas and law enforcement would identify the appropriate routes and assist employees and residents leaving the City in accordance with the City's recently adopted Local Hazard Mitigation Plan (LHMP).

As stated on pages 4.9-15 and 4.17-15 of the Draft EIR, the proposed Project's compliance with the California Manual on Uniform Traffic Control Devices would ensure that temporary lane closures during construction of the proposed Project do not impair evacuation routes from the Project site or adjacent land uses. pages 4.9-15 and 4.17-15 of the Draft EIR acknowledges that implementation of the proposed Project would increase the number of trucks operating near the site and would generate an increase in the amount and volume of traffic on local and regional roadway networks. However, the TIA prepared for the proposed Project concluded that the proposed Project would not result in substantial traffic queuing along Enterprise Way or Dimension Drive, which are anticipated to be used for evacuation of the Project site and adjacent land uses. Therefore, substantial evidence supports the conclusion that the proposed Project would not substantially inhibit evacuation procedures from the Project site or adjacent land uses, including the Meadows community. Therefore, modeling of emergency ingress and egress times and routing for surrounding land uses is not required. The analysis of emergency evacuation presented in the Draft EIR remains valid, and no revisions are necessary. No further response is required.

Response to Comment I-21-69

This comment expresses concern regarding industrial fire smoke, stating that the Draft EIR does not analyze the drift and dispersion of smoke from a potential industrial fire, and requests the Draft EIR be revised to address their comments by modeling smoke drift under typical wind conditions and identifying emergency procedures for the Meadows.

As required under CEQA, the Draft EIR analyzes the potential operational impacts associated with reasonably foreseeable office, manufacturing, and warehouse uses. As stated in Chapter 3.0, Project Description, page 3-9 of the Draft EIR, the future tenant of the proposed building has not yet been determined. However, the proposed uses are not anticipated to involve activities that could introduce abnormally high risk of combustion or industrial fire under typical operating conditions. As stated on page 4.9-16, the proposed Project would adhere to applicable building and fire codes and site design recommendations provided by OCFA following a review of the proposed Project, which would reduce the fire risk at the Project site.

As stated in *State CEQA Guidelines* Section 15064(d)(3), "An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable." It is acknowledged that despite the fire protection measures and coordination with OCFA, the potential

occurrence of an industrial fire during operation of the proposed Project cannot be ruled out. However, this occurrence would be unlikely and could not be accurately predicted. Therefore, any potential effects to the proposed Project are speculative and cannot be considered reasonably foreseeable at this time. In the event of an emergency scenario, the City would implement procedures contained in the Emergency Operations Plan (EOP) to notify residents and business owners of evacuation orders in affected areas and law enforcement would identify the appropriate routes and assist employees and residents leaving the City in accordance with the City's recently adopted LHMP. Therefore, the analyses of emergency risk and evacuation procedures presented in the Draft EIR remain valid, and no revisions are necessary. No further response is required.

Response to Comment I-21-70

This comment expresses concern regarding stormwater runoff, stating the opinion that the Draft EIR fails to model the potential overloading of downstream drainage infrastructure, and requests the Draft EIR be revised to address their comments by expanding the hydrology analysis to include downstream capacity modeling for the Western Realco Enterprise Way Industrial Project (Projects 1 and 2).

Refer to Response to Comment I-10-10 regarding stormwater runoff and drainage impacts related to the proposed Project. This response thoroughly addresses the topic raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. Therefore, the analysis of site runoff presented in the Draft EIR remains valid, and no revisions are necessary. No further response is required.

Response to Comment I-21-71

This comment expresses concern regarding drainage and flooding, stating the opinion that the Draft EIR does not evaluate the impact of concentrated runoff on downstream neighborhoods, and requests the hydrologic analysis address their comments by expanding it to model peak flows beyond Project limits.

As established in Regulatory Compliance Measure (RCM) WQ-3 (refer to Draft EIR, page 4.10-40), "…BMPs shall be designed and implemented to address 303(d) listed pollutants and retain the Project site's minimum design capture volume and hydromodification volume to ensure that post-development storm water runoff volume or time of concentration does not exceed pre-development storm water runoff by more than 10 percent of the 2-year peak flow in accordance with the Santa Ana Regional Water Quality Control Board Order Number R8-2009-0030, NPDES Permit No. CAS618030, as amended by Order No. R8-2010-0062, also known as the North Orange County MS4 permit."

This RCM requires preparation of a Final Hydrology and Hydraulic Analyses demonstrate project-related drainage facilities are appropriately sized to accommodate stormwater runoff from the design storm so that the peak flow of stormwater discharge from the Project site is less than existing

conditions.[39] As evidence that post-development flows would not exceed existing conditions is required prior to grading (or subsequent construction), it is reasonable that downstream conditions would not be altered; therefore, no additional modeling of peak flows in "downstream impact zone" is required. This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. Therefore, the analysis of drainage presented in the Draft EIR remains valid, and no revisions are necessary. No further response is required.

Response to Comment I-21-72

This comment expresses concern regarding land use compatibility, stating the opinion that the Draft EIR does not address the incompatibility of 24/7 industrial use adjacent to residential uses, and requests the Draft EIR be revised to address their comments regarding inclusion of a compatibility matrix.

Refer to Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses and Response to Comment O-6-4 regarding 24/7 operations associated with the proposed Project. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

One of the primary objectives of the City's 2040 General Plan is to encourage economic development in areas adjacent to major roadways and transportation corridors, ensuring a diverse mix of land uses that supports the community's ability to thrive and be economically sustainable over time. City General Plan policies seek to balance economic development, fiscal stability, and land use compatibility. As detailed in the Draft EIR (refer to Table 4.11.B, page 4.11-10), the proposed Project is consistent with the applicable land use compatibility policies established in the General Plan. Furthermore, the proposed Project is consistent with the long-standing land use vision for the Project site envisioned in the City's General Plan. By providing for the redevelopment of a currently underutilized site, the proposed Project satisfies the goals and policies of the General Plan to promote economic development and support the fiscal health of the City. Per the cited case (*Friends of Lagoon Valley v. City of Vacaville*), reading of General and Policy plans so "rigid" that it would essentially rule out development in the area altogether "was clearly at odds with the policies expressed in the plans." [40]

Refer to Master Responses 8, 11 and 12 regarding the assessment of transportation, noise and aesthetic impacts (respectively) related to the proposed Project. These Master Responses thoroughly address the topics raised in this comment.

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39 The final reports would be submitted to the City of Lake Forest Director of Public Works and the Orange County Flood Control District (OCFCD) prior to the issuance of grading permits. The Final Hydrology and Hydraulic Analyses would be prepared consistent with the requirements of the Orange County Hydrology Manual (Orange County Environment Agency 1986) and Orange County Hydrology Manual Addendum No. 1 (Orange County Environment Agency 1996), or subsequent guidance manuals.

40 Friends of Lagoon Valley v. City of Vacaville

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. Therefore, the analysis of land use compatibility presented in the Draft EIR remains valid, and no revisions or additional analysis is required. No further response is required.

Response to Comment I-21-73

This comment expresses concern regarding Project land use conflicts, stating the opinion that the Draft EIR does not analyze conflicts with key policies promoting residential protection, and requests the Draft EIR be revised to address their comments by including a matrix comparing the proposed Project to all applicable land use regulations.

Refer to Master Response 7 and Response to Comment I-21-72 regarding the proposed Project's compatibility with surrounding land uses. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-21-74

This comment expresses concern regarding industrial precedent, stating the opinion that the Draft EIR does not acknowledge the precedent it sets for further industrial encroachment into residential buffers, and requests the Draft EIR be revised to address their comments by including a cumulative planning impact discussion about precedence setting.

Refer to Response to Comment I-7-1 for a detailed response regarding the commenter's claim that the proposed Project could set a precedent for future development trends. The Project site and referenced cumulative sites are located within an urbanized area, previously developed with structures, roadways, and expansive parking areas. The consideration of future potential land actions that may or may not result from the suggested "precedent—setting" action would be purely speculative. The approval actions required for site development are site-specific. Future projects proposed in the City, including projects potentially similar in type and/or scale to the proposed Project, would be subject to their own project-specific environmental review and analysis pursuant to CEQA. Therefore, the proposed Project would not contribute to a significant cumulative land use compatibility impact in the City by creating a precedent for similar future development. No additional assessment relative to speculative future land uses actions is required in the Draft EIR. No further response is required.

Response to Comment I-21-75

This comment expresses concern regarding site abandonment or vacancy, stating that the Draft EIR does not evaluate risks associated with site vacancy, and requests the Draft EIR be revised to address their comments by including an analysis of vacancy and abandonment risk.

As required under CEQA, the Draft EIR analyzes the potential operational impacts associated with reasonably foreseeable office, manufacturing, and warehouse uses. As stated in *State CEQA Guidelines* Section 15064(d)(3), "An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable."

Future abandonment of the proposed Project and/or the potential environmental effects that may result from such an action are purely speculative. The proposed Project is intended as a permanent facility to continue operations throughout the foreseeable life span of the proposed Project for the purpose of achieving the Project objectives, as stated on page 3-20 of the Draft EIR. This comment does not provide evidence that suggests that abandonment is likely to occur. Therefore, the abandonment of the proposed Project is considered a speculative condition, and is not required to be included in the Draft EIR pursuant to CEQA requirements.

State CEQA Guidelines Section 15204(a) further states, "…CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors." In the unlikely event that the proposed Project is abandoned in the future, abandonment procedures would be determined in accordance with applicable requirements set forth by the City and other relevant agencies. Any related actions such as demolition or repurposing of the proposed structure would be required to undergo environmental review as deemed appropriate under CEQA. Therefore, the analysis presented in the Draft EIR remains valid, and no revisions are necessary. No further response is required.

Response to Comment I-21-76

This comment expresses concern regarding construction vibration, stating the opinion that the Draft EIR does not evaluate the potential for construction-related vibration impacts on nearby residences in the Meadows community, requests that a vibration assessment be performed to address their comments regarding vibration thresholds.

Refer to Master Response 11 regarding the assessment of construction-related vibration impacts resulting from the proposed Project. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

Section 4.13.6, Project Impacts, starting on page 4.13-17 of Section 4.13, Noise, of the Draft EIR contains a detailed noise and vibration impact analysis supported by substantial evidence presented in the Noise and Vibration Impact Analysis technical report prepared for the proposed Project (refer to Draft EIR, Appendix H, Tables L and M). The evaluation of noise and vibration impacts was prepared in conformance with appropriate standards, utilizing procedures and methodologies in the

City of Lake Forest Public Safety Element, Municipal Code, and the City of Lake Forest CEQA Significance Thresholds Guide (2025).

As stated on page 4.13-20 of the Draft EIR, construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures and soil type. Although residential structures are located within 100 feet of the Project site boundary, these structures are not necessarily located within 100 feet of the Project's construction activities, and, more specifically, the activities using equipment that are more likely to result in groundborne vibration. The noise analysis presented in the Draft EIR focused on impacts to the nearest structures to the construction boundary of the proposed Project, which were determined to be two industrial buildings within 10 feet of the northern Project construction boundary. Given that vibration impacts correlate directly with proximity to the vibration source, these closer structures can be used as a reference point for structures further from vibration-generating activities. In other words, impacts to buildings that are farther from a vibration source can be expected to experience fewer vibration-related impacts than closer buildings. The Draft EIR found that, with implementation of RCM NOI-2, which details construction vibration assessments pursuant to Section 11.16.090 of the City's Municipal Code, vibration impacts to the two identified industrial buildings would be below the established threshold and therefore less than significant. Given their greater distance from vibration-generating activities, it can be concluded that structures within the Meadows community would also experience less than significant vibration-related impacts. The analysis and conclusions presented in the Draft EIR related to groundborne vibration impacts remain valid, and no revisions are necessary. No further response is required.

Response to Comment I-21-77

This comment expresses concern regarding noise impacts on sensitive receptors, stating the opinion that the Draft EIR fails to identify or evaluate all nearby sensitive receptors for construction noise impacts, and requests all nearby childcare centers be identified and evaluated to address their comments regarding construction period noise impacts.

Refer to Master Response 11 regarding the noise analysis conducted for the proposed Project. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

While childcare centers are consistent with the definition of sensitive receptors utilized in the Draft EIR, the noise analysis presented in the Draft EIR focuses on the sensitive receptors closest to the Project site, which are most likely to be impacted by potential noise impacts generated by construction and operation for the proposed Project. As stated on page 4-13-5 of the Draft EIR, the nearest sensitive receptors to the Project site are single-family homes approximately 82 feet from the Project's eastern boundary line.

The Draft EIR and Noise and Vibration Impact Analysis (Appendix H of the Draft EIR) evaluate construction noise at the nearest residential uses which are closer to the future construction noise than the Bella Montessori School which is the nearest childcare center located approximately 700 feet southwest of the Project site. Given that noise impacts correlate directly with proximity to the noise source, these closer structures can be used as a reference point for structures further from

noise-generating activities. In other words, impacts to buildings that are farther from a noise source can be expected to experience fewer noise-related impacts than closer buildings. The potential noise impacts to residential uses and childcare uses are assessed based on the City's 80 dBA Leq construction noise level standard. The proposed Project's construction noise level impacts are below the City's 80 dBA Leq construction noise level standard.

As described on page 4.13-18, modeled operational noise levels associated with the proposed Project indicate noise levels associated with the proposed on-site HVAC equipment, trash bin emptying activities, parking lot activities, and truck deliveries and loading and unloading activities were modeled at the surrounding sensitive receptors to range from 50.0 dBA Leq to 52.7 dBA Leq. These levels would be below the City's nighttime and daytime noise standards, respectively; therefore, impacts are less than significant, and no mitigation is required. Therefore, all other receptors near the Project site, including those identified in the comment, would have the same or less exposure and thus also would not be exposed to substantial noise concentrations.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. The analysis and conclusions presented in the Draft EIR related to noise impacts remain valid, and no revisions are necessary. No further response is required.

Response to Comment I-21-78

This comment expresses concern regarding noise impacts, stating the opinion that the Draft EIR fails to consider shift workers, night nurses, caregivers, or others who rely on daytime sleep, and requests the noise analysis address their comments by including a sub-section evaluating noise disruption to non-traditional schedules.

The noise impacts identified in the Draft EIR are based on the noise standards established by the City, which do not provide standards for persons requiring daytime sleep. Furthermore, it is speculative to identify if, where, or how many daytime sleepers may be located within the Project vicinity. This comment, which does not raise concerns regarding the adequacy of the information or analysis provided in the Draft EIR, is noted. California Public Resources Code Section 21082.2(c) limits evaluation of social or economic impacts, such as sleep, that do not contribute to, or are not caused by, physical impacts on the environment. Further, as summarized on page 4.13-24, the proposed Project would result in less than significant impacts related to noise and vibration with adherence to standard regulatory measures. No further response is required.

Response to Comment I-21-79

This comment expresses concern regarding operation-related nighttime noise impacts, stating the opinion that the Draft EIR does not evaluate alternative operational schedules or consider limiting truck movements to daytime hours, and requests the Draft EIR be revised to address their comments by including mitigation measures to prohibit heavy-duty truck operations between 10:00 p.m. and 6:00 a.m.

Refer to Master Response 11 and Section 4.13.6, Project Impacts, starting on page 4.13-17 of Section 4.13, Noise, of the Draft EIR regarding the noise analysis conducted for the proposed Project. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

As discussed on page 4.13-18 of the Draft EIR, Project-related traffic noise, including noise associated with truck trips, would generate the greatest increase of 3.3 dBA along Enterprise Way. There are no noise sensitive uses along this roadway segment and the resultant noise level would be well below applicable noise thresholds. Operational traffic noise along all other roadway segments were determined to be imperceptible to the human ear in an outdoor environment. Similarly, the Draft EIR analyzed Project-related stationary noise sources, which included truck deliveries and loading and unloading activities. As discussed on page 4.13-18 of the Draft EIR, hourly noise levels associated with these activities would generate noise levels below the City's daytime and nighttime noise standards. Therefore, the Draft EIR determined that Project-related traffic and on-site truck activities would have a less than significant impact on off-site sensitive receptors; therefore, there is no nexus to require additional mitigation. Refer to Master Response 4 regarding mitigation requirements under CEQA.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. Therefore, the analysis of operational noise presented in the Draft EIR remains valid, and no revisions are necessary. No further response is required.

Response to Comment I-21-80

This comment expresses concern regarding off-hour warehouse servicing and noise, stating the opinion that the Draft EIR fails to evaluate off-hour maintenance activities and requests the Draft EIR be revised to address their comments by including these operations in the noise model and the assignment of mitigation.

The Noise and Vibration Impact Analysis (Draft EIR, Appendix H, pages 31-33) includes an assessment of typical trash pick-up, parking lot, truck movement, and truck loading and unloading activities. The other suggested activities are necessary for site maintenance and are not regular operations. As previously stated, daytime and nighttime operations would not generate noise in excess of established City standards. Other referenced special activities such as equipment maintenance are not required to comply with typical operational noise level standards.

The analysis of the proposed Project contained in the Draft EIR is based upon reasonably foreseeable office, manufacturing, and warehouse operations based on information provided by the Project Applicant. As stated in *State CEQA Guidelines* Section 15064(d)(3), "An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable." The potential for off-hour maintenance activities, including the type of maintenance provided and the need for employees and equipment, cannot be determined prior to identification of a tenant. Therefore, the scope of potential off-hour maintenance activities under the proposed Project is speculative and cannot be considered reasonably foreseeable at this time. Therefore, the

analysis of reasonably foreseeable Project characteristics presented in the Draft EIR remains valid, and no revisions are necessary.

Response to Comment I-21-81

This comment expresses concern regarding power generator noise, stating that the Draft EIR does not evaluate noise generated by diesel backup generators operating during power outages, and requests the Draft EIR be revised to address their comments regarding the noise modeling at property lines during nighttime operation.

By definition, back-up generators would only be used on a limited basis in the case of emergency power failure or for routine testing and maintenance. Such intermittent use would not cause a substantial amount of emissions, since the use would be short-term, intermittent, and infrequent. Further, back-up generators would operate under a permit from the SCAQMD, the requirements of which would regulate their testing and use. As specified in the City's Municipal Code[41], noise level impacts associated with emergency operations are not required to comply with typical operational noise level standards; therefore, no further assessment is necessary for emergency generator operations.

Response to Comment I-21-82

This comment expresses concern regarding cumulative long-term noise, stating that the Draft EIR fails to consider noise fatigue or long-term mental and physiological stress, and requests the noise section be supplemented to address their comments regarding cumulative impacts from daily exposure to industrial noise.

The Noise and Vibration Impact Analysis (refer to Draft EIR, Appendix H) uses a 24-hour noise level to assess off-site traffic-related noise impacts. For the rest of the potential noise impacts including construction and operations, the hourly L_{eq} is appropriately used consistent with the City's noise level standards.

Refer to Master Response 11 regarding the noise analysis conducted for the proposed Project. As stated in Section 4.13.7, Cumulative Impacts, starting on page 4.13-21 of Section 4.13, Noise, of the Draft EIR, construction noise, operational noise, and traffic noise resulting from development of the proposed Project and the cumulative Projects would not exceed established noise standards; therefore, would not generate excessive noise to surrounding sensitive uses during either daytime or nighttime hours.

[41] City of Lake Forest Municipal Code, Section 11.16.050(c), "Any mechanical device, apparatus or equipment used, related to, or connected with emergency machinery, vehicles, or work" is exempt from the provisions of the City's noise control ordinance.

This comment does not raise concerns regarding the adequacy of the information or analysis provided in the Draft EIR. California Public Resources Code Section 21082.2(c) limits evaluation of economic impacts or social impacts (such as mental and physiological stress), that do not contribute to, or are not caused by, physical impacts on the environment. *State CEQA Guidelines* Section 15204(a) further states, "…CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors." As the technical analysis was developed by qualified professionals and underwent third-party peer review prior to its incorporation into the Draft EIR, it is reasonable the noise analysis based on the technical report appropriately and fully addresses the noise-related impacts resulting from Project development; therefore, no revision of the Draft EIR or technical noise analysis is required.

Response to Comment I-21-83

This comment expresses concern regarding HVAC noise, stating the opinion that the Draft EIR omits evaluation of noise from rooftop HVAC systems, and requests the Draft EIR address their comments by modeling rooftop HVAC noise at the nearest property line.

Contrary to this comment, as detailed on page 31 of the Noise and Vibration Impact Analysis (refer to Draft EIR, Appendix H), noise from rooftop HVAC equipment was considered in the assessment of potential noise impacts. As stated, "The proposed Project would have various rooftop mechanical equipment including HVAC units on the rooftop of the proposed building. Based on the Project site plan and prior industrial warehouse experience, the proposed Project would be assumed to have four (4) rooftop HVAC units and to operate 24 hours per day and would generate sound power level (Lw) of up to 87 dBA Lw or 72 dBA Leq at 5 feet, based on manufacturer data."

As summarized on page 4.13-24 of the Draft EIR, the proposed Project would result in less than significant impacts related to noise and vibration, including noise associated with HVAC operations, with adherence to standard regulatory measures. Therefore, the noise analysis presented in the Draft EIR remains valid, and no revisions are necessary. No further response is required.

Response to Comment I-21-84

This comment expresses concern regarding noise modeling, stating the opinion that the Draft EIR does not adjust for higher sensitivity and lower background noise levels at night, and requests the Draft EIR be revised to address their comments regarding the use of nighttime background ambient noise levels as a basis for impact modeling after 10:00 p.m.

Contrary to this comment, existing nighttime noise levels at the nearest sensitive receptor range from 40.8 to 52.8 dBA L_{eq} (refer to Draft EIR, Appendix H, Table H). As detailed in Table 4.13.E (page 4.13-13) and Table 4.13.G (page 4.13-16) in Section 4.13, Noise, of the Draft EIR, the City has established individual daytime and nighttime noise standards that take factors such as nighttime sensitivity and background noise into account. The post-development daytime and nighttime noise

conditions at the nearest sensitive receptor are detailed in Tables O and P of the technical noise analysis (Draft EIR, Appendix H).[42]

Consistent with the above discussion, the City of Lake Forest has established noise standards which are based on federal and State level requirements. The federal and State level requirements appropriately consider the health effects of excessive noise which also guide the establishment of local standards.

As discussed on page 4.13-24 of the Draft EIR, operational noise generated by the proposed Project would be below the City's daytime and nighttime noise standards. Therefore, the Draft EIR appropriately accounts for both daytime and nighttime conditions. No revisions to the Draft EIR are necessary, and no further response is required.

Response to Comment I-21-85

This comment expresses concern regarding truck brake noise, stating the opinion that the noise report does not model truck brake noise, and requests the noise analysis address their comments by modeling these noise values.

Contrary to the comment, page 32 of the Noise and Vibration Impact Analysis (Draft EIR, Appendix H) acknowledges that the truck arrival and departure activities analyzed for the proposed Project include noise associated with truck engine running, air brakes, and back-up alarms. The Noise and Vibration Impact Analysis utilized representative noise levels measured under a similar project type, which included daily truck deliveries and loading activities similar to those proposed under the Project. These representative noise levels were measured at 75 dBA L_{eq} at a distance of 20 feet. The post-development daytime and nighttime noise conditions at the nearest sensitive receptor are detailed in Tables O and P of the Noise and Vibration Impact Analysis (Draft EIR, Appendix H). As detailed in the Noise and Vibration Impact Analysis, the combined hourly noise levels generated by HVAC equipment, trash bin emptying activities, parking lot activities, truck loading and unloading activities, and truck arrival and departure activities at the closest off-site sensitive land uses would be below the City's daytime and nighttime noise standards at the nearest sensitive receptors.

Therefore, the Draft EIR appropriately analyzes potential noise impacts associated with truck operations under the proposed Project, including braking noise. This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. Therefore, there is no nexus to require additional mitigation; refer to Master Response 4 regarding CEQA mitigation requirements. Therefore, the analysis of operational noise presented in the Draft EIR remains valid, and no revisions are necessary. No further response is required.

[42] Note: Tables O and P of the Noise and Vibration Impact Analysis identify the exterior noise levels. Typical residential construction provides noise attenuation of up to 24 dBA; therefore, it is reasonable that interior noises levels could be reduced to as low as 26 dBA. This level of interior noise would be within the interior residential noise standard (45 dBA Ldn) identified in Table 4.13.D of the Draft EIR.

Response to Comment I-21-86

This comment expresses concern regarding cumulative 24/7 truck noise, stating the opinion that the Draft EIR fails to reflect worst-case cumulative noise impacts from nighttime operations and back-to-back truck arrivals, and requests noise levels be recalculated according to a worst-case scenario to address their comments.

Refer to Master Response 11 regarding the results of the noise analysis provided in the Draft EIR and Response to Comment O-6-4 regarding 24/7 operations associated with the proposed Project. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

Consistent with the TIA prepared for the proposed Project, the operational noise analysis assumed that 15 truck arrivals and departure activities could occur during any daytime peak hour and that 4 truck arrivals and departures could occur during any nighttime off-peak hour. Based on prior analysis experience of similar facilities, the noise analysis reasonably assumed that unloading activities could occur at half of the total docks (12 docks) simultaneously for a period of 20 minutes in a given hour.

The specific assessment and supporting assumptions have been peer-reviewed by a third-party acoustical consultant on behalf of the City, who confirmed that methodology, assumptions, and conclusions are appropriate. Daytime and nighttime analyses are consistent with the City's established standards which account for the sensitivity during nighttime hours. Furthermore, the City's nighttime noise standards take into account the sensitivity of the nighttime hours at which most people sleep, thus the analysis also considers this time of day which could be seen as potentially more impacted by industrial operation. Therefore, the analysis of operational noise presented in the Draft EIR and supporting technical analysis valid, and no revisions to either document are necessary. No further response is required.

Response to Comment I-21-87

This comment expresses concern regarding environmental justice and equity, stating that the draft EIR does not discuss disproportionate impacts on low-income or minority residents, and requests a new section be added to the Draft EIR to address their comments regarding potential disproportionate impacts.

Refer to Master Response 14 regarding disproportionate environmental burdens and the requirements for an analysis of environmental justice impacts. This Master Response thoroughly addresses the topic raised in this comment.

Response to Comment I-21-88

This comment expresses concerns regarding displacement of small businesses, stating the opinion that the Draft EIR does not evaluate whether the Project will displace nearby small or family-run businesses, due to increased traffic, loss of visibility, or incompatible land uses, and requests the Draft EIR be revised to address their comments by surveying nearby businesses and assessing the potential for economic displacement.

Refer to Master Response 3 regarding speculation without substantiation. *State CEQA Guidelines* Section 15131(a) states "Economic or social effects of a project shall not be treated as significant effects on the environment…The focus on the analysis [in the EIR] shall be on the physical changes." While an EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes", the commenter presents no substantiated evidence such an effect would or could occur. On the contrary, as the current building is vacant and underutilized, the redevelopment of the site may actually eliminate a potential for conditions (e.g., blight, vagrancy,) that could actually have a negative effect on adjacent business. This comment, which does not raise concerns regarding the adequacy of the information or analysis provided in the Draft EIR, is noted. No further response is required.

Response to Comment I-21-89

This comment expresses concern regarding warehousing sector automation and future job displacement, stating that the Draft EIR fails to assess the role of automation in the warehousing sector, and requests the Draft EIR address their comments by including a discussion on potential automation.

Refer to Master Response 3 regarding speculation without substantiation and Response to Comment I-21-7 regarding new technological advances both within and beyond the logistics industry This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-21-90

This comment expresses concerns regarding the emergency access plan, stating the opinion that the OCFA letter does not include an operational analysis of fire truck circulation, and requests the Draft EIR be revised to address their comments by including a Fire Apparatus Movement and Access Plan.

The Orange County Fire Authority (OCFA) reviews project plans to determine whether they comply with minimum requirements for fire department access and fire flow. This review is conducted when new structures are proposed or where proposed modifications to existing buildings may impact these requirements. Certain uses that are regulated by the State Fire Marshal or that present an unusual hazard to occupants, the public, or firefighters are also reviewed to ensure that they meet more stringent requirements for construction, emergency egress, and fire safety. Depending

on the individual project, OCFA also reviews fire sprinkler and alarm system plans.[43] The proposed Project provides a fire lane around the entirety of the building ranging in width from 27- to 40+ feet. As stated in the Draft EIR, (refer to page 4.9-15), "… the project applicant is required to design, construct, and maintain structures, roadways, and facilities to maintain appropriate emergency/evacuation access to and from the Project site. Entrances and exits to and from parking and loading facilities would be marked with appropriate directional signage. All site access points and driveway aprons would be designed and constructed to adequate widths for public safety pursuant to OCFA. Site design and compliance with standard and emergency OCFA and City requirements, such as the size and location of fire access routes and fire truck turning radii, would allow for proper site evacuation, if necessary, during Project operations." As the design and location of required emergency access and fire facilities will be reviewed and approved during OCFA's routine plan check process, it is reasonable the proposed Project would incorporate required features and access requirements into final Project design.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. The analysis and conclusions presented in the Draft EIR related to fire access remain valid, and no revisions are necessary. No further response is required.

Response to Comment I-21-91

This comment expresses concerns regarding school district impacts, stating the opinion that the Draft EIR does not evaluate potential indirect impacts to local school districts from new employees, and requests the Draft EIR be revised to address their comments by adding an analysis of potential student generation from warehouse employees.

As described in Section 4.15.3.3, Public Schools, starting on page 4.15-5 of Section 4.15, Public Services, of the Draft EIR, the proposed Project is located within the Saddleback Valley Unified School District (SVUSD). An analysis of the potential indirect impacts to local school districts from new employees generated by the proposed Project is provided under Threshold 4.15.1(iii) of the Draft EIR. Given current unemployment statistics in the City and the County, it is reasonable to assume that a majority of the 187 jobs created by the proposed Project would be filled by existing City residents or residents of neighboring cities within Orange County. Therefore, the Draft EIR concluded that the generation of a substantial number of students within the SVUSD service area is unlikely.

Further, as described on page 4.15-5 of the Draft EIR, SVUSD collects a developer fee for new development for the purpose of providing adequate school facilities. As of June 17, 2024, the current fees are $0.84 per square foot for retail and services, office, research and development, and the industrial/warehousing/other and commercial/industrial development categories. Pursuant to Government Code Section 65995, the imposition and collection of required school fees fully mitigate potential impacts relative to impacts to school services and facilities. Therefore, no revisions to the Draft EIR are necessary, and no further response is required.

[43] 2025. Orange County Fire Authority, *General Information* https://ocfa.org/about-us/departments/community-risk-reduction/planning-development-services/ website accessed: November 5, 2025.

Response to Comment I-21-92

This comment expresses concerns regarding recreational resources, stating the opinion that the Draft EIR does not analyze the proposed Project's indirect impacts on local recreational resources associated with increased diesel traffic, air pollution, and noise, and requests the Draft EIR be revised to address their comments by re-evaluating the proposed Project's impacts on the Meadows Greenbelt and nearby parks.

The analysis of potential impacts to recreational facilities presented in Section 4.16.6, Project Impacts, starting on page 4.16-4 of Section 4.16, Recreation, of the Draft EIR is consistent with the requirements of CEQA, which address physical environmental effects related to recreational and open space resources. The evaluation criteria is limited to a discussion of: a) physical impacts associated with the provision of new or physically altered governmental facilities, b) increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, and c) inclusion of recreational facilities within the Project or requirements to construct or expand recreational facilities which might have an adverse physical effect on the environment. In addition, recreational facilities are considered sensitive receptors for the purposes of the air quality analysis and health risk assessment, as users and visitors typically conduct activities at these locations that make them more vulnerable to air pollution.

However, the referenced recreational facilities are located approximately 0.1 mile (Meadows Greenbelt/dog park) and 0.15 mile (Nature Park and Serrano Creek Trail) away from the site. The referenced recreational facilities are not located within the Project study area and are located at greater distance from the site than the nearest sensitive receptor identified in the Draft EIR; therefore, it is reasonable and appropriate the referenced recreational areas were not specifically discussed and evaluated in the Draft EIR. It should be noted that the comment includes a reference to Cherry Park. According to Google Earth and Google Maps, the closest "Cherry Park" is located on the other side of the City of Lake Forest and is assumed to be noted incorrectly in the comment letter.

Potential impacts of the proposed Project with respect to transportation, air quality, and noise are provided in Section 4.17.6, Project Impacts, starting on page 4.17-7 of Section 4.,17, Transportation and Traffic Section 4.3.6, Project Impacts, starting on page 4.3-22 of Section 4.3, Air Quality; and Section 4.13.6, Project Impacts, starting on page 4.13-17 of Section 4.13, Noise, of the Draft EIR, respectively. In addition, refer to Response to Comment O-1-4 regarding the proposed Project's impacts to air quality, and Master Responses 8 and 11 regarding the proposed Project's transportation and noise impacts, respectively. These analyses fully consider the direct and reasonably foreseeable indirect impacts of the proposed Project at nearest sensitive receptors and on local roadways. As the Draft EIR adequately analyzes potential indirect transportation, air quality, and noise impacts, no revisions are necessary. No further response is required.

Response to Comment I-21-93

This comment expresses concerns regarding truck trip modeling, stating the opinion that the Draft EIR does not align its assumption of truck trips with its operations scope, and requests their comment be addressed by clarifying the operational assumptions for each building, including tenant type.

Refer to Master Response 8 regarding the discussion of traffic analysis prepared for the proposed Project. This Master Response thoroughly addresses the topic raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-21-94

This comment expresses concern regarding parking demand, stating that the Draft EIR does not account for independent contractor delivery drivers, and requests the Draft EIR be revised to address their comments by modeling parking demand form independent drivers and requiring designated off-street parking.

As required under CEQA, the Draft EIR analyzes the potential operational impacts associated with the proposed building, including potential office, manufacturing, and warehouse uses. As stated throughout the Draft EIR, the future tenant of the proposed building has not yet been determined. The use of independent contractor delivery drivers would depend upon tenant preferences and needs and therefore would not be determined until after the tenant is determined.

As stated on pages 3-17 and 3-18 in Section 3.5.3, Parking, of the Draft EIR, the City's Zoning Code (Chapter 9.168, Off-Street Parking) establishes parking requirements for industrial uses, and the proposed Project would be subject to the City's parking requirements. Per the City's parking requirements, a total of 261 total parking spaces would be required for the proposed Project. As currently designed, the proposed Project would include 262 parking spaces around the perimeter of the proposed structure. Refer to Section 3.5.3, Parking, starting on page 3-17 of the Draft EIR for more detail.

Refer to Master Response 3 regarding speculation without substantiation. The analysis of the proposed Project contained in the Draft EIR is based upon reasonably foreseeable office, manufacturing, and warehouse operations based on information provided by the Project Applicant. As stated in *State CEQA Guidelines* Section 15064(d)(3), "An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable." The use of independent contractor delivery drivers, including the number of drivers and type of material being delivered, cannot be determined prior to identification of a tenant. Therefore, the potential use of independent contractor delivery drivers under the proposed Project is speculative and cannot be

considered reasonably foreseeable at this time. Therefore, the analysis of reasonably foreseeable parking demand presented in the Draft EIR remain valid, and no revisions are necessary.

Response to Comment I-21-95

This comment expresses concern regarding demand from new truck infrastructure and requests the Draft EIR be revised to address their comments regarding evaluation of whether the proposed Project would catalyze further industrial development or truck-heavy land use conversions nearby.

The Project site is located in an urbanized area, already developed with office, warehouse, light industrial and residential. It is speculative to assume existing properties would develop or be redeveloped with warehouse uses. The Draft EIR includes an appropriate and comprehensive assessment of the potential cumulative effects that may result from development of the proposed Project and related projects. Refer to Master Response 6 regarding the adequacy of the cumulative impacts analysis provided in the Draft EIR.

Refer to Response to Comment I-7-1 for a detailed response regarding the commenter's claim that the proposed Project could set a precedent for future development trends. No further response is required.

Response to Comment I-21-96

This comment expresses concern regarding transit and active transportation impacts, stating the opinion that the Draft EIR does not evaluate whether nearby OCTA bus stops or pedestrian/bicycle facilities would be impacted by truck activity, and requests the Draft EIR be revised to address their comments by mapping and evaluating transit routes, bike lanes, sidewalks, and school crossings.

As described on page 4.17-10 of the Draft EIR, based on the LOS analysis provided in the TIA (Appendix J to the Draft EIR), the seven study area intersections are forecast to operate at an acceptable LOS during the a.m. and p.m. peak hours both in Existing (2024) with Project and Opening Year (2027) with Cumulative Projects with Project traffic conditions. Further, the proposed Project would not create any new physical barriers to inhibit access to OCTA bus stops in the Project site vicinity. Therefore, the Draft EIR concluded that the proposed Project would not affect any existing or planned bus stops in the study area or otherwise degrade access to public transit facilities. Similarly, the Draft EIR found that the proposed Project would maintain the existing walkways/sidewalks in the vicinity of the Project site, and would not otherwise degrade access to pedestrian facilities.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. Therefore, the analysis of transit and pedestrian facilities presented in the Draft EIR remains valid, and no revisions are necessary. No further response is required.

Response to Comment I-21-97

This comment expresses concerns regarding regional VMT goals, stating the opinion that the Draft EIR does not analyze the proposed Project's compatibility with SCAG's regional transportation plan goals for VMT reduction, and requests the Draft EIR be revised to address their comments by comparing the Project's VMT profile to SCAG's 2045 goals.

Refer to Master Response 8 which addresses the significant VMT impacts resulting from Project development and the consideration of VMT mitigation options. This Master Response thoroughly addresses the topic raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-21-98

This comment expresses concern regarding the VMT assessment, stating the opinion that the Draft EIR underestimates VMT because it fails to incorporate heavy-duty truck trips, and therefore underestimates associated GHG and air quality impacts, and requests their comments be addressed by revising the VMT analysis using regional routing assumptions for Class 8 diesel trucks.

Heavy truck traffic is typically exempt from VMT assessments under SB 743 because the analysis focuses on passenger cars and light trucks.[44] While heavy-duty truck VMT may be included in a model for convenience, it is not used for impact evaluation, and some project types are explicitly excluded from VMT analysis altogether. Section 3.2, VMT Methodology, of the City's *Traffic Analysis Guidelines* states that VMT is defined as the amount and distance of automobile travel attributed to a project. Heavy duty vehicles (e.g., medium and large trucks) are not intended to be the subject of a VMT analysis; however, it is acceptable to include heavy duty vehicle trips when included by the travel demand model used as the source form VMT data. The VMT assessment for the proposed Project was prepared using both the Lake Forest VMT Look-Up Table and the Orange County Transportation Analysis Model (OCTAM) pursuant to City's *Traffic Analysis Guidelines*. Neither the Lake Forest VMT Look-Up Table nor OCTAM incorporate heavy-duty truck trips; therefore, heavy-duty truck trips were not included in the VMT analysis prepared for the proposed Project. Refer to Master Response 8 which addresses the significant VMT impacts resulting from Project development and the consideration of VMT mitigation options.

Furthermore, Section 4.3, Air Quality, page 4.3-29 of the Draft EIR, includes the methodology used to evaluate operational emissions associated with the proposed Project, including heavy duty truck

[44] For the purposes of CEQA Guidelines Section 15064.3(a), "'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project. Here, the term "automobile" refers to on-road passenger vehicles, specifically cars and light trucks." (OPR, Technical Advisory on Evaluating Transportation Impacts in CEQA (Dec. 2018) p. 4); *see also Yerba Buena Neighborhood Consortium, LLC v. Regents of University of California* (2023) 95 Cal.App.5th 779, 803 (court relying on the OPR Technical Advisory on Evaluating Transportation Impacts in CEQA).

assumptions. As described in page 4.3-29 of the Draft EIR, the operational emissions analysis incorporates heavy-duty truck activity consistent with the Project's trip generation, which includes approximately 58 four-axle truck trips. Accordingly, all four-axle truck trips were conservatively assumed to travel approximately 40 miles. SCAQMD's High-Cube Warehouse Truck Trip Study documents that heavy-duty truck activity associated with industrial/warehouse uses consists of regular regional trips to and from distribution centers across Southern California, rather than short local trips[45]. Because SCAQMD's warehouse trip research demonstrates that heavy-duty trucks serving industrial uses make longer regional trips across the basin, applying a 40-mile per-trip distance ensures emissions are not understated and provides a conservative representation of heavy-duty truck VMT for use in CalEEMod modeling (e.g., as opposed to CalEEMod default trip length). Two separate CalEEMod analyses were prepared to ensure these emissions were fully captured: one model run evaluated operational and passenger vehicle trip emissions, and a second model run evaluated emissions from four-axle heavy heavy-duty truck trips. These same input assumptions were used in the operational GHG emissions analysis presented in Section 4.8, Greenhouse Gas Emissions, pages 4.8-15 to 4.8-16 of the Draft EIR. Emissions associated with heavy-duty truck activity are presented in Table 4.3.K on page 4.3-29 and Table 4.8.B on page 4.8-16 of the Draft EIR. Therefore, heavy-duty truck trips—and their associated air pollutant and GHG emissions—were fully accounted for and evaluated in the Draft EIR.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-21-99

This comment expresses concern regarding pedestrian and school safety impacts, stating the opinion that the Draft EIR does not assess the safety impact of truck trips near school and pedestrian facilities, and requests the draft EIR be revised to address their comments by conducting a detailed pedestrian and school zone safety analysis.

Refer to Master Response 8 regarding the perceived public safety concerns resulting from Project traffic. This Master Response thoroughly addresses the topic raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

[45] SCAQMD. N.d. High Cube Warehouse Trip Rate Study for Air Quality Analysis. Website: High-Cube Warehouse Truck Trip Study for CEQA Air Quality Analysis (accessed February 2026)

Response to Comment I-21-100

This comment expresses concern regarding outdated traffic data, stating that the TIA uses traffic volume counts collected in 2023 and requests their comments be addressed by updating the traffic counts including the TIA using current 2025 data.

Refer to Response to Comment I-21-27 regarding the establishment of a baseline for the various analyses prepared for the proposed Project. Per *State CEQA Guidelines* Section 15125, the time a Notice of Preparation is issued generally establishes the environmental baseline at the beginning of the CEQA process. An NOP for the proposed Project was distributed by the City via the State Clearinghouse on March 20, 2024. Therefore, the use of traffic data from 2025 is not warranted.

As detailed in Appendix C of the TIA (refer to Draft EIR, Appendix J), weekday peak-hour intersection turn volumes for the signalized study area intersections were collected in February 2024. The methodology employed in the TIA and approved by the City's Transportation Engineer in June 2024, applied a growth rate of 1 percent per year for the purpose of preparing the future year traffic analysis. The methodology and conclusions of the TIA have been developed by qualified transportation engineering professionals and independently reviewed and approved by City staff and determined to be adequate and accurate in terms of identifying and disclosing the Project's potential environmental impacts; therefore, no revision to analysis provided in the Draft or supporting TIA is necessary.

Response to Comment I-21-101

This comment expresses concern regarding traffic volume and LOS evaluation, stating that the traffic analysis uses a pre-pandemic baseline and the opinion that it does not adjust for ongoing conditions. This comment requests the traffic volume data be updated to address their comments regarding the use of current year counts during peak school and commute hours.

Refer to Response to Comment I-21-100 and Master Response 8 regarding the assessment of transportation impacts provided in the Draft EIR. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-21-102

This comment expresses concern regarding truck turning and sight distance, stating that the TIA does not include turning radius diagrams or sight line visibility studies, and requests that the Draft EIR address their comments by including diagrams showing turning paths for trucks.

The Project driveways were designed to accommodate the Project trucks and therefore a truck turning analysis is not required at the Project driveway locations. Figure 13 (Driveway Sight Distances) of the Project TIA (refer to Draft EIR, Appendix J) demonstrates that there are no sight

distance obstructions in either direction at the Project driveways, and all Project vehicles (including trucks) can safely enter and exit the Project driveways.

A truck turning analysis was conducted at the study area intersections (refer to the Project's TIA, pages 31 and 33, and Appendix E on PDF pages 202-206, included in Appendix J of the Draft EIR) and the proposed off-site improvements (refer to Appendix A of the Project's TIA, included in Appendix J of the Draft EIR). Proposed improvements incorporated as Project design features would enhance public safety and address concerns related to large truck turning movements at the study area intersections. A sight distance/visibility analysis at existing public signalized intersections is not typically required because these locations should already provide adequate sight distance/visibility pursuant to City requirements. Therefore, the proposed Project is not subject to the sight distance/visibility analysis for any existing intersections. Therefore, no revision to analysis provided in the Draft or supporting TIA is necessary.

Response to Comment I-21-103

This comment expresses concern regarding spillover traffic, stating the opinion that the TIA does not assess whether overflow traffic may occur on local streets, and requests the Draft EIR be revised to address their comments by evaluating the potential for spillover traffic on local streets.

Refer to Master Response 8, regarding the assessment of transportation issues provided in the Draft EIR. The traffic study area and the roadways/intersections assessed in the TIA were established through coordination with the City, pursuant to the City's TA guidelines. The proposed Project is not anticipated to add traffic/trucks to residential streets. Both passenger vehicles and trucks generated by the proposed Project may use major public streets like Bake Parkway, Lake Forest Drive, Dimension Drive, and Commercentre Drive, which have higher speed limits and fewer traffic interruptions. Therefore, the proposed Project is not subject to the sight distance/visibility analysis for any existing intersections. Therefore, no revision to analysis provided in the Draft or supporting TIA is necessary.

Response to Comment I-21-104

This comment expresses concern regarding off-site staging and overnight truck parking, stating the opinion that the Draft EIR fails to identify where trucks will queue or park when gates are closed, and requests the Draft EIR be revised to address their comments regarding off-site parking and staging impacts and a requirement for a truck staging and parking plan.

The analysis of the proposed Project contained in the Draft EIR is based upon reasonably foreseeable office, manufacturing, and warehouse operations based on information provided by the Project Applicant. As stated in *State CEQA Guidelines* Section 15064(d)(3), "An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable."

The proposed Project trucks would not park or stage on the public streets. The City's Zoning Code (Chapter 9.168, Off-Street Parking) establishes parking requirements for industrial uses, and the

proposed Project would be subject to the City's parking requirements. While the conduct of individual truck drivers cannot be predicted with absolute certainty, as the Draft EIR assesses the Project as a 24-hour operation; it is reasonable that access to on-site truck parking would be available as required. Therefore, the consideration of potential off-site parking is not necessary. Therefore, the operational characteristic presented in the Draft EIR remain valid, and no revisions are necessary. This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

Response to Comment I-21-105

This comment expresses concern regarding tribal cultural resources consultation, stating the opinion that the Draft EIR does not provide consultation outcomes and requests that the Draft EIR address their comments by including a detailed log of tribal consultation efforts.

As required under CEQA and AB 52, the City initiated formal tribal consultation with the California Native American tribes traditionally and culturally affiliated with the area that have requested notification under AB 52. Section 4.18.3.2, Native American Consultation, starting on page 4.18-2 of Section 4.18, Tribal Cultural Resources, of the Draft EIR describes the Native American consultation process in sufficient detail to satisfy the requirements of CEQA and AB 52. The Draft EIR provides specific dates on which consultation milestones occurred, identifies the tribes that were contacted, and summarizes communications between the City and the Consulting Tribe. The City addressed the Consulting Tribe's request for additional information and received no additional responses or requests for consultation.

Native American consultation is a government-to-government process and often involves the exchange of sensitive or confidential information. AB 52 requires that any information submitted by a California Native American tribe during the environmental review process remain confidential and not be disclosed to third parties unless the tribe agrees in writing (Public Resources Code 21082.3[c][1]). This comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, and no further response is required.

Response to Comment I-21-106

This comment expresses concern regarding water demand and drought resilience, stating that the Draft EIR does not analyze peak summer usage and resilience under long-term water stress scenarios, and requests the utilities section be revised to address their comments regarding the modeling of peak-day and peak-month water usage under various scenarios.

The Project site and the referenced cumulative projects are located within an urbanized area. Though now vacant, the uses on these sites have been previously developed with structures, expansive parking areas, outdoor lighting, landscaping, and utility and drainage infrastructure. Therefore, the demand for public services has previously been accounted for in utility planning efforts. The proposed Project is consistent with applicable General Plan land use designations and zoning designations; and therefore, has been considered in the service plans developed by utility and service providers (e.g., IRWD Urban Water Management Plan.)

The analysis presented in the Draft EIR with respect to utilities and service systems was prepared in accordance with relevant provisions of the *State CEQA Guidelines* as well as the Irvine Ranch Water District (IRWD) 2020 Urban Water Management Plan. The modeling of average daily water demand is recognized as a best practice for the evaluation of water resources under CEQA as it can be accurately modeled and enables meaningful comparison with available water supply. Peak summer water usage is variable based on factors such as weather and therefore is difficult to accurately predict. Utility providers often address peak utility demand through market strategies, such as dynamic pricing, that are beyond the scope of CEQA.

Further, as stated on page 4.19-13 of the Draft EIR, IRWD's supplies remain relatively unchanged between normal, single-dry, and five-year drought scenarios. Therefore, overlapping timelines between peak demand and drought scenarios are not anticipated to result in a water supply shortage.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. Therefore, the analysis of water resources presented in the Draft EIR remains valid, and no revisions are necessary. No further response is required.

Response to Comment I-21-107

This comment expresses concern regarding sewer capacity, stating that the Draft EIR does not provide flow projections, line capacity data, or confirmation from the El Toro Water District (ETWD), and requests the lead agency address their comments by obtaining and disclosing a will-serve letter and hydraulic modeling report from ETWD to confirm there is adequate capacity for peak flow scenarios.

As stated on page 4.19-14 of the Draft EIR, wastewater collection and processing services would be provided to the Project site by the IRWD rather than the ETWD as stated in this comment. As previously stated, the proposed Project is consistent with applicable General Plan land use designations and zoning designations; and therefore, has been considered in the service plans developed by utility and service providers. As described on page 4.9-14, the proposed connection to the existing 8-inch diameter vitrified clay pipe (VCP) sewer main in Enterprise Way would be reviewed and approved by the City's Public Works Department and IRWS, as applicable. This review process would ensure that existing sewer infrastructure can reasonably accommodate wastewater conveyance demands generated by the proposed Project.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. Therefore, the analysis of wastewater conveyance infrastructure presented in the Draft EIR remains valid, and no revisions are necessary. No further response is required.

Response to Comment I-21-108

This comment expresses concern regarding solid waste, stating that the Draft EIR does not evaluate whether wind-blown packaging, warehouse refuse, or unsecured trash from delivery vehicles could increase litter in surrounding neighborhoods and requests the Draft EIR address their comments by including a solid waste containment plan for outdoor operations, trash enclosures, and truck cleaning procedures.

Delivery vehicles utilized under operations of the proposed Project would comply with applicable local and State regulations related to the transportation of goods and materials. Therefore, materials would be enclosed and/or appropriately secured to prevent the release of garbage or other materials along public or private right-of-way. This would be considered a matter of operational compliance rather than an issue required for analysis under CEQA.

Further, the proposed Project design includes trash enclosures throughout the Project site to properly store solid waste generated on the Project site. As described on page 3-13 of the Draft EIR, the proposed Project would include a 16-foot high, 65-foot-long wall located at the eastern end of the loading docks, which would prevent the movement of debris from the Project site to land uses adjacent to the eastern Project site boundary.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. Therefore, the analysis of solid waste presented in the Draft EIR remains valid, and no revisions are necessary. No further response is required.

Response to Comment I-21-109

This comment expresses concern regarding solid waste disposal and landfill capacity, stating the opinion that the Draft EIR provides no estimate of total waste volume, types of waste generated and requests that the Draft EIR address their comments by quantifying total projected solid waste tonnage, classifying waste types, and identifying receiving facilities.

Though now vacant, the uses on these sites have been previously developed with structures, expansive parking areas, outdoor lighting, landscaping, and utility and drainage infrastructure. Therefore, the demand for public services has previously been accounted for in previous planning efforts. The proposed Project is consistent with applicable General Plan land use designations and zoning designations; and therefore, has been considered in the service plans developed by utility and service providers.

As stated throughout the Draft EIR, the future tenant of the proposed building has not yet been determined. Therefore, the exact type of solid waste to be generated under the proposed Project is not yet known. As stated in *State CEQA Guidelines* Section 15064(d)(3), "An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable." Because the specific makeup of the solid waste to be generated by the proposed Project cannot be determined prior to identification of a tenant, this detail is speculative and cannot be considered

reasonably foreseeable at this time. Regardless of solid waste type, the proposed Project would comply with federal, State, and local statutes and regulations related to solid waste, including OCWR's CIWMP and agency permits, AB 341, SB 1016, and the CALGreen Code.

As described on page 4.19-4 of the Draft EIR, the Frank R. Bowerman Landfill would be expected to provide solid waste disposal for the construction and operation of the proposed Project. The Frank R. Bowerman Landfill is permitted to receive a daily maximum of 11,500 tons per day (tpd) and receives an average of approximately 8,500 tpd. Waste generation estimates for the proposed Project were modeled using CalEEMod software and are provided on page 4.19-18 of the Draft EIR. As stated on page 4.19-18, the proposed Project is anticipated to generate approximately 156 tons per year or 855 pounds of solid waste per day during operation. The Draft EIR compared this increase in solid waste generated by the proposed Project to the average daily capacity of the Frank R. Bowerman Landfill and determined that the proposed Project would constitute approximately 0.01 percent of the landfill's average daily capacity. Therefore, contrary to the claims provided in this comment, the Draft EIR appropriately quantifies and analyzes potential solid waste generation of the proposed Project. No revisions to the Draft EIR are necessary, and no further response is required.

Response to Comment I-21-110

This comment expresses concern regarding utility pole clearance, stating that the Draft EIR does not evaluate the clearance of overhead utility lines and poles along truck ingress/egress routes and requesting the Draft EIR address their comments by including a survey of all nearby truck routes and mapping overhead utility conflicts.

Typically, street lighting along highways and main roads and large parking lots range from 25-40 feet in height. The height is determined by factors like the width of the road, the desired light coverage, and local ordinances. Taller poles are used for wider roads to ensure adequate light coverage and visibility for high-speed traffic. The average height of an 18-wheeler trailer is **13 feet, 6 inches to 14 feet**. Utility pole design, including height, is regulated by state and local codes which establish standards requirements for the placement and height of street lighting.[46] These standards and requirements ensure appropriate vehicular clearance and other safety considerations. Truck access and circulation routes utilized by the proposed Project would be reviewed during the final design and permitting process to avoid clearance conflicts that could result in a potential collision. Furthermore, it is reasonable that the drivers of trucks, who are licensed by the State to operate high profile vehicles, would exercise appropriate care and caution on local roadways. It is not appropriate to speculate on potential future damage that may result from the operation of trucks in local roadways. This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. Therefore, the analysis of truck route safety presented in the Draft EIR remains valid, and no revisions are necessary. No further response is required.

46 2025. *City of Lake Forest Municipal Code*, Section 14.05.010.

Response to Comment I-21-111

This comment expresses concern regarding wildfire conditions, claiming that the Draft EIR fails to consider how the proposed Project may impair evacuation routes during a wildfire or other emergency, and requests the Draft EIR revised to address their comments by including a transportation and evacuation model simulating wildfire scenarios with peak warehouse truck volumes.

Refer to Master Response 8 regarding the discussion of transportation and emergency access provided in the Draft EIR.

As stated in Master Response 13, the design and location of required emergency access will be reviewed and approved during OCFA's routine plan check process. The Draft EIR explicitly addresses the proposed Project's potential impacts on emergency evacuation routes under Threshold 4.9.6, starting on page 4.9-15 of Section 4.9, Hazards and Hazardous Materials; Threshold 4.17.4, starting on page 4.17-15 of Section 4.17, Transportation and Traffic; and Threshold 4.20.1, starting on page 4.20-8 of Section 4.20, Wildfire, of the Draft EIR. As discussed therein, the proposed Project would be designed, constructed, and maintained in compliance with the California Fire Code, which requires adequate emergency access to and from the Project site. Accordingly, the proposed Project would not physically interfere with any adopted emergency response or evacuation plans. Further, the Draft EIR explains that the Project does not propose or modify any emergency facilities and would not function as an emergency evacuation route. Construction activities would not require full or partial road closures or detours that could impede emergency access. Instead, large construction vehicles would be managed by on-site personnel using signage and flagging to maintain safe and consistent traffic flow. Therefore, the proposed Project's impact on emergency evacuation routes is adequately addressed in the Draft EIR, and no further response is required.

Response to Comment I-21-112

This comment expresses concern regarding analysis of alternatives, claiming that the Draft EIR dismisses several feasible alternative options and requests the Draft EIR be revised to address their comments by expanding the alternatives analysis to include at least two feasible and environmentally superior options.

Refer to Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project.

Refer to Master Response 12 which discusses the assessment of lighting provided in the Draft EIR, Master Response 11 regarding assessment of nighttime noise provided in the Draft EIR, and Response to Comment O-6-4 regarding 24/7 operations associated with the proposed Project. As the Draft EIR appropriately considers a range of alternatives; evaluation of additional alternatives is not warranted; therefore, no revision of the Draft EIR or further response is required.

Response to Comment I-21-113

This comment expresses concern regarding the mitigation monitoring and reporting program, claiming that the MMRP includes vague implementation language and lacks specific performance standards or enforcement mechanisms and requests the MMRP revise all mitigation measures to address their comments regarding the inclusion of responsible parties, performance criteria, monitoring frequency, and enforcement penalties.

Refer to Master Response 4 regarding the requirements for mitigation under CEQA and the purpose of an MMRP. The MMRP is presented in Chapter 7.0 of the Draft EIR.

Response to Comment I-21-114

This comment expresses concern regarding maintenance and replacement for noise and light, claiming that the Draft EIR fails to describe how light shielding and sound attenuation features will be maintained, tested, or replaced over the facility's lifespan, and requests the Draft EIR be revised to address their comments by including a 20-year light and sound mitigation maintenance plan, with inspection frequency, responsible parties, and replacement triggers.

Refer to Master Response 4 regarding the adequacy of mitigation provided in the Draft EIR. As detailed in Section 4.1.7, Cumulative Impacts, starting on page 4.1-26 of Section 4.1, Aesthetics, and 4.13.7, Cumulative Impacts, starting on page 4.13-21 of Section 4.13, Noise, of the Draft EIR the Project-specific and cumulative impacts associated with the construction and operation of the proposed Project were comprehensively evaluated and determined to be less than significant; therefore, no mitigation is required.

CEQA does not require the analysis of general "wear and tear" of a proposed development during its operational lifespan. As the referenced features are integral components of the proposed Project, necessary for the efficient and safe operation of proposed use; it is reasonable that any future tenant would appropriately operate and routinely maintain these features pursuant to applicable standards and operating guidelines. This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. Therefore, the analysis presented in the Draft EIR remains valid, and no revisions are necessary. No further response is required.

Response to Comment I-21-115

This comment expresses concern regarding community complaints, claiming that the Draft EIR does not explain how post-construction community complaints will be logged, tracked, or resolved and requests the Lead Agency address their comments by establishing a public-facing complaint portal or hotline.

While the *State CEQA Guidelines* contain various public noticing requirements, these requirements are intended to ensure that the Lead Agency "receive and evaluate public reactions to environmental issues related to the agency's activities" (*State CEQA Guidelines* Section 15201). All CEQA requirements related to public noticing and participation have been satisfied to date. CEQA

requires the Lead Agency to address substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR received during the Draft EIR review period.

CEQA does not require the establishment of a portal or hotline to enable public complaint during operation of the proposed Project. The City's Community Preservation Division is charged with maintaining and improving the character, aesthetic quality and property values within the City by notifying property owners of conditions of violation observed on private properties. The Division maintains and improves the City's residential and commercial neighborhoods through the enforcement of codes pertaining to such matters as public nuisances, property maintenance, zoning, building, health and safety, and signage.[47] It would fall to any future tenant of the Project site to address any concerns raised by the City's Community Preservation Division. Should future operations result in received complaints, an adequate and appropriate code enforcement process is available which would allow concerned residents to report and resolve complaints.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No further response is required.

Response to Comment I-21-116

This comment expresses concern regarding long-term enforcement of mitigation measures, claiming that mitigation measures are written vaguely or do not identify who will monitor compliance, how enforcement will occur, or what penalties exist for violations after Project approval, and requests the MMRP be revised to address their comments regarding specific timelines, responsible departments, and penalties for noncompliance.

Refer to Master Response 4 regarding the implementation of the MMRP prepared for the Project, as presented in Chapter 7.0 of the Draft EIR.

[47] 2025. City of Lake Forest, *Community Preservation, What We Do*. https://www.lakeforestca.gov/departments/community_development/code_enforcement/index.php website accessed: November 6, 2025.

From:	Gordon Hu
To:	Stonich, Amy; EnterpriseProjects
Cc:	Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; rable@lakeforestca.gov; Stannard, Michael; Villwock, Jordan; ts@lakeforestca.gov; Pequeno, Robert; Cirbo, Doug; Yu, Benjamin; Smith, Amy
Subject:	Formal Objection to the IPT Enterprise Business Center LLC Project DEIR (SCH# 2024030755)
Date:	Saturday, August 2, 2025 9:49:49 PM

August 3, 2025

Ms. Amy Stonich
Assistant Director of Community Development
City of Lake Forest Community Development Department
100 Civic Center Drive
Lake Forest, CA 92630

Subject: Formal Objection to the IPT Enterprise Business Center LLC Project DEIR (SCH# 2024030755)

Dear Ms. Stonich,

I-22-1

My name is Gordon Hu, resident, City of Lake Forest, California. I am writing to formally protest the proposed IPT Enterprise Business Center project and to challenge the validity and completeness of the Draft Environmental Impact Report (DEIR) dated July 2025. After a thorough review of the DEIR and the public comments submitted thus far, it is evident that this project poses serious, unmitigated risks to public health, community safety, and environmental integrity. Furthermore, the DEIR fails to meet California Environmental Quality Act (CEQA) standards for comprehensive impact disclosure and mitigation.

1. Air Quality and Public Health Risks Are Understated
The DEIR states that diesel particulate matter (DPM) emissions from truck traffic and warehouse operations will be mitigated to below-significance thresholds. However, the DEIR omits:

I-22-2

- Modeling for wind-driven dispersion of diesel emissions, which can carry PM2.5 deep into adjacent residential zones.
- A health risk assessment (HRA) specific to medically vulnerable populations, especially seniors and children in the Meadows Community, less than 100 feet from the loading docks.
- Any consideration of 24/7 operations compounding cumulative exposure to carcinogens like benzene and DPM.

2. Traffic and Emergency Access Are Dangerously Overlooked
Despite listing five intersection improvements, the DEIR inadequately addresses:

I-22-3

- Emergency egress challenges for residents due to increased truck volume near narrow roads not designed for WB-67 vehicles.
- Noise and safety risks posed by overnight staging and idling of trucks, especially during nighttime hours.

I-22-3 cont.

- Spillover truck traffic into residential neighborhoods, which was not modeled in the Traffic Impact Analysis.

3. Nighttime Noise and Mental Health Effects Ignored
Though the DEIR includes standard noise modeling, it fails to:

I-22-4

- Evaluate the effects of continuous nighttime noise on sleep disruption, cognitive decline, and mental health for shift workers, children, and the elderly.
- Analyze the cumulative long-term psychological fatigue of warehouse-adjacent living, which violates the community's right to quiet enjoyment.

4. Violation of General Plan and Community Vision
The City of Lake Forest General Plan (2020) emphasizes preservation of neighborhood character, walkability, and environmental health. This project:

I-22-5

- Conflicts with the General Plan's land use compatibility goals by placing 35-foot industrial structures with 23 dock doors adjacent to homes.
- Undermines the Lake Forest 2040 Community Vision by privileging industrial use over residential quality of life.

5. No Consideration of Wildfire Risk and Evacuation
Section 4.20 of the DEIR discusses wildfire generally, but the report:

I-22-6

- Does not evaluate the impact of increased traffic congestion on emergency evacuation routes in a Very High Fire Hazard Severity Zone (VHFHSZ).
- Ignores the risk of diesel fuel storage or backup generators contributing to fire ignition hazards.

6. Lack of Visual Simulations for Public Transparency
The DEIR includes text-based descriptions of project massing, but:

I-22-7

- No 3D renderings or residential-perspective visual simulations are included to help the public and Planning Commission understand visual blight from second-story windows and common outdoor areas.

7. Disregard for Environmental Justice and Equity
Although the DEIR acknowledges nearby sensitive receptors, it does not:

I-22-8

- Analyze disproportionate impacts on low-income, elderly, or minority residents living in adjacent developments.
- Provide alternatives that avoid environmental injustice or propose any community health protections beyond standard CEQA thresholds.

My Request

I-22-9

This project is fundamentally incompatible with its surrounding context. The DEIR fails to disclose and mitigate multiple significant impacts and overlooks critical community vulnerabilities. I strongly urge the City of Lake Forest to reject the current DEIR and require a

I-22-9 cont.

Revised EIR that:

- Includes a full Health Risk Assessment with subpopulation analysis,
- Models worst-case traffic and noise conditions,
- Provides 3D visual simulations from residential vantage points,
- Evaluates compliance with Lake Forest's General Plan and CEQA's mandate for full environmental disclosure,
- And, most importantly, proposes a reasonable alternative that maintains neighborhood integrity.

Thank you for your time and consideration of this urgent matter.

Sincerely,

Gordon Hu

CAUTION: Think Security! This email is not from someone at the City of Lake Forest. **Do not click any links or open any attachments you are not expecting.**

GORDON HU

Letter Code: I-22
Date: August 2, 2025

Response to Comment I-22-1

This comment expresses opposition to the proposed Project and states the opinion that the proposed Project poses risks to public health, community safety, and environmental integrity and does not meet CEQA standards.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-22-2

This comment expresses concern regarding air quality and public health risks associated with the proposed Project, stating the opinion that the Draft EIR omits modeling for wind-driven dispersion of diesel emissions, an HRA specific to medically vulnerable populations, and consideration of 24/7 operations.

Refer to Response to Comment O-1-4 and Master Response 9 regarding the proposed Project's impacts related to air quality public health, diesel dispersion, and sensitive receptors. In addition, refer to Response to Comment O-6-4 regarding 24/7 operations associated with the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-22-3

This comment expresses concern regarding traffic and emergency access associated with the proposed Project, stating the opinion that the Draft EIR inadequately addresses emergency egress challenges, noise and safety risks, and spillover truck traffic into residential neighborhoods.

Refer to Master Response 8 regarding the proposed Project's impacts related to traffic and emergency access and Master Response 11 regarding the analysis of Project-related noise. It should be noted that Project trucks are not anticipated to utilize minor roads within the residential neighborhoods. Both passenger vehicles and trucks generated by the proposed Project may use major public streets like Bake Parkway, Lake Forest Drive, Dimension Drive, and Commercentre Drive, which have higher speed limits and fewer traffic interruptions.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more

severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-22-4

This comment expresses concern regarding nighttime noise and mental health effects associated with the proposed Project, stating the opinion that the Draft EIR does not evaluate the effects of continuous nighttime noise and analyze the cumulative long-term psychological impacts of living adjacent to a warehouse.

Refer to Master Response 11 regarding the Draft EIR's noise and vibration analysis and Response to Comment I-21-82 regarding the evaluation of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-22-5

This comment states the opinion that the proposed Project conflicts with the City's General Plan Land Use compatibility goals and undermines the City's community vision.

Refer to Master Response 7 regarding the proposed Project's consistency with applicable land use documents. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-22-6

This comment expresses concern regarding wildfire risk and evacuation associated with the proposed Project, stating the opinion that the Draft EIR does not evaluate the impact of increased traffic congestion on emergency evacuation routes in a Very High Fire Hazard Severity Zone (VHFHSZ) and does not analyze the risk of Project operations contributing to fire ignition hazards.

Refer to Response to Comment O-1-10 regarding wildfire risk and evacuation associated with the proposed Project. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-22-7

This comment states the opinion that the Draft EIR does not provide any 3D renderings or residential-perspective visual simulations for visual blight from second-story windows and common areas.

As shown in Figure 4.1-1, page 4.1-3, of the Draft EIR, visual simulations were prepared for the proposed Project, showing three-dimensional renderings of the proposed Project in comparison to the existing setting. Refer to Response to Comment I-21-115 regarding CEQA requirements for the analysis or protection of views from private properties.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-22-8

This comment states that the draft EIR does not analyze disproportionate impacts on low-income, elderly, or minority residents, provide alternatives that avoid environmental injustice, or propose community health protections.

Refer to Master Response 14 regarding disproportionate environmental burdens and the requirements for an analysis of environmental justice impacts. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-22-9

This comment concludes the letter and re-expresses opposition to the proposed Project, requesting the Draft EIR be revised to address their comments regarding inclusion of a full HRA, worst-case traffic and noise conditions, visual simulations, evaluation of compliance with land use regulations, and reasonable alternatives.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses above. No further response is required.

August 2nd, 2025

Attn: Amy Stonich, Assistant Director of Community Development

Subject: Public Comment on Draft Environmental Impact Report (DEIR) for the IPT Enterprise Business Center LLC Project (SCH#2024030755) and Related Warehouse Projects

Dear Ms. Stonich and City of Lake Forest Planning Commission,

City Council Members:

As a resident of Lake Forest, I greatly appreciate the City's successful efforts in transforming our community from an agriculture-oriented city into a vibrant, attractive place for residents and businesses. We cherish the peace and beauty of Lake Forest, enhanced by its natural assets like parks and trails, and value the City's commitment to resident quality of life.

I-23-1 The DEIR highlights significant and unavoidable impacts related to vehicle miles travel (VMT) and greenhouse gas emissions but does not address two other critical areas: zoning compatibility and maintaining resident quality of life as outlined in the Lake Forest General Plan.

I appreciate the opportunity to provide comments on the DEIR for the IPT Enterprise Business Center LLC Project (SCH#2024030755), which includes 23 truck docks, along with two related developments adding an added 25 docks. These concerns are shared by many in our community, including Meadows Residential Community, and require immediate attention to critical deficiencies.

DEIR Deficiencies and Cumulative Impacts

I-23-2 I strongly oppose these three projects due to **severe land use conflicts** arising from the City's outdated industrial/warehouse zoning, cumulative impacts on our recently rezoned residential community, an affordable senior apartment, a daycare, a beautiful park, and natural trails, **and these issues violation of state priorities outlined in the California Attorney General's comment letter on the Notice of Preparation (NOP) dated April 5, 2024.**

The IPT DEIR does not adequately address two key areas, undermining CEQA compliance and the City's 2020 General Plan:

I-23-3
- **Land Use Conflicts**: The DEIR does not resolve the mismatch between the light industrial zoning and the residential context, including sensitive receptors, despite CEQA's requirement for zoning compatibility with surrounding uses and the 2020 General Plan's provision for mixed-use areas near the Civic Center to maintain resident quality of life. This failure echoes the City Council's December 20, 2022, recognition (Item #9) of outdated, inconsistent zoning near 6,000+ new homes.

I-23-4

- **Cumulative Impacts**: The DEIR omits analysis of the 48 total docks (23 from IPT, 25 from the other two projects), with WB-67 18 wheels semi-trailer trucks running through residential areas - the NOA's significant and unavoidable vehicle miles travel (VMT) effects, and combined air quality and noise impacts, violating CEQA Guidelines §15130. This neglects the 2022 meeting's call (Items #7, #9) for a Zoning Ordinance amendment to address such cumulative effects.

I-23-5

<u>These deficiencies threaten:</u>

- **Traffic Safety and Congestion**: Hundreds of truck trips from 48 docks endanger residents, seniors, and children, needing a cumulative traffic study.
- **Air Quality and Health Risks**: Diesel emissions from 48 docks, linked to cancer risk per CARB data, endanger sensitive receptors as pointed out in the Attorney General's comment letter.
- **Noise Pollution** Continuous operations could generate disruptive noise levels, with insufficient mitigation measures.
- **Deterioration of Community Assets:** The park and trails are threatened by increased traffic and pollution. Approval of the warehouse project could result in a decline in property values exceeding 10%.

I stand united with my neighbors in requesting a revised DEIR to address these critical oversights.

1. Request to Hold the IPT Project DEIR Review

I-23-6

CEQA Guidelines §15130 mandate a comprehensive analysis of cumulative impacts for related projects under the same Lead Study Agency (LSA) in the same business park. In October and December 2022, the city reviewed all three warehouse projects together, recognizing their interconnected effects, as noted in the December 20, 2022, City Council meeting. The subsequent decision to stagger DEIR timelines, however, fragments this analysis and burdens residents with multiple comment periods, suggesting a developer-driven strategy to weaken community participation—a concern echoed by the California Attorney General's April 5, 2024, letter, which calls for "cumulative measures to reduce emissions" and avoiding land use conflicts. Our community collectively asks that the city hold the IPT project's DEIR review, which proposes a 165,803 sq ft industrial building with 23 docks at 26200 Enterprise Way, until all three DEIRs are available for simultaneous public comment. This ensures a thorough assessment aligned with state priorities and the 2020 General Plan.

2. Addressing Outdated Zoning

I-23-7

During the Lake Forest City Council Meetings in October and December 2022, city staff acknowledged these inconsistencies and outdated regulations. These issues were highlighted during discussions of the three warehouse projects. In the December 20, 2022, meeting, Item #7 pointed out these inconsistencies, and Item #9 directed staff to prepare a zoning ordinance amendment to address them.

It is crucial for the city to follow up on these directives to fulfill its duty to the community. I'd like to request an update on the status of these amendments:

- What is the status and timeline for implementation?
- How will this process ensure decisions are consistent and protective of residents?

I-23-7 cont.

These omissions highlight the urgent need for a comprehensive review and corrective action to ensure compatibility and protect community interests. Addressing these questions is critical, and if necessary, these issues may be pursued in court to challenge any approval of the project.

This delay risks favoring developer interests over residents, despite the business park's historical use as a low-intensity office area and our community's recent rezoning from agricultural to residential. The Attorney General's letter emphasizes avoiding land use conflicts with sensitive receptors, and we collectively urge rezoning to commercial or mixed-use to reflect our residential neighborhood's character and the 2020 General Plan's mixed-use vision.

3. Impacts on Sensitive Receptors

I-23-8

The affordable senior apartment and daycare near 26200 Enterprise Way, along with the Meadows Residential Community to the northeast, are highly vulnerable to health and safety risks from 48 docks' industrial activities. The park and trails, valued by our community, are also at risk. The Attorney General's letter calls for mitigating impacts on such receptors, and we collectively request health risk.

4. CEQA and State Policy Considerations

I-23-9

DEIR's current scope, as outlined in NOA, does not fully follow CEQA and state laws, according to the Attorney General's guidance:

- **Cumulative Analysis**: The staggered DEIRs violate CEQA Guidelines §15130 by omitting 48-dock impacts.
- **Environmental Justice**: Effects on disadvantaged communities (e.g., senior housing) are overlooked, according to the Attorney General's 2024 letter.

5. Requested Actions

Thank you for your consideration of the following actions, which are consistent with the Attorney General's guidance, CEQA, and the 2020 General Plan.

I-23-10

1. **Hold the IPT DEIR Review**: Delay until all three DEIRs are available, easing resident burden and ensuring compliance.
2. **Update on Zoning**: Provide the promised guidelines or amendments from the 2022 City Council meeting, with rezoning or CUPs as solutions.
3. **Evaluate Project Rejection**: Consider rejecting all three projects if 48-dock impacts persist, preserving our community's character.
4. **Implement Mitigations**: Require 1,000-foot setbacks, zero-emission trucks, restricted hours, designated truck routes, and park/trail preservation.
5. **Revise the DEIR**: Include a cumulative DEIR with health risk assessments.

6. Community and State Support

I-23-11 The nearby resident position is reinforced by the Attorney General's April 5, 2024, letter, aligning with our efforts to protect Lake Forest, and the City's 2022 zoning admission. We look forward to a public hearing at the Lake Forest Civic Center to discuss these issues and appreciate the City's engagement.

Conclusion

I cherish Lake Forest's transformation and value resident collaboration with city staff, but the three warehouse projects, including the IPT project with 23 docks and 25 more docks, threaten our peace, health, and natural assets due to outdated zoning and 48-dock cumulative impacts.

I-23-12 We collectively encourage the City stuff to work with the developer to plan alternatives for Lake Forest's future, such as mixed-use or commercial developments that align with the 2020 General Plan and CEQA which in line with the Attorney General's guidance while committing to collaborate with the residents' community to ensure our input shapes these plans.

Sincerely,

June Bian

[redacted]

Lake Forest, CA 92630

Email: [redacted]

Background Information:

1) Lake Forest City Council Meeting agenda item on Three warehouse/manufacture projects by the Meadows community



Warehouse-Info-Action-items-Lake

2) Attorney General Rob Bonta Comment Letter to IPT project



Attotney General - Rob Bonta Com

Lake Forest City Council Meeting
12-20-2022 Agenda #16



Background

October 18, 2022 – City Council considered possible options to address impacts from these uses and directed staff to:

- Return within 60 days with a general update on 3 applications
- Initiate public engagement
- Continue to work with current applicants
- Provide info on intersection modifications that could lead to the use of eminent domain

Summary of Applications

3

Map	Description	Breakdown of uses	Latest Submittal
1	• Proposed 157,800+ sq. ft. building • 35-feet+ tall • 12 truck docks	Warehouse 68,900 sq. ft. Manufacturing 76,900 sq. ft. Office 12,000 sq. ft.	12/12/2022
2	• Proposed 168,467 sq. ft. building • 46-feet tall • 25 truck docks	Warehouse 158,467 sq. ft. Office 10,000 sq. ft. Alternative plan: Warehouse 53,467 sq. ft. Manufacturing 105,000 sq. ft. Office 10,000 sq. ft.	12/6/2022
3	• Proposed 77,000 sq. ft. building • 40-46-feet tall • 7 truck docks	Warehouse 69,000 sq. ft. Office 8,000 sq. ft.	12/12/2022



12/20/2022

City Council Regular Meeting December 20, 2022

Map	Description	Breakdown of uses	Latest Submittal
1	• Proposed 157,800+ sq. ft. building • 35-feet+ tall • 12 truck docks	Warehouse 68,900 sq. ft. Manufacturing 76,900 sq. ft. Office 12,000 sq. ft.	12/12/2022
2	• Proposed 168,467 sq. ft. building • 46-feet tall • 25 truck docks	Warehouse 158,467 sq. ft. Office 10,000 sq. ft. <u>Alternative plan</u>: Warehouse 53,467 sq. ft. Manufacturing 105,000 sq. ft. Office 10,000 sq. ft.	12/6/2022
3	• Proposed 77,000 sq. ft. building • 40-44-feet tall • 7 truck docks	Warehouse 69,000 sq. ft. Office 8,000 sq. ft.	12/12/2022


ns
3
1
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Public Engagement

4

December 7, 2022, staff presented to the Leadership Academy alumni a program on current trends in industrial development.

Met with representatives of National Association of Industrial and Office Properties (NAIOP)

Participated in a site visit of industrial properties

Met with Irvine City staff

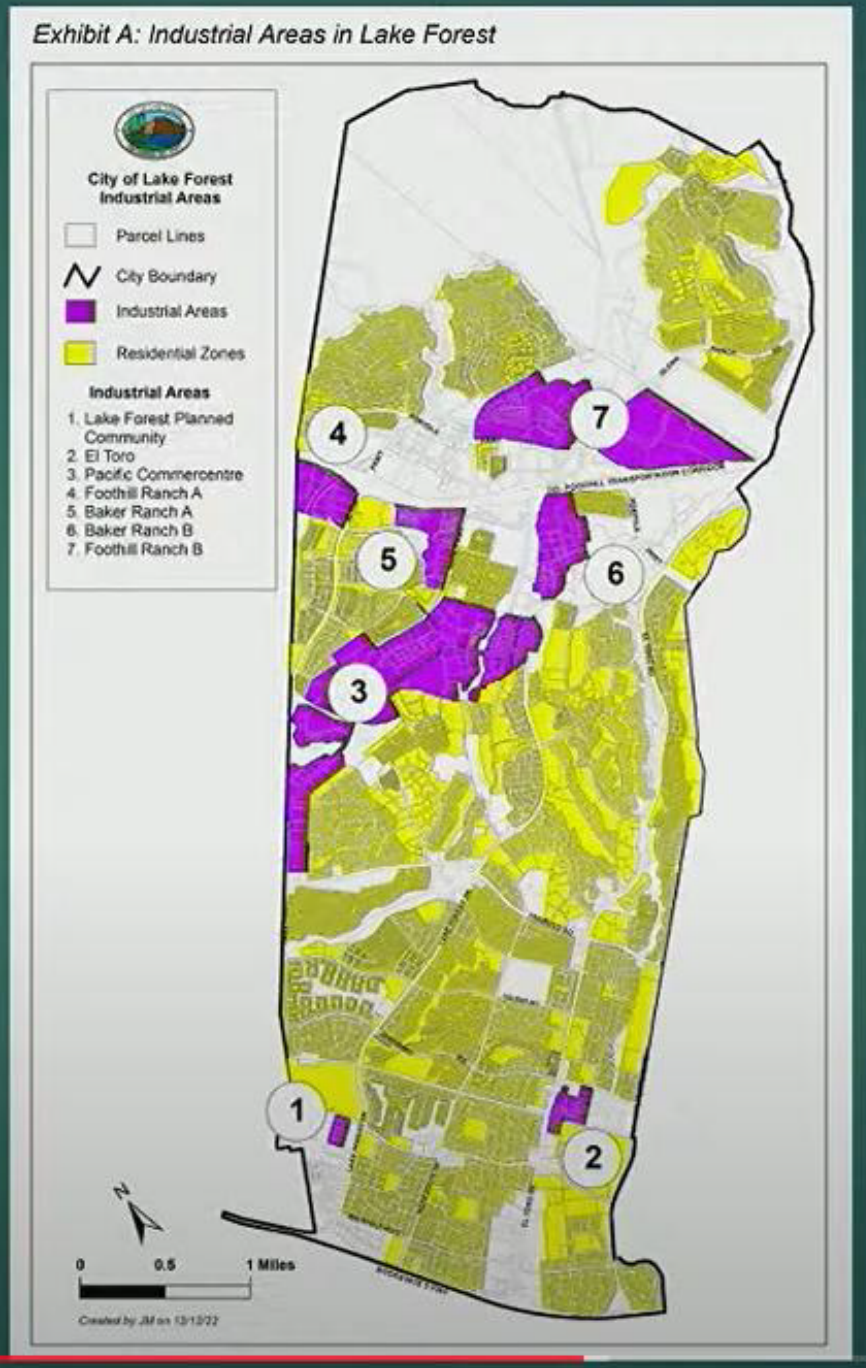


Potential Intersection Modifications

5

- Applications are in process
- Applicants may be successful in acquiring the additional land area needed for intersection improvements through negotiations with impacted property owners.

Citywide Industrial Land Survey



Lake Forest Observations

7

- Since 2014, more than 6,000 new homes have been built adjacent to industrial areas in the center of the city
- An updated General Plan adopted in 2020 that allows for additional residential in mixed-use areas, including the industrial area near the Civic Center
- The City's regulations for manufacturing, warehouse and distribution uses are outdated and inconsistent
- Lake Forest and Irvine Spectrum contain +75% of the industrial land in South Orange County

Industrial Trends

Large scale warehouse, distribution and manufacturing facilities are in high demand

- Demand for office space has decreased
- Modern industrial buildings are larger and taller to accommodate a variety of uses
- Modern industrial uses include manufacturing, warehousing and distribution

Staff Recommendation

9

1. Direct staff to prepare a Zoning Ordinance amendment to

- define the types of industrial uses that include a warehousing/storage/distribution component and
- potentially identify locations where some types of warehousing/storage/distribution are not allowed
- provide policy direction regarding the applicability of any Zoning Code amendment on current development applications.

2. Direct staff to include a study of the City's industrial areas that

Staff Recommendation

9

2. Direct staff to include a study of the City's industrial areas that
   - analyzes the existing industrial stock
   - identifies how market trends and new technology may shape future uses, and
   - determines the suitability of the existing circulation system to accommodate future uses
   - as a new initiative in the City's Strategic Plan

ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE

1300 I STREET, SUITE 125
P.O. BOX 944255
SACRAMENTO, CA 94244-2550

E-Mail: EJ@doj.ca.gov

April 5, 2024

Amy Stonich, Assistant Director of Community Development
City of Lake Forest
100 Civic Center Drive
Lake Forest, CA 92630

RE: IPT Enterprise Business Center LLC, SCH #2024030755

Dear Ms. Stonich:

Thank you for the opportunity to provide comments on the Notice of Preparation for the IPT Enterprise Business Center LLC project. While the logistics industry is an important component of our modern economy, warehouses can bring various environmental impacts to the communities where they are located. For example, diesel trucks visiting warehouses emit nitrogen oxide (NO_x)—a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation—and diesel particulate matter (a subset of fine particular matter that is smaller than 2.5 micrometers)—a contributor to cancer, heart disease, respiratory illnesses, and premature death.[1] Trucks and on-site loading activities can also be loud, bringing disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure.[2] The hundreds, and sometimes thousands, of daily truck and passenger car trips that warehouses generate can contribute to traffic jams, deterioration of road surfaces, traffic accidents, and unsafe conditions for pedestrians and bicyclists. Depending on the circumstances of an individual project, warehouses may also have other environmental impacts.

To help lead agencies avoid, analyze, and mitigate warehouses' environmental impacts, the Attorney General Office's Bureau of Environmental Justice has published a document containing best practices and mitigation measures for warehouse projects. We have attached a

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[1] California Air Resources Board, Nitrogen Dioxide & Health, https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health (NOx); California Air Resources Board, Summary: Diesel Particular Matter Health Impacts, https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts; Office of Environmental Health Hazard Assessment and American Lung Association of California, Health Effects of Diesel Exhaust, https://oehha.ca.gov/media/downloads/calenviroscreen/indicators/diesel4-02.pdf (DPM).

[2] Noise Sources and Their Effects, https://www.chem.purdue.edu/chemsafety/Training/PPETrain/dblevels.htm (a diesel truck moving 40 miles per hour, 50 feet away, produces 84 decibels of sound).

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copy of this document to this letter, and it is also available online.[5] We encourage you to consider the information in this document as you prepare the draft environmental impact report for this project.

Priority should be placed on avoiding land use conflicts between warehouses and sensitive receptors and on mitigating the impacts of any unavoidable land use conflicts. However, even projects located far from sensitive receptors may contribute to harmful regional air pollution, so you should consider measures to reduce emissions associated with the project to help the State meet its air quality goals. A distant warehouse may also impact sensitive receptors if trucks must pass near sensitive receptors to visit the warehouse.

The Bureau will continue to monitor proposed warehouse projects for compliance with the California Environmental Quality Act and other laws. We are available to discuss as you prepare the draft environmental impact report and consider how to guide warehouse development in your jurisdiction. Please do not hesitate to contact the Environmental Justice Bureau at ej@doj.ca.gov if you have any questions.

Sincerely,

CHRISTIE VOSBURG
Supervising Deputy Attorney General

For ROB BONTA
Attorney General

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JUNE BIAN

Letter Code: I-23
Date: August 2, 2025

Response to Comment I-23-1

This comment is introductory and states the opinion that the Draft EIR does not address zoning compatibility and maintaining resident quality of life.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-23-2

This comment expresses opposition to the proposed Project, stating the opinion that the cumulative industrial warehouse projects represent severe land use conflicts, and that these projects present issues which violate the priorities outlined in the California Attorney General's NOP comment letter (*IPT Enterprise Business Center LLC, SCH #2024030755*, April 5, 2024; located in Appendix A of the Draft EIR).

Refer to Master Response 6 regarding the adequacy of the cumulative analysis presented in the Draft EIR and Master Response 7 regarding land use conflicts.

The City acknowledges the California Attorney General's NOP comment letter and takes into consideration the issues presented in the letter during preparation of the Draft EIR. The Draft EIR adequately evaluates air pollution and health risks associated with the proposed Project, as described in Master Response 9, and adequately evaluates noise impacts and traffic impacts associated with the proposed Project, as described in Master Responses 11 and 8, respectively. As described in Master Response 4, the Draft EIR fulfills all CEQA mitigation requirements. The comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-23-3

This comment states the opinion that the Draft EIR does not resolve land use incompatibility of the proposed Project with the nearby residential community, including sensitive receptors, contrary to CEQA requirements and the City's General Plan provision for mixed-use areas to maintain quality of life, affirming the City Council's December 2022 recognition of outdated inconsistent zoning.

Refer to Master Response 7 regarding land use compatibility impacts related to the proposed Project, and Response to Comment O-1-4 and Master Response 9 regarding the proposed Project's air quality and health risk impacts to sensitive receptors. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-23-4

This comment states the opinion that the Draft EIR omits analysis of total docks from all cumulative industrial warehouse projects, the Notice of Availability's (NOA's) significant VMT impacts, and combined air quality and noise impacts in violation of CEQA requirements and the City Council's December 2022 zoning ordinance amendment.

As described in Response to Comment I-5-1, the State Clearinghouse publication of the NOP for preparation of a Draft EIR for the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) noted a maximum of 18 usable dock doors would be provided under Project 1, and a maximum of seven usable dock doors would be provided under Project 2. In addition, refer to Master Response 6 regarding the adequacy of the cumulative impacts analysis included in the Draft EIR, Master Response 8 regarding the proposed Project's VMT impacts, Response to Comment O-1-4 regarding air quality impacts associated with the proposed Project, and Master Response 11 regarding noise impacts associated with the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-23-5

This comment states the opinion that purported deficiencies in the Draft EIR may lead to impacts related to traffic safety and congestion, air quality and health risks, noise pollution, and deterioration of community assets.

Refer to Master Response 8 regarding traffic safety and congestion, Response to Comment O-1-4 and Master Response 9 regarding the Draft EIR's air quality and health risk analysis, Master Response 11 regarding the proposed Project's noise analysis, and Master Response 7 regarding land use compatibility associated with the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-23-6

This comment requests the City address their comments by holding the proposed Project's Draft EIR review until all three cumulative industrial warehouse project Draft EIRs (the proposed Project and the Western Realco Enterprise Way Industrial Project [Projects 1 and 2]) are available for simultaneous public comment.

Refer to Master Response 6 regarding the adequacy of the Draft EIR's cumulative impacts analysis and Master Response 1 regarding the adequacy of the public review period for the proposed Project. Pursuant to *State CEQA Guidelines* Sections 15084 through 15087 and Article 9 of the *State CEQA Guidelines*, environmental documents for separate projects are not required to be circulated simultaneously. The timing of circulation is determined by each project's environmental document and the respective lead agency. Therefore, the City does not need to recirculate the Draft EIR to coincide with publication of any other environmental review documents. No further response is necessary.

Response to Comment I-23-7

This comment requests the City address their comments by following up on zoning ordinance directives, including the status and timeline for implementation, and disclosing the process to ensure decisions are consistent and protective of residents.

The City acknowledges this request. However, this request is outside of the scope of CEQA. The Draft EIR does not establish or implement zoning or policy changes, and as described in Master Response 7, the proposed Project is consistent with the City's adopted General Plan and Zoning Code.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-23-8

This comment states the opinion that the cumulative industrial warehouse projects could lead to health and safety risks for sensitive receptors and impacts to parks and trails and requests their comments be addressed by provision of an HRA.

Refer to Master Response 6 regarding the adequacy of the Draft EIR's cumulative analysis and Response to Comment O-1-4 and Master Response 9 regarding the proposed Project's air quality and health risks. In addition, refer to Response to Comment O-1-16 regarding impacts to recreation associated with the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more

severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-23-9

This comment states the opinion that the Draft EIR's current scope does not comply with CEQA requirements because the cumulative industrial warehouse projects have staggered EIRs and environmental justice impacts are not addressed.

As described in Response to Comment I-23-6, environmental documents for separate projects are not required to be circulated simultaneously. Refer to Master Response 14 regarding disproportionate environmental burdens and the requirements for an analysis of environmental justice impacts. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-23-10

This comment requests the City address their comments by holding the proposed Project's Draft EIR review, updating the zoning ordinance, evaluating Project rejection, implementing mitigation, and revising the Draft EIR. These comments were addressed in the preceding responses.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses above. No further response is required.

Response to Comment I-23-11

This comment states the opinion that the nearby residents' position is reinforced by the California Attorney General's NOP comment letter (*IPT Enterprise Business Center LLC, SCH #2024030755*, April 5, 2024; located in Appendix A of the Draft EIR) and the City's 2022 zoning admission.

The City acknowledges the California Attorney General's NOP comment letter and takes into consideration the issues presented in the letter during preparation of the Draft EIR.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-23-12

This comment requests the City address their comments by finding alternatives to the proposed Project that align with the City's General Plan, CEQA, and the California Attorney General's guidance from the NOP comment letter (*IPT Enterprise Business Center LLC, SCH #2024030755*, April 5, 2024; located in Appendix A of the Draft EIR).

Refer to Master Response 5, regarding the adequacy of the range of alternatives considered for the proposed Project. The City acknowledges the California Attorney General's NOP comment letter and takes into consideration the issues presented in the letter during preparation of the Draft EIR.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: Mindy Li
To: Stonich, Amy; EnterpriseProjects; Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin
Subject: Formal objection to the draft EIR for the IPT Enterprise Business Center Project (APN 610-401-06)
Date: Sunday, August 3, 2025 11:18:51 PM

Dear Ms. Stonich,

I-24-1 I hereby submit a formal objection to the draft Environmental Impact Statement (EIR) for the proposed IPT Enterprise Business Centre Warehouse project at 26200 Enterprise Way. As a Lake Forest City resident / stakeholder, after reviewing the draft EIR, I believe that the project would pose an unacceptable risk to the environmental quality, public health and safety of my community, for the following reasons:

I-24-2 1. The draft EIR has recognized the existence of significant and irreparable environmental hazards in the project According to the EIR conclusions:
· The impact of greenhouse gas emissions and vehicle mileage (VMT) is classified as "significant and unavoidable";
· The project violates California's 2045 carbon neutrality goals and the City of Lake Forest Climate Action Plan;
· 23 truck loading gates and heavy traffic will worsen local air quality (especially threatening the adjoining Meadows neighborhood).

I-24-3 II. Project design seriously threatens the health and safety of the community
· Residential Exposure Risk: East Side Meadows Neighborhood Will Be Directly Exposed to Truck Emissions of PM2.5/NOX contaminants, 65 feet of sound barrier does not block the spread of pollutants;
· Traffic safety hazards: The proposed five intersections cannot carry the combined traffic of 262 commuter vehicles plus heavy trucks, raising the risk of accidents.

I-24-4 III. Tenant uncertainty amplifies environmental risk
· EIR is assessed on the highest pollution intensity (65,000 m2 manufacturing + 90,803 m2 warehousing), but does not limit the industry type of future tenants;
· If industries such as chemicals and logistics are introduced, the risk of leakage of hazardous substances will endanger surrounding communities.

I-24-5 IV. Absence of alternatives violates the spirit of CEQA
· No studies have been conducted on low-carbon alternatives for the conversion of existing buildings or downsizing;
· Demolition of existing buildings will generate 11,000 tons of construction waste (in violation of AB 1583 Waste Reduction Order).

I-24-6 Demands and Calls for Action
1.Rejection of the current protocol (in violation of CEQA § 21081);
2. Additional research is required: PM2.5 diffusion simulation in residential areas, tenant industry restriction list, zero emission truck retrofit scheme;
3. A hearing was held to invite independent experts to consider the shortcomings of the VMT model.

I-24-7 The project, if approved, would set a dangerous precedent in which the interests of corporations would take precedence over the health of residents. I urge the city government to fulfill its environmental fiduciary obligations.

Please file this letter as a formal objection and notify me of the schedule of a follow-up hearing.

Sincerely,

Mindy Li
[redacted]
Lake Forest CA 92630

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MINDY LI

Letter Code: I-24
Date: August 3, 2025

Response to Comment I-24-1

This comment is an introductory comment and expresses opposition to the proposed Project, stating the opinion that the proposed Project would pose risks to environmental quality, public health, and community safety.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-24-2

This comment states that the Draft EIR recognizes significant and irreparable environmental hazards associated with the proposed Project including significant and unavoidable GHG and VMT impacts, violation of California's 2045 carbon neutrality goals and the City's CAP, and states the opinion that worsening local air quality is a result of truck loading docks and heavy traffic associated with the proposed Project.

Refer to Master Response 8 regarding the Draft EIR's transportation analysis and VMT impacts, Master Response 10 regarding the Draft EIR's GHG analysis, and Response to Comment O-1-4 and Master Response 9 regarding the Draft EIR's air quality and health risk analysis. It should be noted that, contrary to the comment, the Draft EIR conclusions do not state that the Project would "violate California's 2045 carbon neutrality goals". In addition, the City of Lake Forest does not have an adopted Climate Action Plan. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-24-3

This comment expresses concern regarding community health and safety related to the proximity of the Meadows community to the proposed Project and that the nearby intersections would not be able to support increased traffic associated with the proposed Project, potentially increasing the risk of accidents.

Refer to Master Response 8 regarding the roadway circulation and transportation analysis and Master Response 9 regarding the community's exposure to emissions. Further, please note that the proposed sound wall would be installed for screening purposes and noise attenuation; it is not intended to dissipate or block pollutant emissions. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-24-4

This comment expresses concern regarding the uncertainty of the type of future tenant.

Refer to Response to Comment O-1-10 regarding tenant uncertainty and Master Response 13 regarding potential impacts from hazards and hazardous materials associated with the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-24-5

This comment expresses concern that the Draft EIR did not analyze a low-carbon alternative and the amount of construction waste.

Refer Master Response 5 regarding the adequacy of the range of alternatives for the proposed Project and Response to Comment I-21-109 regarding the generation of construction waste. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-24-6

This comment suggests that additional research, including a PM2.5 diffusion simulation in residential areas, future tenancy, and zero-emission trucks be conducted. This comment also states that there was a hearing to consider the purported inadequacies of the VMT model.

It is assumed that the commenter's request for "PM2.5 diffusion simulation" refers to a request for dispersion modeling of PM2.5 emissions. The Draft EIR included dispersion modeling of PM emissions on all nearby sensitive receptors, which included residential areas, during both construction and operation of the Project. As presented in Tables 4.3.M and 4.3.N (pages 4.3-34 and 4.3-35, respectively) in the Draft EIR, impacts were determined to be less than significant with the incorporation of mitigation.

Refer to Response to Comment O-1-4 and Master Response 9 regarding the air quality and health risk analyses presented in the Draft EIR, Master Response 8 regarding VMT impacts associated with

the proposed Project, and Response to Comment S-2-7 regarding Warehouse Actions and Investments to Reduce Emissions (WAIRE) and the potential for the acquisition and use of NZE and ZE trucks. In addition, refer to Response to Comment O-1-10 regarding tenant uncertainty and Response to Comment O-6-13 regarding significant unmitigable impacts and approval of the proposed Project. In addition, it is not clear from the comments who facilitated or when the hearing to discuss the purported inadequacies of the VMT model was held. To date, no hearings for the proposed Project have occurred and future hearings regarding the Project will be noticed in accordance with CEQA requirements.

These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-24-7

This comment concludes the letter and states the opinion that approval of the proposed Project would set a precedent for industrial development over resident health, and requests notification of a follow-up hearing.

Residents who have requested to be added to the Project notification list will be notified of future public hearing(s) for the proposed Project, at which time verbal comments can be made by members of the public.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses above. No further response is required.

From:	Bin Zhou
To:	ej@doj.ca.gov
Cc:	Stonich, Amy
Subject:	Urgent Community Concerns Regarding Proposed Warehouse Projects in Lake Forest
Date:	Monday, August 4, 2025 9:07:31 AM
Attachments:	To Attorney General .pdf

Urgent Community Concerns Regarding Proposed Warehouse Projects in Lake Forest
08/04/2025
To: Rob Bonta (ej@doj.ca.gov)
Attorney General State of California
Department of Justice 1300 | Street, Suite 125 Sacramento, CA 94144-2550
Cc:
Christie Vosburg, Supervising Deputy Attorney General
Amy Stonich, Assistant Director of Community Development, City of Lake Forest (AStonich@lakeforestca.gov)

Dear Attorney General Bonta,

We, the concerned residents of Lake Forest, write to express our strong opposition to the three proposed industrial warehouse projects slated for development adjacent to our residential communities. We sincerely appreciate your office's April 5, 2024, letter to the City of Lake Forest, which underscored the severe environmental and health risks posed by warehouse projects, and we urge you to take immediate action to support our community in halting these detrimental developments.

1. Our Grave Concerns
The proposed warehouses would be constructed alarmingly close to our homes, schools, and parks, directly contradicting your office's guidance to avoid land use conflicts between warehouses and sensitive receptors. The projects threaten to:
-Degrade air quality through increased diesel emissions (NOx and particulate matter), exacerbating respiratory illnesses and cancer risks, as highlighted in your letter.
- Disrupt our daily lives with 24/7 noise pollution from trucks and loading activities, which far exceed safe decibel levels.
- Endanger public safety by adding hundreds of daily truck trips, worsening traffic congestion, road deterioration, and risks for pedestrians and cyclists.
I-25-1 - Undermine environmental justice, as the burdens of pollution and health hazards will fall disproportionately on families and vulnerable populations.
The City's own Draft Environmental Impact Report (DEIR) acknowledges these risks, yet the projects continue to advance without adequate mitigation measures. This disregard for community well being is unacceptable.
2. Request for Immediate Intervention
We respectfully request your office:
- Review the DEIR for compliance with CEQA and other environmental laws, particularly in light of the clear conflicts with sensitive receptors.
- Demand stronger mitigation measures or outright rejection of the projects, given their proximity to homes and the irreversible harm they pose.
- Hold the City accountable for addressing the cumulative impacts of these warehouses, as emphasized in your bureau's best practices document.
3. Community Mobilization
Our community is actively organizing against these projects:
- Public comments are being submitted to the City (deadline: September 15, 2025).
- Petitions have garnered widespread support ([link](https://urldefense.proofpoint.com/v2/url?u=https-3A chng.it VnzkjvRrMw&d=DwIFAg&c=euGZstcaTDllvimEN8b7jXrwqOf-

I-25-1 cont.

v5A_CdpgnVfiiMM&r=8uST-pBslKkfEyDtdlaql8hQ5rc0AjV6In_W8sSW5C8&m=xRtlzyf-hZ_0NQr6YFVA4V9TbfV9dgFXJ0lBTEDsmSFynVOl5jO-AUyatWGKZjo_&s=v01WBDaai-uR-TG0cRlHYGG65ercaRn0n0otCRayBLA&e=)).
- Legal and technical experts are evaluating the DEIR's deficiencies.

We implore your office to stand with us in this critical fight. The health, safety, and quality of life of Lake Forest residents hang in the balance.

Attachments:
- Links to the DEIR, City notices, and community resources (referenced in your letter).
- Compilation of resident testimonials and expert analyses.
- Your office's April 5, 2024, letter to the City of Lake Forest.

Thank you for your urgent attention to this matter. We are available to provide further information or meet with your team at your earliest convenience.

Sincerely,

Bin Zhou
Address: [redacted]
Lake Forest, CA 92630
Email: [redacted]
Phone Number: [redacted]

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More references:
1. City's Draft Environmental Impact Report (534 pages)
https://urldefense.proofpoint.com/v2/url?u=https-3A__www.lakeforestca.gov_sites_default_files_Compiled-2520EIR-2520OCRd.pdf&d=DwIFaQ&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=8uST-pBslKkfEyDtdlaql8hQ5rc0AjV6In_W8sSW5C8&m=xRtlzyf-hZ_0NQr6YFVA4V9TbfV9dgFXJ0lBTEDsmSFynVOl5jO-AUyatWGKZjo_&s=x2AOiklVOhBoX82WvO3ms-E7IWgcSfp2LyU-krYoJKs&e=
2. City's Public Notice
https://urldefense.proofpoint.com/v2/url?u=https-3A__www.lakeforestca.gov_sites_default_files_IPT-5Fdraft-2520NOA-5Frev-5F7.30.25.pdf&d=DwIFaQ&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=8uST-pBslKkfEyDtdlaql8hQ5rc0AjV6In_W8sSW5C8&m=xRtlzyf-hZ_0NQr6YFVA4V9TbfV9dgFXJ0lBTEDsmSFynVOl5jO-AUyatWGKZjo_&s=vV10jwlmqb599sCv1MvFQA9SjJi4QrDfaC-f012Di0A&e=
3. Community Town Hall Presentation
https://urldefense.proofpoint.com/v2/url?u=https-3A__drive.google.com_file_d_1iFjtJDFPZFA0WIqjuqQe54QzEL7bMLKv_view-3Fusp-3Dsharing&d=DwIFaQ&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=8uST-pBslKkfEyDtdlaql8hQ5rc0AjV6In_W8sSW5C8&m=xRtlzyf-hZ_0NQr6YFVA4V9TbfV9dgFXJ0lBTEDsmSFynVOl5jO-AUyatWGKZjo_&s=Tu2xEAZfnDc20GmWsmNALreML-9F2ecR1JxTJp1a_hA&e=
4. We the Meadows – Community Comments
https://urldefense.proofpoint.com/v2/url?u=https-3A__drive.google.com_file_d_1JxaiG5BxAo0wI4d8e0aBVsrsDZuJqKyy_view-3Fusp-3Dsharing&d=DwIFaQ&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=8uST-pBslKkfEyDtdlaql8hQ5rc0AjV6In_W8sSW5C8&m=xRtlzyf-hZ_0NQr6YFVA4V9TbfV9dgFXJ0lBTEDsmSFynVOl5jO-

AUyatWGKZjo_&s=Ly6dBLDps2g4wCAtaUBUZGgzXP0MXxK5GFnKP0IDZIY&e=
5. California Attorney General's Letter to the City
https://urldefense.proofpoint.com/v2/url?u=https-3A__drive.google.com_file_d_19XQTqQh-2DJNHjA5ji6t2YmiPSfnbXtRkU_view-3Fusp-3Dsharing&d=DwIFaQ&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=8uST-pBslKkfEyDtdlaql8hQ5rc0AjV6In_W8sSW5C8&m=xRtlzyf-hZ_0NQr6YFVA4V9TbfV9dgFXJ0lBTEDsmSFynVOl5jO-AUyatWGKZjo_&s=9cRJKEJ30eYz02_AhMq-NHfQQc93ZRw63CCmFlfcgtc&e=

Urgent Community Concerns Regarding Proposed Warehouse Projects in Lake Forest

08/04/2025

To: Rob Bonta (ej@doj.ca.gov)

Attorney General

State of California

Department of Justice

1300 I Street, Suite 125

Sacramento, CA 94144-2550

Cc:

Christie Vosburg, Supervising Deputy Attorney General

Amy Stonich, Assistant Director of Community Development, City of Lake Forest (AStonich@lakeforestca.gov)

Dear Attorney General Bonta,

We, the concerned residents of Lake Forest, write to express our strong opposition to the three proposed industrial warehouse projects slated for development adjacent to our residential communities. We sincerely appreciate your office's April 5, 2024, letter to the City of Lake Forest, which underscored the severe environmental and health risks posed by warehouse projects, and we urge you to take immediate action to support our community in halting these detrimental developments.

1. Our Grave Concerns

The proposed warehouses would be constructed alarmingly close to our homes, schools, and parks, directly contradicting your office's guidance to avoid land use conflicts between warehouses and sensitive receptors. The projects threaten to:

-Degrade air quality through increased diesel emissions (NO_x and particulate matter), exacerbating respiratory illnesses and cancer risks, as highlighted in your letter.

- Disrupt our daily lives with 24/7 noise pollution from trucks and loading activities, which far exceed safe decibel levels.

- Endanger public safety by adding hundreds of daily truck trips, worsening traffic congestion, road deterioration, and risks for pedestrians and cyclists.

- Undermine environmental justice, as the burdens of pollution and health hazards will

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fall disproportionately on families and vulnerable populations.

The City's own Draft Environmental Impact Report (DEIR)** acknowledges these risks, yet the projects continue to advance without adequate mitigation measures. This disregard for community well-being is unacceptable.

2. Request for Immediate Intervention**

We respectfully request your office:

- Review the DEIR for compliance with CEQA and other environmental laws, particularly in light of the clear conflicts with sensitive receptors.
- Demand stronger mitigation measures or outright rejection of the projects, given their proximity to homes and the irreversible harm they pose.
- Hold the City accountable for addressing the cumulative impacts of these warehouses, as emphasized in your bureau's best practices document.

3. Community Mobilization

Our community is actively organizing against these projects:

- Public comments are being submitted to the City (deadline: September 15, 2025).
- Petitions have garnered widespread support ([link](https://chng.it/VnzkjvRrMw)).
- Legal and technical experts are evaluating the DEIR's deficiencies.

We implore your office to stand with us in this critical fight. The health, safety, and quality of life of Lake Forest residents hang in the balance.

Attachments:

1. Links to the DEIR, City notices, and community resources (referenced in your letter).
2. Compilation of resident testimonials and expert analyses.
3. Your office's April 5, 2024, letter to the City of Lake Forest.

Thank you for your urgent attention to this matter. We are available to provide further information or meet with your team at your earliest convenience.

Sincerely,

Bin Zhou
Address: [redacted]
Lake Forest, CA 92630
Email: [redacted]
Phone Number: [redacted]

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BIN ZHOU

Letter Code: I-25
Date: August 4, 2025

Response to Comment I-25-1

This comment is a copy of an email that was sent to Mr. Rob Bonta, Attorney General for the State of California (*IPT Enterprise Business Center LLC, SCH #2024030755*, April 5, 2024; located in Appendix A of the Draft EIR), expressing opposition to the proposed Project and expresses concerns regarding land use conflicts, air pollution, noise pollution, public safety, traffic congestion, and environmental justice.

Refer to Master Response 7 regarding land use conflicts, Response to Comment O-1-4 and Master Response 9 regarding the Draft EIR's air quality and health risk analysis, Master Response 11 regarding the Draft EIR's noise and vibration analysis, Master Response 8 regarding the Draft EIR's transportation analysis, Master Response 6 regarding the adequacy of the Draft EIR's cumulative impacts analysis, and Master Response 14 regarding disproportionate environmental burdens and the requirements for an analysis of environmental justice impacts. The City acknowledges the California Attorney General's NOP comment letter and considered the issues presented in the letter during preparation of the Draft EIR. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: sharon hu
To: Stonich, Amy
Subject: opposition to the proposed IPT Enterprise Business Center Project
Date: Wednesday, August 6, 2025 8:36:06 PM

Dear Ms. Amy Astonich;

I-26-1 I am a resident of Lake Forest living in the Meadows. My family moved to the community from San Jose after my retirement last May. I was so upset when I heard the project. I have history of asthma. One of the reasons that I left San Jose was environmental issue. I cannot tolerate noise and air pollution. I thought Lake Forest was a clean, peaceful and beautiful place, an ideal place for retirees. I really don't want this city becomes an industrial area. I hope I don't have to move again at this ago.

Thanks,

Sharon Hu

[redacted]

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SHARON HU

Letter Code: I-26
Date: August 6, 2025

Response to Comment I-26-1

This comment expresses concerns about the City becoming an industrial area.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. No further response is required.

Weiss, Jennifer

From: Sam Mu Team [redacted]
Sent: Saturday, August 9, 2025 9:59 AM
To: EnterpriseProjects; MU Yubo
Subject: Opposition to Proposed IPT Enterprise Business Center LLC Project – SCH# 2024030755

Dear Ms. Stonich,

My name is **Yubo Mu**, and I am a resident of Lake Forest. I live at [redacted] **Lake Forest, CA 92630**, which is located in close proximity to the proposed project site at 26200 Enterprise Way.

I am writing to formally express my strong opposition to the proposed IPT Enterprise Business Center LLC Project for the following reasons:

1. **Traffic Congestion and Safety Risks**
   The proposed project will significantly increase large truck traffic, passenger vehicle trips, and turning movements at nearby intersections. The affected intersections—Bake Parkway, Dimension Drive, Commerce Drive, and Rancho Parkway—already experience congestion during peak hours. Additional truck traffic will increase the likelihood of accidents, especially for pedestrians, cyclists, and school routes in the area.
2. **Noise Pollution** I-27-1
   The operation of 23 dock-high loading bays and frequent truck deliveries will result in persistent noise throughout the day and potentially late-night hours. This will negatively impact the peaceful residential character of nearby communities.
3. **Air Quality and Health Concerns**
   The increased truck trips will contribute to higher levels of diesel exhaust and particulate matter, impacting air quality. This poses health risks, especially for children, seniors, and individuals with respiratory conditions.
4. **Negative Impact on Residential Environment and Property Values**
   The scale and industrial nature of the proposed development are incompatible with the surrounding residential communities. The visual impact, constant activity, and potential environmental degradation will reduce the desirability of the neighborhood and may lower property values.

Given these concerns, I respectfully request that the City of Lake Forest **deny approval** of the current proposal.

Thank you for your attention to this matter. I appreciate the opportunity to provide my comments and trust the City will prioritize the safety, health, and quality of life of its residents. *Please confirm receipt of this comment letter. Thank you!*

Sincerely,

Yubo Mu
[redacted]
Lake Forest, CA 92630

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YUBO MU

Letter Code: I-27
Date: August 9, 2025

Response to Comment I-27-1

This comment expresses opposition to the proposed Project and states the opinion that the proposed Project would result in negative impacts related to truck traffic, noise pollution, air pollution, health risks, and property values for the nearby communities. The comment requests that the City address their comments by denying approval of the proposed Project.

Refer to Master Response 8 regarding truck traffic associated with the proposed Project, Master Response 11 regarding noise pollution associated with the proposed Project, Response to Comment O-1-4 and Master Response 9 regarding air pollution and health risks associated with the proposed Project, and Response to Comment O-1-12 regarding property value impacts associated with the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: Jinguo wang [redacted]
Sent: Sunday, August 10, 2025 11:41 AM
To: EnterpriseProjects
Subject: Formal Objection to Draft Environmental Impact Report (EIR) for IPT Corporate Business Center Project (APN 610-401-06)

Dear Ms. Stonich

I am writing to formally express my strong opposition to the Draft Environmental Impact Report (EIR) for the proposed IPT Corporate Business Center Project (Assessor's Parcel Number: 610-401-06). After thoroughly reviewing the document and assessing the potential consequences of this development, I have identified several serious concerns that render the current draft EIR insufficient and unacceptable.

1. Traffic and Transportation Impacts

I-28-1 The proposed project will significantly increase vehicular traffic in an area that is already facing congestion issues. The draft EIR underestimates the cumulative impact on local roadways, intersections, and freeway access points. Increased truck and commercial vehicle activity will further strain the infrastructure, leading to higher risks of accidents, delays, and air pollution. Mitigation measures proposed are vague and lack enforcement mechanisms.

2. Air Quality and Environmental Health

The project will contribute substantially to air pollution, particularly particulate matter (PM2.5 and PM10), nitrogen oxides (NOx), and other pollutants associated with industrial development. These emissions pose a serious threat to the health of nearby residents, especially vulnerable populations such as children and the elderly. The draft EIR fails to adequately address long-term health impacts or propose effective, measurable mitigation strategies.

3. Noise Pollution

The draft EIR does not sufficiently assess the impact of increased noise levels due to construction, operational activities, and increased traffic volumes. Continuous noise exposure from heavy machinery and transport vehicles will significantly degrade the quality of life for surrounding communities.

4. Water Resources and Stormwater Management

There is inadequate analysis of the potential effects on local water resources, particularly regarding stormwater runoff and contamination. Industrial development often leads to increased impermeable surfaces, heightening the risk of flooding and pollutant runoff into local waterways. The current plan lacks detailed, enforceable solutions to these issues.

5. Community Character and Land Use Compatibility

The scale and nature of the IPT project are incompatible with the surrounding land uses. The project threatens to disrupt the existing community character, displace local small businesses, and reduce property values. The draft EIR fails to evaluate the social and economic impacts on existing neighborhoods.

I-28-1 cont.

6. Cumulative Impact Analysis Deficiencies

The cumulative impacts of this project, when considered alongside other ongoing or proposed developments in the region, are significantly understated. The draft EIR does not adequately analyze how the combined effects will exacerbate existing environmental and infrastructural problems.

Conclusion:

Given the significant and inadequately addressed impacts outlined above, I urge the lead agency to reject the current Draft EIR and require a revised document that thoroughly evaluates all environmental, health, and community concerns. Furthermore, I recommend that a more robust public engagement

process be implemented to ensure that the voices of local residents and stakeholders are fully considered.

I-28-1 cont.

Thank you for your attention to this important matter.

Sincerely,

Jinguo Wang

[redacted] Lake Forest CA 92630

8/10/2025

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JINGUO WANG

Letter Code: I-28
Date: August 10, 2025

Response to Comment I-28-1

This comment expresses opposition to the proposed Project and expresses concerns regarding truck and vehicle traffic and congestion, air pollution and health impacts, noise pollution, water resources and stormwater management, land use incompatibility, and cumulative impacts. In addition, this comment requests that the City address their comments by rejecting the Draft EIR and requiring a revised Draft EIR that addresses the concerns stated in this comment letter.

Refer to Master Response 8 regarding the Draft EIR's analysis of vehicle traffic and congestion, Response to Comment O-1-4 and Master Response 9 regarding the Draft EIR's analysis of air quality and health risks, Master Response 11 regarding the Draft EIR's analysis of noise pollution, Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses, and Master Response 6 regarding the adequacy of the Draft EIR's cumulative impacts analysis. Additionally, refer to Response to Comment I-10-10 regarding stormwater runoff and water quality impacts associated with the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: Coraline Wang [redacted]
Sent: Sunday, August 10, 2025 12:06 PM
To: EnterpriseProjects
Subject: The Formal Objection to the Draft EIR for the IPT Corporate Business Center Project (APN 610-401-06)

Dear Ms. Stonich,

I hope this message finds you well!

I-29-1 I hereby submit a formal objection to the draft Environmental Impact Statement (EIR) for the proposed IPT Enterprise Business Centre Warehouse project at 26200 Enterprise Way. As a Lake Forest City resident / stakeholder, after reviewing the draft EIR, I believe that the project would pose an unacceptable risk to the environmental quality, public health and safety of my community, for the following reasons:

1. The draft EIR has recognized the existence of significant and irreparable environmental hazards in the project
According to the EIR conclusions:
· The impact of greenhouse gas emissions and vehicle mileage (VMT) is classified as "significant and
I-29-2 unavoidable";
· The project violates California's 2045 carbon neutrality goals and the City of Lake Forest Climate Action Plan;
· 23 truck loading gates and heavy traffic will worsen local air quality (especially threatening the adjoining Meadows neighborhood).

II. Project design seriously threatens the health and safety of the community
· Residential Exposure Risk: East Side Meadows Neighborhood Will Be Directly Exposed to Truck
I-29-3 Emissions of PM2.5/NOX contaminants, 65 feet of sound barrier does not block the spread of pollutants;
· Traffic safety hazards: The proposed five intersections cannot carry the combined traffic of 262 commuter vehicles plus heavy trucks, raising the risk of accidents.

III. Tenant uncertainty amplifies environmental risk
· EIR is assessed on the highest pollution intensity (65,000 m2 manufacturing + 90,803 m2 warehousing),
I-29-4 but does not limit the industry type of future tenants;
· If industries such as chemicals and logistics are introduced, the risk of leakage of hazardous substances will endanger surrounding communities.

IV. Absence of alternatives violates the spirit of CEQA
· No studies have been conducted on low-carbon alternatives for the conversion of existing buildings or
I-29-5 downsizing;
· Demolition of existing buildings will generate 11,000 tons of construction waste (in violation of AB 1583 Waste Reduction Order).

Demands and Calls for Action
I-29-6 1.Rejection of the current protocol (in violation of CEQA § 21081);

I-29-6 cont.

2. Additional research is required: PM2.5 diffusion simulation in residential areas, tenant industry restriction list, zero emission truck retrofit scheme;
3. A hearing was held to invite independent experts to consider the shortcomings of the VMT model.

I-29-7

The project, if approved, would set a dangerous precedent in which the interests of corporations would take precedence over the health of residents. I urge the city government to fulfill its environmental fiduciary obligations.

Please file this letter as a formal objection and notify me of the schedule of a follow-up hearing.

Sincerely,

Yijia Wang
[redacted]
Lake Forest CA 92630

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YIIJIA WANG

Letter Code: I-29
Date: August 10, 2025

Response to Comment I-29-1

This comment is an introductory comment and expresses opposition to the proposed Project, stating the opinion that the proposed Project would pose risks to environmental quality, public health, and community safety.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-29-2

This comment states that the Draft EIR recognizes significant and irreparable environmental hazards associated with the proposed Project including significant and unavoidable GHG and VMT impacts, violation of California's 2045 carbon neutrality goals and the City's CAP, and worsening air quality as a result of truck loading docks and heavy traffic associated with the proposed Project.

Refer to Response to Comment I-24-2 regarding GHG and VMT impacts. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-29-3

This comment expresses concern regarding community health and safety related to the proximity of the Meadows community to the proposed Project and that the nearby intersections would not be able to support increased traffic associated with the proposed Project, increasing the risk of accidents.

Refer to Response to Comment I-24-3 regarding community health and safety. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-29-4

This comment expresses concern regarding the uncertainty of the type of future tenant.

Refer to Response to Comment I-24-4 regarding tenant uncertainty. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-29-5

This comment expresses concern that the Draft EIR did not analyze a low-carbon alternative and about the amount of construction waste.

Refer to Response to Comment I-24-5 regarding the Draft EIR's alternatives analysis. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-29-6

This comment suggests that additional research, including a PM2.5 diffusion simulation in residential areas, future tenancy, and zero emission-trucks be conducted. This comment also states that a hearing considering the purported inadequacies of the VMT model was held.

Refer to Response to Comment I-24-6 regarding the commenter's request for a PM2.5 diffusion simulation, future tenancy, zero-emission trucks, and the adequacy of the VMT model. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-29-7

This comment concludes the letter and states that approval of the proposed Project would set a precedent for industrial development over resident health, and requests notification of a follow-up hearing.

Residents who have requested to be added to the Project notification list will be notified of future public hearing(s) for the proposed Project, at which time verbal comments can be made by members of the public.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses above. No further response is required.

Weiss, Jennifer

From: Xiuying zhou [redacted]
Sent: Sunday, August 10, 2025 12:12 PM
To: EnterpriseProjects
Subject: Formal Objection to Draft Environmental Impact Report(EIR) for the IPT Business Center Project (APN610-401-06)

Dear Ms. Stonich,

I-30-1 I hereby submit a formal objection to the draft Environmental Impact Statement (EIR) for the proposed IPT Enterprise Business Centre Warehouse project at 26200 Enterprise Way. As a Lake Forest City resident / stakeholder, after reviewing the draft EIR, I believe that the project would pose an unacceptable risk to the environmental quality, public health and safety of my community, for the following reasons:

I-30-2 1. The draft EIR has recognized the existence of significant and irreparable environmental hazards in the project According to the EIR conclusions:
· The impact of greenhouse gas emissions and vehicle mileage (VMT) is classified as "significant and unavoidable";
· The project violates California's 2045 carbon neutrality goals and the City of Lake Forest Climate Action Plan;
· 23 truck loading gates and heavy traffic will worsen local air quality (especially threatening the adjoining Meadows neighborhood).

I-30-3 II. Project design seriously threatens the health and safety of the community
· Residential Exposure Risk: East Side Meadows Neighborhood Will Be Directly Exposed to Truck Emissions of PM2.5/NOX contaminants, 65 feet of sound barrier does not block the spread of pollutants;
· Traffic safety hazards: The proposed five intersections cannot carry the combined traffic of 262 commuter vehicles plus heavy trucks, raising the risk of accidents.

I-30-4 III. Tenant uncertainty amplifies environmental risk
· EIR is assessed on the highest pollution intensity (65,000 m2 manufacturing + 90,803 m2 warehousing), but does not limit the industry type of future tenants;
· If industries such as chemicals and logistics are introduced, the risk of leakage of hazardous substances will endanger surrounding communities.

I-30-5 IV. Absence of alternatives violates the spirit of CEQA
· No studies have been conducted on low-carbon alternatives for the conversion of existing buildings or downsizing;
· Demolition of existing buildings will generate 11,000 tons of construction waste (in violation of AB 1583 Waste Reduction Order).

I-30-6 Demands and Calls for Action
1.Rejection of the current protocol (in violation of CEQA § 21081);
2. Additional research is required: PM2.5 diffusion simulation in residential areas, tenant industry restriction list, zero emission truck retrofit scheme;

I-30-6 cont. 3. A hearing was held to invite independent experts to consider the shortcomings of the VMT model.

I-30-7 The project, if approved, would set a dangerous precedent in which the interests of corporations would take precedence over the health of residents. I urge the city government to fulfill its environmental fiduciary obligations.

Please file this letter as a formal objection and notify me of the schedule of a follow-up hearing.

Sincerely,

Xiuying Zhou
[redacted] Lake Forest CA 92630

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XIUYING ZHOU

Letter Code: I-30
Date: August 10, 2025

Response to Comment I-30-1

This comment is an introductory comment and expresses opposition to the proposed Project, stating the opinion that the proposed Project would pose risks to environmental quality, public health, and community safety.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-30-2

This comment states that the Draft EIR recognizes significant and irreparable environmental hazards including significant and unavoidable GHG and VMT impacts, violation of California's 2045 carbon neutrality goals and the City's CAP, and the opinion that truck loading docks and heavy traffic associated with the proposed Project would worsen local air quality.

Refer to Response to Comment I-24-2 regarding GHG and VMT impacts.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-30-3

This comment expresses concern regarding community health and safety related to the proximity of the Meadows community to the proposed Project and that the nearby intersections cannot support increased traffic associated with the proposed Project, increasing the risk of accidents.

Refer to Response to Comment I-24-3 regarding community health and safety related to Project design.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-30-4

This comment expresses concern regarding the uncertainty of the type of future tenant.

Refer to Response to Comment I-24-4 regarding tenant uncertainty.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-30-5

This comment expresses concern that the Draft EIR did not analyze a low-carbon alternative and about the amount of construction waste.

Refer to Response to Comment I-24-5 regarding the Draft EIR's analysis of alternatives.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-30-6

This comment requests the City address their comments by rejecting the current protocol and states that additional research is required for PM2.5 diffusion simulation in residential areas, future tenancy, and zero-emission trucks. This comment also states that a hearing considering shortcomings of the VMT model was held.

Refer to Response to Comment I-24-6 regarding the requested additional research.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-30-7

This comment concludes the letter and claims that approval of the proposed Project would set a precedent for industrial development over resident health, and requests notification of a follow-up hearing.

Refer to Response to Comment I-24-7 regarding the precedent for industrial development. Residents who have requested to be added to the Project notification list will be notified of future public hearing(s) for the proposed Project, at which time verbal comments can be made by members of the public.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses above. No further response is required.

From:	Meadows
To:	Stonich, Amy; EnterpriseProjects
Cc:	Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject:	Additional Public Comment on Missing Cumulative Projects in DEIR – IPT and Western Realco Projects
Date:	Sunday, August 10, 2025 2:04:02 PM

Hi Amy,

This is Harrison Jiang again. While visiting friends in the Great Park community in Irvine, adjacent to Lake Forest, I became aware of **three significant projects** that were not identified or evaluated in the DEIR **Section 4.4 – Cumulative Projects** or **Table 4.A – Summary of Cumulative Projects**.

These omissions are material, as each project has direct and substantial cumulative impacts—particularly on truck and school traffic—when considered alongside the proposed IPT and Western Realco warehouse developments.

1. Large Warehouses at Southeast Corner of I-5 and Bake Parkway

- Status: Under construction, near completion.
- Impact: Will generate direct and significant truck traffic along Alton Parkway, the same truck route identified for the IPT and Western Realco projects.

2. Large Warehouses at Southeast Corner of Alton Parkway and Muirlands Boulevard

I-31-1

- Status: Under construction, near completion.
- Impact: Will generate direct and significant truck traffic along Bake Parkway, also serving as a primary truck route for the proposed warehouse projects.

3. ~770 New Residential Homes – Lunar Park, Great Park, Irvine

- Status: Under construction; sales to the public underway.
- Location: Irvine address, but zoned to Saddleback Valley Unified School District:
  - K–6 Rancho Canada Elementary School
  - 7–8 Serrano Intermediate School
  - 9–12 El Toro High School
- Impact: Will create substantial daily school traffic from new families traveling to these Lake Forest schools via major roadways including Astor, Fairbank, Irvine Blvd, Toledo Way, Bake Pkwy, Alton Pkwy, Jeronimo Rd, and Trabuco Rd.
- Note: Although located in Irvine, these homes will directly affect Lake Forest's transportation network and significantly compound impacts from the proposed warehouses.

Significance Under CEQA

These projects are reasonably foreseeable, geographically proximate, and either under construction or nearing completion. CEQA requires that cumulative impacts consider **all past, present, and probable future projects** that may have overlapping environmental effects. The omission of these projects from the DEIR's cumulative analysis results in a serious underestimation of **transportation/traffic impacts**, which in reality are already analyzed and described **in DEIR as Significant and Unavoidable** even without the omitted projects and with proposed mitigation measures.

I-31-1 cont.

For these reasons, I again urge the City to reject the proposed IPT and Western Realco industrial warehouse projects and prioritize the health, safety, and quality of life of Lake Forest residents.

Please include this email as my additional formal public comments.

Thank you,

Harrison Jiang
[redacted]
Lake Forest, CA 92630
Email: [redacted]

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HARRISON JIANG

Letter Code: I-31
Date: August 10, 2025

Response to Comment I-31-1

This comment expresses concerns regarding the cumulative impact list presented in the Draft EIR, stating that the list omits three relevant projects, including 1) a warehouse project at the southeast corner of I-5 and Bake Parkway, 2) a warehouse project at the southeast corner of Alton Parkway and Muirlands Boulevard, and 3) a residential project near Great Park in Irvine. The comment states the opinion that these projects would result in cumulatively considerable traffic volumes when considered in conjunction with the proposed Project and other cumulative industrial warehouse projects already included in the cumulative projects list and urges the City to reject the proposed Project.

Refer to Master Response 6 regarding the adequacy of the proposed Project's cumulative impacts analysis. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: Zack Xu
To: Stonich, Amy; EnterpriseProjects
Subject: Public Comments on DEIR of IPT Enterprise Business Center Project
Date: Monday, August 11, 2025 10:40:19 AM

Dear Lake Forest City:

I-32-1 I submit these comments regarding the Draft Environmental Impact Report (EIR) for the IPT Enterprise Business Center Project ("Project"). I am the owner of a single family house immediately adjacent to the Project. These comments are intended to be part of the administrative record for this Project under the California Environmental Quality Act ("CEQA"), Public Resources Code §21000 et seq., and the CEQA Guidelines, Title 14, Cal. Code Regs. §15000 et seq. I request that the City provide written, detailed responses to each of these comments pursuant to CEQA Guidelines §15088.

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1. Significant and Unavoidable Impacts Require Exhaustive Mitigation Efforts

I-32-2 Section 1.4 of the EIR acknowledges significant and unavoidable impacts, including **Vehicle Miles Traveled (VMT)** and related greenhouse gas (GHG) emissions. Under CEQA, the City must demonstrate that it has adopted all feasible mitigation measures before relying on a Statement of Overriding Considerations (SOC) (CEQA Guidelines §§15021, 15091, 15093).

The EIR must explain, with substantial evidence, why additional measures—such as deeper size reductions, operational restrictions, or accelerated zero-emission fleet requirements—are not feasible. A 25% warehouse size reduction appears arbitrary without quantitative analysis showing that greater reductions were considered and found infeasible.

---

2. Mitigation Measures Lack Specificity and Enforceability

I-32-3 The mitigation measures described in the Executive Summary are general and in some cases lack clear performance standards, enforceable timelines, or monitoring protocols (CEQA Guidelines §15126.4(a)(2)). Measures must be fully enforceable, supported by substantial evidence, and include measurable performance outcomes.

For example:

- VMT-reducing measures should specify trip-reduction targets and monitoring schedules.
- GHG measures should include enforceable commitments to transition to zero-emission vehicles by a date certain, rather than aspirational language.

---

3. Alternatives Analysis – Need for a 50% Reduction Alternative

I-32-4 The alternatives analysis appears legally inadequate because it fails to evaluate a **50%**

warehouse size reduction alternative.

- CEQA requires the EIR to consider a reasonable range of alternatives that would feasibly attain most of the project's objectives while avoiding or substantially lessening significant impacts (CEQA Guidelines §15126.6).
- The current 25% reduction alternative is insufficient to avoid significant VMT and GHG impacts.
- A **50% reduction alternative** could meaningfully reduce truck trips, VMT, localized air pollution, and GHG emissions — potentially to less-than-significant levels — while still meeting core project objectives such as job creation, economic activity, and industrial land use.

I-32-4 cont.

The City must either:

1. **Fully evaluate the 50% reduction alternative** in the EIR, including quantitative modeling of environmental benefits, or
2. Provide substantial evidence explaining why this alternative is infeasible (e.g., specific economic, operational, or site constraints).

Without such analysis, the EIR fails CEQA's requirement to disclose and consider feasible alternatives that might avoid the need for an SOC.

---

4. Air Quality and Health Risk Analysis May Understate Localized Impacts

The EIR should provide a robust Health Risk Assessment (HRA) that evaluates localized diesel particulate matter (DPM) and NOx impacts on nearby residents, schools, and sensitive receptors.

I-32-5

Key questions include:

- Did the HRA consider cumulative exposure from nearby industrial and warehouse uses?
- Were health risks evaluated for peak operational periods?
- Were the most recent CARB emissions factors and OEHHA risk assessment guidelines used?

If not, the EIR may significantly understate health risks.

---

5. VMT and Traffic Methodology Needs Clarification

The EIR should disclose the methodology and assumptions used for VMT analysis, including:

I-32-6

- Trip generation rates for trucks and passenger vehicles.

- Peak season freight activity assumptions.
- Consideration of induced demand and ancillary business trips.
- Compliance with the latest Office of Planning and Research (OPR) VMT guidance.

I-32-6 cont.

Without this transparency, it is unclear whether the analysis accurately reflects real-world conditions.

---

6. Greenhouse Gas Reduction and Climate Consistency

The EIR concedes inconsistency with the **2022 Scoping Plan** due to VMT-related GHG emissions. CEQA requires discussion of feasible mitigation to reduce inconsistency (CEQA Guidelines §15126.4(c)). The EIR should address whether:

I-32-7

- Accelerated electrification of trucks and equipment was considered.
- Onsite renewable energy generation and battery storage were maximized.
- Carbon offset programs were analyzed as supplemental measures.

---

7. Cumulative Impact Assessment – Adjacent Projects Must Be Included

The cumulative impacts analysis must consider the **two immediately adjacent warehouse projects** (Large Warehouses at Southeast Corner of I-5 and Bake Parkway and Large Warehouses at Southeast Corner of Alton Parkway and Muirlands Boulevard) that are currently in the City's EIR process and will be developed in the same timeframe.

These projects are **reasonably foreseeable** under CEQA Guidelines §15130 because:

I-32-8

- They are actively undergoing environmental review.
- They share immediate proximity to the Project site.
- They will generate similar categories of impacts (traffic, VMT, diesel emissions, noise) in the same local circulation network.

Excluding them from the cumulative list understates the true environmental burden on nearby residents and sensitive receptors. The combined effects — particularly cumulative diesel particulate matter exposure, overlapping truck route congestion, and cumulative GHG emissions — must be disclosed and analyzed now, using the best available information.

The City should include these projects in the cumulative impacts list and update its modeling accordingly.

---

8. Procedural and Public Engagement Concerns

I-32-9

CEQA requires that all technical data relied upon in the EIR be made available for public

review during the comment period (CEQA Guidelines §15087(c)(6)). Please confirm that:

I-32-9 cont.

- All technical appendices, modeling files, and data inputs were available from the start of the public review period.
- No late-released documents were relied upon without extending the comment period.

Conclusion and Request

For the reasons stated above, the current EIR appears to have analytical gaps and mitigation deficiencies that prevent meaningful public review and do not fully satisfy CEQA's requirements. In particular:

- **Failure to evaluate a 50% warehouse size reduction alternative** is a critical omission.
- **Failure to include the two adjacent foreseeable warehouse projects in the cumulative analysis** understates the Project's environmental impacts.

I-32-10

The City should:

1. Include a full quantitative analysis of a 50% reduction alternative; or
2. Provide substantial evidence demonstrating why this alternative is infeasible; and
3. Revise the cumulative impacts analysis to include both adjacent projects.

Until this analysis is completed, the City cannot make the findings required under CEQA, nor can it lawfully adopt a Statement of Overriding Considerations.

Please include these comments in the Final EIR and provide detailed written responses as required by CEQA Guidelines §15088.

Please provide confirmation of receipt of this comment letter.

Sincerely,

Zachary Xu

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ZACHARY XU

Letter Code: I-32
Date: August 11, 2025

Response to Comment I-32-1

This introductory comment, which states that the commenter owns property adjacent to the Project site, requests detailed written responses to the issues presented in Comments I-32-2 through I-32-10 below.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-32-2

This comment expresses concerns regarding the significant and unavoidable VMT and GHG emissions impacts presented in the Draft EIR and requests an explanation of why additional mitigation measures or a larger square footage reduction alternative were not considered.

Refer to Master Response 8 regarding the VMT analysis conducted for the proposed Project, Master Response 10 regarding the GHG analysis conducted for the proposed Project, Master Response 4 regarding the adequacy of the proposed Project's mitigation under CEQA, and Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-32-3

This comment expresses concerns regarding the mitigation measures presented in the Draft EIR, stating the opinion that some measures are general and lack clear performance standards, enforceable timelines, or monitoring protocols as required under CEQA.

Refer to Master Response 4 regarding the adequacy of the proposed Project's mitigation under CEQA. This Master Responses thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-32-4

This comment expresses concerns regarding the alternatives analysis contained in the Draft EIR, stating the opinion that a 25 percent Reduced Project Alternative is inadequate and a 50 percent Reduced Project Alternative should be considered. The comment requests revisions to the Draft EIR to address their comments by including an analysis of a 50 percent Reduced Project Alternative or a detailed explanation of why this alternative is not considered feasible.

Refer to Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-32-5

This comment expresses concerns that the HRA prepared for the proposed Project may understate health risks and inquires as to whether the HRA considered cumulative exposure from other cumulative industrial warehouse projects, peak operational periods, and the most recent California Air Resources Board (CARB) emissions factors and Office of Environmental Health Hazard Assessment (OEHHA) risk assessment guidelines.

Refer to Master Response 9 regarding the HRA prepared for the proposed Project and Master Response 6 regarding the cumulative impacts analysis prepared for the proposed Project. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-32-6

This comment states the opinion that the Draft EIR should disclose the methodology and assumptions used to analyze VMT impacts, including trip generation rates for trucks and passenger vehicles, peak season freight activity assumptions, consideration of induced demand and ancillary business trips, and compliance with the latest Office of Planning and Research (OPR) [Now known as the Office of Land Use and Climate Innovation (LCI)] guidance.

Refer to Master Response 8 regarding the VMT analysis conducted for the proposed Project. Trip generation rates for trucks and passenger vehicles are provided in Table C (Project Trip Generation Summary) of the TIA (Appendix J of the Draft EIR). Per City's TA Guidelines, the VMT assessment metric for the proposed Project is "Home-Based Work VMT per employee," which does not include the peak-season freight activity and business trips. The VMT analysis for the proposed Project was conducted following the guidance from the City and is also consistent with the City's TA Guidelines,

as well as the latest Technical Advisory on Evaluating Transportation Impacts in CEQA (Office of Planning and Research [OPR], December 2018).

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-32-7

This comment expresses concerns regarding the proposed Project's inconsistency with the 2022 Scoping Plan, and states the opinion that the Draft EIR should address whether truck/equipment electrification, onsite renewable energy generation and battery storage, and carbon offset programs were considered and implemented to the extent feasible.

Refer to Master Response 10 regarding the GHG analysis conducted for the proposed Project. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

As discussed in Section 4.8, Greenhouse Gas Emissions, of the Draft EIR, under Threshold 4.8.2, starting on page 4.8-16, the proposed Project's consistency with the 2022 Scoping Plan is evaluated. As described therein, in addition to meeting the Tier 2 measures for off-street electric vehicle ("EV") requirements in the most recently adopted version of the CALGreen Code, the proposed Project would also be required to implement MM GHG-1 to provide on-site electric truck charging stations to support the reduction of GHG emissions related to mobile source operational activities. To clarify the timing of installation of on-site electric truck charging stations, revisions to MM GHG-1 have been made as shown below and as noted in Section 3, Errata, of this RTC document:

MM GHG-1 **Electric Vehicle Charging.** Provisions shall be made at the Project site for emerging electric truck technology. Prior to the issuance of a shell building permit, the ~~City shall verify that the site plan identifies an on-site location for future electric truck charging stations, with space available for a minimum of four (4) trucks to simultaneously charge when charging stations are installed in the future. The conduit trenching shall be installed to that location for future conduit pull as a requirement of the shell building permit. In conjunction with the approval of tenant improvement plans and permits, the applicant shall install electric truck charging stations on the site for a minimum of four (4) electric truck to simultaneously charge.~~ construction plan set shall:

(c) Provide for installation of all necessary infrastructure, including conduit, wiring, and sufficient electrical capacity, to support the future installation of on-site electric truck charging stations; and

(d) Designate sufficient space to accommodate a minimum of four electric trucks charging simultaneously.

Prior to issuance of tenant improvement permits for the building, the tenant improvement plans shall include installation of a minimum of four electric truck charging stations at the predesignated locations. The charging stations shall be installed and operational prior to tenant occupancy of the building.

As stated under Threshold 4.8.2, starting on page 4.8-16 of Section 4.8, Greenhouse Gas Emissions, and further discussed under Threshold 4.17.2, starting on page 4.17-11 of Section 4.17, Transportation and Traffic, of the Draft EIR, because the proposed Project's VMT impact cannot be reduced to a less than significant level even with implementation of mitigation, the proposed Project would conflict with the goals and policies of the 2022 Scoping Plan related to VMT. There is no additional feasible mitigation that can reduce this plan's inconsistency impact to a less than significant level. Therefore, the Project would result in a significant and unavoidable impact related to consistency with the 2022 Scoping Plan. Refer to Master Response 8, Transportation Analysis, for a discussion of VMT mitigation.

The analysis of the proposed Project contained in the Draft EIR is based upon reasonably foreseeable office, manufacturing, and warehouse operations based on information provided by the Project Applicant. Refer to Response to Comment I-21-15 regarding the proposed Project's compliance with the SCAQMD's Warehouse Indirect Source Rule (Rule 2305) and the potential acquisition and use of near-zero-emission (NZE) and zero-emission (ZE) trucks, acquisition and use of ZE yard tractors, acquisition and use of ZE fueling infrastructure for on-road vehicles, and acquisition and use of solar panels for on-site electricity generation. Additionally, as noted in Section 3.7, Sustainability Features, on page 3-19 of the Draft EIR, the proposed Project would be consistent with California's Building Energy Efficiency Standards (Energy Code) and requirements for solar photovoltaic systems.

As stated in *State CEQA Guidelines* Section 15064(d)(3), "An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable." Because electric truck charging technology is still in the developing stages, it is unknown exactly when and to what scale "accelerated electrification" technology would be available. Similarly, the potential for future utility upgrades are speculative and cannot be considered reasonably foreseeable at this time. Therefore, the consideration of alternative technologies presented in the Draft EIR remain valid, and no revisions are necessary. No further response is required.

Response to Comment I-32-8

This comment expresses concerns regarding the cumulative impacts analysis contained in the Draft EIR and states the opinion that the other cumulative industrial warehouse projects should be included in the Draft EIR's cumulative impacts analysis so that environmental burdens, particularly cumulative DPM exposure, truck route congestion, and GHG emissions, are not understated.

Refer to Master Response 6 regarding the adequacy of the Draft EIR's cumulative impacts analysis. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-32-9

This comment requests confirmation that all technical appendices, modeling files, and data inputs were available from the start of the public review period, and no documents were released late without extending the public comment period.

Refer to Master Response 1 regarding the availability of Project documentation and information during public review period for the proposed Project. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-32-10

This concluding comment restates the commenter's concerns regarding alternatives and cumulative impacts, requests that the City address their comments by revising its cumulative impact analysis to include the other cumulative industrial warehouse projects and either revising its alternatives analysis to include a 50 percent Reduced Project Alternative or explaining why this alternative is infeasible. The comment states the opinion that the City cannot make findings under CEQA or adopt a Statement of Overriding Considerations until these comments have been addressed.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses above. No further response is required.

From: Li Iris
To: Stonich, Amy; EnterpriseProjects
Subject: Public Comments on DEIR of IPT Enterprise Business Center Project
Date: Monday, August 11, 2025 10:59:50 AM

Dear City of Lake Forest Planning Department,

This letter serves as a formal public comment on the Draft Environmental Impact Report (EIR) for the IPT Enterprise Business Center LLC Project. I am an owner of a single family residence immediately next to the Project. I have reviewed the Executive Summary of the Draft EIR and have identified several significant weaknesses and inadequacies that, in my opinion, render the document insufficient for informed decision-making under the California Environmental Quality Act (CEQA).

I-33-1

The most fundamental issue is that the EIR, by its own admission, concludes that the project will result in significant and unavoidable environmental impacts, specifically related to Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions. This is true even with the proposed mitigation measures and the EIR's designated "Environmentally Superior Alternative," which involves a 25% reduction in project size. The purpose of an EIR is to identify feasible mitigation measures that reduce impacts to a less than significant level. The failure to achieve this, coupled with a seemingly limited exploration of project alternatives, is a major flaw that must be addressed.

Inadequate Project Alternatives and Mitigation

The Draft EIR considers a Reduced Project Alternative (Alternative 3) that proposes a 25% reduction in the warehouse's square footage. The document identifies this as the environmentally superior alternative to the proposed project, yet it explicitly states that it "would not reduce the significant impacts related to VMT or cumulatively considerable significant impacts related to GHG emissions to a less than significant level."

This conclusion raises a critical question about the adequacy of the alternatives analysis: if a 25% reduction is insufficient, why was a more substantial reduction not analyzed? The EIR presents the 25% figure without a clear justification for its selection as the endpoint of the alternatives analysis. A more comprehensive EIR would explore a broader range of reductions to determine the point at which the significant and unavoidable impacts could be fully mitigated.

I-33-2

Therefore, we formally request that the City of Lake Forest revise this EIR to include a robust analysis of a **50% Reduced Project Alternative**. This alternative would involve constructing a warehouse of approximately 82,900 square feet, which is a substantial reduction from the proposed 165,803 square foot building. This alternative has the potential to significantly decrease traffic generation, VMT, and associated GHG emissions to a point where they may no longer be considered significant.

We request that the City of Lake Forest provide a detailed explanation of why an alternative with a 50% reduction in square footage was not considered. Furthermore, if the City believes such an alternative is infeasible, it must provide substantial evidence and analysis to support that conclusion.

Flawed and Incomplete Cumulative Impact Analysis

A second major deficiency in the Draft EIR is its incomplete analysis of cumulative impacts. The EIR's executive summary mentions that the project's construction-related emissions would be cumulatively significant if built at the same time as the "two Western Realco Projects." This acknowledgement highlights the project's presence in a larger context of simultaneous development.

I-33-3

However, the EIR does not provide a comprehensive cumulative impact analysis of the operational impacts from all three projects. The two adjacent projects are also proposing warehouse development and are currently undergoing their own EIR processes, with no public draft EIRs yet available. It is a fundamental requirement of CEQA that the City must consider the combined effects of all past, present, and reasonably foreseeable future projects. The operational VMT, GHG emissions, noise, and air quality impacts from three large warehouse facilities in such close proximity will undoubtedly be massive.

The City cannot make an informed decision on this project without understanding the full, combined effect of these three developments. The current EIR's cumulative impact analysis is speculative at best, as it is missing crucial data and analysis from the other two projects. The City must be the lead agency in coordinating these analyses to ensure the cumulative impacts are properly understood and addressed.

Demands and Conclusion

For the reasons outlined above, I urge the City of Lake Forest to take the following actions:

1. **Do not certify the current Draft EIR.** The document is fundamentally flawed due to its failure to adequately mitigate significant impacts and its incomplete cumulative analysis.

I-33-4

2. **Require the project applicant to revise the EIR.** The revised EIR must include a detailed analysis of a more aggressive alternative, specifically a **50% Reduced Project Alternative**.

3. **Provide a clear, evidence-based justification** for why a 50% reduction is not a feasible or environmentally superior alternative.

4. **Recirculate a new Draft EIR** that includes a comprehensive and coordinated cumulative impact analysis that considers the operational impacts of the IPT Enterprise Business Center LLC Project in conjunction with the two adjacent Western Realco Projects.

I-33-5

I appreciate the opportunity to provide these comments and look forward to a revised EIR that fully and adequately addresses these critical environmental issues. The City of Lake Forest has a responsibility to protect the health and well-being of its residents and the local environment. I believe that proceeding with this project based on the current EIR would be a dereliction of that duty.

Sincerely,

Iris Li

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IRIS LI

Letter Code: I-33
Date: August 11, 2025

Response to Comment I-33-1

This introductory comment states that the commenter owns property immediately adjacent to the Project site and states the opinion that the Draft EIR is insufficient under CEQA, particularly given that it identifies two significant and unavoidable impacts with respect to VMT and GHG emissions despite the mitigation measures provided in the document.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-33-2

This comment expresses concerns regarding the alternatives analysis contained in the Draft EIR and inquires as to why a 25 percent square footage reduction was selected for the Reduced Project Alternative given that it would not reduce VMT or GHG emissions impacts to a less than significant level. The comment requests revisions to the Draft EIR to address their comments by including an analysis of a 50 percent Reduced Project Alternative or a detailed explanation of why this alternative is not considered.

Refer to Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-33-3

This comment expresses concerns regarding the cumulative impacts analysis contained in the Draft EIR and states the opinion that the Draft EIR does not provide a comprehensive cumulative impact analysis that considers the proposed Project's impacts in the context of other cumulative industrial warehouse projects, particularly with respect to VMT, GHG emissions, noise, and air quality. The comment requests that the City address their comments by ensuring potential cumulative impacts are properly characterized.

Refer to Master Response 6 regarding the adequacy of the cumulative impacts analysis presented in the Draft EIR. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more

severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-33-4

This comment urges the City to withhold certification of the Draft EIR, include a more robust cumulative impacts analysis, include a 50 percent Reduced Project Alternative or an explanation of why this alternative is not feasible, and recirculate the Draft EIR following revisions.

Refer to Master Response 6 regarding the adequacy of the cumulative impacts analysis presented in the Draft EIR and Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-33-5

This concluding comment restates the commenter's request for a revised Draft EIR. The comment states the opinion that proceeding with the Project would be a violation of the City's duty to protect its residents and the environment.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses above. No further response is required.

Weiss, Jennifer

From: Connie Ding [redacted]
Sent: Monday, August 11, 2025 2:39 PM
To: Stonich, Amy; EnterpriseProjects
Cc: Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Critical Comments on DEIR Section 4.16 (Recreation) for IPT Enterprise Business Center LLC Project – SCH No. 202430755

Amy Stonich, Assistant Director
Community Development Department
City of Lake Forest
100 Civic Center Drive
Lake Forest, CA 92630

Dear Ms. Stonich,

I am a resident of the **MEADOWS** community, which is located directly adjacent to the proposed **IPT Enterprise Business Center LLC Project** (26200 Enterprise Way, Lake Forest, CA 92630).

After reviewing the Draft Environmental Impact Report (DEIR SCH No. 2024030755), I have identified significant deficiencies, particularly its failure to assess the cumulative impacts of this project in conjunction with two adjacent Western Realco projects on residents. I request that this project be evaluated jointly with the other two projects to ensure a comprehensive analysis.

I-34-1

I am submitting the following **substantive comments** regarding **Section 4.16 (Recreation)** of the DEIR. The current analysis contains **systemic flaws** that severely underestimate the project's potential impacts on public recreational resources, violating CEQA's rigorous standards and necessitating a **complete revision**.

I. Core Deficiencies and Evidence

1. **Flawed Population Assumptions (Ignoring Employee Temporal and Spatial Distribution)**
    - **Deficiency:** The DEIR claims that "industrial projects do not add residents and thus have no impact," but it **deliberately ignores** the behavioral patterns of **187 employees** who may use nearby parks during weekday lunch breaks.
    - **Evidence:**
        - **Nature Park**, located just **130 meters** from the project site, is the most likely recreational facility to be used by employees.
        - While the DEIR acknowledges that "employees may increase park usage" (§4.16.6), it **subjectively dismisses** overcrowding risks by asserting "the number is small," **without supporting data**.
2. **Misapplication of Park Supply Standards (Distorting Service Capacity)**
    - **Deficiency:** The DEIR misleadingly includes **Limestone Wilderness Park (2,500 acres, 89% of total parkland)** in its per capita metrics (claiming "32.5 acres per 1,000 residents").
    - **Evidence:**
        - Wilderness parks serve as **ecological reserves** and **lack daily recreational amenities** (e.g., picnic areas, sports facilities), fundamentally differing from community parks.
        - Excluding wilderness parks, the actual usable parkland is only **294 acres**, reducing the per capita area to **3.4 acres per 1,000 residents (Note 1)**—far below the city's standard of **5 acres per 1,000 residents**.
3. **Inaccurate Cumulative Impact Assessment (Ignoring Overlapping Effects of Commercial Projects)**
    - **Deficiency:** The DEIR mandates park provisions for residential projects but asserts that "industrial projects do not significantly increase recreational demand" (§4.16.7).
    - **Evidence:**
        - Multiple ongoing projects exist within a **0.5-mile radius (Figure 4-1)**, leading to a **surge in midday population**.
        - The DEIR **fails to quantify** the capacity of small parks like **Nature Park** to accommodate additional users.

I-34-1 cont.

4. **Ineffective Mitigation Measures (Corporate Terraces Cannot Substitute Public Space)**
    - **Deficiency:** The DEIR claims that **two corporate terraces (totaling 448 sq. ft.)** can offset employee demand.
    - **Evidence:**
        - These terraces can accommodate only **~20 people**, grossly inadequate for **187 employees**.
        - The DEIR does not assess the terraces' **actual usability** (e.g., access policies, amenities), violating CEQA's **"substantial mitigation"** requirement.
5. **Missing Critical Data (Violating CEQA's Quantification Principle)**
    - **Deficiency:** The DEIR lacks **baseline data on current park usage rates**, making it impossible to evaluate whether "adding 187 users" exceeds capacity thresholds.
    - **Evidence:**
        - This omission violates **CEQA Appendix G**, which mandates **quantitative analysis**.
        - No assessment of **peak midday park saturation** (e.g., Nature Park's capacity) is provided.

I-34-1 cont.

II. Required Revisions

To comply with CEQA, the DEIR must supplement the following analyses:

1. **Employee Recreation Behavior Survey**: Quantify expected frequency, timing, and facility preferences of employees using nearby parks.
2. **Time-Specific Park Capacity Analysis**: Focus on **midday peak usage** at **Nature Park (0.08 miles away)** and similar facilities.
3. **Regional Facility Accessibility Assessment**:
    - Clarify whether **private facilities (e.g., Meadows Community Park)** are open to the public.
    - Verify the availability of **school facilities during lunch hours**.

4. **Revised Park Supply Standards**: Exclude wilderness parks and other non-daily recreational land, using **effective per capita metrics**.

III. Conclusion

Section 4.16 of the DEIR systematically underestimates the project's impacts through:

- **Narrow definitions** (excluding employee populations),
- **Selective data use** (conflating park types),
- **Failure to quantify key parameters**,

posing **major legal risks**. We urge the City to:

I-34-1 cont.

1. **Reject the current conclusions** and require the preparer to **revise the analysis**.
2. **Hold a dedicated public hearing** to address these concerns.

Attachments:

- Park Service Radius & Capacity Calculation Model (Technical Memorandum)
- Excerpts of Relevant CEQA Appendix G Provisions

Sincerely,

Connie Ding

Resident, The Meadows at Lake Forest

Note 1: Per capita calculation based on DEIR data: Total non-wilderness parkland = 294 acres; 2020 population = 85,858 → 294 ÷ 85.858 ≈ **3.4 acres/1,000 residents**, below the city's 5-acre standard.

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CONNIE DING

Letter Code: I-34
Date: August 11, 2025

Response to Comment I-34-1

This comment states the opinion that the Draft EIR contains deficiencies pertaining to its cumulative parks and recreational facilities analysis. The comment requests that the City address their comments by rejecting the Draft EIR as it is currently written and requiring revisions, including conducting an employee recreation behavior survey, a time-specific park capacity analysis, a regional facility accessibility assessment, and preparing revised park supply standards.

Refer to Master Response 6 regarding the adequacy of the cumulative analysis presented in the Draft EIR, and Response to comment O-1-16 regarding the adequacy of the recreation analysis presented in the Draft EIR. Potential cumulative impacts related to population growth and recreation are presented in Sections 4.14.7, Cumulative Impacts, starting on page 4.14-8 of Section 4.14, Population and Housing, and 4.16.7, Cumulative Impacts, starting on page 4.16-5 of Section 4.16, Recreation, of the Draft EIR, respectively. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: William Wang [redacted]
Sent: Monday, August 11, 2025 12:39 PM
To: Stonich, Amy; EnterpriseProjects
Cc: Ackerman, Gayle; Barajas, Francisco; Grable, Tom; tgrable@lakeforest.gov; jvillwock@lakeforest.gov; Voigts, Scott; rpequeno@lakeforest.gov; dcirbo@lakeforest.gov; mtettemer@lakeforest.gov; byu@lakeforest.gov; Smith, Amy
Subject: Public CommEnts on DEIR of IPT Enterprise Business Center Project

Dear Amy, Gayle, Planning Commission, and City Council,

I-35-1 This is William Wang, a resident of the Meadows. In writing these comments, I represent my family and myself. We are deeply concerned about the current proposals under review to construct a total of 4 industrial warehouse and manufacturing buildings within 100 ft right next to the Meadows which reside more than 600 houses. we strongly oppose this project because a lot of reasons show that this project is not proper for our community, our health, and our future generations.

Comment 1: Noise and Traffic Impacts on The Meadows and the City of Lake Forest

Citation: Section 4.13.1, Figures 4.13.1 and 4.13.2 (pp. 4.13-3, 4.13-7), Table 4.13.H (p. 4.13-19)

The EIR includes monitoring data near sensitive receptors (Fig. 4.13.1) but fails to assess the cumulative increase in noise from three warehouse projects. Table 4.13.H only

I-35-2 compares noise levels before and after this one project. Moreover, it doesn't analyze combined truck volume, idling noise, or delivery activities during early or late hours. This underrepresents the impact on The Meadows community and other residents in the City of Lake Forest, which shares the same roads.

Requested Action: Recalculate traffic and noise modeling assuming simultaneous operation of all three projects. Add nighttime noise restrictions and require bu er walls or setbacks along the project's eastern boundary adjacent to residences.

Comment 2: Air Quality and Cancer Risk to Residents

Citation: Table 4.3.T (p. 4.3-47), Table 4.3.U (p. 4.3-48), Executive Summary p. 1-2 and 1-3

Table 4.3.T confirms that cumulative health risks from diesel emissions are significant if the Enterprise and Western Realco projects are built concurrently. Although the EIR proposes

I-35-3 Tier 4 engines as mitigation (AQ-3), this still results in significant cumulative cancer risk from diesel particulate matter (DPM) near homes in The Meadows, especially since the warehouse tenant is unknown, and truck frequency is underestimated.

Requested Action: Require updated HRA modeling using combined emissions from all three projects, overlaid with residential receptor locations from The Meadows. Add mitigations such as 100% zero-emission trucks, buffer zones, and truck route restrictions near residences.

Comment 3: General - Inadequate Cumulative Impact Analysis

Citation: Draft EIR, Executive Summary, Section 1.4.2, pp. 1-3 to 1-4

I-35-4 The EIR fails to sufficiently evaluate the cumulative impact of this project in combination with the nearby Western Realco Projects 1 and 2. Although these projects are acknowledged, the cumulative analysis is not integrated across all relevant topics (e.g., air quality, noise, traffic, health risk). As a result, the EIR does not meet CEQA Guidelines

I-35-4 cont.

§15130. A cumulative discussion limited to a few emissions tables (Table 4.3.R, 4.3.U) is not adequate for a community facing the prospect of three industrial warehouse projects adjacent to homes.

Requested Action: Recirculate the Draft EIR with a dedicated cumulative section across all environmental areas, particularly air quality, noise, traffic, and health risk, incorporating full modeling for the Enterprise Business Center plus both Western Realco projects.

I-35-5

Comment 5: Insufficient Project Alternatives

Citation: Section 5.4.3, pp. 5-28 to 5-31

The EIR identifies only one build alternative — Alternative 3: Reduced Intensity — but this merely reduces square footage by 25% and fails to propose relocating or reorienting the warehouse, switching to non-industrial uses, or increasing setbacks from residential zones. CEQA requires consideration of feasible alternatives that reduce impacts — which this EIR fails to meet.

Requested Action: Evaluate new alternatives including:

- A reoriented warehouse layout to reduce proximity to homes
- A low-impact commercial alternative with limited trucking
- A zero-emission vehicle (ZEV)-only warehouse or clean technology campus

I-35-6

Comment 4: Environmental Justice and Public Health

Citation: No specific EJ section present; inferred from omission throughout Chapter 4

The Draft EIR does not contain a standalone Environmental Justice section or any evaluation of how the project may disproportionately burden nearby vulnerable populations — a key CEQA equity requirement. The residents of The Meadows, many of whom are families with children, will bear the brunt of pollution, noise, and safety hazards — yet no focused analysis was conducted.

Requested Action: Include a full Environmental Justice impact analysis that accounts for demographic vulnerability, proximity, and exposure duration. Propose mitigations to protect frontline communities, such as air filters for nearby homes, enhanced public health outreach, or priority truck route re-routing.

I-35-7

Please reject these projects and demand the applicants to propose different plans that are suitable for nearby residential neighborhoods.

We are responsible for and will be remembered by our actions. Let's come together and do what is right for our residents! History will remember what we've done.

Sincerely,

William Wang

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WILLIAM WANG

Letter Code: I-35
Date: August 11, 2025

Response to Comment I-35-1

This introductory comment expresses opposition to the proposed Project based on the concerns outlined below.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-35-2

This comment expresses concerns regarding the noise and traffic analyses presented in the Draft EIR, stating the opinion that the Draft EIR fails to analyze cumulative noise and truck volumes from the other cumulative industrial warehouse projects. The comment requests their comments be addressed by providing a recalculation of noise and traffic modeling and the addition of nighttime noise restrictions and buffer walls or setbacks along the Project site's shared boundary with residential uses.

Refer to Master Response 11 regarding the noise analysis conducted for the proposed Project, Master Response 8 regarding the transportation analysis conducted for the proposed Project, and Master Response 6 regarding the adequacy of the cumulative impacts analysis presented in the Draft EIR. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-35-3

This comment expresses concern regarding cumulative health risks associated with the proposed Project and the other cumulative industrial warehouse projects, even with incorporation of Mitigation Measure (MM) AQ-3. The comment requests their comments be addressed by updating the HRA modeling using combined emissions from cumulative projects and by providing additional mitigation.

Refer to Master Response 9 regarding the health risk analysis conducted for the proposed Project and Master Response 6 regarding the adequacy of the cumulative analysis presented in the Draft EIR. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more

severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-35-4

This comment expresses concern regarding the cumulative impact analysis presented in the Draft EIR, stating the opinion that the cumulative impact analysis was not integrated across all relevant topics and therefore does not satisfy CEQA requirements. The comment requests recirculation of the Draft EIR to address their comments regarding provision of a dedicated cumulative impact section across all environmental impact areas, particularly air quality, noise, traffic, and health risk.

Refer to Master Response 6 regarding the adequacy of the cumulative analysis presented in the Draft EIR. No further response is necessary. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-35-5

This comment expresses concern regarding the alternatives analysis presented in the Draft EIR, stating the opinion that the proposed reduced intensity alternative is insufficient and requests revisions to the Draft EIR to address their comments by including additional alternatives, a modified layout, a commercial alternative, or a zero-emission vehicle warehouse.

Refer to Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-35-6

This comment expresses concern regarding the absence of environmental justice analysis in the Draft EIR, stating the opinion that this analysis is required under CEQA and that a majority of the residents that would experience potential impacts of the proposed Project consist of families. The comment requests revisions to the Draft EIR be revised to address their comments by including a full environmental justice impact analysis and proposed mitigation.

Refer to Master Response 14 regarding disproportionate environmental burdens and the requirements for an analysis of environmental justice impacts. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-35-7

This concluding comment requests that the City address their comments by rejecting the proposed Project and the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) and demands the Project Applicant addresses their comments by proposing different plans that are suitable for the vicinity of residential neighborhoods.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses above. No further response is required.

From:	Connie Ding
To:	Stonich, Amy; EnterpriseProjects
Cc:	Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject:	Formal Objection to the Draft Environmental Impact Report (SCH No. 2024030755) for the IPT Enterprise Business Center Project – Systemic Deficiencies in Traffic, Safety, and Cumulative Impact Analysis
Date:	Tuesday, August 12, 2025 12:17:29 AM

Amy Stonich, Assistant Director

Community Development Department

City of Lake Forest

100 Civic Center Drive

Lake Forest, CA 92630

Dear Ms. Stonich,

I-36-1

As a resident of the **Meadows** community adjacent to the proposed IPT Enterprise Business Center project (26200 Enterprise Way), I am submitting this formal objection to the Draft Environmental Impact Report (DEIR SCH No 2024030755） report contains critical flaws that undermine its validity, as its traffic and safety analyses fail to meet the transparency, rigor, and cumulative impact assessment requirements under the California Environmental Quality Act (CEQA). Below are the key concerns that must be addressed before project approval:

1. Fraudulent VMT Analysis Violates SB 743 and CEQA

The DEIR claims compliance with SB 743's Vehicle Miles Traveled (VMT) metric but withholds all underlying calculations:

I-36-2

- Data Contradictions: The report cites a residential VMT of 19.3 miles per person for TAZ 45, yet asserts an implausible 24.6 miles per employee for an industrial site (Table 4.17.B). This 25% discrepancy suggests fabricated data.
- Model Secrecy: The "LFTAM model" referenced in the text is absent from the appendices, violating CEQA §15131(d). The attached Traffic Impact Analysis (TIA) report (Appendix J) is also withheld, denying public scrutiny.
- Ineffective Mitigation: The proposed bike lane (TRA1) reduces VMT by only 0.5%—33 times less than needed to offset the 20% VMT excess.

I-36-2 cont.

Request: Disclose the full VMT model, recalculate using SCAG regional standards, and reject TRA1 as fraudulent mitigation.

2. Deliberate Ignorance of Truck Safety Risks

The DEIR dismisses 59 public comments about truck dangers with unsupported assertions:

I-36-3

- Routing Deception: Policy M9.1 mandates trucks use "major roads," yet 269 daily truck trips (37% of traffic) will congest Enterprise Way—a 25 mph private road with no truck-specific analysis.
- Turn Radius Fraud: The claim that the Dimension/Commercentre intersection is "WB67 truck-compliant" ignores satellite evidence of immovable infrastructure (e.g., underground utilities) limiting radius expansions.
- Blind Spot Omission: A 2024 billboard on Enterprise Way blocks 30% of sightlines but was excluded from assessment, violating Caltrans HDM §201.5.

Request: Require an independent truck impact study, including peak-hour simulations and resident evacuation testing.

3. Illegal Segmentation of Cumulative Impacts

The DEIR isolates the IPT project from adjacent Western Realco developments, despite shared roadways (Enterprise Way, Dimension Drive) facing combined daily truck traffic of 649 trips, violating CEQA §15130(b):

I-36-4

- Roadway Overload: Dimension Drive's peak capacity (2,200 vehicles/hour) will be exceeded by 37% when combining projects, triggering gridlock (see Caltrans simulation CT230871).
- Fire Access Crisis: The Orange County Fire Authority (OCFA) 5-minute response standard is already unmet; added trucks will delay emergency vehicles by 4+ minutes (per OCFA Report 2024089).

Request: Halt all approvals until a joint EIR evaluates regional traffic collapse and life-safety risks.

I-36-5

4. Fire Access Non compliance & Legal Liability

I-36-5 cont.

The DEIR falsely certifies compliance with OCFA standards:

- Width Shortfall: Enterprise Way is 18 feet wide (vs. the required 20 feet), with no plan to address parking obstructions.
- Dead-End Violation: Internal lanes extend 210 feet, breaching the 150-foot limit under California Fire Code §503.

Request: Conduct live fire truck tests and revoke the "less-than-significant impact" finding.

I-36-6

Conclusion: Legal Risks Demand Recirculation

The DEIR's data manipulation (VMT), safety misrepresentations (truck turns), and segmented review of cumulative impacts constitute CEQA violations under *Neighbors for Smart Rail v. Exposition Metro Line (2013)*. Approval risks:

- Litigation: Claims under Public Resources Code §21081.5 for inadequate mitigation.
- Federal Action: EPA sanctions under Clean Air Act §176(c) for induced congestion.

Immediate Actions Required:

1. Recirculate the DEIR with full VMT/truck data and joint Western Realco analysis.
2. Reject TRA1 and demand CARB-compliant VMT reductions (≥15%).
3. Verify fire access via third-party testing.

Sincerely,
Connie Ding

Resident, The Meadows at Lake Forest

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CONNIE DING

Letter Code: I-36
Date: August 12, 2025

Response to Comment I-36-1

This introductory comment expresses opposition to the proposed Project and states the opinion that the Draft EIR contains inadequacies pertaining to its traffic and safety analyses under CEQA.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-36-2

This comment expresses concerns regarding the VMT analysis presented in the Draft EIR, stating the opinion that the analysis relies upon incorrect data, withholds modeling results from public review, and proposes ineffective mitigation. The comment requests their comments be addressed by providing the full VMT model to the public, calculating VMT impacts using SCAG regional standards, and the rejecting Mitigation Measure (MM) TRA-1.

Refer to Master Response 8 regarding the VMT analysis conducted for the proposed Project. In addition, per the City's TA Guidelines, the Lake Forest VMT Look-Up Table is an appropriate tool for the VMT analysis. The Lake Forest VMT Look-Up Table is based on the LFTAM model, which was provided as Appendix G of the Project TIA (Appendix J of the Draft EIR). It should be noted that the Draft EIR does not cite a residential VMT of 19.3 as stated in the comment letter.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-36-3

This comment expresses concerns regarding truck safety risks associated with the proposed Project, particularly the truck routing, turn radius, and blind spot analyses contained in the Draft EIR. The comment requests their comments be addressed by preparing an independent truck impact study, including peak-hour simulations and resident evacuation testing.

Refer to Master Response 8 regarding the transportation analysis, including truck safety risks, presented in the Draft EIR. In addition, the Project TIA demonstrates that the proposed Project (including proposed off-site improvements at five study area intersections) is not expected to significantly affect the intersection operation (LOS and queuing) within the study area, which includes Dimension Dr/Commercentre Dr./Enterprise Way. In addition, the 269 truck trips would travel to/from the site over the course of the day, rather than occurring simultaneously. Therefore, no operational issues are expected on Enterprise Way. It is unclear what "2024 billboard on

Enterprise Way" the comment letter is referencing as no billboard exists on that street. Therefore, there was no omission of a potential blind spot in the TIA. Additionally, the comment letter does not specify what unmovable infrastructure is being referenced in the comment letter. As noted on the conceptual street improvement plan (refer to Appendix A of the Project's TIA, included in Appendix J of the Draft EIR), the existing storm drain catch basin on the surface of the southeast corner of the Dimension Drive/Commercentre Drive-Enterprise Way intersection would be relocated (i.e., removed and reconstructed) to widen the intersection and would adhere to the City's latest design standards and construction procedures.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-36-4

This comment expresses concerns regarding cumulative impacts of the proposed Project, particularly with respect to the related the Western Realco Enterprise Way Industrial Project (Projects 1 and 2), which would utilize some of the same roadways as the proposed Project. The comment states the opinion that cumulative traffic volumes would exceed the roadway's peak capacity and delay emergency response times. The comment requests their comments be addressed by withholding approval of the proposed Project and reevaluating the proposed Project and the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) in a singular EIR.

Refer to Master Response 8 regarding the transportation analysis presented in the Draft EIR and Master Response 6 regarding the adequacy of the cumulative impact analysis presented in the Draft EIR. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

The proposed Project is completely independent of the Western Realco Enterprise Way Industrial Project (Projects 1 and 2). The proposed Project and the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) are proposed by different developers, pursue different objectives, and would be subject to different approvals. Therefore, evaluating both projects within a single EIR is not required under CEQA and would be considered a misrepresentation of the proposed Project. The analysis of the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) as a cumulative project is the appropriate approach under CEQA.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-36-5

This comment expresses concerns regarding fire protection standards, stating the opinion that Enterprise Way does not meet OCFA roadway width or dead-end requirements.

As described in Master Response 13, emergency evacuation and emergency access to the Project site would be in compliance with all existing regulations, standards, and requirements. This Master Response thoroughly addresses the topics in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-36-6

This concluding comment restates the opinion that the Draft EIR violates CEQA and could face litigation and/or federal action. This comment concludes the letter, states the opinion that the DEIR's omissions regarding cumulative impacts, hazardous materials, and emergency preparedness are unacceptable, and requests their comments be addressed by recirculating the Draft EIR with updated VMT data and inclusion of the Western Realco Enterprise Way Industrial Project (Projects 1 and 2), replacing MM TRA-1 with CARB-compliant VMT reductions, and verifying fire access via third-party testing.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses above. No further response is required.

From: [redacted]
To: EnterpriseProjects
Subject: Formal Objection to the Draft EIR for the IPT Business Center Project (APN 610-401-06)
Date: Tuesday, August 12, 2025 4:12:34 AM

Dear Ms. Stonich,

I-37-1 I hereby submit a formal objection to the draft Environmental Impact Statement (EIR) for the proposed IPT Enterprise Business Centre Warehouse project at 26200 Enterprise Way. As a Lake Forest City resident / stakeholder, after reviewing the draft EIR, I believe that the project would pose an unacceptable risk to the environmental quality, public health and safety of my community, for the following reasons:

I-37-2 1. The draft EIR has recognized the existence of significant and irreparable environmental hazards in the project
According to the EIR conclusions:
· The impact of greenhouse gas emissions and vehicle mileage (VMT) is classified as "significant and unavoidable";
· The project violates California's 2045 carbon neutrality goals and the City of Lake Forest Climate Action Plan;
· 23 truck loading gates and heavy traffic will worsen local air quality (especially threatening the adjoining Meadows neighborhood).

I-37-3 II. Project design seriously threatens the health and safety of the community
· Residential Exposure Risk: East Side Meadows Neighborhood Will Be Directly Exposed to Truck Emissions of PM2.5/NOX contaminants, 65 feet of sound barrier does not block the spread of pollutants;
· Traffic safety hazards: The proposed five intersections cannot carry the combined traffic of 262 commuter vehicles plus heavy trucks, raising the risk of accidents.

I-37-4 III. Tenant uncertainty amplifies environmental risk
· EIR is assessed on the highest pollution intensity (65,000 m2 manufacturing + 90,803 m2 warehousing), but does not limit the industry type of future tenants;
· If industries such as chemicals and logistics are introduced, the risk of leakage of hazardous substances will endanger surrounding communities.

I-37-5 IV. Absence of alternatives violates the spirit of CEQA
· No studies have been conducted on low-carbon alternatives for the conversion of existing buildings or downsizing;
· Demolition of existing buildings will generate 11,000 tons of construction waste (in violation of AB 1583 Waste Reduction Order).

I-37-6 Demands and Calls for Action
1.Rejection of the current protocol (in violation of CEQA § 21081);
2. Additional research is required: PM2.5 diffusion simulation in residential areas, tenant industry restriction list, zero emission truck retrofit scheme;
3. A hearing was held to invite independent experts to consider the shortcomings of the VMT model.

I-37-7 The project, if approved, would set a dangerous precedent in which the interests of

I-37-7 cont.

corporations would take precedence over the health of residents. I urge the city government to fulfill its environmental fiduciary obligations.

Please file this letter as a formal objection and notify me of the schedule of a follow-up hearing.

Sincerely,
Fengyi Yang [redacted] Lake Forest CA 92630

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FENGI YANG

Letter Code: I-37
Date: August 12, 2025

Response to Comment I-37-1

This comment is an introductory comment and expresses opposition to the proposed Project, stating the opinion that the proposed Project would pose risks to environmental quality, public health, and community safety.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-37-2

This comment states that the Draft EIR recognizes significant and irreparable environmental hazards associated with the proposed Project including significant and unavoidable GHG and VMT impacts, violation of California's 2045 carbon neutrality goals and the City's CAP, and states the opinion that worsening air quality is a result of truck loading docks and heavy traffic associated with the proposed Project.

Refer to Response to Comment I-24-2 regarding GHG and VMT impacts. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-37-3

This comment expresses concern regarding community health and safety related to the proximity of the Meadows community to the proposed Project and that the nearby intersections would not be able to support increased traffic associated with the proposed Project, increasing the risk of accidents.

Refer to Response to Comment I-24-3 regarding community health and safety. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-37-4

This comment expresses concern regarding the uncertainty of the type of future tenant .

Refer to Response to Comment I-24-4 regarding tenant uncertainty. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-37-5

This comment expresses concern that the Draft EIR did not analyze a low-carbon alternative and about the amount of construction waste.

Refer to Response to Comment I-24-5 regarding the Draft EIR's alternatives analysis. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-37-6

This comment suggests that additional research, including a PM2.5 diffusion simulation in residential areas, future tenancy, and zero emission-trucks be conducted. This comment also states that there was a hearing to consider shortcomings of the VMT model.

Refer to Response to Comment I-24-6 regarding the PM2.5 diffusion, future tenancy, and zero-emission trucks. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-37-7

This comment concludes the letter and states the opinion that approval of the proposed Project would set a precedent for industrial development over resident health, and requests notification of a follow-up hearing.

Refer to Response to Comment I-7-1 for a detailed response regarding the commenter's claim that the proposed Project could set a precedent for future development trends. Residents who have

requested to be added to the Project notification list will be notified of future public hearing(s) for the proposed Project, at which time verbal comments can be made by members of the public.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses above. No further response is required.

Weiss, Jennifer

From: [redacted]
Sent: Tuesday, August 12, 2025 4:14 AM
To: EnterpriseProjects
Subject: Formal Objection to the Draft EIR for the IPT Business Center Project (APN 610-401-06)

Dear Ms. Stonich,

I-38-1 I hereby submit a formal objection to the draft Environmental Impact Statement (EIR) for the proposed IPT Enterprise Business Centre Warehouse project at 26200 Enterprise Way. As a Lake Forest City resident / stakeholder, after reviewing the draft EIR, I believe that the project would pose an unacceptable risk to the environmental quality, public health and safety of my community, for the following reasons:

I-38-2 1. The draft EIR has recognized the existence of significant and irreparable environmental hazards in the project
According to the EIR conclusions:
· The impact of greenhouse gas emissions and vehicle mileage (VMT) is classified as "significant and unavoidable";
· The project violates California's 2045 carbon neutrality goals and the City of Lake Forest Climate Action Plan;
· 23 truck loading gates and heavy traffic will worsen local air quality (especially threatening the adjoining Meadows neighborhood).

I-38-3 II. Project design seriously threatens the health and safety of the community
· Residential Exposure Risk: East Side Meadows Neighborhood Will Be Directly Exposed to Truck Emissions of PM2.5/NOX contaminants, 65 feet of sound barrier does not block the spread of pollutants;
· Traffic safety hazards: The proposed five intersections cannot carry the combined traffic of 262 commuter vehicles plus heavy trucks, raising the risk of accidents.

I-38-4 III. Tenant uncertainty amplifies environmental risk
· EIR is assessed on the highest pollution intensity (65,000 m2 manufacturing + 90,803 m2 warehousing), but does not limit the industry type of future tenants;
· If industries such as chemicals and logistics are introduced, the risk of leakage of hazardous substances will endanger surrounding communities.

I-38-5 IV. Absence of alternatives violates the spirit of CEQA
· No studies have been conducted on low-carbon alternatives for the conversion of existing buildings or downsizing;
· Demolition of existing buildings will generate 11,000 tons of construction waste (in violation of AB 1583 Waste Reduction Order).

I-38-6 Demands and Calls for Action
1.Rejection of the current protocol (in violation of CEQA § 21081);
2. Additional research is required: PM2.5 diffusion simulation in residential areas, tenant industry restriction list, zero emission truck retrofit scheme;

I-38-6 cont. 3. A hearing was held to invite independent experts to consider the shortcomings of the VMT model.

I-38-7 The project, if approved, would set a dangerous precedent in which the interests of corporations would take precedence over the health of residents. I urge the city government to fulfill its environmental fiduciary obligations.

Please file this letter as a formal objection and notify me of the schedule of a follow-up hearing.

Sincerely,

Jingping Guo
[redacted] Lake Forest CA 92630

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JINGPING GUO

Letter Code: I-38
Date: August 12, 2025

Response to Comment I-38-1

This comment is an introductory comment and expresses opposition to the proposed Project, stating the opinion that the proposed Project would pose risks to environmental quality, public health, and community safety.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-38-2

This comment states that the Draft EIR recognizes significant and irreparable environmental hazards associated with the proposed Project including significant and unavoidable GHG and VMT impacts, violation of California's 2045 carbon neutrality goals and the City's CAP, and states the opinion that worsening air quality is a result of truck loading docks and heavy traffic associated with the proposed Project.

Refer to Response to Comment I-24-2 regarding GHG and VMT impacts. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-38-3

This comment expresses concern regarding community health and safety related to the proximity of the Meadows community of the proposed Project and that the nearby intersections would not be able to support increased traffic associated with the proposed Project, increasing the risk of accidents.

Refer to Response to Comment I-24-3 regarding community health and safety. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-38-4

This comment expresses concern regarding the uncertainty of the type of future tenant

Refer to Response to Comment I-24-4 regarding tenant uncertainty. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-38-5

This comment expresses concern that the Draft EIR did not analyze a low-carbon alternative or the amount of construction waste.

Refer to Response to Comment I-24-5 regarding the Draft EIR's alternatives analysis. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-38-6

This comment suggests that additional research, including PM2.5 diffusion, future tenancy, and zero emission-trucks be conducted. This comment also states that there was a hearing to consider the purported inadequacies of the VMT model.

Refer to Response to Comment I-24-6 regarding the PM2.5 diffusion, future tenancy, and zero-emission trucks. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-38-7

This comment concludes the letter and states the opinion that approval of the proposed Project would set a precedent for industrial development over resident health, and requests notification of a follow-up hearing.

Residents who have requested to be added to the Project notification list will be notified of future public hearing(s) for the proposed Project, at which time verbal comments can be made by members of the public.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses above. No further response is required.

Weiss, Jennifer

From: Lucy Cai [redacted]
Sent: Tuesday, August 12, 2025 6:25 PM
To: EnterpriseProjects
Subject: Stop Massive Warehouse

I-39-1 Greetings to all of the government employees, I'm a house owner in the Meadows community. I have heard from all around my community, about the city planning of building a massive warehouse by our community. As a parent, I believe this warehouse will for sure threaten my family's wellbeing. My kids are still under the age of 10, and I wish them and all the kids in my community to grow up healthy. I wish to stop any possibilities of building this warehouse for the sake of my family and thousands of others.

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LUCY CAI

Letter Code: I-39
Date: August 12, 2025

Response to Comment I-39-1

This comment expresses opposition to the proposed Project and states concerns related to the wellbeing of community members, including children.

Refer to Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses, including Project's effect on quality of life. In addition, Master Response 9 provides detail on the Health Risk Assessment conducted for the proposed Project and the potential health effects the proposed Project may have on the surrounding community. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: Yaling Zhou [redacted]
Sent: Tuesday, August 12, 2025 8:56 PM
To: EnterpriseProjects
Subject: Subject: Strong Opposition to Proposed Warehouse Development in METOS Community

To Whom It May Concern,

I am a resident of the Meadows community and the owner of property valued at over $2 million within this neighborhood. When we purchased our home, it was with the clear understanding and expectation—based on the development plan at that time—that the nearby site would be used for the construction of a school.

It has now come to our attention that the intended purpose has been changed from building a school to developing a warehouse. This change is completely unacceptable to us as both residents and property owners. It fundamentally violates the original intent and promise under which we made our purchase. The value of our property, the quality of life in our neighborhood, and the integrity of the community plan are all at stake.

I-40-1

A school would have contributed to the educational value, livability, and long-term desirability of the area. In stark contrast, a warehouse next to our homes will bring increased traffic, noise, and industrial activity—conditions entirely inconsistent with a residential and family-oriented environment. This is not what we agreed to, nor what was represented to us before we made the significant financial and personal decision to settle here.

Had the original plan indicated the construction of a warehouse, we—and many other residents—would never have purchased our properties in this community. Not a single resident we have spoken to supports this change, and we stand united in our opposition.

We respectfully but firmly urge the decision-makers to reject this proposed change in land use. Please listen to the voices of the residents whose lives and investments will be directly impacted. We are committed to opposing this proposal in every appropriate forum, and we will continue to defend the original vision and commitments made to our community.

Yaling zhou

[redacted]

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YALING ZHOU

Letter Code: I-40
Date: August 12, 2025

Response to Comment I-40-1

This comment states that the commenter resides in the Meadows community and purchased their home with the understanding that the Project site would be developed with a school. The comment states the opinion that operation of the proposed Project would result in increased traffic, noise, and industrial activity, conflicting with the existing character of the community. The comment urges the City to deny approval of the Draft EIR.

Refer to Master Response 7 regarding the proposed Project's consistency with relevant land use plans, policies, or regulations contained in applicable planning documents adopted by the City and other agencies and the Project's effect on quality of life, Master Response 8 regarding traffic associated with the proposed Project, and Master Response 11 regarding noise associated with the proposed Project. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: 蔡佳悦 [redacted]
Sent: Tuesday, August 12, 2025 6:13 PM
To: EnterpriseProjects
Subject: Stop Massive Warehouses!

I-41-1 Greetings to all. I'm a high school student living in Meadows community, and I wish to stop this activity. The fuel and poisonous gas the warehouse and trucks will release is inestimable, it will bring negative impacts to ALL of us in the community. The children who are only at the ages of six and the elderly people's health will be greatly affected. Besides the releasing chemicals, noises caused by trucks and the warehouses themselves are going to be a huge problem and concern to me and to every citizen in the community! When it's all to myself, a student who is staying up late for all the exams and projects, I strongly believe that this city planning will bring negativities greater than the positives.

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CAIJIYUE

Letter Code: I-41
Date: August 12, 2025

Response to Comment I-41-1

This comment expresses opposition to the proposed Project and states concerns related to air pollution, noise, and hazardous materials from heavy truck and warehouse operations.

Refer to Response to Comment O-1-4 and Master Response 9 regarding the air quality analysis and health risk assessment conducted for the proposed Project, Master Response 11 regarding the noise analysis conducted for the proposed Project, and Master Response 13 regarding hazardous materials associated with the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: YI QIN [redacted]
Sent: Wednesday, August 13, 2025 4:04 PM
To: EnterpriseProjects
Subject: Petition _ Lake Forest CA

Good afternoon, Officer,

I-42-1 This is Yi Qin, the homeowner of Meadows Community of Lake Forest CA 92630.
I oppose the construction of a factory warehouse in the Forest Lake Community. Please consider our petition.

Thank you so much.

Yi Qin
[redacted] Lake Forest CA 92630.

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YI QIN

Letter Code: I-42
Date: August 13, 2025

Response to Comment I-42-1

This comment expresses opposition to the proposed Project and urges the City to consider the petition contained in Comment I-72.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. The commenter's concern is now part of the public record. No further response is required.

Weiss, Jennifer

From: Merritt, Thy
Sent: Wednesday, August 13, 2025 5:21 PM
To: Sharon Chen; EnterpriseProjects
Cc: Stonich, Amy; Council
Subject: RE: Comment RE Enterprise Project EIR

Sharon,

Council is in receipt of your email. Thank you.

THY MERRITT
Acting City Clerk
City Clerk Department
(949) 461-3423
tmerritt@lakeforestca.gov
100 Civic Center Drive
Lake Forest, CA 92630
www.lakeforestca.gov

From: Sharon Chen [redacted]
Sent: Wednesday, August 13, 2025 5:19 PM
To: EnterpriseProjects <EnterpriseProjects@lakeforestca.gov>
Cc: Stonich, Amy <AStonich@lakeforestca.gov>; Council <council@lakeforestca.gov>; Merritt, Thy <tmerritt@lakeforestca.gov>
Subject: Comment RE Enterprise Project EIR

Dear Members of the City Council,

My name is Sharon Chen, I am a resident of Serrano Summit neighborhood which is right next to the city hall.

I-43-1 I am writing to express my strong opposition to the proposed construction of massive warehouses close to our community. As a resident of this area, I am deeply concerned about the negative impacts that such warehouses would have on our neighborhood and the well-being of its residents.

First and foremost, the increased presence of large trucks associated with these warehouses would pose significant safety risks to our community. The influx of heavy traffic would make Bake Parkway, CommerceCenter Drive and Dimension Drive more dangerous for residents and increase the likelihood of accidents and collisions. This is especially alarming considering the presence of families and children in our neighborhood who rely on these streets for daily commute.

Furthermore, the construction and operation of these warehouses would contribute to air pollution. The constant flow of trucks emitting harmful pollutants would worsen air quality in our community, leading to respiratory problems and other health issues, particularly for vulnerable populations such as the elderly and children.

In addition to safety and health concerns, the proposed warehouses would also exacerbate road congestion in our area, especially on Bake Parkway, CommerceCenter Drive and Dimension Drive, which are the main streets residents use for daily life.

I-43-1 cont.

The increased traffic volume would lead to longer commute times, gridlock, and frustration for residents trying to navigate our already congested streets. This would diminish our quality of life.

Given these significant concerns, I urge the City Council to reconsider the proposal to build massive warehouses next to our community. Instead, I encourage you to explore alternative locations that are less densely populated and pose fewer risks to residents. Our neighborhood deserves to be protected from the negative impacts of industrial development, and it is incumbent upon the City Council to prioritize the safety, health, and well-being of its constituents.

Thank you for your attention to this matter. I trust that you will carefully consider the voices of concerned residents like myself as you make decisions that will shape the future of our community.

Sincerely,

Sharon Chen

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SHARON CHEN

Letter Code: I-43
Date: August 13, 2025

Response to Comment I-43-1

This comment expresses opposition to the proposed Project and states concerns about warehouse operations in the vicinity of residential communities, including the opinion that there is the potential for increased roadway hazards, traffic congestion, and air pollution associated with heavy trucks. The comment requests that the City address their comments by denying approval of the Draft EIR and exploring alternative locations for the proposed Project that are less densely populated.

Refer to Master Response 8 regarding traffic congestion and potential safety issues associated with the proposed Project, Response to Comment O-1-4 and Master Response 9 regarding air pollution and potential health risks associated with the proposed Project, and Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: May Cai [redacted]
Sent: Thursday, August 14, 2025 8:48 AM
To: EnterpriseProjects
Subject: We Strongly Oppose the Proposed Warehouse Adjacent to Our Community

Dear government officials,

We, the undersigned residents, urge city officials to reject the proposed warehouse project next to our neighborhood. This facility would bring constant heavy truck traffic onto our already narrow, hilly roads—greatly increasing the risk of accidents, worsening congestion, and threatening the safety of drivers, pedestrians, and children.

I-44-1

Our community has already experienced significant traffic growth over the past year, and we have seen firsthand the dangers of large commercial trucks. The proposed location—surrounded by substantial residential housing—makes this project incompatible with the character, safety, and quality of life of our city.

We ask the city to protect residents' health, safety, and peace of mind by denying approval for this warehouse and preventing harmful industrial development in close proximity to homes.

Thanks & regards

May Cai
Quality Assurance Specialist
Tongji University
Irvine Valley College
[redacted]
www.linkedin.com/in/may-cai

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MAY CAI

Letter Code: I-44
Date: August 14, 2025

Response to Comment I-44-1

This comment expresses opposition to the proposed Project and states concerns related to transportation, stating the opinion that heavy truck traffic on local roadways would increase congestion, threaten driver safety, and be incompatible with the character of surrounding neighborhoods and the City. The comment requests that the City address their comments by denying approval of the Draft EIR.

Refer to Master Response 8 regarding truck traffic, congestion, and safety associated with the proposed Project and Master Response 7 regarding compatibility of the proposed Project with the surrounding land uses. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: Xiangan Cai [redacted]
Sent: Thursday, August 14, 2025 11:57 AM
To: EnterpriseProjects; Stonich, Amy
Cc: Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Public Comments on DEIR of IPT Enterprise Business Center Project

Dear Sirs/Madams,

I received short-term bus driving training with the Orange County Transportation Department, so I know firsthand the dangers large buses and heavy trucks can pose on the road. Now imagine those trucks passing through our narrow streets every single day—streets that thousands of families rely on to get home. The risk is real, and the impact will be huge.

I-45-1 I work from home. Today, I can step outside for fresh air whenever I need a break. But if a massive warehouse is built next door, with trucks constantly coming and going and the air quality declining, will I still feel safe going outside? I'm sure my neighbors feel the same way.

Most of us have poured our life savings into our homes here. This community is our dream. But if this warehouse is approved, it could turn that dream into a place we no longer want to live.

I urge the city to listen to its residents. Please, protect our safety, our health, and the home we've worked so hard for.

Best regards
Xiangan Cai

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XIANGAN CAI

Letter Code: I-45
Date: August 14, 2025

Response to Comment I-45-1

This comment expresses opposition to the proposed Project and states concerns related to roadway hazards and air pollution associated with the operation of heavy trucks in close proximity to residential neighborhoods.

Refer to Master Response 8 regarding roadway hazards, Response to Comment O-1-4 regarding air pollution, and Master Response 9 regarding potential health risks associated with the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: [redacted]
Sent: Thursday, August 14, 2025 1:13 PM
To: Stonich, Amy; EnterpriseProjects
Subject: Public Comment on Traffic Impacts – Draft EIR for IPT Enterprise Business Center

Dear Ms. Stonich,

I am writing as a resident of Lake Forest living near Bake Parkway, the primary route that trucks from the proposed IPT Enterprise Business Center at 26200 Enterprise Way would use. My comment is focused specifically on **traffic concerns** related to this project.

1. Bake Parkway Already at Capacity

Bake Parkway, particularly in the segment near Enterprise Way, is a **two-lane road** in each direction and is already congested during peak commute hours. Adding a large-scale warehouse and manufacturing facility with **up to 23 dock doors** will inevitably bring a significant increase in heavy truck traffic — including large tractor-trailers that move more slowly, require longer acceleration and braking distances, and create bottlenecks at intersections.

The Draft EIR's proposed intersection improvements are insufficient to address the long-term increase in both freight and passenger vehicles. Traffic backups on Bake Parkway already spill into adjacent streets during rush hour, and the addition of high-volume truck traffic will worsen safety hazards for commuters, cyclists, and pedestrians. I-46-1

2. Impact on School Traffic and Student Safety

The area is home to many families, including students attending nearby schools. Increased heavy truck presence during school drop-off and pick-up hours will **directly increase safety risks** for children walking, biking, or being driven to school.

Currently, the school district **does not provide any school bus service** for local students, which forces hundreds of parents to drive daily. This already contributes significantly to congestion on Bake Parkway and surrounding streets. Adding high-volume truck operations will only amplify this unsafe mix of heavy industrial traffic and large numbers of school-age pedestrians.

3. Request for City Action – School Bus Implementation

If the City moves forward with this project despite its traffic impacts, it should **require or coordinate with the school district to provide school bus service** for the affected neighborhoods. School buses would substantially reduce the number of private vehicles during peak hours, help offset new congestion, and improve safety by reducing the interaction between heavy trucks and children on local streets.

This is a reasonable and proactive mitigation step that directly benefits residents and aligns with the City's responsibility to ensure safe, efficient transportation for all users — especially vulnerable road users like children.

I-46-1 cont.

In Conclusion

The Draft EIR underestimates the real-world traffic and safety impacts of introducing a large-scale truck operation into an already congested corridor with no current school bus service. Without significant mitigation — including the immediate introduction of school buses — the project will cause unacceptable and avoidable harm to both traffic flow and community safety.

Please ensure this comment is entered into the public record and carefully considered before any approvals are granted.

Thanks,

Cherie

From:Stonich, Amy <AStonich@lakeforestca.gov>
Send Time:2025 Jul. 10 (Thu.) 11:46
Subject:Notice of Availability of Draft EIR for IPT Enterprise Business Center LLC Project

The Draft Environmental Impact Report (EIR) is now available for public review.
Please see the attached document for more details.

We appreciate your interest and participation in the environmental review process.

Sincerely,
Amy Stonich
Assistant Director of Community Development
City of Lake Forest

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CHERIE

Letter Code: I-46
Date: Auust 14, 2025

Response to Comment I-46-1

This comment states the opinion that the Draft EIR provides an inadequate analysis related to traffic, and purports that the proposed Project would increase congestion and safety hazards along Bake Parkway and increase safety hazards to students of nearby schools during drop-off and pick-up hours. The comment requests that the City address their comments by coordinating with the school district to provide school bus service for affected neighborhoods to mitigate potential transportation impacts.

Refer to Master Response 8 regarding traffic congestion and safety hazards associated with the proposed Project.

In addition, as described in Response to Comment I-21-91, Threshold 4.15.1(iii), starting on page 4.15-14 of Section 4.15, Public Services, of the Draft EIR, includes an analysis of potential indirect impacts to local school districts associated with the proposed Project. The analysis determined that the existing school facilities would be adequate to accommodate any new student generation associated with the proposed Project, and that any potential impacts related to school facilities would be mitigated through the payment of developer fees. The Draft EIR cannot require the local school district to provide school bus service, as it is outside the City's jurisdiction and beyond the scope of feasible CEQA mitigation for Project-level impacts. However, the City will continue to coordinate with SVUSD to provide safe travel routes for students.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: Aaron Xie [redacted]
Sent: Thursday, August 14, 2025 2:00 PM
To: EnterpriseProjects
Subject: Urgent: Opposition to Warehouse/Manufacturing Projects Adjacent to The Meadows & Baker Ranch

Dear Mayor, City Council Members, and Planning Commission:

I-47-1 I write as a long-time resident of Lake Forest—particularly of *The Meadows/Baker Ranch community*—to urge you, once again, to halt planning for warehousing or manufacturing projects adjacent to our neighborhoods. I fully support responsible economic development; however, these proposals in their current locations pose serious threats to public health, safety, property values, and community character.

1. Zoning & General Plan Inconsistencies

- The City's **General Plan 2040** directs updates to the zoning map to align with land-use designations, emphasizing residential, open-space, or community-centric uses in locations like ours (lakeforest.primegov.com).

I-47-2

- The **Nakase/The Meadows** and **Baker Ranch Planned Community texts** delineate specific development standards—designed to preserve their residential character—and should be read carefully before considering industrial uses so nearby (lakeforestca.gov).
- Historically, the vast majority of the former military base lands were rezoned for residential, civic, and recreational purposes, acknowledging the flight paths and residents' welfare (cp-dr.com).

Allowing heavy industrial development here violates both the letter and the spirit of our current planning documents.

2. Traffic, Pollution & Public Health Impacts

Truck Traffic & Infrastructure Wear

According to the Institute of Transportation Engineers (Trip Generation Manual), typical high-cube warehouse types (code 156) can generate hundreds to thousands of vehicle trips daily—including numerous heavy trucks (ceds.org). This volume will exacerbate congestion on local streets and degrade infrastructure, threatening pedestrian and cyclist safety.

I-47-3

Air Quality & Health Risks

- A NASA-funded study determined that **NO_2 concentrations near warehouses are approximately 20% higher**—a diesel exhaust byproduct linked to asthma and other respiratory ailments (NASA, Nature, Milken Institute School of Public Health).
- In Southern California, $PM_{2.5}$ and diesel-derived elemental carbon near warehouses show a clear correlation with increased **respiratory and cardiovascular risks** (PMC, environmentalhealth.ucdavis.edu).
- Diesel exhaust is a classified **Group 1 carcinogen** by the IARC. Even non-occupational exposure elevates lung cancer, heart disease, and systemic inflammation risks (Wikipedia).

Noise Pollution & Psychosocial Stress

- Freight operations generate chronic noise, leading to **sleep disturbance, hypertension, cardiovascular issues**, and mental health challenges (NRDC, Wikipedia).
- Research globally and domestically links long-term traffic noise to increased rates of **heart disease, dementia, diabetes**, and reduced cognitive health (The Sun, Wikipedia).

I-47-3 cont.

Collectively, these studies reveal that the siting of large industrial projects next to homes is not just inconvenient—it is **a serious threat to community health**.

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3. Property Values & Community Character

The Meadows and Baker Ranch are celebrated for their family-friendly, low-density design, well-maintained parks, and quiet streets. Warehouses and manufacturing facilities will:

I-47-4

- Introduce visual blight, light pollution, and persistent noise.
- Undermine the tranquility and aesthetics residents invested in.
- Likely depress **property values** and marketability—an outcome none of us wants.

---

4. Environmental Justice & Equity Considerations

I-47-5 Though Lake Forest may not mirror the demographics of megacity neighborhoods, the pattern is consistent: industrial facilities disproportionately burden adjacent residential zones—often affecting vulnerable groups disproportionately (The Guardian, The Verge, Nature, arXiv). This trend stands in direct conflict with equitable planning.

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5. Alternatives Exist

The City has available alternatives that support industry without compromising residential communities—including existing business parks and commercially zoned corridors near Spectrum or other mixed-use nodes. Redirecting warehouse development to these areas would:

I-47-6

- Take advantage of **existing infrastructure designed for heavy traffic**.
- Buffer homes from **pollution and noise**.
- Uphold Lake Forest's vision of family-centered development aligned with its General Plan.

Conclusion & Request

For the sake of resident health, safety, and quality of life, I respectfully urge the City to:

I-47-7

1. **Reject the current proposals** to site warehouses or manufacturing near The Meadows and Baker Ranch.
2. **Respect the General Plan and Planned Community frameworks**, preserving their intended residential and open-space distinctions.
3. **Engage the community** through transparent hearings and data-driven dialogue.
4. **Explore alternative locations** more appropriate for industrial uses—where infrastructure is better suited and conflicts minimized.

I-47-7 cont. Thank you for your ongoing dedication to thoughtful, community-oriented planning. I look forward to seeing Lake Forest continue as a safe, healthy, and prosperous city for all its residents.

Sincerely,
Aaron Xie

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AARON XIE

Letter Code: I-47
Date: August 14, 2025

Response to Comment I-47-1

This introductory comment expresses opposition to the proposed Project and any warehouse project adjacent to residential land uses, and states the opinion that these projects result in threats to public health, safety, property values, and community character.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-47-2

This comment states the opinion that locating industrial land uses near residential communities, particularly the Meadows and Baker Ranch communities, would be inconsistent with the City's General Plan and Zoning Code.

Refer to Master Response 7 regarding the proposed Project's consistency with the City's General Plan and Zoning Code. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-47-3

This comment expresses concerns regarding traffic congestion and associated air and noise pollution, associated with the proposed Project, stating the opinion that these issues would pose a threat to community health.

Refer to Response to Comment O-1-4 and Master Response 9 regarding air pollution and potential health risks associated with the proposed Project and Master Response 11 regarding noise pollution associated with the proposed Project. In addition, refer to Master Response 8 regarding traffic congestion associated with the proposed Project. It should be noted that Land Use Code 150 (Warehouse), from the Institute of Transportation Engineers (ITE) Trip Generation Manual, is more appropriate for the proposed Project (warehousing component). Land Use Code 156 (High-Cube Parcel Hub Warehouse) is a building that typically has at least 200,000 gross square feet (sf) of floor area and has a ceiling height of 24 feet or more. The Project proposes a 165,803-sf industrial building (including approximately 10,000 sf of office use, up to 65,000 sf of manufacturing use, and the remainder to be utilized for warehouse use), which is less than 200,000 sf. Therefore, Land Use Code 156 (High-Cube Parcel Hub Warehouse) is not applicable to the proposed Project.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-47-4

This comment expresses concerns regarding community character, stating the opinion that the proposed Project would disturb neighborhood tranquility and depress property values.

Refer to Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses as well as the Project's effect on the quality of life, Master Response 12 regarding the potential light and glare impact from the proposed Project to the surrounding community, and Response to Comment O-1-12 regarding the impact on property values associated with the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-47-5

This comment expresses concerns regarding environmental justice, stating the opinion that industrial facilities disproportionately burden adjacent residential zones, which may potentially affect vulnerable groups.

Refer to Master Response 14 regarding the disproportionate environmental burdens and the requirements for an analysis of environmental justice impacts. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-47-6

This comment suggests relocating the proposed Project and other cumulative industrial warehouse projects to other areas of the City and states the opinion that this relocation would take advantage of existing infrastructure, buffer homes from air and noise pollution, and uphold the City's values.

Refer to Master Response 6 regarding the adequacy of the cumulative impacts analysis presented in the Draft EIR, and Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-47-7

This is a concluding comment and urges the City to reject the proposed Project and the Western Realco Enterprise Way Industrial Project (Projects 1 and 2), respect the City's General Plan and Planned Community frameworks, engage with the community, and explore alternative locations for industrial uses.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses above. No further response is required.

Weiss, Jennifer

From:	Deborah Walck <Deborah@orangecountycomputer.com>
Sent:	Thursday, August 14, 2025 3:58 PM
To:	EnterpriseProjects
Cc:	Maylene Holmes; Kristofer Wilks
Subject:	Formal Objection to Draft Environmental Impact Report – Redevelopment of 26200 Enterprise Way
Attachments:	City of LF Objection DraftEIRAug25sign.pdf

August 14, 2025

Subject: Formal Objection to Draft Environmental Impact Report – Redevelopment of 26200 Enterprise Way

Dear Ms. Stonich,

I-48-1 Please find enclosed a formal objection letter regarding the Draft Environmental Impact Report (EIR) for the proposed redevelopment of 26200 Enterprise Way in Lake Forest, CA. This letter outlines concerns related to air quality, biological resources, noise, and the impact on adjacent properties and wildlife.

Thank you for your attention to this matter.

Sincerely,
Deborah Walck

Deborah Walck,
Chief of Network Operations
ORANGE COUNTY COMPUTER®, INC.
www.orangecountycomputer.com
26150 Enterprise Way, Suite 400
Lake Forest, CA 92630 (949) 699-6619

"Worldwide end-user spending on public cloud services is forecast to grow 20.4% to total $678.8 billion in 2024, up from $563.6 billion in 2023", according to the latest forecast from Gartner, Inc.

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August 14, 2025

Amy Stonich
Assistant Director of Community Development
City of Lake Forest
100 Civic Center Drive
Lake Forest, CA 92630

Subject: Formal Objection to Draft Environmental Impact Report – Redevelopment of 26200 Enterprise Way

Dear Ms. Stonich,

I-48-2

I am writing as the property owner of 26150 Enterprise Way, Suite #400, to formally object to the proposed redevelopment project at 26200 Enterprise Way, as outlined in the Draft Environmental Impact Report (EIR) currently under public review.

While I appreciate the City's efforts to improve infrastructure and support economic development, I have serious concerns regarding the environmental, operational, and health impacts this project will have on my property, employees, and business operations.

Key Concerns:

I-48-3

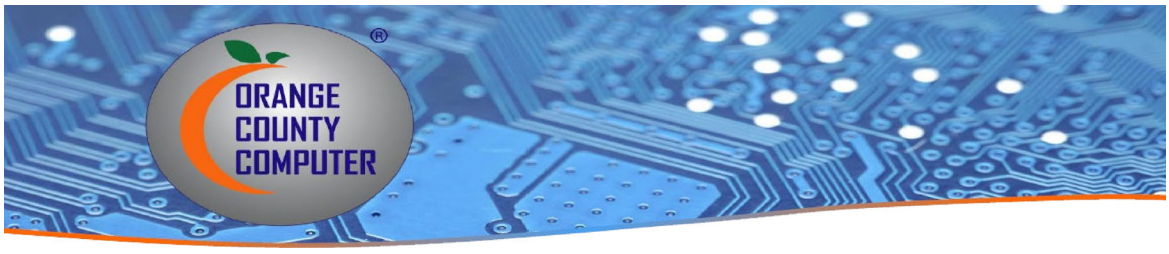
1. Traffic and Accessibility
The redesign of surrounding streets to accommodate larger trucks will significantly hinder customer access to our location. This will disrupt business operations and reduce visibility and accessibility for clients and vendors.

I-48-4

2. Environmental and Health Hazards
The demolition and construction phases will generate excessive dust, dirt, and debris, which pose serious risks to:
- HVAC systems, which may become clogged and damaged.
- Building exteriors, windows, and landscaping, which will be coated in concrete dust.
- Employee health, especially those with asthma or respiratory sensitivities, who may be unable to safely walk outside due to airborne particulates.
- Section 4.3 of the Draft EIR identifies significant impacts to air quality, including exposure to volatile organic compounds (VOCs) and fine particulate matter.

I-48-5

3. Biological Resources
Section 4.4 of the Draft EIR highlights the impact on biological resources. The existing landscape includes nearly 100 mature pine trees that support hawks, owls, and other protected birds of prey. These species, along with other wildlife, have already been



I-48-5 cont. displaced by the adjacent residential development completed last year. Further disruption from this project would be detrimental to the remaining habitat.

4. Noise Pollution

I-48-6 Section 4.13 of the Draft EIR outlines significant noise impacts. The demolition and construction activities will cause substantial disruption to workflow and productivity for businesses in the area, including ours.

5. Proximity to Our Property

I-48-7 This project is directly adjacent to our Flex Condo property, and the scale of the redevelopment poses a direct threat to our operational environment and property value.

6. Property Maintenance Burden

I-48-8 The dust and debris will require frequent car washes (potentially twice weekly) and constant cleaning of sidewalks, walls, and windows. Wind-blown dust settling on buildings and trees will further exacerbate this issue.

7. Lack of Trust in Oversight

I am concerned about the City's ability to enforce adequate safety and environmental protections during this project. The scale of this undertaking in a densely populated business area demands more rigorous planning, transparency, and accountability.

Preferred Alternative:

I-48-9 Given the significant environmental and operational concerns, I support the alternative option of doing nothing with the property and simply leasing it as-is. This would avoid the extensive disruptions and preserve the existing ecosystem and business environment.

Request for Action:

I respectfully request that the City pause the project until a comprehensive mitigation plan is presented that addresses these concerns. Property owners deserve meaningful engagement and solutions—not just notification.

Please consider this letter as my formal objection to the Draft EIR. I request that my concerns be documented and addressed before any further approvals or actions are taken.

Sincerely,

Deborah Walck

Deborah Walck, Owner, Forest River Holdings, LLC
Additionally Operating as Director of Operations, Orange County Computer, Inc,
26150 Enterprise Way, # 400 deborah@orangecountycomputer.com (949) 699-6619

DEBORAH WALCK

Letter Code: I-48
Date: August 14, 2025

Response to Comment I-48-1

This comment is introductory, expresses opposition to the proposed Project, and describes the following comments as concerns related to air quality, biological resources, noise, and impacts to wildlife and adjacent properties.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-48-2

This comment is introductory and expresses opposition to the proposed Project, stating concern regarding the environmental, operational, and health impacts related to the proposed Project.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-48-3

This comment expresses concern regarding traffic and accessibility, stating the opinion that street improvements associated with the proposed Project would hinder access to the commenter's business, disrupt business operations, and reduce visibility and accessibility for clients and vendors.

Refer to Master Response 8 regarding traffic and accessibility associated with the proposed Project. Trucks are currently traveling on public roadways like Bake Parkway, Lake Forest Drive, Dimension Drive, and Commercentre Drive. Therefore, the presence and addition of Project trucks do not inherently hinder customer access to that area and disrupt business operation. The Project proposes off-site improvements at the study area intersections to accommodate WB-67 trucks to ensure that inbound and outbound truck turning movements (including WB-67 trucks) are feasible and safe. Those off-site improvements are intended to enhance public safety and address concerns related to large truck turning movements.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-48-4

This comment expresses concern regarding environmental and health hazards, stating the opinion that dust, dirt, and debris related to demolition and construction of the proposed Project would pose risks to HVAC systems, building exteriors, and employee health, and references the Draft EIR's finding of significant impacts to air quality.

Refer to Response to Comment O-1-4 and Master Response 9 regarding air quality and potential health risk impacts associated with the proposed Project. As described in Response to Comment I-20-3, the proposed Project would be required to comply with SCAQMD's Rule 403, which requires the prevention, reduction, or mitigation of fugitive dust emissions from a project site during construction. In addition, as discussed on page 11 of the Health Risk Assessment prepared for the proposed Project (Appendix C to the Draft EIR), the AERMOD model was utilized to assess emissions dispersion under the proposed Project, including particulate matter (dust) emissions. Therefore, the discussion and mitigation of fugitive dust impacts contained in the Draft EIR remains valid.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions to the Draft EIR are necessary, and no further response is required.

Response to Comment I-48-5

This comment expresses concern regarding biological resources, stating the opinion that the proposed Project would be detrimental to remaining habitat for hawks, owls, and other birds of prey.

As described in Response to Comment O-1-5, as well as Section 4.4.6, Project Impacts, starting on page 4.4-10 of Section 4.4, Biological Resources, of the Draft EIR, the proposed Project would have no impact on sensitive species, plant communities, habitat fragmentation, jurisdictional waters, wildlife movement, migratory corridors, nursery sites, habitat conservation plans, or local regulations protecting biological resources. The Draft EIR also states that the Project could affect nesting birds if construction occurs during the nesting season and nests are present in existing vegetation. However, the proposed Project would be required to comply with the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code through implementation of RCM BIO-1 that would ensure potential impacts to nesting birds are reduced to less-than-significant levels.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions to the Draft EIR are necessary, and no further response is required.

Response to Comment I-48-6

This comment expresses concern regarding noise pollution, stating the opinion that demolition and construction associated with the proposed Project would cause substantial disruption to workflow and productivity for nearby businesses.

Refer to Master Response 11 regarding the noise analysis conducted for the proposed Project. Additionally, workflow and productivity are not required to be analyzed under CEQA, as *State CEQA Guidelines* Section 21082.2(c) limits evaluation of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-48-7

This comment states the opinion that the scale of the proposed Project would impact the commenter's operational environment and property value.

Refer to Response to Comment O-1-12 regarding the impact on property values associated with the proposed Project. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-48-8

This comment expresses concern regarding property maintenance burdens associated with the proposed Project from wind-blown dust and debris.

Refer to Response to Comment O-1-4 regarding the Draft EIR's air quality analysis. Additionally, maintenance burdens patterns are not required to be analyzed under CEQA, as *State CEQA Guidelines* Section 21082.2(c) limits evaluation of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-48-9

This comment expresses concern regarding the City's ability to enforce adequate safety and environmental protections for the proposed Project and expresses support for the No-Build Alternative. The comment restates opposition to the proposed Project, and requests the City address their comments by pausing the Project until a comprehensive mitigation plan is presented.

Refer to Master Response 4 regarding the adequacy of the proposed Project's mitigation and enforceability of that mitigation. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: Raymond luo [redacted]
Sent: Friday, August 15, 2025 10:42 AM
To: EnterpriseProjects
Subject: Objection to proposed warehouse project

Cover Letter – Objection to Proposed Warehouse Project

Rui Luo

[redacted]

Lake Forest, CA 92630

Email: [redacted]

Phone: [redacted]

August 15, 2025

City of Lake Forest

Development Services Department

100 Civic Center Drive

Lake Forest, CA 92630

Subject: Public Comments and Formal Objection to Proposed Warehouse Project – EIR Review

Dear Planning Commission and Development Services Staff,

I-49-1 As a concerned resident of Lake Forest, I am writing to formally submit the attached document titled "200 Detailed Objection Questions – Proposed Warehouse Near Residential Area" as part of the public comment period on the Environmental Impact Report (EIR) for the proposed warehouse development project.

We strongly oppose the construction of a warehouse facility in such close proximity to existing residential communities, senior housing, schools, and parks. The attached questions, organized by subject matter, highlight

numerous deficiencies, omissions, and ambiguities in the current Draft EIR. These include but are not limited to:
- Undisclosed or underestimated traffic impacts on neighborhood safety and congestion
- Potential violations of CEQA thresholds for air quality, noise, and greenhouse gas emissions
- Insufficient consideration of environmental justice and health impacts on vulnerable populations
I-49-1 cont. - Lack of credible analysis of alternative sites further from residential zones

We respectfully urge the City to withhold approval of this project until all environmental and community concerns have been fully addressed, and the EIR is revised accordingly. We also request that the City provide written responses to the questions submitted, as required by CEQA, and that any future hearings or meetings regarding this project be publicly noticed with adequate time for community input.

Thank you for your attention to this matter and for your service to the residents of Lake Forest.

Sincerely,
Rui Luo
On behalf of concerned residents of Lake Forest

200 Detailed Objection Questions – Proposed Warehouse Near Residential Area

I-49-2 This document contains 200 detailed, evidence-based, and difficult-to-answer questions crafted to challenge the environmental and community impacts of the proposed warehouse project in Lake Forest. These questions are aligned with CEQA requirements and target specific areas such as air quality, traffic, noise, water resources, public health, and legal compliance.

Air Quality & Greenhouse Gases

I-49-3
1. Has the warehouse emissions modeling considered cumulative impacts from nearby facilities in the same air basin?
2. What is the expected lifetime diesel particulate matter contribution of the facility over 30 years?
3. Was a Health Risk Assessment (HRA) conducted using OEHHA guidelines, and were sensitive receptors within 1,000 feet fully evaluated?
4. How are episodic events like wildfires considered in cumulative air quality impact modeling?
5. Did the EIR assess whether the project would hinder the region's compliance with California's AB 617 Community Air Protection Program?

Traffic & Transportation

I-49-4
6. How many average daily truck trips are expected during peak season, and what are the modeled traffic levels at all impacted intersections?
7. What is the predicted change in Level of Service (LOS) at the intersection of Portola Parkway and Glenn Ranch Road due to truck activity?
8. Have residential side streets been analyzed for increased cut-through traffic?
9. Does the traffic impact analysis account for increased e-commerce peak periods like Black Friday?
10. How will delivery vehicle scheduling be enforced to avoid peak-hour congestion?

Noise, Vibration & Light

11. What will be the decibel level at the closest residential windows during nighttime operations?
12. How were cumulative operational noises from loading docks, HVAC units, and backup alarms modeled?
13. Has the project modeled ground-borne vibration impacts using Caltrans guidance at nearest structural receptors?
14. Will truck idling during unloading violate California's Anti-Idling Regulation (13 CCR §2485)?
15. What shielding or directional lighting controls will be used to limit skyglow and glare at night?

I-49-5

Biological & Ecological Resources

16. Has a complete biological survey been conducted within the last 12 months to identify protected species?
17. Does the project site fall within a known wildlife corridor, and if so, what species use it?
18. What mitigation measures are proposed for potential impacts to nesting birds under the Migratory Bird Treaty Act?
19. How will stormwater runoff from the paved site affect downstream habitat?
20. Has the EIR evaluated impacts to the Serrano Creek watershed or connected ecosystems?

I-49-6

Water Resources & Stormwater

21. How will the facility manage first-flush runoff events containing oils, metals, and sediments from truck surfaces?
22. What is the projected annual stormwater volume increase, and how will it be detained or treated on-site?
23. Does the stormwater management plan comply with the Orange County MS4 permit under the Clean Water Act?
24. What best management practices (BMPs) are proposed for preventing contamination of nearby groundwater?
25. Has modeling been done for flood events under both 10-year and 100-year storm conditions?

I-49-7

Hazards & Hazardous Materials

26. Will the project include storage of flammable or hazardous chemicals, and how is that addressed under HMBP requirements?
27. What are the risk management procedures in case of a fuel spill or chemical fire on-site?
28. Has the site ever been used for hazardous material storage or industrial use prior to this application?
29. How close are the nearest fire hydrants or water supply lines for emergency suppression?
30. Does the project meet current Cal Fire or NFPA code requirements for industrial warehouse design?

I-49-8

Emergency Preparedness & Public Services

31. How will emergency evacuation of nearby residents be affected by increased truck congestion?
32. Has the Orange County Fire Authority reviewed and approved the emergency access plans?
33. Will noise or air emissions impair access to nearby healthcare or senior facilities?
34. How will emergency response times be impacted by intersection delays near the facility?
35. Is the proposed facility equipped with backup power and communication systems in the event of grid failure?

I-49-9

Visual, Aesthetic & Land Use Compatibility

I-49-10

36. Does the design incorporate architectural screening or buffering elements to reduce visual blight?
37. How tall are the proposed structures relative to adjacent zoning height limits?
38. Have any shadow studies been completed for winter months when the sun is lower in the sky?
39. Does the proposed exterior lighting meet Dark Sky ordinance guidelines or local lighting codes?
40. Is the building massing compatible with adjacent land uses per the City of Lake Forest General Plan?

Cultural, Tribal & Historical Resources

I-49-11

41. Has a records search been conducted through the California Historical Resources Information System?
42. Were local tribal governments (under AB 52) formally consulted during the environmental review?
43. Have ground disturbance activities been evaluated for potential archaeological sensitivity?
44. What procedures are in place if human remains or artifacts are uncovered during construction?
45. Has any past use of the site been associated with historical or culturally significant uses?

CEQA Compliance, Alternatives & Public Transparency

46. Does the project qualify for a CEQA exemption under any ministerial or streamlined approvals, and why or why not?
47. Why were certain environmentally superior alternatives rejected, and where is that analysis documented?
48. Was a No Project Alternative given full quantitative environmental impact assessment?
49. Did the City of Lake Forest circulate the EIR for at least 45 days as required under CEQA Guidelines §15087?
50. Have all scoping comments been responded to in the Final EIR with adequate detail and substantiation?
51. What independent peer-reviewed data supports the conclusions in the EIR's section on air quality & greenhouse gases?
52. What independent peer-reviewed data supports the conclusions in the EIR's section on traffic & transportation?
53. What independent peer-reviewed data supports the conclusions in the EIR's section on noise, vibration & light?

I-49-12

54. What independent peer-reviewed data supports the conclusions in the EIR's section on biological & ecological resources?
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I-49-12 cont.

200. What independent peer-reviewed data supports the conclusions in the EIR's section on ceqa compliance, alternatives & public transparency?

--
Raymond Luo,Realtor®
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Harvest Realty Development Inc
50 N Hill Ave #301,Pasadena CA 91106
MP: [redacted]



CAUTION: Think Security! This email is not from someone at the City of Lake Forest. **Do not click any links or open any attachments you are not expecting.**

RUI LUO

Letter Code: I-49
Date: August 15, 2025

Response to Comment I-49-1

This introductory comment expresses opposition to the proposed Project. The commenter generalizes a number of concerns regarding the analyses provided in the Draft EIR, which are provided in further detail in subsequent comments. The comment requests that the City address their comments by withholding approval of the proposed Project until revisions to the Draft EIR have been made and also requests written responses to the following comments and notification of future hearings.

Residents who have requested to be added to the Project notification list will be notified of future public hearing(s) for the proposed Project, at which time verbal comments can be made by members of the public.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-49-2

This comment explains that the subsequent comments in the letter are designed to challenge the potential impacts of the proposed Project and are aligned with CEQA requirements.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-49-3

This comment raises questions regarding the Draft EIR's air quality and GHG emissions analysis, including cumulative emissions modeling, lifetime DPM emissions estimates, HRA methodology, wildfire contribution, and AB 617 compliance.

Refer to Master Response 6 and Master Response 9 regarding the cumulative analysis and health risk assessment provided in the Draft EIR, respectively and Response to Comment O-1-4 regarding the potential air quality impacts resulting from the proposed Project. Because the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) is a reasonably foreseeable project that would be located in the immediate vicinity of the Project site and is assumed to have a construction schedule that overlap with the proposed Project, a quantitative evaluation of the combined air quality and health risk impacts of constructing and operating the proposed Project and the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) was prepared as part of the Draft EIR. Both the Air Quality, Greenhouse Gas, and Energy Impact Report and the Health Risk Assessment prepared for the proposed Project (both included as Appendix C to the Draft EIR) provide cumulative

analyses supported by quantitative outputs generated by the CalEEMod tool. This tool assumes that the proposed Project, Western Realco Enterprise Way Industrial Project (Projects 1 and 2) would all be operational by 2027. Refer to page 61 of the Air Quality, Greenhouse Gas, and Energy Impact Report and page 17 of the Health Risk Assessment for cumulative air pollutant emissions and health risk analyses, respectively. The findings of both reports are summarized in Section 4.3.7, page 4.3-39, of Section 4.3, Air Quality, of the Draft EIR. The Draft EIR ultimately found, based on substantial evidence, cumulatively considerable impacts would not occur with implementation of Mitigation Measure (MM) AQ-1, MM AQ-2, and MM AQ-3.

The HRA prepared for the proposed Project (Appendix C to the Draft EIR) utilized the EMFAC2021 tool to determine the emissions factors of idling and operating diesel trucks to determine total PM_{10} emissions. Although the TAC of concern from diesel trucks is DPM, EMFAC2021 does not include emissions factors for this TAC. DPM is a component of the overall exhaust from Project-related trucks. Therefore, the HRA conservatively used PM_{10} emissions to represent DPM emissions, consistent with OEHHA guidance. While it is expected that the truck emissions rate will continue to reduce over time with the implementation of standard regulatory requirements and technological advancement, an HRA only allows for a single emission rate to represent the entire 25- or 30-year exposure period. The use of emissions factors for the earliest year the proposed Project could start operations (2027) was selected for the HRA to be conservative.

To determine the potential health risk to people living and working near the Project site associated with the exhaust of diesel-powered trucks and equipment associated with the proposed Project, an operational HRA was conducted. The residential risk conservatively incorporated both the risk for a child living in a nearby residence for 9 years (the standard period of time for child risk) and an adult living in a nearby residence for 30 years (considered a conservative period of time for an individual to live in any one residence). An exposure period of 25 years was assumed for worker receptors. As shown in Table C (page 16) of the HRA, all health risk levels to nearby receptors from operation-related emissions of TACs (including PM_{10}, used to represent DPM) would be well below the SCAQMD's HRA thresholds, and no significant health risks would occur from Project operation.

The Air Quality, Greenhouse Gas, and Energy Impact Report (Appendix C to the Draft EIR) provides an analysis of long-term air pollutant emissions, including PM_{10}, as quantified using the CalEEMod program. The results shown in Table L (page 50) of the Air Quality, Greenhouse Gas, and Energy Impact Report indicate the proposed Project would not exceed the significance criteria, as established by SCAQMD, for daily VOC, NO_X, PM_{10} or $PM_{2.5}$ emissions. It should be noted that this long-term operational emissions analysis is presented in terms of pounds per day for consistency with applicable SCAQMD thresholds. No thresholds have been established requiring the evaluation of DPM emissions on a 30-year basis.

As recommended by the City, the HRA prepared for the proposed Project (Appendix C of the Draft EIR) was prepared in accordance with policies and procedures of the State OEHHA and SCAQMD. The HRA evaluates all these criteria in compliance with applicable requirements. As described on page 5 of the HRA, sensitive receptors are areas of the population that have an increased sensitivity to air pollution or environmental contaminants, including residences, schools, daycare centers, hospitals, parks, and similar uses that are sensitive to air quality. The closest sensitive receptors to the proposed Project site were determined to be residential uses, such as single-family homes

located adjacent to the east property line at approximately 82 feet from the Project site's eastern boundary limit to the residential building facade. Other residential uses were identified located north of the Project site, at approximately 900 feet from the Project site's northern boundary limit as measured to the residential building facade. In addition, a nature park is located to the south of the proposed Project site, within 450 feet as measured from the proposed Project site southern boundary to the center of the park. Therefore, the HRA appropriately analyzed potential impacts to sensitive receptors within 1,000 feet.

As stated in *State CEQA Guidelines* Section 15064(d)(3), "An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable." It is acknowledged that despite proposed fire protection measures and coordination with OCFA, it is possible that a wildfire could occur during construction or operation of the proposed Project. However, this occurrence would be rare and could not be accurately predicted. Therefore, any potential air quality effects related to wildfire are speculative and cannot be considered reasonably foreseeable at this time. Therefore, the cumulative air quality analysis presented in the Draft EIR remains valid, and no revisions are necessary. No further response is required.

As stated in *State CEQA Guidelines* Section 15125(d), "The EIR shall discuss any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans". While AB 617 provides a useful framework for achieving long-term air quality goals, this document is not a legally binding plan that applies directly to individual development projects. Instead, the Draft EIR analyzes the proposed Project within the context of other legally binding and enforceable plans, including SCAQMD's 2022 AQMP and Rule 2305. Under Rule 2305, the proposed Project would reduce emissions from day-to-day warehouse operations where feasible. Warehouse operators are required to earn a certain number of points for actions and investments in clean technologies annually (called WAIRE, or Warehouse Actions and Investments to Reduce Emissions, points) depending on the number of trucks visiting their facility. Examples of actions and investments that can generate WAIRE points under this rule include acquisition and use of NZE and ZE trucks, acquisition and use of ZE yard tractors, acquisition and use of ZE fueling infrastructure for on-road vehicles, and acquisition and use of solar panels for on-site electricity generation. Therefore, although the Draft EIR does not directly reference AB 617, the proposed Project would include actions and design features that are consistent with the document's objectives for broader air quality management efforts. Further, as stated on page 4.3-51 of the Draft EIR, with implementation of MM AQ-1, MM AQ-2, and MM AQ-3, the proposed Project would not result in any significant impacts related to air quality.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-49-4

This comment raises questions regarding the Draft EIR's transportation analysis, including peak season average daily truck trip modeling, LOS changes to the intersection of Portola Parkway and

Glenn Ranch Road, residential side street cut-through traffic analysis, traffic modeling for e-commerce peak periods, and delivery vehicle scheduling.

Refer to Master Response 8 regarding the assessment of transportation impacts provided in the Draft EIR. The proposed Project is estimated to add 94 trips (70 inbound and 24 outbound) in the a.m. peak hour and 99 trips (31 inbound and 68 outbound) in the p.m. peak hour in passenger car equivalents (PCEs). As noted in the TIA prepared for the proposed Project (refer to Draft EIR, Appendix J, Table D), with the intersection improvements that are a component of the Project, the studied intersections are forecast to operate at an acceptable LOS (D or better) during the a.m. and p.m. peak hour; therefore, roadways would meet City standards relative to traffic congestion.

The intersection of Glenn Ranch Road and Portola Parkway is located north of State Route 241, approximately one mile from the proposed Project site; therefore, it was not identified by the City as an intersection that required assessment in the TIA.

The trip generation for the proposed uses was developed using Institute of Traffic Engineers *Trip Generation Manual (11th Edition*), which is an accepted industry standard used by traffic engineering professionals in the development of traffic. Therefore it provides appropriate and substantiated data to support the calculation of projected vehicle trips that would result from operation of the proposed use.

The traffic study area and the roadways/intersections assessed in the TIA were established through coordination with the City, pursuant to the City's TA guidelines. The proposed Project is not anticipated to add traffic/trucks to residential streets. The TIA analysis for the proposed Project (refer to Draft EIR, Appendix J), was prepared based on the objectives and methodologies set forth in the City of Lake Forest's (City) *Transportation Analysis Guidelines* (TA Guidelines), the 2021 Congestion Management Program (CMP) for Orange County, and applicable provisions of CEQA. The methodology and conclusions of the TIA have been developed by qualified transportation engineering professionals and independently reviewed and approved by City staff and determined to be adequate and accurate in terms of identifying and disclosing the Project's potential environmental impacts; therefore, no revision to analysis provided in the Draft or supporting TIA is necessary.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No further response is required.

Response to Comment I-49-5

This comment raises questions regarding the Draft EIR's noise, vibration, and light analysis, including nighttime operational noise impacts, cumulative operational noise, consistency with Caltrans ground-borne vibration analysis guidance, consistency with California's Anti-Idling Regulation, and nighttime glare reduction.

Refer to Master Response 11 regarding the assessment of noise provided in the Draft EIR.

As stated on page 4.3-38 of the Draft EIR, idling of trucks under the proposed Project would be limited by the CARB's In-Use Off-Road Diesel Vehicles regulation, which limits idling to 5 minutes or less. Therefore, the proposed Project would not violate any applicable anti-idling regulations detailed in 13 CCF Section 2485.

In addition, refer to Master Response 12 regarding the assessment of lighting impacts provided in the Draft EIR. The proposed Project would limit skyglow and glare at night through compliance with applicable lighting requirements. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No further response is required.

Response to Comment I-49-6

This comment raises questions regarding the Draft EIR's biological resource analysis, including biological surveying, wildlife corridors, nesting bird mitigation, stormwater impacts to downstream habitat, and impacts to the Serrano Creek watershed and connected ecosystems.

Refer to Response to Comment O-1-5 regarding the proposed Project's impact on biological resources and protection of nesting birds under the MBTA. As discussed on page 4.4-2 of the Draft EIR, a qualified biologist conducted a biological resource survey of the Project site on May 21, 2021. In addition, a qualified biologist conducted an additional field survey of the Project site and surrounding areas on December 20, 2024, to confirm there were no changes to existing site conditions since the 2021 survey. Therefore, a survey was conducted within 12 months of the date this comment was received.

Refer to Response to Comment I-21-48 for a detailed response regarding wildlife corridors and Response to Comment O-1-5 for a detailed response regarding stormwater runoff generated on the Project site. With adherence to design measures and required BMPs, the proposed Project would effectively control runoff quantity and quality, ensuring that stormwater-related impacts to downstream habitat remain less than significant.

Compliance with RCM WQ-1 through RCM WQ-4 would ensure that the proposed Project would not degrade or alter water quality, cause the receiving waters to exceed the water quality objectives, or impair the beneficial use of receiving waters. Therefore, the proposed Project appropriately evaluates impacts to the Serrano Creek watershed and connected ecosystems.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No further response is required.

Response to Comment I-49-7

This comment raises questions regarding the Draft EIR's water resource and stormwater analysis, including first-flush runoff events, projected annual stormwater volume increase and capture, compliance with the Orange County MS4 Permit, proposed BMPs, and flood event modeling.

Refer to Response to Comment O-1-5 for a detailed response regarding stormwater runoff generated on the Project site. With adherence to design and regulatory requirements and required BMPs, the proposed Project would effectively control the quantity and quality of stormwater runoff, including first-flush runoff, and reduce potential impacts to a less than significant level.

A Project-specific Hydrology Report is included as Appendix F to the WQMP prepared for the proposed Project (Appendix G to the Draft EIR). As discussed on page 3 of the Hydrology Report, the peak flow rates for the 100-year, 24-hour storm event for the existing condition is 37.97 cubic feet per second (CFS). Peak flow rates under the proposed Project would be 47.37 CFS without mitigation and 21.50 CFS with mitigation. A flow rate of 21.50 CFS would represent a decrease in projected stormwater volume under single-storm, annual, and long-term conditions, rather than the increase suggested in this comment.

The analysis of hydrology and water quality presented in the Draft EIR was prepared in accordance with all applicable federal, State, and local regulations, including the Santa RWQCB Basin Plan, Orange County Drainage Area Management Plan, City of Lake Forest Local Implementation Plan, and the North Orange County MS4 Permit. As discussed on page 4.10-26 of the Draft EIR, the North Orange County MS4 Permit requires preparation of a Water Quality Management Plan (WQMP) and implementation of post-construction BMPs for new development and significant redevelopment projects that qualify as Priority Projects. The proposed Project is considered a Priority Project as it includes the addition or replacement of 5,000 square feet or more of impervious surface on a developed site. Regulatory Compliance Measures WQ-3 and WQ-4 detail the proposed Project's compliance with North Orange County MS4 Permit to ensure that operational impacts to water quality would be less than significant.

Refer to Response to Comment O-1-5 for a description of the BMPs incorporated into the proposed Project for the purpose of preventing contamination of nearby groundwater.

As previously stated, the Project-specific Hydrology Report (Appendix G to the Draft EIR) provides peak flow rate modeling for the 100-year, 24-hour storm event. This represents the worst-case scenario; therefore, potential impacts of the 10-year storm event would be accounted for in the modeling for the 100-year storm event and are not required to be analyzed under CEQA.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No further response is required.

Response to Comment I-49-8

This comment raises questions regarding the Draft EIR's hazards and hazardous materials analysis, including flammable and hazardous materials storage, fuel spill or fire risk management procedures, prior site usage, fire hydrant and water supply line proximity, and consistency with CAL FIRE and NFPA requirements.

Refer Master Response 13 regarding the assessment for the proposed Project's impacts related to hazardous materials. Further, Response to Comments I-21-61 and I-21-63 provide detailed responses regarding the potential for storage or spillage of hazardous materials on the Project site and the preparation of a HMBP. Refer to Response to Comment O-1-10 regarding fire risk and emergency procedures.

As discussed on page 4.9-1 of the Draft EIR, the existing structure on the Project site, which was constructed in 1999, was previously used as an office, manufacturing, and research testing facility by Panasonic Avionics. Prior to the development of the existing building, the Project site was vacant and undeveloped, except for the northeast portion of the Project site, which was used for orchards from 1938 to 1952. Surrounding properties were also utilized for orchards from at least 1938 to 1980, when commercial development began in the area. Preparation of the Phase I ESA (Appendix F to the Draft EIR) involved a site reconnaissance survey and a review of available government database information prepared by Environmental Risk Information Services (ERIS) to evaluate the Project site for the historical presence of hazardous materials. The Phase I ESA ultimately did not identify any recognized environmental conditions (RECs) at the Project site. Further, according to the Phase I ESA prepared for the proposed Project, the Project site is not included on any hazardous materials sites pursuant to Government Code Section 65962.5. Therefore, although hazardous materials and industrial uses have previously existed on the Project site, these uses would not result in a significant impact with adherence to existing federal, State, and local regulations described in Section 4.9.3, Existing Environmental Setting, starting on page 4.9-1 of Section 4.9, Hazards and Hazardous Materials, of the Draft EIR related to hazardous materials.

Refer to Response to Comment I-21-90. The OCFA reviews project plans to determine whether they comply with minimum requirements for fire department access and fire flow. This review is conducted when new structures are proposed or where proposed modifications to existing buildings may impact these requirements. Certain uses that are regulated by the State Fire Marshal or that present an unusual hazard to occupants, the public, or firefighters are also reviewed to ensure that they meet more stringent requirements for construction, emergency egress, and fire safety. Five fire hydrants are located around the perimeter of the existing building. These hydrants will be removed and salvaged during Project construction. In accordance with OCFA standards and the California Fire Code (CFC) (in effect at the time of the application for the building permit), the proposed Project would include the installation of seven hydrants throughout the Project site. In addition, all buildings on the Project site would include automatic fire sprinkler systems (per Lake Forest Municipal Code Section 903.2.8, Group R) for additional emergency suppression. Therefore, the proposed Project would comply with applicable requirements pertaining to the availability of emergency fire suppression infrastructure.

As listed in Section 4.20.4, Regulatory Setting, starting on page 4.20-4 of Section 4.20, Wildfire of the Draft EIR, the proposed Project would be subject to applicable. Local, OCFA, National Fire Protection

Association (NFPA), and CAL FIRE standards and requirements The proposed Project would also be subject to the CFC, which sets forth building design requirements such as the installation of sprinklers; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas. The proposed Project would be reviewed by OCFA and the City Engineer will review the proposed Project to ensure compliance with all applicable code requirements pertaining to fire protection.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No further response is required.

Response to Comment I-49-9

This comment raises questions regarding the Draft EIR's emergency preparedness and public services analysis, including impacts of truck traffic on emergency evacuation, OCFA review and approval of proposed emergency access plans, impaired access to nearby healthcare or senior facilities, emergency response times, and backup power and communications systems.

Refer to Responses to Comment I-21-68 for a detailed response regarding the nexus between Project-generated traffic and emergency evacuation, Response to Comment I-49-4 regarding roadway congestion, Response to Comment I-49-8 regarding emergency access, and Response to Comment I-21-90 regarding OCFA review and comment. The proposed Project would be reviewed by OCFA and the City Engineer will review the proposed Project to ensure compliance with all applicable code requirements pertaining to fire protection. It is not required for this review to occur prior to the CEQA process. It should be noted that OCFA's Assistant Fire Marshal provided a preliminary review of the proposed Project and noted in correspondence dated December 31, 2024, that the proposed Project would have a less than significant impact on fire protection services.

Response times to the Project site are dependent on various factors, including the location of patrol vehicles at the given moment. Nevertheless, as discussed under Threshold 4.17.1, starting on page 4.17-7 of Section 4.17, Transportation and Traffic, of the Draft EIR, the proposed Project would not conflict with a program plan, ordinance, or policy addressing the circulation system, create a significant design hazard due to a geometric design feature or incompatible use, or result in a significant impact to any study area intersections. Therefore, the proposed Project would not impair emergency response vehicles, and average response times in the area would remain within acceptable response time limits.

An emergency backup generator has not been included in the design of the proposed Project. As stated throughout the Draft EIR, the future tenant of the proposed building has not yet been determined. However, operations at the proposed building could be temporarily paused in the event of a power outage and there would be no urgent safety-related need for continuous power.

Further, even if such equipment were installed at some later time, back-up generators (by definition) would only be used on a limited basis in the case of emergency power failure or for routine testing and maintenance. Such intermittent use would not cause a substantial amount of

emissions, since the use would be short-term, intermittent, and infrequent. The installation of any equipment that emits pollutants is subject to permitting through the SCAQMD; therefore, it is reasonable any subsequent installation or operation of said equipment would not cause long-term air emission impacts. As specified in the City's Municipal Code[48], noise level impacts associated with emergency operations (e.g., generator use) are not required to comply with typical operational noise level standards; therefore, no further assessment is necessary for emergency generator operations.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No further response is required.

Response to Comment I-49-10

This comment raises questions regarding the Draft EIR's aesthetics and land use analysis, including architectural screening or buffering elements, zoning height limits, winter shadow studies, Dark Sky ordinance compliance, and building massing compatibility.

The proposed Project incorporates both architectural screening and buffering elements to reduce potential visual impacts. As discussed in Section 4.1.6, Project Impacts, starting on page 4.1-16 of Section 4.1, Aesthetics, of the Draft EIR, the proposed building would be constructed of architecturally enhanced tilt-up concrete panels and would be painted different shades of gray with a blue accent. The building architecture utilizes scoring, color transitions, and windows to provide articulation to long facades of the building. The truck doors, which would be painted to match the building, would be located on the south elevation of the building, and would not be visible from the surrounding streets, nor residential properties. The overall building treatment and façade will be compatible and consistent with the remainder of the existing, surrounding industrial park. The proposed Project also includes perimeter landscaping that would serve as a screen along all streets and boundaries. Vegetation within 20 feet of driveway and street intersections would be between 36 inches and 42 inches high. Further, equipment located on the roof of the proposed building would be screened by the building parapet and would be out of the line of sight from the property line. The proposed Project would not impact any existing parks, trails, or scenic vistas and would enhance streetscapes by providing a variety of trees, shrubs and ground cover and maintaining the existing landscaping around the perimeter of the Project site.

As discussed in Section 4.1.6, Project Impacts, starting on page 4.1-16 of Section 4.1, Aesthetics, of the Draft EIR, the proposed structure would be 35 feet tall and would replace an existing 35-foot-tall structure. The proposed building height would be consistent with the site development standards set forth in Chapter 11 Section C2 of the Pacific Commercentre Planned Community District Regulations (June 1987), the City's Zoning Code Section 9.72.070 C2, and with Section 9.144.050 (Height Limits) of the Lake Forest Municipal Code. Height limits established for adjacent parcels are not applicable to the Project site and therefore the analysis of such standards is not required under

[48] City of Lake Forest Municipal Code, Section 11.16.050(c), "Any mechanical device, apparatus or equipment used, related to, or connected with emergency machinery, vehicles, or work" is exempt from the provisions of the City's noise control ordinance.

CEQA. However, the height and mass of the proposed structure would also be similar to the existing structure and similar to the surrounding development. Shadows cast on private residences or commercial/industrial facilities are not potential impacts under CEQA. Therefore, a Project-specific shade and shadow study is not required.

Refer to Master Response 12 and Response to Comment I-49-5 for a discussion of the proposed Project's compliance with applicable lighting requirements.

The proposed industrial building is located within the Pacific Commercentre Planned Community. The Pacific Commercentre Planned Community was developed as a master planned industrial business park with local streets providing internal circulation. The buildings in the Planned Community include a mix of warehouses, distribution, manufacturing, research and development and offices. The proposed industrial building is consistent with the type, scale, and intensity of the existing industrial development in the Pacific Commercentre Planned Community. The proposed Project includes the replacement of an existing 2-story concrete tilt-up industrial building with a new 2-story concrete tilt-up industrial building. The subject site is adjacent to the Meadows community to the northeast/east. The Project site is not connected to the Meadows community by any streets or walkways. Furthermore, a landscape buffer separates the Meadows community and the industrial area. The proposed Project includes the installation of additional landscaping and mature trees along the northeastern corner of the Project site, adjacent to the Meadows community. This new landscaping will further reduce the visibility of the industrial site as viewed from the Meadows community. Furthermore, the building was designed so that the truck dock and loading area of the proposed building is oriented to the southeast (not facing the residential properties), is located over 200 feet away from the nearest residential property line and would not be readily visible from the residences. Therefore, the new proposed building is compatible with the surrounding land uses. Further, the proposed Project would require a Site Development Permit, which would provide the opportunity for the City to review the physical improvements to the Project site, including the overall building scale, massing, and design to ensure compatibility and compliance with City requirements governing scenic quality. With the approval of a Site Development Permit, the proposed Project would be consistent with the General Plan and zoning designations, and no General Plan Amendment, Specific Plan Amendment, or zone change would be required as part of Project approval.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No further response is required.

Response to Comment I-49-11

This comment raises questions regarding the Draft EIR's cultural, tribal, and historic resource analysis, including whether a records search has been conducted through the California Historical Resources Information System (CHRIS), Assembly Bill (AB) 52 consultation, archaeological sensitivity, human remains discovery procedures, and historical associations of the Project site.

The analysis of cultural resources presented in the Draft EIR is largely based upon the Cultural Resources Assessment prepared for the proposed Project and consultations between the City and

Native American tribal government(s) conducted pursuant to AB 52. As described in Section 4.5, Cultural Resources, page 4.5-1, of the Draft EIR, the Cultural Resources Assessment included an archaeological records search conducted by the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System (CHRIS), including a review of all recorded historic and prehistoric cultural resources, as well as a review of known cultural resources, and survey and excavation reports generated from projects completed within one mile of the Project site. Further, a literature review and pedestrian field survey were also conducted to determine the potential presence or presence of cultural resources on the Project site.

As required under CEQA and AB 52, the City initiated formal tribal consultation with the California Native American tribes traditionally and culturally affiliated with the area that have requested notification under AB 52. Section 4.18, Tribal Cultural Resources, of the Draft EIR describes the Native American consultation process in sufficient detail to satisfy the requirements of CEQA and AB 52. Refer to page 4.18-2 of the Draft EIR for information regarding the specific dates on which consultation milestones occurred, the tribes that were contacted, and a summary of the communications between the City and the Consulting Tribe. A request for consultation was received from the Gabrieleno Band of Mission Indians – Kizh Nation (Kizh Nation) on June 12, 2024. The City attended a meeting with representatives of the Kizh Nation and conducted research to provide additional Project grading information, as requested. The City addressed the Consulting Tribe's request for additional information and received no additional responses or requests for consultation. Therefore, the City adhered to required procedures for formal consultation under AB 52.

The Project site has been comprehensively evaluated for its potential archaeological sensitivity. The existing vacant building on the Project site was constructed in 1999 and was previously used as an office, manufacturing, and research testing facility by Panasonic Avionics. Because the building is less than 50 years old, it is not considered to be historically significant. According to the data obtained from the SCCIC records search, 25 previous cultural resource studies were completed within a 0.5-mile radius of the Project site, resulting in the recording of 13 cultural resources within this 0.5-mile radius. Of the 25 previous cultural resources studies, 8 assessed the Project site for cultural resources, and one cultural resource (a prehistoric lithic scatter) was previously recorded within the Project site's boundaries. The cultural resource site was systematically excavated in 1988, and was subject to subsequent construction excavation, which removed the knoll, reducing the elevation from 720 to 700 feet above mean sea level. The final archaeological site visit prior to the current study indicated that the knoll was no longer present due to development of the site in 1994. Therefore, there is no evidence to suggest that the Project site has been associated with historical or culturally significant uses. Further, previous site disturbances, including excavation and compaction, have disturbed sediments beyond depths at which buried cultural resources are likely. Based on these results, the Cultural Resources Assessment determined that encountering buried cultural resources during Project construction is unlikely and that no additional cultural resources work or monitoring is necessary during proposed activities associated with the development of the Project site. Nevertheless, as stated on page 4.5-9 of the Draft EIR, in the unlikely event that archaeological resources are discovered at any time during construction, those activities would be halted in the vicinity of the find until the find can be assessed for significance by a qualified archaeologist, pursuant to RCM CUL-1. With implementation of RCM CUL-1, the Draft EIR found that potential impacts to previously undiscovered archaeological resources would be less than significant.

Refer to Response to Comment O-1-6 regarding the potential for and process for handling the discovery of human remains.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No further response is required.

Response to Comment I-49-12

This comment provides questions regarding general CEQA compliance and Draft EIR preparation, including the potential for exemptions, the No Project Alternative, circulation period duration, scoping comments, and the specific independent peer-reviewed data used to support the conclusions presented in the Draft EIR.

The proposed Project does not qualify for an exemption or ministerial approval under CEQA. As determined by the City, an EIR is the appropriate document to evaluate the proposed Project under CEQA.

Refer to Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project. The analysis of Project alternatives is provided in Chapter 5.0, Alternatives, of the Draft EIR. As described on page 5-6 of the Draft EIR, the reasonable range of alternatives that have the potential to feasibly attain most of the basic objectives of the proposed Project but that may avoid or substantially lessen any of the significant impacts of the proposed Project include the No Project Alternative, Previous Use and Associated Site Development Permit Alternative, and the Reduced Project Alternative. Based on the qualitative and quantitative analysis presented in Chapter 5.0, it was determined that Alternative 1, the No Project Alternative, would have the least impact to the environment because it would not result in any construction activities on the Project site or operational uses. While Alternative 1, the No Project Alternative, would avoid the impacts of the proposed Project, it would not achieve the beneficial impacts of the proposed Project including the re-envisioning of an existing underutilized office/industrial property to provide a building type that is flexible and accommodating to a variety of permitted land uses to extend the useful life of the building, and creating employment opportunities. *State CEQA Guidelines* Section 15126.6(e)(2) provides that, if the No Project/No Build Alternative is the Environmentally Superior Alternative, then the EIR shall also identify an Environmentally Superior Alternative among the other alternatives. Therefore, the secondary environmentally superior alternative was identified as Alternative 3, the Reduced Intensity Alternative. As discussed on page 5-32 of the Draft EIR, Alternative 3 would result in similar or reduced environmental impacts compared to the proposed Project, but would not achieve those objectives to the same degree as the proposed Project. Additionally, Alternative 3, consistent with the proposed Project, would result in a significant and unavoidable transportation impact related to VMT and a significant and unavoidable cumulatively considerable impact related to GHG emissions.

As required by the *State CEQA Guidelines* Section 15087, the City provided a public Notice of Availability (NOA) of the Draft EIR for the IPT Enterprise Business Center LLC Project at the same time it filed a Notice of Completion (NOC) with the State Clearinghouse. The Draft EIR was circulated

for public review for a period of 67 days, from July 10, 2025, to September 15, 2025. Refer to Master Response 1 regarding the adequacy of the public review period and associated noticing.

Comments received during the scoping period that raised substantive environmental issues were noted and incorporated into individual resource topics of the Draft EIR as appropriate. These comments are not required to be addressed in the Final EIR. All comments received during the Draft EIR public review period have been included in the Final EIR. Pursuant to *State CEQA Guidelines* Section 15088, the City has evaluated comments on the Draft. The Final EIR includes comprehensive and reasoned responses to the substantive comments received by the City from agencies, organizations, and individuals and revisions to the information disclosed in the Draft EIR and/or prescribed mitigation have been made when warranted.

Regarding the inquiry as to what independent peer-reviewed data supports the conclusions reached in the Draft EIR, the Draft EIR analysis relies on a number of technical evaluations and reports prepared by the Project Applicant's consultants, which were submitted with the Project application. These reports are provided in the appendices to the Draft EIR, are incorporated by reference, and include the following:

- Photometric Plan (Appendix B)
- Biological Resources Report and CNDDB Record Search (Appendix D)
- Geotechnical Investigation and Infiltration Testing Results (Appendix E)
- Phase I Environmental Site Assessment (Appendix F)
- Water Quality Management Plan (WQMP) and Preliminary Hydrologic & Hydraulic Drainage Report (Appendix G)
- Orange County Fire Authority Notice of Preparation (Appendix I)

These reports were prepared by qualified technical experts with specific technical knowledge and credentials relative to the applicable subject area. In addition, the City and its qualified technical consultants, including the CEQA consultants, peer reviewed these reports prior to use in the Draft EIR analysis. Although the Draft EIR analysis in some cases relies on technical reports prepared by the Project applicant, the analysis in the Draft and Final EIRs reflects the independent judgment and expertise of the City as Lead Agency for environmental review of the proposed Project. The analysis in the Final EIR, including the supporting applicant-prepared and peer-reviewed technical studies, provides substantial evidence supporting the analysis and conclusions in the EIR.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No further response is required.

Weiss, Jennifer

From: 王ZHU [redacted]
Sent: Friday, August 15, 2025 10:44 AM
To: EnterpriseProjects
Subject: Objection to proposed warehouse project

Cover Letter – Objection to Proposed Warehouse Project

Zhu Wang

[redacted]

Lake Forest, CA 92630

Email: [redacted]

Phone: [redacted]

August 15, 2025

City of Lake Forest

Development Services Department

100 Civic Center Drive

Lake Forest, CA 92630

Subject: Public Comments and Formal Objection to Proposed Warehouse Project – EIR Review

Dear Planning Commission and Development Services Staff,

I-50-1 As a concerned resident of Lake Forest, I am writing to formally submit the attached document titled "200 Detailed Objection Questions – Proposed Warehouse Near Residential Area" as part of the public comment period on the Environmental Impact Report (EIR) for the proposed warehouse development project.

We strongly oppose the construction of a warehouse facility in such close proximity to existing residential communities, senior housing, schools, and parks. The attached questions, organized by subject matter, highlight

numerous deficiencies, omissions, and ambiguities in the current Draft EIR. These include but are not limited to:
- Undisclosed or underestimated traffic impacts on neighborhood safety and congestion
- Potential violations of CEQA thresholds for air quality, noise, and greenhouse gas emissions
- Insufficient consideration of environmental justice and health impacts on vulnerable populations
- Lack of credible analysis of alternative sites further from residential zones

I-50-1 cont.

We respectfully urge the City to withhold approval of this project until all environmental and community concerns have been fully addressed, and the EIR is revised accordingly. We also request that the City provide written responses to the questions submitted, as required by CEQA, and that any future hearings or meetings regarding this project be publicly noticed with adequate time for community input.

Thank you for your attention to this matter and for your service to the residents of Lake Forest.

Sincerely,
Zhu Wang
On behalf of concerned residents of Lake Forest

200 Detailed Objection Questions – Proposed Warehouse Near Residential Area

I-50-2 This document contains 200 detailed, evidence-based, and difficult-to-answer questions crafted to challenge the environmental and community impacts of the proposed warehouse project in Lake Forest. These questions are aligned with CEQA requirements and target specific areas such as air quality, traffic, noise, water resources, public health, and legal compliance.

Air Quality & Greenhouse Gases

I-50-3

1. Has the warehouse emissions modeling considered cumulative impacts from nearby facilities in the same air basin?
2. What is the expected lifetime diesel particulate matter contribution of the facility over 30 years?
3. Was a Health Risk Assessment (HRA) conducted using OEHHA guidelines, and were sensitive receptors within 1,000 feet fully evaluated?
4. How are episodic events like wildfires considered in cumulative air quality impact modeling?
5. Did the EIR assess whether the project would hinder the region's compliance with California's AB 617 Community Air Protection Program?

Traffic & Transportation

I-50-4

6. How many average daily truck trips are expected during peak season, and what are the modeled traffic levels at all impacted intersections?
7. What is the predicted change in Level of Service (LOS) at the intersection of Portola Parkway and Glenn Ranch Road due to truck activity?
8. Have residential side streets been analyzed for increased cut-through traffic?
9. Does the traffic impact analysis account for increased e-commerce peak periods like Black Friday?
10. How will delivery vehicle scheduling be enforced to avoid peak-hour congestion?

Noise, Vibration & Light

11. What will be the decibel level at the closest residential windows during nighttime operations?
12. How were cumulative operational noises from loading docks, HVAC units, and backup alarms modeled?

I-50-5

13. Has the project modeled ground-borne vibration impacts using Caltrans guidance at nearest structural receptors?
14. Will truck idling during unloading violate California's Anti-Idling Regulation (13 CCR §2485)?
15. What shielding or directional lighting controls will be used to limit skyglow and glare at night?

Biological & Ecological Resources

16. Has a complete biological survey been conducted within the last 12 months to identify protected species?
17. Does the project site fall within a known wildlife corridor, and if so, what species use it?

I-50-6

18. What mitigation measures are proposed for potential impacts to nesting birds under the Migratory Bird Treaty Act?
19. How will stormwater runoff from the paved site affect downstream habitat?
20. Has the EIR evaluated impacts to the Serrano Creek watershed or connected ecosystems?

Water Resources & Stormwater

21. How will the facility manage first-flush runoff events containing oils, metals, and sediments from truck surfaces?
22. What is the projected annual stormwater volume increase, and how will it be detained or treated on-site?

I-50-7

23. Does the stormwater management plan comply with the Orange County MS4 permit under the Clean Water Act?
24. What best management practices (BMPs) are proposed for preventing contamination of nearby groundwater?
25. Has modeling been done for flood events under both 10-year and 100-year storm conditions?

Hazards & Hazardous Materials

26. Will the project include storage of flammable or hazardous chemicals, and how is that addressed under HMBP requirements?

I-50-8

27. What are the risk management procedures in case of a fuel spill or chemical fire on-site?
28. Has the site ever been used for hazardous material storage or industrial use prior to this application?
29. How close are the nearest fire hydrants or water supply lines for emergency suppression?
30. Does the project meet current Cal Fire or NFPA code requirements for industrial warehouse design?

Emergency Preparedness & Public Services

31. How will emergency evacuation of nearby residents be affected by increased truck congestion?
32. Has the Orange County Fire Authority reviewed and approved the emergency access plans?

I-50-9

33. Will noise or air emissions impair access to nearby healthcare or senior facilities?
34. How will emergency response times be impacted by intersection delays near the facility?
35. Is the proposed facility equipped with backup power and communication systems in the event of grid failure?

Visual, Aesthetic & Land Use Compatibility

36. Does the design incorporate architectural screening or buffering elements to reduce visual blight?
37. How tall are the proposed structures relative to adjacent zoning height limits? I-50-10
38. Have any shadow studies been completed for winter months when the sun is lower in the sky?
39. Does the proposed exterior lighting meet Dark Sky ordinance guidelines or local lighting codes?
40. Is the building massing compatible with adjacent land uses per the City of Lake Forest General Plan?

Cultural, Tribal & Historical Resources

41. Has a records search been conducted through the California Historical Resources Information System?
42. Were local tribal governments (under AB 52) formally consulted during the environmental review? I-50-11
43. Have ground disturbance activities been evaluated for potential archaeological sensitivity?
44. What procedures are in place if human remains or artifacts are uncovered during construction?
45. Has any past use of the site been associated with historical or culturally significant uses?

CEQA Compliance, Alternatives & Public Transparency

46. Does the project qualify for a CEQA exemption under any ministerial or streamlined approvals, and why or why not?
47. Why were certain environmentally superior alternatives rejected, and where is that analysis documented?
48. Was a No Project Alternative given full quantitative environmental impact assessment?
49. Did the City of Lake Forest circulate the EIR for at least 45 days as required under CEQA Guidelines §15087?
50. Have all scoping comments been responded to in the Final EIR with adequate detail and substantiation?
51. What independent peer-reviewed data supports the conclusions in the EIR's section on air quality & greenhouse gases?
52. What independent peer-reviewed data supports the conclusions in the EIR's section on traffic & transportation?
53. What independent peer-reviewed data supports the conclusions in the EIR's section on noise, vibration & light?
54. What independent peer-reviewed data supports the conclusions in the EIR's section on biological & ecological resources?
I-50-12 55. What independent peer-reviewed data supports the conclusions in the EIR's section on water resources & stormwater?
56. What independent peer-reviewed data supports the conclusions in the EIR's section on hazards & hazardous materials?
57. What independent peer-reviewed data supports the conclusions in the EIR's section on emergency preparedness & public services?
58. What independent peer-reviewed data supports the conclusions in the EIR's section on visual, aesthetic & land use compatibility?
59. What independent peer-reviewed data supports the conclusions in the EIR's section on cultural, tribal & historical resources?
60. What independent peer-reviewed data supports the conclusions in the EIR's section on ceqa compliance, alternatives & public transparency?
61. What independent peer-reviewed data supports the conclusions in the EIR's section on air quality & greenhouse gases?

62. What independent peer-reviewed data supports the conclusions in the EIR's section on traffic & transportation?
63. What independent peer-reviewed data supports the conclusions in the EIR's section on noise, vibration & light?
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I-50-12 cont.

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ZHU WANG

Letter Code: I-50
Date: August 15, 2025

Response to Comment I-50-1

This introductory comment expresses opposition to the proposed Project. The commenter generalizes a number of concerns regarding the analyses provided in the Draft EIR, which are articulated in further detail in subsequent comments below. The comment requests that the City address their comments by withholding approval of the proposed Project until revisions to the Draft EIR have been made and also requests written responses to the following comments and notification of future hearings.

Residents who have requested to be added to the Project notification list will be notified of future public hearing(s) for the proposed Project, at which time verbal comments can be made by members of the public.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-50-2

This comment states that the comments detailed in the letter are designed to challenge the potential impacts of the proposed Project and are aligned with CEQA requirements.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-50-3

This comment raises questions regarding the Draft EIR's air quality and GHG emissions analysis, including cumulative emissions modeling, lifetime DPM emissions estimates, HRA methodology, wildfire contribution, and AB 617 compliance.

Refer to Response to Comment I-49-3 regarding the air quality and GHG emissions analysis, including cumulative emissions modeling, lifetime DPM emissions estimates, HRA methodology, wildfire contribution, and AB 617 compliance. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-50-4

This comment raises questions regarding the Draft EIR's transportation analysis, including peak season average daily truck trip modeling, LOS changes to the intersection of Portola Parkway and Glenn Ranch Road, residential side street cut-through traffic analysis, traffic modeling for e-commerce peak periods, and delivery vehicle scheduling.

Refer to Response to Comment I-49-4 regarding the proposed Project's transportation analysis. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-50-5

This comment raises questions regarding the Draft EIR's noise, vibration, and light analysis, including nighttime operational noise impacts, cumulative operational noise, consistency with Caltrans ground-borne vibration analysis guidance, consistency with California's Anti-Idling Regulation, and nighttime glare reduction.

Refer to Response to Comment I-49-5 regarding the proposed Project's noise, vibration, and light analyses. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-50-6

This comment raises questions regarding the Draft EIR's biological resource analysis, including biological surveying, wildlife corridors, nesting bird mitigation, stormwater impacts to downstream habitat, and impacts to the Serrano Creek watershed and connected ecosystems.

Refer to Response to Comment I-49-6 regarding the proposed Project's biological resources assessment. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-50-7

This comment raises questions regarding the Draft EIR's water resource and stormwater analysis, including first-flush runoff events, projected annual stormwater volume increase and capture, compliance with the Orange County MS4 Permit, proposed BMPs, and flood event modeling.

Refer to Response to Comment I-49-7 regarding the proposed Project's water resources and stormwater analysis. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-50-8

This comment raises questions regarding the Draft EIR's hazards and hazardous materials analysis, including flammable and hazardous materials storage, fuel spill or fire risk management procedures, prior site usage, fire hydrant and water supply line proximity, and consistency with CAL FIRE and NFPA requirements.

Refer to Response to Comment I-49-8 regarding the proposed Project's hazards and hazardous materials analysis. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-50-9

This comment raises questions regarding the Draft EIR's emergency preparedness and public services analysis, including impacts of truck traffic on emergency evacuation, OCFA review and approval of proposed emergency access plans, impaired access to nearby healthcare or senior facilities, emergency response times, and backup power and communications systems.

Refer to Response to Comment I-49-9 regarding the proposed Project's emergency preparedness and public services analysis. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-50-10

This comment raises questions regarding the Draft EIR's aesthetics and land use analysis, including architectural screening or buffering elements, zoning height limits, winter shadow studies, Dark Sky ordinance compliance, and building massing compatibility.

Refer to Response to Comment I-49-10 regarding the proposed Project's land use analysis. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-50-11

This comment raises questions regarding the Draft EIR's cultural, tribal, and historic resource analysis, including whether a records search has been conducted through the California Historical Resources Information System (CHRIS), Assembly Bill (AB) 52 consultation, archaeological sensitivity, human remains discovery procedures, and historical associations of the Project site.

Refer to Response to Comment I-49-11 regarding the proposed Project's cultural, tribal, and historic resource analysis. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-50-12

This comment provides questions regarding general CEQA compliance and Draft EIR preparation, including the potential for exemptions, the No Project Alternative, circulation period duration, scoping comments, and the specific independent peer-reviewed data used to support the conclusions presented in the Draft EIR.

Refer to Response to Comment I-49-12 regarding general CEQA compliance and Draft EIR preparation. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: Nanbo Li [redacted]
Sent: Sunday, August 17, 2025 9:02 PM
To: EnterpriseProjects
Subject: Public Comments and Formal Objection to Proposed Warehouse Project – EIR Review

Dear Planning Commission and Development Services Staff,

As a deeply concerned resident of Lake Forest, I am submitting this letter as a **formal objection** during the public comment period on the Environmental Impact Report (EIR) for the proposed warehouse development near our residential neighborhoods.

This project poses **unacceptable risks** to the health, safety, and quality of life of surrounding communities, particularly seniors, children, and families who live, study, and recreate in the immediate vicinity. The Draft EIR fails to adequately disclose, analyze, or mitigate these impacts. Specifically, the following deficiencies stand out:

- **Traffic & Safety:** The EIR grossly underestimates traffic volumes and ignores cumulative impacts from multiple concurrent warehouse projects on Enterprise Way. Increased heavy-truck traffic will worsen congestion, compromise neighborhood safety, and elevate accident risks at key intersections.
- **Air Quality & Health:** The analysis downplays significant emissions of diesel particulates and greenhouse gases from warehouse operations. These pollutants disproportionately endanger vulnerable populations, creating environmental justice concerns in violation of CEQA standards.
- **Noise & Quality of Life:** Noise studies do not credibly account for 24-hour truck movements, loading dock activity, or backup alarms that will disrupt nearby homes, schools, and senior housing facilities.
- **Flawed Alternatives Analysis:** The EIR dismisses viable alternatives further from residential zones without meaningful evaluation, thereby ignoring less harmful siting options that could still meet industrial development goals.

I-51-1

For these reasons, we strongly urge the City to **withhold approval** of this project until the EIR is fully revised to address the deficiencies and all cumulative impacts are transparently analyzed. We further demand:

1. Written responses to each objection raised, as required under CEQA.
2. Independent, peer-reviewed studies of traffic, health, and air quality impacts.
3. Public hearings with adequate notice, scheduled at times accessible to working families.
4. A good-faith review of alternative sites not adjacent to residential and senior communities.

Lake Forest residents deserve thoughtful, responsible planning that prioritizes public health and community safety over unchecked industrial expansion. Approving this project in its current form would represent a profound failure of stewardship and a betrayal of community trust.

Thank you for your attention to this matter and for your obligation to protect the residents of Lake Forest.

Sincerely,

Nanbo Li
The concerned resident of Lake Forest

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NANBO LI

Letter Code: I-51
Date: August 17, 2025

Response to Comment I-51-1

This comment expresses opposition to the proposed Project and states the opinion that it would result in unacceptable risks to the health, safety and quality of life for surrounding communities, stating concerns related to truck traffic, air pollution, noise pollution, and alternatives. This comment states the opinion that there are alternative locations for the proposed Project which would be less harmful and requests that the City address their comments by withholding approval of the proposed Project until the Draft EIR is revised to address the issues cited in this comment. This comment also requests written responses to all objections raised, and requests their comments be addressed by the provision of independent peer-reviewed technical studies, public hearings with adequate notice and accessible timing, and a good-faith review of alternative sites.

Refer to Master Response 8 regarding truck traffic and safety impacts associated with the proposed Project, Response to Comment O-1-4 and Master Response 9 regarding air pollution and potential health risks associated with the proposed Project, Master Response 11 regarding noise pollution impacts associated with the proposed Project, Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project, and Master Response 7 regarding the compatibility of the proposed Project on surrounding land uses, including the Project's effect on quality of life. Public hearings will be held associated with the Planning Commissions consideration of the EIR and the proposed Project.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: Qiyuan Liu [redacted]
Sent: Friday, August 22, 2025 12:23 PM
To: Stannard, Michael; Stonich, Amy; EnterpriseProjects; Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Villwock, Jordan; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Public Comment on Cost-Effective Development – Draft EIR for IPT Enterprise Business Center (SCH# 2024030755)

Dear Planning Commission and City Council,

I am writing to urge the City of Lake Forest to carefully consider the **long-term cost-effectiveness of development choices** for the proposed IPT Enterprise Business Center site at 26200 Enterprise Way.

1) Current Proposal Is Low-Return, High-Cost

Warehouses and similar logistics facilities typically generate **very few jobs per square foot** (around 1 per 1,500 sq ft) and at comparatively **low wages** (averaging ~$40,000 annually for warehouse labor). Despite the large footprint, such uses contribute little in local sales tax revenue since transactions are often booked outside the city under California's "place of sale" rules.

Meanwhile, these facilities impose **significant external costs** on the community — including truck traffic, congestion on Bake Parkway, air pollution, greenhouse gas emissions, and neighborhood quality-of-life impacts. These are not industries that enhance the city's reputation or advance its sustainability goals.

2) More Cost-Effective Opportunities Ahead

I-52-1

By contrast, environmentally friendly, high-tech, or professional industries — whether in clean technology, advanced research, AI/IT industries, or corporate headquarters — typically bring:

- **10× more jobs per square foot** compared to warehousing;
- **3× higher average wages**, leading to more household spending in Lake Forest;
- Far lower truck traffic and associated emissions;
- A stronger reputation for Lake Forest as a forward-looking, innovation-friendly city.

Even if such an opportunity is not immediately available, reserving the land for a future **higher-value, lower-impact use** would generate **far greater tax revenue and community benefit** than moving forward now with a project that locks the site into a low-return use for decades.

3) The City Should Weigh True Costs vs. Benefits

Cost-effective development means maximizing fiscal return while minimizing community burdens. Approving a warehouse/factory now would create a situation where **the long-term costs — to air quality, traffic, safety, and the City's reputation — outweigh the short-term economic gain.** It also increases the risk of future litigation from residents impacted by noise, traffic, or environmental harms.

In Conclusion

I-52-1 cont.

Lake Forest has a rare opportunity to guide its growth wisely. This parcel is a valuable long-term asset, and rushing to approve a warehouse/factory is short-sighted. A more cost-effective strategy is to **preserve the site for future, environmentally friendly, high-tech opportunities** that bring higher wages, more jobs, less pollution, and a stronger tax base.

I urge the City to reject or defer the proposed project and prioritize future-oriented development that aligns with Lake Forest's long-term vision.

Qiyuan

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QIYAN LIU

Letter Code: I-52
Date: August 22, 2025

Response to Comment I-52-1

This comment, expresses concerns regarding the cost-effectiveness of the proposed Project and states the opinion that the proposed warehouse uses would generate relatively few jobs per square foot, offer low wages, and impose costs on affected communities. The comment recommends that the City reserve the Project site for future higher-value land uses.

The economic benefit of the proposed Project is not required to be analyzed under CEQA, as *State CEQA Guidelines* Section 21082.2(c) limits evaluation of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From:	Jason Y.
To:	Stonich, Amy; EnterpriseProjects
Cc:	Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject:	comments for IPT warehouse project (SCH No. 2024030755)
Date:	Wednesday, August 27, 2025 10:16:38 AM

Dear Ms. Amy Stonich,

I-53-1 My name is Jason Ye, a resident of the Meadows sub-community, which is located in immediate proximity to the proposed IPT Corporate Business Center project.

As a member of the Lake Forest community, I am submitting comments on the Draft Environmental Impact Report (DEIR) (No. 2024030755).

I-53-2 After reviewing the Draft Environmental Impact Report, I have identified significant deficiencies, particularly its failure to adequately address wildfire risks and cumulative impacts in conjunction with adjacent projects. Below, I outline critical issues and recommendations specific to (SCH No. 2024030755), referencing relevant sections of the DEIR.

I-53-3 **1. Misrepresentation of Historical Wildfire Data**
The DEIR's claim that "the project site has no historical fire record" is inaccurate and misleading. According to CAL FIRE's official fire perimeter data, both the 2007 Santiago Fire (CAORC112) and the 2020 Silverado Fire (CAORC215) affected areas in immediate proximity to the project site (coordinates: 33.621°N, 117.713°W). The latter fire burned within 300 meters of the proposed location. This omission constitutes a serious misrepresentation of baseline wildfire risk.

I-53-4 **2. Underestimation of Fire Hazard Zoning**
While the DEIR states the project lies within a Local Responsibility Area (LRA), it fails to acknowledge that the Orange County Fire Authority (OCFA) reclassified this area as an "Extreme Risk Zone" in 2023. Relying solely on CAL FIRE's 2024 map without integrating OCFA's stricter assessment undermines the credibility of the fire risk evaluation and appears intended to bypass mandatory fire prevention measures.

I-53-5 **3. Inadequate Consideration of Fuel Load and Vegetation**
The assertion that the area lacks continuous flammable material is contradicted by satellite imagery, which clearly shows approximately 10 hectares of undeveloped land containing highly combustible eucalyptus groves directly east of the project site. This continuous fuel load significantly increases the risk of fire spread toward the Meadows community and other nearby residences.

I-53-6 **4. Failure to Address Extreme Santa Ana Winds**
The DEIR mentions Santa Ana wind speeds of up to 75 mph but neglects to include recent data from OCFA meteorological stations recording gusts as high as 98 mph in 2023. Underestimating wind speeds—a critical factor in wildfire spread—invalidates the report's conclusions regarding fire safety and evacuation planning.

I-53-7 **5. Non-Compliant Fire Access and Egress Routes**
California Fire Code (CFC) §503.2.1 requires two independent fire access roads for projects of

I-53-7 cont.

this scale. The current proposal depends entirely on a single access route (Enterprise Way), which is insufficient to accommodate large emergency vehicles and violates CFC §503.2.3. This deficiency poses a grave threat to evacuation safety and emergency response effectiveness.

I-53-8

6. Ignoring Cumulative Impacts with Adjacent Projects
Although the DEIR acknowledges the ongoing Western Realco residential development, it fails to assess the compounded wildfire evacuation risks posed by the simultaneous development of both projects. This omission violates California Government Code §51177(f), which requires regional coordination in wildfire risk assessment and mitigation.

I-53-9

Request for Joint Review
Given the proximity and scale of the IPT project and the Western Realco development, I strongly urge the city to evaluate these projects cumulatively rather than in isolation. The current segmented approach underestimates the overall risk to community safety, especially concerning wildfire evacuation and emergency resource allocation.

I-53-10

Conclusion
The DEIR's wildfire risk assessment is fundamentally flawed, incorporating inaccurate data, omitting critical risk factors, and disregarding cumulative impacts. These shortcomings render its "Less than Significant Impact" conclusion invalid and dangerous.

I-53-11

I request that the city:
- Require a revised DEIR that accurately reflects historical fire data, current fire zone classifications, and realistic Santa Ana wind projections.
- Mandate design changes to include a second compliant fire access road.
- Evaluate the IPT project's impact in conjunction with the Western Realco development.
- Submit evidence of data omissions—including CAL FIRE perimeter maps and OCFA wind records—to relevant enforcement agencies.

Thank you for your attention to these urgent concerns. Please confirm receipt of this email and include my comments in the public record for SCH No. 2024030755.

Sincerely,
Jason Ye
8/27/2025

CAUTION: Think Security! This email is not from someone at the City of Lake Forest. **Do not click any links or open any attachments you are not expecting.**

JASON YE

Letter Code: I-53
Date: August 27, 2025

Response to Comment I-53-1

This introductory comment states that the commenter lives in the Meadows community adjacent to the Project site and is transmitting comments on the Draft EIR.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the comments and responses below. No further response is required.

Response to Comment I-53-2

This comment expresses concerns regarding the perceived deficiencies of the Draft EIR with respect to wildfire risks and cumulative impacts, and that more detailed comments are provided below.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-53-3

This comment states the opinion that the Draft EIR inaccurately characterizes the Project site's wildfire history as does not acknowledge two historical fires (the 2007 Santiago Fire and the 2020 Silverado Fire) that burned in the Project site vicinity.

Refer to Response to Comment O-1-10 regarding wildfire risk and emergency evacuation. Though the Draft EIR does not specifically mention the fires cited in this comment, page 4.20-3 of the Draft EIR acknowledges that the City has consistently experienced wildfires from 1970 to 2020, and that CAL FIRE mapping indicates that the Project site is within an area historically prone to wildland fires. However, the Draft EIR's assertion that there have been no recorded fires that have burned onto any portion of the Project site is accurate, as neither the 2007 Santiago Fire nor the 2020 Silverado Fire reached the immediate Project site vicinity or burned onto the Project site. Therefore, the characterization of the Project site's wildfire history is accurate as presented in the Draft EIR. A reference to the 2007 Santiago Fire and the 2020 Silverado Fire has been added to the Final EIR to acknowledge that these fires were included in the fire history review conducted for the proposed project as noted in Section 3, Errata, of this RTC document. As mentioned above, this addition does not change the conclusion of the Draft EIR, nor does it convey information that represents a new impact or impact of greater severity; therefore, recirculation of the EIR is not required.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-53-4

This comment states the opinion that the Draft EIR inaccurately characterizes the Project site's wildfire risk as it does not acknowledge the OCFA's 2023 reclassification of the Project site as within an "Extreme Risk Zone".

This comment does not clarify a source for its claim that OCFA classified the Project site as an "Extreme Risk Zone" in 2023. An online GIS viewer published by OC Public Works on July 12, 2023, classifies the Project site as facing a "very low risk" of wildfire[49].

As described on page 4.20-4 of the Draft EIR, CAL FIRE is responsible for publishing maps that predict the threat of fire for each county within the State. The thresholds utilized in Section, 4.20, Wildfire, of the Draft EIR, which are derived from Appendix G of the *State CEQA Guidelines*, reference CAL FIRE risk classifications (e.g., State Responsibility Area; very high fire severity zone). Further, CAL FIRE's Fire Hazard Severity Zones map was reviewed and adopted by the Orange County Board of Supervisors via Ordinance No. 25-015 on August 26, 2025. Therefore, the analysis of wildfire risks associated with the proposed Project appropriately relies upon CAL FIRE wildfire risk classifications, which classify the Project site as located within a non-VHFHSZ.

As discussed throughout the Draft EIR, coordination with OCFA and other agencies with jurisdiction over the proposed Project is required and would ensure the proposed Project's compliance with applicable fire codes, including provisions for emergency access, fire flow requirements, and fire suppression systems.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-53-5

This comment states the opinion that the Draft EIR inaccurately characterizes the Project site as lacking continuous flammable material due to the presence of undeveloped land containing eucalyptus trees directly east of the Project site, which the commenter states may increase the risk of fire spread toward residential uses.

The "undeveloped land containing eucalyptus trees" referenced in this comment is an area consisting of non-native, ornamental landscaping containing visible irrigation fixtures. While it is acknowledged that vegetation can represent a component of wildfire spread, it should be noted that this vegetation is managed and irrigated, thereby reducing its potential to spread fire. This area would remain as is under the proposed Project and would ultimately be maintained by the property owner, including ongoing vegetation management such as trimming, irrigation, and removal of dead material.

[49] Orange County Fire Severity Map | County of Orange, CA. Accessed October 15, 2025.

Further, the proposed Project is located in an urbanized area of the City, and is located in a non-VHFHSZ as classified by CAL FIRE. As stated above in Response to Comment I-53-4, coordination with OCFA and other agencies with jurisdiction over the proposed Project is required and would ensure the proposed Project's compliance with applicable fire codes, including provisions for emergency access, fire flow requirements, and fire suppression systems. This process would ensure that any vegetation present on site under the proposed Project would be properly assessed and handled to ensure minimal fire risk to the Project site and surrounding areas. It is not required for this review to occur prior to the CEQA process. It is also worth noting that OCFA's Assistant Fire Marshal provided a preliminary review of the proposed Project and noted in correspondence dated December 31, 2024, that the proposed Project would have a less than significant impact on fire protection services.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-53-6

This comment states the opinion that the Draft EIR inaccurately characterizes maximum recorded wind speeds associated with the Santa Ana winds, which, in the opinion of the commenter, invalidates the Draft EIR's conclusions regarding fire safety and evacuation planning.

Page 4.20-3 of the Draft EIR acknowledges that wind can be an important component of a wildfire's ability to spread. Specifically, the Draft EIR notes that the Santa Ana winds can be particularly strong, reaching gusts of up to 75 miles per hour (mph) or higher. Therefore, while 75 mph is provided as an example of a high speed wind gust that could occur under the Santa Ana winds, the Draft EIR acknowledges that wind speeds can reach higher speeds. The wind speed cited in the Draft EIR was not used as a basis for quantitative modeling but rather was provided for the qualitative discussion of the climate conditions most conducive to wildfire danger. The analysis of wildfire risk presented in the remainder of Section 4.20, Wildfire, of the Draft EIR is not affected by the potential for the Santa Ana winds to reach slightly higher speeds than stated in the document. As summarized on page 4.20-13 of the Draft EIR, the proposed Project would result in less than significant impacts related to wildfire.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-53-7

This comment states the opinion that the Project design relies upon a single emergency access route, which, in the opinion of the commenter, violates the California Fire Code and threatens evacuation safety and emergency response effectiveness.

Refer to Master Response 13 and Response to Comment O-1-10 regarding the adequacy of emergency access provided under the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-53-8

This comment states the opinion that the Draft EIR's cumulative impacts analysis is insufficient and violates State law as it does not assess cumulative wildfire evacuation risks of the proposed Project and the related Western Realco Enterprise Way Industrial Project (Projects 1 and 2).

As discussed on page 4.17-16 of the Draft EIR, other past, present, and reasonably foreseeable projects would be required to comply with existing City General Plan goals, policies, and actions; California Fire Code requirements; and standard and emergency OCFA and City requirements to provide project-specific transportation facilities that accommodate pedestrian, bicycle, and vehicle travel and that meet the City's design requirements to avoid increasing hazards due to a geometric design feature and/or ensure adequate emergency access to and within the Project site. In this way, potential transportation impacts would be evaluated and mitigated to a less than significant level by each cumulative project and would not individually contribute to a cumulatively considerable impact on transportation or traffic.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-53-9

This comment requests that the City address their comments by evaluating the proposed Project and the related Western Realco Enterprise Way Industrial Project (Projects 1 and 2) collectively rather than separately and states the opinion that separate evaluations would underestimate community safety risks.

Refer to Response to Comment I-36-4 regarding the Western Realco Enterprise Way Industrial Project (Projects 1 and 2)and Master Response 6 regarding the adequacy of the proposed Project's cumulative impacts analysis. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-53-10

This concluding comment restates the opinion that the wildfire risk assessment presented in the Draft EIR is flawed and invalid.

Specific concerns are described and addressed in detail in the responses above. No revisions are necessary, and no further response is required.

Response to Comment I-53-11

This comment requests that the City address their comments by requiring a revised Draft EIR, mandating changes to the proposed Project's design to address California Fire Code regulations, evaluating the Project's cumulative impacts, and submitting evidence of data omissions to relevant fire protection agencies based on the comments presented above.

Specific concerns are described and addressed in detail in the responses above. No revisions are necessary, and no further response is required.

From: Connie Ding
To: Stonich, Amy; EnterpriseProjects
Cc: Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Formal Comments on the Draft Environmental Impact Report (DEIR) for the IPT Enterprise Business Center LLC Project (SCH#2024030755) and Related Warehouse Projects
Date: Wednesday, August 27, 2025 2:45:11 PM

Dear Ms. Stonich and City of Lake Forest Planning Commission and City Council Members,

I-54-1 As a resident of Lake Forest, I appreciate the City's ongoing commitment to enhancing our community's quality of life. However, I have significant concerns regarding the DEIR for the proposed IPT Enterprise Business Center LLC Project and its related warehouse developments, which together would introduce 48 truck docks near sensitive residential areas.

I-54-2 While the DEIR acknowledges significant and unavoidable vehicle miles traveled (VMT) and greenhouse gas impacts, it fails to address several critical issues pertaining to zoning compatibility, cumulative effects, housing equity, fiscal responsibility, and community welfare—as mandated by the Lake Forest General Plan and state law.

Below are key deficiencies that must be remedied prior to certification of the EIR:

1. Inadequate Analysis of Jobs-Housing Balance and Regional Consistency

The DEIR relies on outdated regional growth projections that do not account for the substantial local employment increase represented by these projects:

I-54-3
- The SCAG forecast anticipates only +1,200 jobs in Lake Forest by 2050, yet this project alone could generate 800–1,200 jobs—nearly the entire regional projected growth.
- The DEIR does not reconcile this discrepancy, thereby invalidating its jobs-housing balance conclusions.
- Under a 1.5 jobs-housing ratio, 1,000 new jobs would require approximately 667 new housing units—25.6% of regional housing growth projections—which the DEIR ignores, thereby underestimating housing demand and potential displacement pressures.

2. Failure to Address Impacts on an Aging Community

I-54-4

Lake Forest's population is older than the county average (46.5% are over 45), yet the DEIR does not analyze how an influx of younger warehouse workers could alter community character, create noise conflicts with senior living facilities, or accelerate gentrification and displacement of fixed-income residents.

3. Non-Compliance with Housing Element Laws

The DEIR violates California Government Code §65583 by:

I-54-5

- Failing to assess the project's effect on affordable housing demand.
- Ignoring the regional need for housing affordable to warehouse workers (earning $39k–$45k annually), who cannot afford Lake Forest's median rent of $3,200/month.
- Omitting analysis of whether the City's Housing Element can accommodate low-income workers attracted by these projects.

4. Incomplete Cumulative Impact Analysis

The DEIR artificially limits the geographic scope of cumulative impacts:

I-54-6

- It excludes three residential projects within a one-mile radius.
- It underestimates traffic and noise impacts by ignoring commuter vehicle trips (estimated at 800–1,200 additional daily car trips) and only focusing on truck traffic.
- Cumulative traffic on Enterprise Way could exceed noise thresholds by 3.3 dBA or more when combined with commuter flows.

5. Misrepresentation of Fiscal and Economic Benefits

I-54-7

The DEIR significantly overestimates public revenue and underestimates long-term public costs:

Fiscal Impact	DEIR Claim	Reality
Property Tax	$54,000/year	Based on inflated valuation; market value closer to $3.2M
Sales Tax	Not disclosed	$0 (warehouses generate no retail sales)
Employment Taxes	Implied benefit	$0 (workers below income tax threshold)
Total Annual Revenue		≤ $55,000 (0.02% of City budget)

I-54-7 cont.

Long-Term Costs		20-Year Total
Road Maintenance	$300,000/year (truck wear)	$6M+
Fire & Safety	$200,000 (initial upgrade)	Recurring costs ignored
Noise Mitigation	Excluded	$30,000 initial + $5,000/year maintenance
Education & Services	Excluded	$10M+ (for new school-age children)
Net Fiscal Outcome		$16M+ DEFICIT over 20 years

Additionally, the opportunity cost of not pursuing higher-value land uses (e.g., R&D parks generating $350,000+ annually) represents a significant lost opportunity for sustainable tax revenue and quality job creation.

6. Worker Commuting and Traffic Realities

I-54-8

I-54-8 cont.

The DEIR ignores the fact that warehouse workers will likely commute from outside Lake Forest due to unaffordable local housing:

- This will generate substantial additional vehicle traffic (not analyzed in the DEIR) through residential streets.
- Peak-hour traffic could increase by 13%, worsening congestion and noise in neighborhoods.

I-54-9

Recommendations for a Credible Revised EIR:

1. Revise the Jobs-Housing Analysis: Model expected worker residence patterns and impacts on regional housing demand.
2. Expand Cumulative Analysis: Include all residential and industrial projects within a 1-mile radius.
3. Address Housing Compliance: Evaluate the project under Government Code §65583 and the Housing Element.
4. Provide Fiscal Mitigation: Require the developer to fund:
    - Road maintenance fees per vehicle mile ($0.12/truck mile)
    - Prepaid fire service and emergency upgrades ($5M)
    - Affordable housing fund ($300K+)
    - Noise mitigation for affected residents
5. Require Local Hiring: Mandate that 50% of jobs be offered to Lake Forest residents.

I-54-10

Without these revisions, the DEIR does not provide an accurate assessment of the project's impacts and risks long-term harm to the community's character, fiscal health, and quality of life.

I urge the City to reject the current DEIR and require a revised analysis that fully and fairly evaluates these critical issues.

Sincerely,

Connie Ding

Lake Forest Resident

CAUTION: Think Security! This email is not from someone at the City of Lake Forest. **Do not click any links or open any attachments you are not expecting.**

CONNIE DING

Letter Code: I-54
Date: August 27, 2025

Response to Comment I-54-1

This introductory comment expresses concerns regarding the Draft EIR for the proposed Project, including the number of truck docks proposed under the Project in combination with the Western Realco Enterprise Way Industrial Project (Projects 1 and 2).

Refer to Master Response 6 regarding the proposed Project's cumulative impacts analysis. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-54-2

This comment states the opinion that while the Draft EIR acknowledges significant and unavoidable VMT and GHG impacts, it does not address zoning compatibility, cumulative effects, housing equity, fiscal responsibility, and community welfare.

Refer to Master Response 7 regarding the proposed Project's impacts related to zoning compatibility, including the Project's effects on community welfare. Refer to Master Response 6 regarding the proposed Project's cumulative impacts. Further, with respect to the comments about housing equity and fiscal responsibility, California Public Resources Code Section 21082.2(c) limits evaluation of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-54-3

This comment states the opinion that the growth projections utilized in the Draft EIR are outdated and do not account for the local employment increase that could result from the proposed Project and the other cumulative industrial warehouse projects, which would, in the opinion of the commenter, render the Draft EIR's jobs-housing balance and housing demand conclusions invalid.

This comment does not provide a source to support the conclusion that the proposed Project could generate between 800 and 1,000 jobs. As discussed in Section 4.14, Population and Housing, page

4.14-7, of the Draft EIR, the proposed Project is anticipated to generate 187 new jobs in the City. This would represent approximately 17 percent of the job growth anticipated in Lake Forest by 2035 and less than 1 percent of the job growth anticipated in Orange County by 2035. Further, based on the City's current unemployment characteristics, it is anticipated that the majority of these positions would be filled by existing City or County residents and would not necessarily result in an influx of new residents. Further, as described in Section 4.14, Population and Housing, page 4.14-5, of the Draft EIR, the City is currently within the jobs-to-housing ratio range recommended by the American Planning Association. According to the 2024–2050 RTP/SCS Growth Forecast Technical Report (SCAG 2024), Lake Forest had a jobs-to-housing ratio of 1.5 in 2019 and is projected to have a jobs-to-housing ratio of 1.4 in 2035 and 2050. The decrease in the jobs-to-housing ratio suggests that the job growth expected in the region will be less than the expected growth in housing. Additionally, all discretionary private development and public works projects within the proposed Project's cumulative study area would be required to evaluate potential impacts on population and housing and implement mitigation measures, as needed. Therefore, the perceived discrepancy described in this comment does not exist.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-54-4

This comment states that, on average, the City has an older population than the County, and expresses concern that the Draft EIR does not analyze the Project's employment of a younger workforce and the associated potential for impacts related to community character, noise, and displacement.

Refer to Master Response 7 regarding the compatibility of the proposed Project on surrounding land uses and community character and Master Response 11 regarding the noise analysis prepared for the proposed Project. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

While senior living facilities are consistent with the definition of sensitive receptors utilized in the Draft EIR, the noise analysis presented in the Draft EIR focuses on the sensitive receptors closest to the Project site, which are most likely to be impacted by potential noise impacts generated by construction and operation for the proposed Project. As stated in Section 4.13, Noise, page 4-13-5 of the Draft EIR, the nearest sensitive receptors to the Project site are single-family homes approximately 82 ft from the Project's eastern boundary line. Given that noise impacts correlate directly with proximity to the noise source, these closer structures can be used as a reference point for structures further from noise-generating activities. In other words, impacts to further buildings from a noise source can be expected to experience fewer noise-related impacts than closer buildings.

As described on page 4.13-18, modeled operational noise levels associated with the proposed Project at the nearest sensitive receptor were determined to be below the City's daytime and

nighttime noise standards, and therefore are considered less than significant noise impacts. Therefore, all other receptors nearby the Project site, including those identified in the comment, would have the same or less exposure and thus also would not be exposed to substantial noise concentrations. This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. The analysis and conclusions presented in the Draft EIR related to noise impacts remain valid, and no revisions are necessary.

As stated on page 4.14-18 of the Draft EIR, under existing conditions, the Project site does not contain any residential uses, and neither construction nor operation of the proposed Project would displace existing residents on site or from the nearby residential areas. Therefore, no displacement impacts would occur that could affect community livability.

Further, California Public Resources Code Section 21082.2(c) limits evaluation of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment. Therefore, the analysis and conclusions of the Draft EIR regarding evaluation of individual impacts remain valid, and no further response is required.

Response to Comment I-54-5

This comment states the opinion that the Draft EIR violates State Housing Element law as it does not include an analysis of the proposed Project's impacts with respect to affordable employee housing.

The law cited in this comment is not applicable to the proposed Project as it governs the preparation of General Plan Housing Element documents rather than EIRs for specific development projects. Further, this comment does not provide a source for the salary and median rent estimates that are provided. Given that the tenant for the Project site has not yet been identified, it would be speculative to establish future Project employee compensation.

As stated above in Response to Comment I-54-3, it is anticipated that the majority of the permanent jobs generated by the proposed Project would be filled by existing City or County residents and would not necessarily result in an influx of new residents. Therefore, it is not anticipated that the proposed Project would result in a substantial increase in housing demand in the City or the County.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-54-6

This comment states the opinion that the geographic scope of cumulative -Projects utilized in the Draft EIR is insufficient as it excludes nearby residential projects and does not account for commuter vehicle trips.

The comment letter does not specifically identify the three residential projects the letter refers to and does not provide evidence to support its assertions that the Project-specific analysis

underestimates traffic and noise impacts. Refer to Master Response 6 regarding the adequacy of the proposed Project's cumulative impacts analysis. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-54-7

This comment states the opinion that the Draft EIR overestimates revenue and underestimates costs associated with the proposed Project and provides estimated financial calculations.

State CEQA Guidelines Section 21082.2(c) limits evaluation of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment. Therefore, the analysis and conclusions of the Draft EIR regarding evaluation of individual impacts remain valid, and no further response is required. It should be noted that the Draft EIR does not identify figures for public revenue and therefore does not significantly overestimate these figures. Furthermore, the comment letter does not provide evidence to support its assertions that the Draft EIR overestimates revenue and underestimates costs associated with the proposed Project.

Response to Comment I-54-8

This comment states the opinion that the transportation analysis presented in the Draft EIR does not account for warehouse employee commutes, which the comment purports could generate additional traffic and noise in the adjacent neighborhoods.

This comment does not provide a source for the assertion that employee trips could increase peak-hour traffic by 13 percent. As discussed on page 17 of the Traffic Impact Assessment prepared for the proposed Project (Appendix J to the Draft EIR), the trip generation of the proposed Project was calculated by applying the trip generation rates for Land Use Code 140 (Manufacturing), Land Use Code 150 (Warehousing), and Land Use Code 710 (General Office Building) from the ITE Trip Generation Manual, 11th Edition (2021). These trip generation rates account for employee commutes. As discussed on page 4.17-10, Section 4.17, Transportation and Traffic, of the Draft EIR, the seven study area intersections are forecast to operate at an acceptable LOS during the a.m. and p.m. peak hours both in Existing (2024) with Project and Opening Year (2027) with Cumulative Projects with Project traffic conditions. Additionally, the Project driveways are forecast to operate at satisfactory LOS (B or better) during both the a.m. and p.m. peak hours. Therefore, the proposed Project would be consistent with the City's LOS threshold for acceptable intersection operations and the traffic analysis in the Draft EIR remains valid.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-54-9

This comment provides a list of recommended revisions to the Draft EIR, including revisions to the existing jobs-housing, cumulative, housing compliance, fiscal mitigation, and employment analyses.

Refer to Responses to Comments I-54-3 through I-54-8 for responses to each specific concern. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-54-10

This concluding comment states the opinion that the Draft EIR provides an inaccurate analysis of the proposed Project's impacts to community character, fiscal health, and quality of life, and requests that their comments be addressed by revising and recirculating the Draft EIR .

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR.

From: Connie Ding
To: Stonich, Amy; EnterpriseProjects
Cc: Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: comments on the Draft Environmental Impact Report (DEIR) (State Clearinghouse No. 2024030755).
Date: Wednesday, August 27, 2025 3:20:25 PM

Dear Ms. Stonich,

My name is Connie Ding, a resident of the Meadows sub-community, which is located in immediate proximity to the proposed IPT Corporate Business Center project. I-55-1

As a member of the Lake Forest community, I am submitting these comments on the Draft Environmental Impact Report (DEIR) for the aforementioned project (State Clearinghouse No. 2024030755).

After a thorough review of the DEIR, I have identified significant and substantial deficiencies that render the document inadequate under the California Environmental Quality Act (CEQA). The analysis fails to adequately address critical risks pertaining to hazardous materials and hydrology/water quality, and it completely omits a required analysis of cumulative impacts in conjunction with adjacent projects. The following comments outline these critical issues with specific references to the DEIR sections. I-55-2

I. Critical Deficiencies in Hazardous Materials Analysis (Section 4.9)

The DEIR's assessment of hazardous materials risks is fundamentally flawed and underestimates significant impacts due to omissions in data collection, analysis, and mitigation planning.

A. Asbestos Handling Omissions (Section 4.9.3.2)

I-55-3

- Deficiency: While the DEIR identifies various Asbestos-Containing Materials (ACM/PACM) in building materials (wallboard, floor glue, acoustic panels, etc.), it fails to provide a specific plan for their abatement, removal, and disposal during demolition.
- Risk: This omission creates a high risk of asbestos fiber release during construction, endangering workers and nearby residents, including children at the adjacent Bella Montessori school. This violates Cal/OSHA Title 8 §1529.
- Recommendation: The DEIR must be revised to include a mandatory Asbestos

Abatement Plan, requiring:

- A pre-construction survey by a DTSC-certified AHERA inspector.
- Controlled removal under negative pressure containment.
- Real-time air monitoring at the site perimeter, particularly downwind toward the school.
- Proper disposal documentation.

B. Inadequate Assessment of Historical Site Contamination

- Liquid Nitrogen Tank Decommissioning (4.9.3.2): The DEIR notes the presence of two idle liquid nitrogen tanks (3,000L and 1,500L) but is silent on whether they will be decommissioned per RCRA standards. There is no requirement for providing documentation (e.g., CUPA Form 30) proving proper cleaning, removal, or closure of these tanks, creating a potential for residual hazardous substance release.
- Historical Pesticide Residues (4.9.3.1): The site's history as an orchard from 1938-1952 indicates a high potential for soil contamination with legacy pesticides (e.g., arsenic, lead, DDT). The Phase I ESA, which serves as the basis for the analysis, failed to recommend targeted soil sampling for these contaminants, a major oversight.
- PCB Risk from Transformers (4.9.3.2): The pad-mounted transformer, installed in 1999, has a known potential to contain Polychlorinated Biphenyls (PCBs). The DEIR does not document compliance with TSCA requirements, such as reviewing equipment labels or oil sample test reports to confirm the absence of PCBs.

I-55-3 cont.

C. Insufficient Emergency Response Planning (4.9.3)

- Deficiency: While the DEIR generically references a Business Emergency Plan (BEP), it lacks crucial specifics, including:
  - On-site emergency material (e.g., spill kits) configuration standards.
  - Frequency of hazardous material spill drills.
  - A real-time communication and coordination mechanism with the Orange County Fire Authority (OCFA).
- Recommendation: A detailed Emergency Response Appendix must be added, co-approved by OCFA, outlining these specific protocols.

D. Wildfire Risk Ignored (Section 4.9.7)

- Deficiency: The conclusion of "Less than Significant Impact" for wildfire is based on an outdated and superficial analysis. It fails to assess:
    1. Combustible Material Storage: The future industrial tenants may store plastics or chemicals (e.g., NFPA 30 Class II liquids), which could violate CBC Chapter 4 fire spacing requirements.
    2. Roofing Material Rating: The DEIR does not specify the fire rating (must be Class A) for new roofing to resist flying embers.
- Recommendation: The fire safety analysis must be revised to include tenant use restrictions and mandatory Class A roofing materials.

I-55-3 cont.

II. Critical Deficiencies in Hydrology and Water Quality Analysis (Section 4.10)

The hydrological analysis is based on outdated, inaccurate, and incomplete data, leading to dangerously flawed conclusions and illegal design proposals.

A. Data Inconsistencies and False Statements (4.10.3)

- Surface Water Flow Path: The DEIR claims runoff flows via Prism Place to Serrano Creek. However, Orange County watershed maps clearly show the project site resides in the Bake Parkway watershed, not the Serrano Creek watershed.
- Groundwater Depth: The DEIR relies on a limited geotechnical investigation stating groundwater is "greater than 30 feet deep." This contradicts 2023 data from OC Water District monitoring well MW12 (800 ft away), which recorded a seasonal high water table at 18 feet.
- Aquifer Recharge Capacity: The DEIR cites a geotechnical report (SC Geotechnical 2021b) to support infiltration designs. However, that same report explicitly states the clay layer has a permeability ($K=1\times10^{-7}$ cm/s) *below* the legal minimum standard for infiltration (1×10^{-6} cm/s) and notes the presence of "desiccation cracks," creating preferential flow paths. Basing an infiltration design on this report is a violation of California Water Code §13142.5.

I-55-4

B. Fraudulent Hydrological Modeling & Illegal Infiltration Design

- Deficiency: The DEIR references a "Preliminary Hydrologic & Hydraulic Report" model that is not provided for review. It does not validate the capacity of the aging (1980s) Bake Parkway storm drain system for a 20-year storm event, which is known to be overloaded.
- Illegal Design: Proposing infiltration basins ("percolation pits") given the site's soil conditions ($K=1\times10^{-7}$ cm/s + cracks) constitutes "willful improper disposal" under Water Code §13350 and violates Water Code §13142.5. This design would create a direct conduit for pollutants to groundwater.
- Recommendation: The infiltration design must be abandoned entirely and replaced with a closed, lined stormwater detention/reuse system.

I-55-4 cont.

C. Failure to Address Known Pollutants and Cumulative Impacts

- Toxic Pollutants: The DEIR admits Serrano Creek is impaired for pesticides like DDT yet proposes Best Management Practices (BMPs) that lack specific controls for these pollutants and new threats like Pyrethroids (added to the Basin Plan in 2023). It also fails to mandate monitoring for industrial roof runoff (e.g., zinc, copper).
- Compound Hazard Risk: The DEIR fails to analyze a cascading disaster scenario where a wildfire in the adjacent Very High Fire Hazard Severity Zone (VHFHSZ) leads to ash debris clogging storm drains, subsequent flooding, and the washout of hazardous materials from the site into the creek. This violates NPDES requirements for extreme event planning.

III. Lack of Cumulative Impact Analysis

The DEIR's most glaring omission is a separate and meaningful analysis of cumulative impacts. The project does not exist in a vacuum. Its potential impacts on traffic, air quality, hazardous material transport, water quality, and wildfire evacuation must be analyzed in combination with other recent, ongoing, and proposed projects in the immediate area. The mere listing of other projects is insufficient under CEQA. A rigorous cumulative impact analysis must be added to the EIR.

I-55-5

Conclusion and Request

I-55-6

The DEIR, in its current form, is inadequate and must be recirculated for public review

pursuant to CEQA Guidelines §15088.5. The significant new information and analysis required to correct the fatal flaws documented above—particularly the hazardous materials handling procedures and the completely reconfigured hydrological design—will alter the conclusions of the EIR and require public scrutiny.

I respectfully request that the City of Lake Forest require the project applicant to:

1. Withdraw the current DEIR.
2. Conduct all necessary supplemental testing (soil, asbestos, PCB, hydraulic modeling).
3. Prepare a revised DEIR that includes:
    - A complete hazardous materials abatement and emergency response plan.
    - A legal and technically sound stormwater management plan.
    - A robust cumulative impact analysis.
4. Recirculate the revised DEIR for a full public comment period.

I-55-6 cont.

Thank you for considering these critical comments. I look forward to your response and the recirculation of a legally sufficient EIR.

Sincerely,

Connie Ding

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CONNIE DING

Letter Code: I-55
Date: August 27, 2025

Response to Comment I-55-1

This introductory comment states that the commenter resides in the Meadows community. The comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. No further response is required.

Response to Comment I-55-2

This comment states the opinion that the Draft EIR contains deficiencies pertaining to its hazardous materials, water quality, and cumulative impact analyses and that, in the opinion of the commenter, undermine the document's validity under CEQA.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-55-3

This comment expresses concerns regarding the hazardous materials analysis presented in the Draft EIR, stating the opinion that the document does not clearly mitigate potentially significant asbestos and emergency response impacts, inaccurately assesses historical site contamination, and provides a deficient wildfire risk analysis. The comment requests that the Draft EIR be revised to address their comments regarding the inclusion of a mandatory Asbestos Abatement Plan, revised fire safety analysis, and a detailed Emergency Response Appendix.

Refer to Master Response 13 regarding hazardous materials and emergency response planning related to the proposed Project and Master Response 4 regarding CEQA mitigation requirements. There is no nexus to require additional mitigation such as an Asbestos Abatement Plan. Therefore, the analysis of geotechnical hazards characteristics presented in the Draft EIR remains valid.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-55-4

This comment expresses concerns regarding the hydrology and water quality analysis presented in the Draft EIR, stating the opinion that the document falsely characterizes the site's surface water flow path, groundwater depth, and aquifer recharge capacity. The comment also states the opinion that the proposed BMPs and infiltration design do not address potential water quality impacts and

requests their comments be addressed by replacing the proposed infiltration design with a closed, lined stormwater system.

It is unclear which maps the commenter referenced to determine that the Project site is located in the Bake Parkway watershed. As shown in Figure 4.10-1 (page 4.10-3), Watersheds and Subwatersheds, of the Draft EIR, the Project site is located within the Upper San Diego Creek Watershed based on mapping data prepared by the California Department of Fish and Wildlife (CDFW). As discussed on page 4.10-1 of the Draft EIR, the San Diego Creek Watershed is approximately 112 square miles in area and is located in parts of Irvine, Aliso Viejo, Laguna Hills, Laguna Woods, Lake Forest, Orange, Santa Ana, and Tustin. Serrano Creek, which serves as the receiving waters for the Project site, is a tributary of San Diego Creek. Therefore, the characterization of the Project site's drainage qualities is accurate as presented in the Draft EIR.

This comment vaguely references data from a specific monitoring well but does not provide a source. The groundwater depth presented in the Geotechnical Report prepared for the proposed Project (Appendix E to the Draft EIR) is primarily based upon Project-specific exploratory borings conducted on the Project site, which are expected to provide a more accurate site-specific characterization of groundwater compared to wells located beyond the Project site. Further, the Geotechnical Report also cited the California State Water Resources Control Board website, GeoTracker, which indicated groundwater levels at the nearest monitoring well (1.37 miles west of the Project site) are approximately 72 feet below ground surface. Therefore, the groundwater conclusions presented in the Draft EIR are supported by multiple sources and can be considered accurate.

As stated on page 4.10-32 of the Draft EIR, the presence of dense engineered fill soils comprised of silty sands and clayey sands result in very poor infiltration characteristics on the Project site. The proposed Project would include design features including three proposed modular wetland systems and the three detention systems, which would be installed concurrently with ground disturbance activities under the proposed Project. The modular wetland systems, in themselves, consist of inlets to capture and treat stormwater runoff. Therefore, the proposed Project's stormwater design features would be appropriately installed to meet treatment criteria and mitigate the peak flow rate leaving the site by approximately 47 percent, meeting the 40 percent reduction as required by the City. The proposed Project is therefore consistent with all applicable provisions of the California Water Code.

Despite this comment's statement that the Preliminary Hydrologic & Hydraulic Report is not provided for review, this document was provided within Appendix G of the Draft EIR.

The Draft EIR identifies appropriate reductions in pollutant loads from all sources through the design features described above so that the receiving waters can maintain/attain the beneficial uses in the Basin Plan. Specifically, the proposed Project's adherence to Regulatory Compliance Measures WQ-1, WQ-2, WQ-3, and WQ-4 is meant to ensure that the proposed Project would not degrade or alter water quality, cause the receiving waters to exceed the water quality objectives, or impair the beneficial use of receiving waters. There is no nexus to require additional mitigation; refer to Master Response 4 regarding the purpose and applicability of mitigation measures under CEQA, the nexus for requiring mitigation, and the specific situations that would constitute deferral of mitigation

measures. Therefore, the analysis of impaired waters characteristics presented in the Draft EIR remains valid, and no revisions are necessary.

Refer to Response to Comment O-1-17 regarding the request to analyze a worst-case scenario, such as a cascading disaster scenario.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-55-5

This comment expresses concerns regarding the cumulative impact analysis presented in the Draft EIR, stating the opinion that the document does not contain a meaningful analysis of potential traffic, air quality, hazardous material transport, water quality, and wildfire evacuation impacts in the context of other cumulative projects. The comment requests their comments be addressed by adding a rigorous cumulative impact analysis to the EIR.

Refer to Master Response 6 regarding the adequacy of the proposed Project's cumulative impacts analysis. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-55-6

This concluding comment restates the opinion that the Draft EIR is inadequate and summarizes the above comments. The comment requests that the City address their comments by requiring the Project Applicant to revise and recirculate the Draft EIR based on updated modeling related to hazards and hydrology.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses above. No further response is required.

From: Connie Ding
To: Stonich, Amy; EnterpriseProjects
Cc: Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: PUBLIC COMMENT ON DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE IPT CORPORATE BUSINESS CENTER PROJECT STATE CLEARINGHOUSE NO. 2024030755
Date: Wednesday, August 27, 2025 3:27:05 PM

Dear Ms. Stonich,

I am writing to submit formal comments on the Draft Environmental Impact Report (DEIR) for the proposed IPT Corporate Business Center project (SCH No. 2024030755). As a resident of the Meadows sub-community, which is in immediate proximity to the project site, I have a vested interest in ensuring the environmental review is thorough, accurate, and protective of our community's health and safety.

My review of the DEIR has identified significant and concerning deficiencies in the Greenhouse Gas (GHG) emissions analysis presented in Section 4.8. These flaws undermine the report's conclusion that the project's climate impacts will be less than significant. I urge the City to require substantial revisions to this section before certifying the Final EIR.

My specific technical objections are outlined below, with references to the relevant sections of the DEIR.

I-56-1

1. Improper and Misleading Amortization of Construction Emissions

The DEIR's treatment of short-term construction emissions is methodologically flawed and minimizes the project's real climate impact. As stated in Table 4.8.B, construction will generate 3,194 MT CO_2e. The decision to amortize these emissions over a 30-year operational period (resulting in an annualized value of 245 MT CO_2e/year) is inappropriate and inconsistent with the urgency of the climate crisis.

- Impact: Amortization artificially dilutes a large, concentrated pulse of emissions into a deceptively small, long-term stream. This obscures the significant short-term atmospheric forcing and climate damage caused by the construction phase. The 30-year amortization period appears to rely on an outdated, unadopted 2008 SCAQMD draft guidance document, which does not reflect current climate science or California's emphasis on achieving rapid, absolute emissions reductions (as detailed in the 2022 Scoping Plan).

- Recommendation: The FEIR must analyze the total, un-amortized construction emissions (3,194 MT CO_2e) as a short-term significant impact and provide robust, verifiable mitigation measures (GHG1) to reduce this figure.

2. Unsubstantiated and Overly Optimistic Operational Emissions Analysis

The conclusion that operational emissions will be below the significance threshold (2,568 MT CO_2e/year unmitigated, 1,714 MT CO_2e/year mitigated) is based on unrealistic assumptions and omits key emission sources.

- Reliance on Unproven Mitigation (GHG2): The analysis assumes 100% renewable electricity procurement but provides no evidence of a executed Power Purchase Agreement or a feasible plan to achieve this from day one of operations in 2026. Given that California's grid will not be 100% carbon-free until 2045, this assumption is speculative and likely overstates emission reductions.
- Incomplete Transportation Analysis: The DEIR significantly underestimates mobile source emissions by focusing only on employee commutes and delivery vehicles (1,030 MT CO_2e/year). It completely ignores Scope 3 supply chain emissions, a critical omission for an industrial project. This includes emissions from inbound raw material shipments and outbound product distribution via heavy-duty trucks. The use of a generic 40-mile trip length for all truck traffic is not project-specific and likely a substantial underestimate.
- Questionable Carbon Sequestration Claims (GHG6): The proposed tree planting is a positive step, but the DEIR fails to quantify the actual carbon sequestration rate. It likely overestimates the carbon sink by crediting the project for the entire lifecycle sequestration potential without accounting for the slow growth rate of young trees, saturation at maturity, and risks from drought, pests, and wildfire.
- Unaccounted Stationary Sources: The claim that the project will use "no natural gas" is contradicted by the inclusion of a 300 HP diesel fire pump and 400 HP of diesel-powered material handling equipment. Their emissions (5.7 MT CO_2e) may be underestimated due to low assumed annual runtime (50 hours).

I-56-1 cont.

3. Inadequate Cumulative Impact Analysis

The DEIR fails to properly evaluate the project's contribution to cumulative regional GHG emissions. Simply stating that the project meets outdated local or per-capita goals is insufficient.

- Impact: The analysis does not assess whether the project's 1,714 MT CO_2e/year represents its "fair share" of the regional carbon budget required to meet SCAG's Connect SoCal plan or California's 2030 and 2045 climate targets. The cumulative impact of this project, combined with other developments in the area, could jeopardize the state's ability to meet its mandated goals.
- Recommendation: The FEIR must contextualize the project's emissions within regional GHG inventories and reduction targets to demonstrate consistency.

4. Use of an Outdated and Inappropriate Significance Threshold

The DEIR's reliance on the SCAQMD's 3,000 MT CO_2e/year threshold is a critical flaw.

I-56-1 cont.

- This threshold originates from an unadopted 2008 draft document and is obsolete. It is designed for general commercial projects, not industrial facilities. For appropriate source categories, SCAQMD has a 10,000 MT CO_2e/year threshold. While the project may still be under this higher threshold, the failure to even discuss the more applicable standard suggests a effort to avoid scrutiny.
- Recommendation: The City must apply the most recent and relevant guidance. The analysis should be revised using a scientifically defensible threshold that aligns with California's current climate policy.

Conclusion and Request

The GHG analysis in the DEIR is fundamentally inadequate. It employs accounting gimmicks, relies on speculative mitigation, omits major emission sources, and uses an outdated threshold to arrive at a pre-determined conclusion of "less than significant impact." This does not satisfy the requirements of CEQA for an accurate, stable, and good-faith analysis.

I strongly urge the City of Lake Forest to require the following revisions in the FEIR:

1. Remove the amortization of construction emissions and analyze them as a distinct,

short-term impact.

2. Provide verified evidence for all mitigation measures, especially the 100% renewable energy claim.
3. Conduct a complete analysis that includes all supply chain (Scope 3) emissions from industrial activities.
4. Quantify the projected carbon sequestration from landscaping with realistic growth models.

I-56-1 cont.

5. Re-evaluate the project's significance using a current, scientifically valid emissions threshold.
6. Include a climate vulnerability assessment evaluating risks to the project from wildfire, heat, and other climate hazards.

Thank you for considering these detailed comments. I request that these concerns be addressed substantively in the FEIR and that my name be included on the list of interested parties for this project.

Sincerely,

Connie Ding
Resident of Lake Forest

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CONNIE DING

Letter Code: I-56
Date: August 27, 2025

Response to Comment I-56-1

This comment states the opinion that the Draft EIR contains deficiencies pertaining to its GHG emissions analysis, including amortization of construction emissions, operational emissions assumptions, cumulative impacts, and significance thresholds. The comment urges the City to require substantial revisions to the Draft EIR's GHG emissions analysis based on the comments raised in this letter prior to certification.

Refer to Master Response 10 regarding the proposed Project's impacts related to GHG emissions. In addition, for purposes of the GHG analysis conducted for the proposed Project, the amortization of construction emissions was over an assumed 30-year project horizon and is consistent with guidance released by SCAQMD[50]. The GHG operational emissions estimates were prepared in accordance with air district guidance using CalEEMod and therefore are not unsubstantiated and overly optimistic. Refer to Master Response 6 regarding the adequacy of the cumulative analysis prepared for the proposed Project. A cumulative analysis for GHG was conducted and included in Section 4.8.7, pages 4.8-20 through 4.8-21 of Section 4.8, Greenhouse Gas Emissions, of the Draft EIR and appropriately relied on adopted thresholds for determining the level of significance. Furthermore, the GHG analysis used a more conservative threshold for determining significance in order to present a conservative approach to analysis. Using a higher threshold would not change the conclusion of the analysis. Preparation of a climate vulnerability assessment is not required under CEQA. The EIR appropriately addresses the checklist questions in Appendix G of the *State CEQA Guidelines*.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

[50] The SCAQMD has identified the average operational lifespan of buildings to be 30 years. SCAQMD. 2008. Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf (accessed June 2025).

From: Connie Ding
To: Stonich, Amy; EnterpriseProjects
Cc: Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Formal Comments on Draft EIR for IPT Corporate Business Center Project (SCH No. 2024030755)
Date: Wednesday, August 27, 2025 3:32:04 PM

Dear Ms. Amy Stonich,

I am writing to submit formal comments on behalf of myself and other concerned residents regarding the Draft Environmental Impact Report (DEIR) for the proposed IPT Corporate Business Center project (State Clearinghouse No. 2024030755). As a resident of the Meadows sub-community, which is in immediate proximity to the project site, I have significant concerns about the adequacy and accuracy of the DEIR's analysis, particularly pertaining to hydrological data, flood risk, groundwater impacts, and procedural compliance.

Below, I outline critical deficiencies in the DEIR and provide recommendations for necessary revisions and additional analysis.

I-57-1

1. Outdated Hydrological Standards (WQ4)

The DEIR relies on the 1986 Orange County Hydrology Manual, which has been superseded by the 2017 edition that incorporates climate change models. This outdated reference artificially lowers flood design standards and fails to account for recent extreme weather events, such as the 2023 storm season.

- Recommendation: The DEIR must be updated to adhere to the 2017 Orange County Hydrology Manual, and all hydrological calculations must integrate climate change projections as required by current state and county guidelines.

Additionally, the flood control standard cited in the DEIR (controlling runoff increases for a 2-year storm event) violates California's AB 1279 (2023), which mandates the use of a 100-year storm event for design purposes.

- Recommendation: All drainage and flood control designs must be reevaluated using a

100-year storm event standard as required by AB 1279.

2. Groundwater Impact Analysis (Threshold 4.10.2)

The DEIR incorrectly asserts that the project will have "no impact" on groundwater recharge, despite the project's impervious surface coverage exceeding 85%. This conclusion is unsupported and violates the California Sustainable Groundwater Management Act (SGMA §10727), which requires the submission of a quantitative groundwater impact report.

- Recommendation: A detailed groundwater numerical model must be prepared and included in the EIR to accurately assess the project's impact on local aquifer recharge.

I-57-1 cont.

3. Flood Risk Misrepresentation (Thresholds 4.10.3–4.10.4)

The project is located within FEMA Flood Risk Zone AE17 (San Diego Creek Floodplain), yet the DEIR claims there will be "no impact on flood flow directions." This constitutes a severe oversight and misrepresentation of geographic facts.

Furthermore, the DEIR fails to analyze sea-level rise and climate change-induced flooding, as projected by NOAA (2050 regional flood risk increase of 40%).

- Recommendation: The DEIR must incorporate FEMA's latest Flood Insurance Rate Map (FIRM Panel 06059C0337K) and include a climate resilience assessment that addresses future flood risks.

The DEIR also omits an evaluation of chemical storage areas situated below the 10-foot flood elevation, which violates Clean Water Act §402(j).

- Recommendation: All chemical storage and industrial areas must be evaluated for compliance with federal and state flood pollution control regulations.

4. Procedural Violations and Lead Agency Overreach

The City of Lake Forest improperly assumes the role of Lead Agency despite the project's impacts extending beyond jurisdictional boundaries—specifically, affecting the San Diego Creek watershed. This violates Public Resources Code §21067, which requires a regional or state-level agency (such as the Santa Ana Regional Water Quality Control Board) to serve as Lead Agency for projects with cross-jurisdictional impacts.

- Recommendation: The California Natural Resources Agency should assume the role of Lead Agency, or alternatively, the Santa Ana Regional Water Quality Control Board should be designated.

The public participation process is also flawed. The use of a non-dedicated email address (EnterpriseProjects@lakeforestca.gov) for multiple development projects violates CEQA Guidelines §15087, which requires a dedicated contact channel for each project.

I-57-1 cont.

- Recommendation: A project-specific contact point must be established, and all public comments must be formally addressed and incorporated into the final EIR.

5. Inadequate Analysis of "Worst-Case Scenarios"

The DEIR fails to assess worst-case scenarios, such as a 100-year storm coinciding with an earthquake event, or wildfire combined with high winds. This violates CEQA Guidelines §15126.2(a)(1).

- Recommendation: The DEIR must include quantitative modeling of cumulative and extreme event scenarios, including climate change impacts.

6. Water Supply and Hazardous Waste Misclassification

The DEIR claims sufficient water availability despite the project's cooling system requiring 5,000 gallons per day. This contradicts the Orange County Water District's 2024 drought alert (OCWDALERT06/2024), which mandates a 40% reduction in industrial water use.

- Recommendation: A drought-year contingency plan must be prepared per California Water Code §106.5.

The project will generate Class III hazardous waste (solvent waste fluids) but misclassifies it as "general solid waste." This violates Health and Safety Code §25123.3, which requires specialized permits for hazardous waste exceeding 100 kg per month.

- Recommendation: All hazardous waste must be correctly classified, and the project must obtain the necessary permits from the Department of Toxic Substances Control.

Urgent Legal and Regulatory Actions Required

Given the severity of the deficiencies, the following actions are urgently recommended:

1. Submit a complaint to the California State Water Resources Control Board for intentional misuse of hydrological standards (Water Code §13385).
2. Request FEMA data review using FIRM Panel 06059C0337K to confirm the project's location within AE17.
3. File a citizen lawsuit under Clean Water Act §505 for failure to disclose flood pollution risks.
4. ** Petition the Natural Resources Agency** to revoke the City of Lake Forest's Lead Agency status under PRC §21167.1.
5. Seek an injunction under Code of Civil Procedure §526a to enforce dedicated public participation channels.

I-57-1 cont.

Conclusion

The DEIR, in its current form, is fundamentally inadequate and fails to comply with state and federal regulations. Approval of the project based on this document would expose the City of Lake Forest to significant legal liability, including civil penalties, criminal prosecution, and loss of FEMA flood insurance eligibility.

We urge you to address these issues comprehensively and revise the DEIR accordingly. We

expect a detailed response to each of the points raised above and request that the public comment period be extended to allow for adequate review of any supplemental materials.

I-57-1 cont.

Thank you for your attention to this matter.

Sincerely,
Connie Ding
Resident of the Meadows Sub-community
Lake Forest, CA 92630

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CONNIE DING

Letter Code: I-57
Date: August 27, 2025

Response to Comment I-57-1

This comment states the opinion that the Draft EIR contains deficiencies pertaining to its hydrology and water quality analysis, including hydrological standards, groundwater impact analysis, flood risk, Lead Agency overreach, worst-case scenario analysis, water supply and drought, and hazardous waste. The comment requests that the Draft EIR be revised to address their comments by including updated hydrological standards and calculations, reevaluating drainage and flood control designs, quantitative groundwater analysis, accurate flood risk analysis, compliance with federal and state flood pollution control regulations, an updating Lead Agency, quantitative modeling of cumulative and extreme event scenarios, a drought-year contingency plan, and classified hazardous waste. The comment also recommends various legal actions to address their comments regarding their claims of law violations and requests an extension of the public review period.

This comment's mention of the Orange County Hydrology Manual appears to reference Regulatory Compliance Measure WQ-4, as presented on page 4.10-40, in Section 4.10, Hydrology and Water Quality, of the Draft EIR. As stated in this measure, the Project Applicant shall "submit and obtain approval of the Final Hydrology and Hydraulic Analyses to the Lake Forest Director of Public Works, or designee, and the Orange County Flood Control District (OCFCD). The Final Hydrology and Hydraulic Analyses shall be prepared consistent with the requirements of the Orange County Hydrology Manual (Orange County Environment Agency 1986) and Orange County Hydrology Manual Addendum No. 1 (Orange County Environment Agency 1996), or subsequent guidance manuals". This measure's reference to "subsequent guidance manuals" encompasses future updates to the referenced documents, including the Orange County Hydrology Manual. Further, it should be noted that the OC Public Works website (https://ocip.ocpublicworks.com/service-areas/oc-infrastructure-programs/ documents-maps/online-manuals) still lists the 1986 Orange County Hydrology Manual and its 1996 Addendum and does not list any 2017 update.

As stated in Response to Comment I-49-7, a Project-specific Hydrology Report is included as Appendix F to the WQMP prepared for the proposed Project (Appendix G to the Draft EIR). As discussed on page 3 of the Hydrology Report, the peak flow rates for the 100-year, 24-hour storm event for the existing condition is 37.97 cubic feet per second (CFS). Peak flow rates under the proposed Project would be 47.37 CFS without mitigation and 21.50 CFS with mitigation. Therefore, with mitigation, the peak flow rate under the proposed Project would be less than the existing condition. Therefore, the Draft EIR appropriately analyzes the 100-year storm event cited in this comment.

This comment incorrectly states the Draft EIR's significance conclusion related to groundwater recharge (Threshold 4.10.2 in the Draft EIR) as "no impact". As stated on page 4.10-31 of the Draft EIR, the conclusion reached was "less than significant impact", based on substantial evidence provided in the Geotechnical Investigation and the Infiltration Report prepared for the proposed Project (Appendix E to the Draft EIR). On-site infiltration rates provided in the Infiltration Report indicate that soils underlying the Project site are not conducive to infiltration. Therefore, the Project

site is not a significant source of groundwater recharge, and the proposed Project would not substantially interfere with groundwater recharge even with the proposed impervious surfaces.

As discussed on page 4.10-34 of the Draft EIR, according to FEMA FIRM No. 06059C0316J, the Project site is located in Zone X, which is identified as an area of minimal flood hazard. Therefore, the Draft EIR accurately characterizes flood risk at the Project site under reasonably foreseeable conditions, and no evaluation of chemical storage areas below the 10-foot flood elevation are required. Further, given the Project site's distance to the Pacific Ocean (more than 10 miles), the Project site is not subject to sea-level rise.

As defined by *State CEQA Guidelines* Section 15367, "Lead Agency" means the public agency which has the principal responsibility for carrying out or approving a project. Therefore, the City of Lake Forest is appropriate as the Lead Agency for the proposed Project. *State CEQA Guidelines* Section 15381 defines Responsible Agencies as public agencies other than the Lead Agency that will have discretionary approval power over the project or some component of the project, including mitigation. As listed in Table 3.A (page 3-21) of the Draft EIR, SWRCB is considered a Responsible Agency for the proposed Project and will conduct a review accordingly.

State CEQA Guidelines Section 15087(c)(2) states that the Lead Agency is required to disclose the "manner in which the lead agency will receive those [public] comments", but does not require a singular contact channel for individual projects. Consistent with CEQA requirements, the City disclosed the manner in which comments could be provided by the public on the proposed Project. Therefore, the proposed Project complies with applicable public participation requirements under CEQA.

Refer to Response to Comment O-1-17 regarding the analysis of worst-case scenarios, and refer to Master Response 1 regarding the CEQA requirements for the public review period for the proposed Project.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From:	Connie Ding
To:	Stonich, Amy; EnterpriseProjects
Cc:	Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject:	FORMAL COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT (SCH# 2024030755) FOR THE IPT CORPORATE BUSINESS CENTER PROJECT
Date:	Wednesday, August 27, 2025 3:51:32 PM

Dear Ms. Stonich,

I am writing to submit formal comments on the Draft Environmental Impact Report (DEIR) for the proposed IPT Corporate Business Center project (State Clearinghouse No. 2024030755). As a resident of the Meadows community, which is in immediate proximity to the project site, I have reviewed the DEIR and identified significant deficiencies that render it inadequate and non-compliant with the California Environmental Quality Act (CEQA). My primary concerns relate to the flawed analysis of greenhouse gas (GHG) emissions and the inadequate assessment of hazards and hazardous materials.

I-58-1

1. Deficiencies in Greenhouse Gas Emissions Analysis (Section 4.8)

The DEIR's treatment of GHG emissions is fundamentally flawed and fails to comply with CEQA requirements.

- Inadequate Threshold of Significance (Section 4.8.2): The DEIR incorrectly concludes that the project's GHG impacts are "significant and unavoidable" solely based on a generic conflict with the 2022 Scoping Plan. This is a legal conclusion, not an analysis, and it abdicates the lead agency's responsibility to properly evaluate project-specific impacts.

I-58-2

- Ineffective and Insufficient Mitigation (Mitigation Measure GHG-1): The proposed mitigation measure—installing four electric truck charging stations—is profoundly inadequate. It fails to:
  - Mandate a timeline for implementation, meaning the charging stations could be indefinitely delayed, rendering the mitigation entirely ineffective.
  - Address embodied carbon and operational energy use from the project's construction and ongoing energy consumption for industrial-scale cooling and lighting, which typically constitutes over 80% of a building's carbon footprint.

- Comply with existing law, specifically Assembly Bill 970, which requires non-residential buildings to equip at least 35% of parking spaces with EV charging infrastructure by 2025. The proposal for only four stations falls far short of this mandate.

- Illegal "Significant and Unavoidable" Finding: By admitting the project conflicts with state climate goals and proposing only a token, unenforceable mitigation measure, the DEIR violates CEQA (§15091), which requires that all feasible mitigation measures be adopted to substantially lessen significant impacts. The conclusion is a self-serving contradiction designed to fast-track approval rather than enforce compliance.
- Inadequate Cumulative Impact Analysis: The DEIR fails to quantify the project's incremental contribution to cumulative GHG impacts when combined with other projects, such as the adjacent Western Realco development. It does not provide a calculation of increased Vehicle Miles Traveled (VMT) or other emissions, thereby violating CEQA Guidelines §15064(h)(1) and §15130, and failing to satisfy the requirements of Public Resources Code §21083.05(b).

I-58-2 cont.

2. Deficiencies in Hazards and Hazardous Materials Analysis (Section 4.9)

The analysis of hazards and hazardous materials contains material misrepresentations and omissions.

- Failure to Disclose Hazardous Materials Use (Sections 4.9.1, 4.9.2): The DEIR conveniently omits any discussion of the hazardous materials (e.g., industrial lubricants, solvents, batteries) that will inherently be used, stored, and transported by tenants of an industrial business park. This constitutes a critical failure to disclose known information. The report must provide:
  - An inventory of types and quantities of materials to be stored.
  - A detailed emergency response plan for spills or accidents.
  - A risk assessment for transportation routes, as required by the California Health and Safety Code §25500 et seq. (CUPA requirements).
- Misrepresentation of Proximity to Schools (Section 4.9.3): The DEIR's assertion that the project is "not located within 1/4 mile of any school" is factually incorrect. Publicly available mapping data shows:

I-58-3

- Lake Forest Elementary School is approximately 0.3 miles (480 meters) from the project boundary.
- Saddleback Valley Christian School is approximately 0.2 miles (320 meters) from the project boundary.

I-58-3 cont.

This misrepresentation is a serious error that undermines the entire analysis of public safety risks and requires immediate correction and recirculation of the DEIR.

- Procedural Failure in Hazardous Site Screening (Section 4.9.4): The DEIR provides only a subjective assertion that the site is not listed on a hazardous materials database. It fails to include the mandatory documentation from the Department of Toxic Substances Control (DTSC) required under Government Code §65962.5 (Cortese List). This is a procedural violation that must be remedied.

Summary of Legal Vulnerabilities

DEIR Section	Deficiency Nature	Legal Consequence
GHG-1	Infeasible & Unenforceable Mitigation	Violates CEQA §21081(a); precedent: *Communities for a Better Environment v. SCAQMD*
4.9.3	Factual Misrepresentation	Undermines CEQA's integrity; potential violation of Penal Code §118 (perjury)
4.9.4	Procedural Violation	Violates Gov. Code §65962.5; DTSC enforcement possible under HSC §25187

I-58-4

Recommended Actions

For the DEIR to comply with CEQA, the following actions are imperative:

1. Immediately withdraw and recirculate the deficient DEIR for public review after the required analysis has been competently completed.
2. Mandate a complete and lawful GHG analysis that utilizes the CalEEMod model per the 2023 CEQA GHG Technical Advisory, demonstrates compliance with the Scoping Plan, and proposes legally binding and quantifiable mitigation measures.

I-58-4 cont.

3. Correct all factual errors regarding school proximity and provide a certified, third-party survey to confirm distances.
4. Conduct a full hazardous materials disclosure, including DTSC database screening documentation, a tenant material inventory, and a detailed emergency response plan that addresses risks to the nearby schools.
5. Perform a quantified cumulative impacts analysis for GHG emissions and other related areas.

I-58-5

The deficiencies in this DEIR extend beyond mere technical oversights; they represent a pattern of obfuscation and non-compliance with CEQA. Approval of the project based on this legally inadequate document will invite litigation from community and environmental organizations under statutes such as Public Resources Code §21168.9. I strongly urge the City to fulfill its role as a responsible lead agency by addressing these critical flaws before proceeding any further.

Thank you for considering these comments. I request to be notified of all future public hearings and of the final certification of the EIR.

Sincerely,

Connie Ding
Resident of The Meadows Community, Lake Forest

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CONNIE DING

Letter Code: I-58
Date: August 27, 2025

Response to Comment I-58-1

This introductory comment expresses concerns regarding the Draft EIR for the proposed Project, particularly related to the document's analysis of GHG emissions and hazards and hazardous materials analyses.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-58-2

This comment states the opinion that the Draft EIR uses inadequate thresholds of significance, insufficient mitigation, makes illegal significance findings, and presents an inadequate cumulative impact analysis related to GHG emissions.

Refer to Master Response 10 regarding the proposed Project's impacts related to GHG emissions, Master Response 4 regarding the adequacy of the proposed mitigation for the Project under CEQA, and Master Response 6 regarding the adequacy of the cumulative analysis conducted for the proposed Project. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-58-3

This comment raises concerns regarding the hazards and hazardous materials analysis presented in the Draft EIR, stating the opinion that the document does not disclose hazardous materials use, misrepresents proximity to schools, and does not include mandatory Cortese List documentation.

Refer to Master Response 13 regarding hazardous materials associated with the proposed Project. It should be noted that Phase I ESA (Appendix F of the Draft EIR) included Cortese List documentation. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-58-4

This comment states the opinion that the Draft EIR is subject to legal vulnerabilities, including infeasible and unenforceable mitigation (*State CEQA Guidelines* Section 21080[a)]), factual misrepresentation (potential perjury under Penal Code Section 118), and procedural violation (Section 65962.5 of the California Government Code, and Section 25187 of the California Health and Safety Code) and requests their comments be addressed by revising and recirculating the Draft EIR.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. No further response is required.

Response to Comment I-58-5

This concluding comment restates the opinion that the Draft EIR is not compliant with CEQA and that approval of the proposed Project could result in litigation. The comment urges the City to address the items discussed in this comment letter prior to proceeding with the proposed Project, and requests notification of future hearings.

Residents who have requested to be added to the Project notification list will be notified of future public hearing(s) for the proposed Project, at which time verbal comments can be made by members of the public.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses above. No further response is required.

From:	Connie Ding
To:	Stonich, Amy; EnterpriseProjects
Cc:	Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject:	comments on the Draft Environmental Impact Report (DEIR) (State Clearinghouse No. 2024030755).
Date:	Wednesday, August 27, 2025 4:12:22 PM

Dear Ms. Amy Stonich,

My name is Connie Ding, a resident of the Meadows sub-community, which is located in immediate proximity to the proposed IPT Corporate Business Center project.

As a member of the Lake Forest community, I am submitting comments on the Draft Environmental Impact Report (DEIR) (State Clearinghouse No. 2024030755).

I-59-1

After reviewing the Draft Environmental Impact Report (DEIR), I believe it contains significant deficiencies, particularly its failure to assess the cumulative impacts of this project combined with two adjacent projects on residents. I request that this project be evaluated jointly with the other two projects.
Below, I outline critical issues and recommendations specific to SCH No. 2024030755, referencing relevant sections of the DEIR.

Thank you for your time.

Please confirm receipt of this email at your earliest convenience.

1. Traffic & Air Quality (Section 4.3 Air Quality)

Truck Traffic Impacts: The project anticipates 78 daily truck trips (792 total trips), but it lacks analysis of existing congestion on roads like Enterprise Way and Bake Parkway. Impacts on nearby residential areas (e.g., Meadows and senior housing) from noise and diesel emissions are unaddressed.

I-59-2

Inadequate CO "HotSpot" Analysis: The report claims no CO hot spots but provides no traffic flow data or simulations to support this, especially during peak hours.
Health Risks Underestimated: The cancer risk (0.36 per million) is below thresholds but ignores long-term cumulative effects or risks to sensitive groups (children, elderly).

2. Construction Phase (Section 2.8 Project Construction)

Dust Control: The project involves 8,889 tons of demolition material and 13,373 cubic yards of earthwork. Standard measures (e.g., watering) are mentioned, but no monitoring plan or frequency is specified, risking PM10/PM2.5 exposure to homes 85 feet away.

I-59-3

Saturday Construction Allowed (7:00 AM–8:00 PM): Noise impacts on residents are unassessed. Stricter limits may be needed.

3. Land Use Compatibility (Sections 1.0 & 2.2)

I-59-4

Industrial-Residential Conflict: The Meadows Residential Development (east of the site) faces

potential harm from nighttime truck noise and industrial activity. No mitigation details are provided.

I-59-4 cont.

Alternate Plan Flaws: Reducing warehouse space (155,803 → 50,803 sq ft) to add manufacturing (105,000 sq ft) may increase pollution/traffic, but this is unanalyzed.

4. Infrastructure & Drainage (Section 2.6)

I-59-5

Stormwater System: Three wetland modules will handle 68% of runoff, but capacity for extreme rainfall is undocumented, raising flood risks.

Aging Sewer Line: Reliance on an existing 8-inch VCP pipe without assessing its condition or upgrade needs is risky.

5. Sensitive Receptors (Section 4.3.c)

I-59-6

Proximity to Homes/Schools: Residential areas (85 feet) and Bella Montessori School (733 feet) lack adequate buffers. Noise/vibration impacts are unquantified.

Worker Health Risks: Cancer risk for CRC Cloud workers (0.11 per million) ignores cumulative effects from nearby projects.

6. Missing Emergency Plans

I-59-7

Fire/Chemical Spills: No details on hazardous materials storage, emergency response (e.g., OCFA coordination), or worst-case scenarios (e.g., lithium battery fires).

7. Data Inconsistencies

I-59-8

Outdated Construction Timeline: Air quality modeling uses 2022 data, but construction was delayed to 2023/24. Updated emissions standards may not apply.

8. Undisclosed Pollution Risks (Historical Site Use)

Electronics Manufacturing Legacy: Panasonic Avionics may have left lead, cadmium, or chromium in soil/groundwater (e.g., solder, plating residues).

Asbestos & Lead Paint: The 1999-built structure likely contains these materials. No testing or abatement plans are noted.

I-59-9

Underground Storage Tanks (USTs): Potential leaks of fuels/solvents (e.g., TCE) are uninvestigated. Phase I ESA is absent.

Recommendations:

Conduct Phase I ESA to review Panasonic's chemical use/waste records.

Pre-construction testing for heavy metals/VOCs in soil.

Include emergency cleanup budgets for unexpected contamination.

9. Loading Dock Overcapacity & Hidden Risks

23 Docks for 165,803 sq ft Warehouse is excessive (typical: 2–4 docks per 100,000 sq ft). Suggests high-intensity use (e.g., 24/7 logistics).

I-59-10

Undisclosed Tenants: Potential hazardous materials (e.g., batteries, chemicals) could require DTSC permits. No emergency plans for nighttime incidents.

Traffic Underestimation: PCE-adjusted truck traffic (194 trips/day) may worsen intersection LOS (e.g., Dimension Drive/Lake Forest Drive).

Recommendations:

Disclose tenant types (e.g., hazardous materials users).

Limit nighttime dock activity (e.g., 50% capacity after 11 PM).

Independent traffic simulation for peak dock usage.

10. Worst-Case Scenarios: A Looming Catastrophe

If the warehouse stores lithium batteries or chemicals:

I-59-11

Fire/Explosion:
Lithium fires reach 1,000°C+, emitting toxic HF gas. OCFA lacks specialized suppression.
Evacuation failure: Toxic plumes could reach homes/schools in 5 minutes (per SCAQMD models).
Traffic Gridlock = Delayed Emergencies:
Bake Parkway's LOS F congestion + 200+ trucks could block first responders (8-minute delays vs. 4-minute gold standard).
Legal Violations:
CEQA requires hazard disclosure (§15126.2). Developer's "unknown tenant" claim may violate AB 2061 (1,000-ft battery warehouse buffer; this site is 733 ft from schools).

I-59-12

Conclusion: The DEIR's omissions on cumulative impacts, hazardous materials, and emergency preparedness are unacceptable. We urge:

Immediate Phase I ESA and updated traffic/air modeling.
Public hearings to address community concerns.

Sincerely,
Connie Ding
Resident, The Meadows at Lake Forest

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CONNIE DING

Letter Code: I-59
Date: August 27, 2025

Response to Comment I-59-1

This introductory comment expresses concerns regarding the adequacy of the Draft EIR. Specifically, the comment states the opinion that the cumulative impact analysis presented in the Draft EIR is inadequate and requests that their comments be addressed by evaluating the proposed Project in conjunction with the Western Realco Enterprise Way Industrial Project (Projects 1 and 2).

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-59-2

This comment expresses concerns regarding the operational impact analysis presented in the Draft EIR, stating the opinion that the Draft EIR does not address operational air and noise pollution associated with truck traffic and presents an inadequate analysis of CO hotspots and long-term health risks.

Refer to Master Response 8 regarding the transportation analysis conducted for the proposed Project, which includes an analysis of existing conditions, Response to Comment O-1-4 and Master Response 9 regarding the proposed Project's impacts related to air quality and associated health risks, and Master Response 11 regarding the proposed Project's impacts related to noise. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-59-3

This comment expresses concerns regarding the construction impact analysis presented in the Draft EIR, stating the opinion that the Draft EIR does not include a monitoring plan related to construction-period dust control measures and does not address construction-period noise impacts to nearby residential neighborhoods.

As discussed under Threshold 4.3.2, starting on page 4.3-24 of Section 4.3, Air Quality, of the Draft EIR, the proposed Project would be required to comply with SCAQMD's Rule 403, which requires the prevention, reduction, or mitigation of fugitive dust emissions from a project site during construction. Under Rule 403, the proposed Project would adhere to best available control measures as feasible, including adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers, and/or ceasing all activities. Further specificity would

be provided during the construction permitting phase, during which specific plans and procedures would be outlined in collaboration with the contractor(s), once known, and approved by the City, and other applicable agencies. In addition, as discussed under Threshold 4.13.1, starting on page 4.13-17 of Section 4.13, Noise, of the Draft EIR, during construction, noise would not exceed the daytime construction noise level threshold of 80 dBA L_{eq} at any receiver location. Compliance with Regulatory Compliance Measure (RCM) NOI-1 would ensure that construction activities would only occur during the allowed hours within the City's Municipal Code.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-59-4

This comment expresses concerns regarding the land use and alternatives analysis presented in the Draft EIR, stating the opinion that the proposed Project would result in a land use conflict with adjacent residential communities without mitigation and that the Reduced Project Alternative may increase pollution and traffic.

Refer to Master Response 7 regarding the proposed Project's compatibility with surrounding land uses and Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-59-5

This comment expresses concerns regarding the infrastructure and drainage analysis presented in the Draft EIR, stating the opinion that the document does not analyze an extreme rainfall scenario and relies on an existing stormwater conveyance pipe without assessing its condition.

Refer to Response to Comment I-20-5 regarding the Draft EIR's analysis related to extreme rainfall events and stormwater conveyance pipe conditions. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-59-6

This comment expresses concerns regarding the sensitive receptor analysis presented in the Draft EIR, stating the opinion that the proposed Project does not include adequate buffers near residential areas and schools and the document does not quantify noise, vibration, and cumulative cancer risk impacts.

Refer to Response to Comment O-1-4 and Master Response 11 regarding the potential air quality and noise impacts from the proposed Project, respectively. Therefore, potential air quality and noise impacts of the proposed Project would not significantly impact nearby sensitive receptors. There is no nexus to require additional mitigation such as buffers; refer to Master Response 4 regarding the adequacy of the proposed mitigation for the Project under CEQA. Refer to Master Response 9 regarding the proposed Project's impacts related to health risks, including cancer. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-59-7

This comment expresses concerns regarding the fire and chemical spill analysis presented in the Draft EIR, stating the opinion that the document does not provide details about hazardous materials, emergency response, and worst-case scenarios.

Refer to Master Response 13 for a detailed response regarding the potential for spillage of hazardous materials on the Project site and emergency response associated with the proposed Project. Refer to Response to Comment O-1-17 regarding the requirements for an analysis of a "worst case" scenario. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-59-8

This comment expresses concerns regarding the construction timeline utilized in the Draft EIR, stating the opinion that the document's air quality modeling data may be based on outdated emissions standards.

Refer to Response to Comment O-1-4 regarding the adequacy of the air quality modeling data used for the proposed Project. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more

severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-59-9

This comment expresses concerns regarding the hazardous conditions analysis presented in the Draft EIR, stating the opinion that the Project site may contain hazardous remnants in groundwater, asbestos and lead paint in building materials, and underground storage tanks. This comment recommends the preparation of a Phase I ESA and pre-construction testing for heavy metals/VOCs in soil.

A Phase I ESA was prepared for the proposed Project and was included as Appendix F to the Draft EIR. The Phase I ESA did not identify any recognized environmental conditions (RECs) at the Project site. Refer to Master Response 13 regarding hazardous materials associated with the proposed Project. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-59-10

This comment expresses concerns regarding the number of proposed docks, stating the opinion that the number is excessive and the uncertainty of future tenants could result in hazardous materials incidents and cause intersection LOS to worsen. The comment recommends the disclosure of tenant types, limiting of nighttime dock activity, and preparation of independent traffic simulations for peak dock usage.

Refer to Response to Comment O-1-10 regarding tenant uncertainty associated with the proposed Project and Master Response 13 regarding emergency access and evacuation Master Response 8 discusses the adequacy of, and methodology used, for the transportation analysis. In addition, as explained in the "Project Trip Generation" section of the Project TIA (Appendix J of the Draft EIR), the Project trip generation is based on the proposed square footages as opposed to the number of docks. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-59-11

This comment expresses concern regarding the potential for lithium battery or chemical storage within the proposed warehouse, and states the opinion that a fire or explosion could create toxic conditions for nearby sensitive receptors and would experience delayed emergency response times.

Refer to Master Response 13 for a detailed response regarding the potential for storage of hazardous materials on the Project site and emergency response associated with the proposed Project. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-59-12

This concluding comment is a summary of the comments provided above.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses above. No further response is required.

From: Nan Yan
To: Stonich, Amy; EnterpriseProjects
Subject: Public Comments on DEIR – IPT Enterprise Business Center Project
Date: Wednesday, August 27, 2025 4:35:20 PM

Hello

We are residents of Meadow and recently knew about the proposed warehouse project planned in our area. We wish to express our strong opposition to this development. The warehouse poses significant risks to our safety, health, and property values, and will negatively impact our quality of life in multiple ways, as outlined below:

1. Serious Safety Risks
Warehouses typically store large quantities of goods, which—if improperly managed—can easily cause fires or other accidents. In the event of a fire, flames could spread rapidly and directly endanger the lives and property of nearby residents. With residential areas densely populated around the site, blocked or delayed access for emergency vehicles due to warehouse truck traffic could further worsen the situation, with devastating consequences.

2. Severe Traffic Congestion
Once operational, the warehouse will bring heavy truck and logistics traffic in and out of the area. Local roads [insert specific road conditions, e.g., “narrow” or “serving as the main entrances/exits for our neighborhood”] are not designed to handle such volumes, and
I-60-1 congestion will become inevitable. This will not only disrupt residents’ daily travel but also increase the likelihood of traffic accidents, including collisions and property damage.

3. Pollution and Noise Disturbances
Increased truck traffic will worsen local air quality through exhaust emissions. Noise from truck movements, cargo loading and unloading, and vehicle horns—particularly during nighttime operations—will severely disturb residents’ rest. Such conditions will be especially harmful to vulnerable groups such as children, seniors, and working families, whose health and well-being depend on a quiet and clean environment.

4. Decline in Property Values and Quality of Life
The combined impacts of safety hazards, traffic congestion, pollution, and noise will reduce the livability of the area. This will directly lead to declining property values, undermining residents’ long-term financial security. We have lived here for many years and highly value the peaceful and safe environment of our community. The construction of this warehouse threatens to irreparably disrupt that balance.

I-60-1 cont.

Conclusion

For these reasons, we respectfully urge the relevant agencies to carefully reconsider the feasibility of this project. We request that construction be suspended or relocated to a more suitable non-residential site. Our community is committed to working constructively with the authorities during this review process to protect the safety, health, and harmony of our neighborhood.

Sincerely,
Concerned Residents of Meadow
Yan Nan

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YAN NAN

Letter Code: I-60
Date: August 27, 2025

Response to Comment I-60-1

This comment expresses opposition to the proposed Project and expresses concerns regarding quality of life, including safety risks, emergency access, traffic congestion, air pollution, noise pollution, and decline in property values. The comment requests that their comments be addressed by halting or relocating the proposed Project to a site outside the vicinity of residential communities.

Refer to Master Response 7 regarding the proposed Project's compatibility with surrounding land uses and the Project's effects on quality of life, Master Response 8 regarding traffic congestion and safety risks associated with the proposed Project, Master response 13 regarding emergency access associated with the proposed Project, Response to Comment O-1-4 and Master Response 9 regarding air pollution and health risks associated with the proposed Project, Master Response 11 regarding noise pollution associated with the proposed Project and Response to Comment O-1-12 regarding impacts to property values associated with the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: Zhenni Liu
To: Stonich, Amy; EnterpriseProjects
Subject: IPT Enterprise Business Center Project
Date: Wednesday, August 27, 2025 4:39:25 PM

To Whom It May Concern,

We, the undersigned residents of Meadow, are writing to express our firm and unequivocal opposition to the proposed IPT Enterprise Business Center warehouse project. This project is unacceptable under any circumstances. Its approval would create intolerable risks to public safety, health, the environment, and property values. We therefore state clearly and without reservation: this warehouse must not be built at this location.

—

Key Reasons for Opposition

1. Safety Hazards

- Warehouses store large volumes of goods that carry a heightened risk of fire and other accidents.

I-61-1

- In the event of a fire, flames could spread quickly into nearby neighborhoods, endangering lives and property.
- With residential areas surrounding the site, truck congestion could block fire access routes and delay emergency response—making a tragedy unavoidable.
- Such risks are unacceptable in a densely populated residential community.

2. Traffic Impacts

- A facility of this scale will generate significant heavy truck traffic.
- Local roads [insert description, e.g., “narrow and serving as main residential access points”] are not designed to accommodate such vehicles.
- The result will be chronic congestion, daily hardship for residents, increased traffic accidents, and unsafe conditions for pedestrians and drivers alike.

3. Air Pollution and Noise

- Diesel exhaust from constant truck activity will worsen local air quality, harming public health.
- Noise from engines, horns, and warehouse operations—particularly during overnight hours—will destroy the quiet character of our community.

• These impacts are not temporary inconveniences, but permanent disruptions that will disproportionately affect children, the elderly, and working families.

4. Property Values and Community Integrity

- Proximity to a warehouse will permanently reduce home values, undermining residents' financial security.
- The safety, environmental, and traffic burdens will eliminate the livability of the community we have built and invested in for years.
- The character of Meadow will be irreparably damaged.

—

I-61-1 cont.

Our Position

- This project must be rejected in its entirety.
- No modifications, conditions, or mitigations can make a warehouse compatible with a residential neighborhood.
- Approval would mean knowingly sacrificing the health, safety, and stability of this community.

—

Our Request

We strongly urge the reviewing agencies to uphold their responsibility to protect residents. Stand with the community, not against it. Do not approve this warehouse. Do not place our families and homes at risk.

—

Respectfully submitted,
Residents of Meadow
Jenny Liu

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JENNY LIU

Letter Code: I-61
Date: August 27, 2025

Response to Comment I-61-1

This comment expresses opposition to the proposed Project and expresses concerns regarding safety hazards, traffic impacts, air pollution, noise pollution, property values, and community integrity. The comment requests that their comments be addressed by rejecting the proposed Project.

Refer to Master Response 8 regarding traffic impacts and safety hazards associated with the proposed Project, Response to Comment O-1-4 and Master Response 9 regarding air pollution and health risks associated with the proposed Project, Master Response 11 regarding noise pollution associated with the proposed Project, and Response to Comment O-1-12 regarding impacts to property values associated with the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: omega hu
To: Stonich, Amy; EnterpriseProjects; Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin
Subject: Public Comments on DEIR – IPT Enterprise Business Center Project
Date: Wednesday, August 27, 2025 9:43:03 PM

Dear Ms. Stonich,

I-62-1 I hereby submit a formal objection to the draft Environmental Impact Statement (EIR) for the proposed IPT Enterprise Business Centre Warehouse project at 26200 Enterprise Way. As a Lake Forest City resident / stakeholder, after reviewing the draft EIR, I believe that the project would pose an unacceptable risk to the environmental quality, public health and safety of my community, for the following reasons:

I-62-2 1. The draft EIR has recognized the existence of significant and irreparable environmental hazards in the project
According to the EIR conclusions:
· The impact of greenhouse gas emissions and vehicle mileage (VMT) is classified as "significant and unavoidable";
· The project violates California's 2045 carbon neutrality goals and the City of Lake Forest Climate Action Plan;
· 23 truck loading gates and heavy traffic will worsen local air quality (especially threatening the adjoining Meadows neighborhood).

I-62-3 II. Project design seriously threatens the health and safety of the community
· Residential Exposure Risk: East Side Meadows Neighborhood Will Be Directly Exposed to Truck Emissions of PM2.5/NOX contaminants, 65 feet of sound barrier does not block the spread of pollutants;
· Traffic safety hazards: The proposed five intersections cannot carry the combined traffic of 262 commuter vehicles plus heavy trucks, raising the risk of accidents.

I-62-4 III. Tenant uncertainty amplifies environmental risk
· EIR is assessed on the highest pollution intensity (65,000 m2 manufacturing + 90,803 m2 warehousing), but does not limit the industry type of future tenants;
· If industries such as chemicals and logistics are introduced, the risk of leakage of hazardous substances will endanger surrounding communities.

I-62-5 IV. Absence of alternatives violates the spirit of CEQA
· No studies have been conducted on low-carbon alternatives for the conversion of existing buildings or downsizing;
· Demolition of existing buildings will generate 11,000 tons of construction waste (in violation of AB 1583 Waste Reduction Order).

I-62-6 Demands and Calls for Action
1.Rejection of the current protocol (in violation of CEQA § 21081);
2. Additional research is required: PM2.5 diffusion simulation in residential areas, tenant industry restriction list, zero emission truck retrofit scheme;
3. A hearing was held to invite independent experts to consider the shortcomings of the VMT model.

I-62-7 cont. The project, if approved, would set a dangerous precedent in which the interests of

corporations would take precedence over the health of residents. I urge the city government to fulfill its environmental fiduciary obligations.

I-62-7

Please file this letter as a formal objection and notify me of the schedule of a follow-up hearing.

Sincerely,

WeiWei Zhang
[redacted]
Lake Forest CA 92630

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WEIWEI ZHANG

Letter Code: I-62
Date: August 27, 2025

Response to Comment I-62-1

This comment is an introductory comment and expresses opposition to the proposed Project, stating the opinion that the proposed Project would pose risks to environmental quality, public health, and community safety.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-62-2

This comment states that the Draft EIR recognizes significant and irreparable environmental hazards associated with the proposed Project including significant and unavoidable GHG and VMT impacts, violation of California's 2045 carbon neutrality goals and the City's CAP, and states the opinion that worsening local air quality is a result of truck loading docks and heavy traffic associated with the proposed Project.

Refer to Response to Comment I-24-2 regarding GHG and VMT impacts. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-62-3

This comment expresses concern regarding community health and safety related to the proximity of the Meadows community to the proposed Project and that the nearby intersections would not be able to support increased traffic associated with the proposed Project, potentially increasing the risk of accidents.

Refer to Response to Comment I-24-3 regarding community health and safety. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-62-4

This comment expresses concern regarding the uncertainty of the type of future tenant.

Refer to Response to Comment I-24-4 regarding tenant uncertainty. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-62-5

This comment expresses concern that the Draft EIR did not analyze a low-carbon alternative and the amount of construction waste.

Refer to Response to Comment I-24-5 regarding the Draft EIR's alternatives analysis. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-62-6

This comment suggests that additional research including PM2.5 diffusion, future tenancy, and zero emission-trucks be conducted. This comment also states that there was a hearing to consider the purported inadequacies of the VMT model.

Refer to Response to Comment I-24-6 regarding the PM2.5 diffusion, future tenancy, and zero-emission trucks. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-62-7

This comment concludes the letter and states the opinion that approval of the proposed Project would set a precedent for industrial development over resident health, and requests notification of a follow-up hearing.

Refer to Response to Comment I-7-1 for a detailed response regarding the commenter's claim that the proposed Project could set a precedent for future development trends. Residents who have

requested to be added to the Project notification list will be notified of future public hearing(s) for the proposed Project, at which time verbal comments can be made by members of the public.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses above. No further response is required.

From: zhang weiwei
To: Stonich, Amy; EnterpriseProjects
Subject: strong opposition to the proposed construction
Date: Wednesday, August 27, 2025 9:48:06 PM

To Whom It May Concern at the City Government,

My name is Hu Yu and I am a resident of Meadows. I am writing to express my strong opposition to the proposed construction of a large warehouse near our residential neighborhood.

Building a warehouse so close to homes will significantly and negatively impact our community in the following ways:
1. Traffic Concerns: The operation of a warehouse will greatly increase the number of trucks and transport vehicles passing through our area, leading to traffic congestion and posing safety risks for residents.
2. Safety Risks: The frequent movement of large trucks near homes creates dangers for pedestrians, especially children and seniors.
3. Air Pollution and Noise: Increased vehicle emissions will degrade air quality, and the constant noise from loading, unloading, and vehicle operation will disturb the peace and rest of nearby families.
4. Decline in Quality of Life: A busy warehouse is not compatible with a quiet, residential neighborhood. It would disrupt the community and reduce the livability of our area.

I-63A-1

I respectfully urge the city government to reconsider this project and find an alternative location. We value our right to live in a safe, healthy, and peaceful environment. For the long-term well-being of all residents, please do not allow the construction of a warehouse in our neighborhood.

Thank you for your attention and understanding.

Sincerely,
Yang Li and Weiwei Zhang
[redacted]lake forest

07/27/28

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Hu Yu

Letter Code: I-63A
Date: August 27, 2025

Response to Comment I-63A-1

This comment expresses opposition to the proposed Project and expresses concerns regarding traffic, safety risks, air pollution, noise pollution, and quality of life. The comment requests that the City address their comments by reconsidering the proposed Project or choosing an alternate location.

Refer to Master Response 8 regarding traffic and safety risks associated with the proposed Project, Response to Comment O-1-4 and Master Response 9 regarding air pollution and potential health risks associated with the proposed Project, Master Response 11 regarding noise pollution associate with the proposed Project, and Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses and the Project's effect on quality of life. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: zhang weiwei
To: Stonich, Amy; EnterpriseProjects
Subject: strong opposition to the proposed construction
Date: Wednesday, August 27, 2025 9:49:00 PM

I-63B-1

To Whom It May Concern at the City Government,

My name is Yang Li and I am a resident of Meadows. I am writing to express my strong opposition to the proposed construction of a large warehouse near our residential neighborhood.

Building a warehouse so close to homes will significantly and negatively impact our community in the following ways:
1. Traffic Concerns: The operation of a warehouse will greatly increase the number of trucks and transport vehicles passing through our area, leading to traffic congestion and posing safety risks for residents.
2. Safety Risks: The frequent movement of large trucks near homes creates dangers for pedestrians, especially children and seniors.
3. Air Pollution and Noise: Increased vehicle emissions will degrade air quality, and the constant noise from loading, unloading, and vehicle operation will disturb the peace and rest of nearby families.
4. Decline in Quality of Life: A busy warehouse is not compatible with a quiet, residential neighborhood. It would disrupt the community and reduce the livability of our area.

I respectfully urge the city government to reconsider this project and find an alternative location. We value our right to live in a safe, healthy, and peaceful environment. For the long-term well-being of all residents, please do not allow the construction of a warehouse in our neighborhood.

Thank you for your attention and understanding.

Sincerely,
Yang Li and Weiwei Zhang
[redacted] lake forest

07/27/28

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YANG LI AND WEIWEI ZHANG

Letter Code: I-63B
Date: August 27, 2025

Response to Comment I-63B-1

This comment expresses opposition to the proposed Project and expresses concerns regarding traffic, safety risks, air pollution, noise pollution, and quality of life. The comment requests that the City address their comments by reconsidering the proposed Project or choosing an alternate location.

Refer to Master Response 8 regarding traffic and safety risks associated with the proposed Project, Response to Comment O-1-4 and Master Response 9 regarding air pollution and potential health risks associated with the proposed Project, Master Response 11 regarding noise pollution associate with the proposed Project, and Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses and the Project's effect on quality of life. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From:	[redacted]
To:	Stonich, Amy; EnterpriseProjects
Cc:	Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject:	Subject: Public Comments on IPT Draft EIR for Proposed Warehouse and Manufacturing Complex in Lake Forest, CA
Date:	Wednesday, September 3, 2025 10:35:18 AM

Dear Ms. Stonich and Members of the Lake Forest Planning Commission and the City Council,

I am writing as a concerned resident of Lake Forest, California ("The Meadows"), to submit public comments on the Draft Environmental Impact Report (EIR) in which I discovered some troubling claims (***yellow highlighted*** in the passage from the DEIR) that blatantly dismissed valid and widely accepted concern which is scientifically studied in multiple publications from the various government agencies from Federal to the State of California as well as public and private entities regarding the adverse impact of warehouses and their negative impact on the health and wellbeing of people living hear the facilities.

I-64-1

"4.3.3.1 Air Pollutants and Health Effects Both State and federal governments have established health-based ambient air quality standards (California Ambient Air Quality Standards [CAAQS] and National Ambient Air Quality Standards [NAAQS], respectively) for six criteria air pollutants:1 carbon monoxide (CO), ozone (O3), nitrogen dioxide (NO2), sulfur dioxide (SO2), lead (Pb), and suspended particulate matter (PM). In addition, the State has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety. Long-term exposure to elevated levels of criteria pollutants may result in adverse health effects. However, emission thresholds established by an air district are used to manage total regional emissions within an air basin based on the air basin's attainment status for criteria pollutants. These emission thresholds were established for individual projects that would contribute to regional emissions and pollutant concentrations and could adversely affect or delay the projected attainment target year for certain criteria pollutants. *Because of the conservative nature of the thresholds and the basin-wide context of individual project emissions, there is no known direct correlation between a single project and localized air quality-related health effects. One individual project that generates emissions exceeding a threshold does not necessarily result in adverse health effects for residents in the project vicinity.* This condition is especially true when the criteria pollutants exceeding thresholds are those with regional effects, such as ozone precursors like nitrogen oxides (NOX) and VOCs. Occupants of facilities such as schools, daycare centers, parks and playgrounds, hospitals, and nursing and convalescent homes are considered to be more sensitive than the general public to air pollutants because these population groups have increased susceptibility to respiratory disease. Persons engaged in strenuous outdoor work or exercise also have increased sensitivity to poor air quality. Residential areas are considered more sensitive to air quality conditions, compared to commercial

and industrial areas, because people generally spend longer periods of time at their residences, with greater associated exposure to ambient air quality conditions. Recreational uses are also considered sensitive compared to commercial and industrial uses due to greater exposure to ambient air quality conditions associated with exercise." (IPT DEIR page 4.3-2 to 4.3-3)

Specifically I am deeply concerned with the assertion in the Draft EIR (DEIR) that "***Because of the conservative nature of the thresholds and the basin-wide context of individual project emissions, there is no known direct correlation between a single project and localized air quality-related health effects. One individual project that generates emissions exceeding a threshold does not necessarily result in adverse health effects for residents in the project vicinity***." This statement appears unscientific and baseless, as it dismisses the well-documented links between localized emissions from industrial projects like warehouses and adverse health outcomes, particularly for nearby sensitive populations. By framing impacts solely in a regional context, the DEIR overlooks substantial evidence from peer-reviewed studies and regulatory guidance that individual projects can indeed cause measurable, harmful localized pollution, especially when sited near residential areas.

I-64-1 cont.

First, the DEIR's claim ignores the distinction between regional pollutants (e.g., ozone precursors like NOx and VOCs, which have basin-wide effects) and localized pollutants (e.g., particulate matter [PM2.5 and PM10], nitrogen dioxide [NO2], and diesel exhaust) that warehouses generate through truck traffic and operations. While regional thresholds under the South Coast Air Quality Management District (SCAQMD) and CEQA are designed for attainment planning, they do not preclude localized health risks from a single project. Numerous studies demonstrate direct correlations between warehouse proximity and elevated local pollution levels, leading to health effects like asthma, cardiovascular disease, and premature death (https://pmc.ncbi.nlm.nih.gov/articles/PMC11269699/). For instance, a nationwide analysis using satellite data found that U.S. warehouses increase local NO2 levels by nearly 20% on average, primarily from diesel trucks, with even higher spikes in disadvantaged communities near facilities like the proposed IPT warehouse (https://pmc.ncbi.nlm.nih.gov/articles/PMC11269699/). Another study in Southern California, a region with similar air quality challenges to Lake Forest, showed that warehouse expansion correlates with higher ambient PM2.5 and elemental carbon levels, disproportionately affecting nearby residents and contributing to respiratory illnesses (https://pmc.ncbi.nlm.nih.gov/articles/PMC11410679/). These effects are not merely theoretical; a report from the Environmental Defense Fund linked warehouse truck emissions to increased childhood asthma and heart disease risks in communities of color and low-income areas, where pollution burdens are already high (https://environmentalhealth.ucdavis.edu/air-pollution/californias-warehouse-boom-raises-health-concerns).

The assertion is further undermined by evidence that even projects emitting below regional thresholds can cause localized "hotspots" of pollution, particularly from diesel particulate matter (DPM) and ultrafine particles not fully captured by basin-wide models. For example, research on warehouse clusters in the Inland Empire (comparable to Lake Forest's proposed developments) revealed significant

associations between warehouse activity and elevated air pollution, noise, and traffic-related health issues, including higher rates of asthma and cancer (https://www.sciencedirect.com/science/article/abs/pii/S0966692322001636). A NASA-funded study in Los Angeles-area warehouses confirmed that particulate pollution from such facilities is linked to respiratory diseases, cancers, and adverse birth outcomes, with communities within 200–500 feet (like The Meadows and the senior apartments) facing the greatest exposure (https://www.nasa.gov/earth/nasa-funded-study-assesses-pollution-near-los-angeles-area-warehouses/). Dismissing these as non-correlated ignores the "conservative nature" of thresholds, which are meant to err on the side of caution precisely because individual projects can contribute to cumulative, localized harms that delay air basin attainment and endanger nearby residents.

Moreover, CEQA explicitly requires EIRs to analyze both regional and localized air quality impacts, including those from single projects, to ensure public disclosure and mitigation (https://www.slc.ca.gov/ceqa/). The Bay Area Air Quality Management District's CEQA Guidelines emphasize project-level assessments for localized pollutants, using tools like Localized Significance Thresholds (LSTs) to evaluate risks within the project vicinity (https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds). Similarly, SCAQMD and statewide guidelines mandate that EIRs consider sensitive receptors (e.g., seniors, children) near sources of toxic air contaminants, requiring mitigation if thresholds are exceeded—even for individual projects (https://www.airquality.org/LandUseTransportation/Documents/Ch2EnvRevThresholds4-25-2020.pdf). The DEIR's blanket dismissal contradicts this, potentially violating CEQA's requirement for substantial evidence in impact assessments (CEQA Guidelines §15126.2). If a single project like this warehouse can exceed emission thresholds for NO2 or PM, it logically contributes to localized health risks, as evidenced by studies showing 17.9%–20% higher NO2 near warehouses, directly linked to pediatric asthma and premature death (https://www.healio.com/news/allergy-asthma/20240801/warehouses-add-179-more-nitrogen-dioxide-to-their-communities).

I-64-1 cont.

In conclusion, the DEIR's assertion is not only baseless but also contrary to scientific consensus and CEQA mandates, which demand rigorous analysis of project-specific, localized effects. By understating these risks, the EIR fails to fulfill its purpose of informing decision-makers and protecting communities like The Meadows and the senior apartments from foreseeable harms. A revised EIR should incorporate site-specific modeling, health risk assessments, and mitigation measures, such as zero-emission trucks or enhanced buffers, to address these deficiencies.

I hope my concern will receive due attention and further assessment is required to in order to provide a more scientific and balanced view of the matter.

Please confirm the receipt of my comment letter and thanks for your time.

Warm regards,
Kevin Xie

[redacted] mobile

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KEVIN XIE

Letter Code: I-64
Date: September 3, 2025

Response to Comment I-64-1

This comment generally states the opinion that the Draft EIR provides an inadequate analysis related to air quality, particularly the document's determination that a single project does not necessarily correlate with localized air quality-related health effects. The comment requests revisions to the Draft EIR to address their comments by incorporating site-specific modeling, health risk assessments, and mitigation measures.

Refer to Response to Comment O-1-4 and Master Response 9 regarding the air quality and potential health risk impacts associated with the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: Isabel Duong
To: EnterpriseProjects
Subject: Stop warehouse
Date: Thursday, September 4, 2025 3:47:50 PM

Hello,
I live in baker ranch, closest to the intersection Bake/Dimension. I strongly oppose the plan to turn that area into a warehouse location. It will create a lot of traffic on Bake, which already has enough traffic as it is. It will increase pollution in our neighborhoods. We have a lot of people walking, jogging, biking in the area, and the increase in traffic and trucks will cause more accidents, especially that specific intersection. The way Bake curves at Dimension, it makes it very difficult to enter the street from the neighborhoods with cars speeding through. I imagine having semi trucks thunder through can not make it better. Additionally, I am concerned at the extra noise that the trucks and activity will bring to our peaceful neighborhood.
Please do not allow this to destroy our homes, environment and neighborhoods. This will not benefit the residents of lake forest.

I-65-1

Sincerely,
Isabel Duong

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ISABEL DUONG

Letter Code: I-65
Date: September 4, 2025

Response to Comment I-65-1

This comment expresses opposition to the proposed Project and expresses concerns related to traffic, pollution, roadway and intersection safety, and noise associated with the proposed Project.

Refer to Master Response 8 regarding traffic and roadway safety associated with the proposed Project, Master Responses 9 and 10 regarding pollution associated with the proposed Project, and Master Response 11 regarding noise associated with the proposed Project. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: seattle zhou
To: Stonich, Amy
Subject: Re: Opposing Proposed Warehouse Development in Meadows Residential Community
Date: Friday, September 5, 2025 4:46:53 PM

Dear Ms. Amy Stonich

We would like to invite you to visit the Community and hear personal experiences from the Meadows residents .
discussing our main concerns. Myself, with an Urban Planning Master degree and many years of data and AI analysis, including those data projects for states of CA and Hawaii.
Would love to hear your thoughts and ideas on how to improve the community and potentially "repositioning" the warehouses projects

You are more than welcome to see from the balcony of houses facing the proposed warehouse if you can visit the community.

Understand your guiding planning and development principles and working processes, that residents can support or help you and your team.

hope to hear back from you soon and
have a gorgeous weekend

Best Regards
tim

I-66-1

On Fri, Sep 5, 2025 at 4:39 PM seattle zhou [redacted] wrote:

> **Attn:** Amy Stonich, AICP
> Assistant Director of Community Development
> 100 Civic Center Drive
> Lake Forest, CA 92630
>
> **Subject:** Opposing Proposed Warehouse Development 100 feet close to Residential Community
>
> Dear Ms. Stonich,
>
> We, the undersigned residents of the Meadows, strongly oppose the proposed warehouse development right next to (100 feet) our residential community (IPT Enterprise Business Center LLC Project; Western Realco Enterprise Way Project 1 & 2, hereafter referred to as the “Huge Warehouse Project”). These projects are fundamentally incompatible with the character, safety, and well-being of our neighborhood and threaten to cause long-lasting harm to the quality of life for residents.

In addition to diminishing community safety and livability, this development undermines Lake Forest's long-term growth strategy. Rather than supporting sustainable revenue through high-quality residential development, it risks destabilizing the city's economic and community vision.

Key Concerns and harmful Impacts to the community

1. Public Health and Safety Risks

The proposed warehouses, larger in scale than two SoFi Stadiums combined, will bring a dramatic increase in heavy truck traffic and vehicular congestion. This poses severe risks to road safety, particularly for pedestrians and cyclists, while creating noise pollution and gridlock during peak hours. Narrow, hilly roads will become hazardous, and congestion on Bake Parkway would obstruct emergency services, including fire response.

This facility would bring constant heavy truck traffic onto our already narrow, hilly roads—greatly increasing the risk of accidents, worsening congestion, and threatening the safety of drivers, pedestrians, and children. The to-be-proposed three warehouses projects will jeopardize the firefighters moving into the neighborhood timely with the Bake Parkway road jammed with long logistics truck and long trailers – two long trucks will block all firefighting facilities coming into the Meadows in case of fire. This will potentially endanger the human life and properties!

Despite these risks, the project lacks a comprehensive and scientifically supported Environmental Impact Assessment (EIA). Without accurate data and long-term analysis, the community cannot trust that health and safety have been adequately protected.

I-66-1 cont.

2. Violation of the Lake Forest 2040 General Plan

The Lake Forest 2040 General Plan establishes clear goals to guide growth and protect community character. A massive warehouse complex directly conflicts with these priorities, disrupting the city's transportation vision and threatening established neighborhoods. Such development undermines the city's commitment to balancing economic growth with environmental sustainability.

3. Environmental Consequences

The Draft Environmental Impact Report (EIR) fails to adequately address critical issues such as harmful emissions (e.g., HrNOx concentrations) that would most likely exceed state and federal standards. With constant truck traffic, the project will increase air and noise pollution, diminish green space, and negatively impact residents' health.

This facility would generate constant heavy truck traffic on our already narrow, hilly roads —dramatically increasing accident risks, worsening congestion, and endangering the safety of drivers, pedestrians, and children. Moreover, the addition of three proposed warehouse projects would severely hinder emergency response, as fire crews could be delayed by long-haul trucks and trailers clogging Bake Parkway. Causing serious danger to human life and property at Meadows.

I-66-1 cont.

Requested Actions

We urge the City of Lake Forest to:

1. **Deny the application** for the proposed warehouse development (IPT Enterprise Business Center LLC Project; Western Realco Enterprise Way Project 1 & 2).
2. **Reevaluate zoning regulations and planning policies** to ensure they prioritize residential well-being and align with the Lake Forest 2040 General Plan.
3. **Identify alternative sites** for large-scale industrial projects located away from residential neighborhoods, and hold public meetings with affected communities such as the Meadows, Baker Ranch, Serrano Summit, and Foothill Ranch.
4. **Require comprehensive and transparent Environmental Impact Assessments (EIA)** based on accurate data, long-term projections, and clear scientific methodology.

Thank you for your attention to this critical matter. We trust that the City will consider our concerns with the utmost seriousness and act in the best interest of residents and the long-term vision for Lake Forest.

Sincerely,
[redacted] Lakeforest
Meadows, CA 92630
Tim Zhou
Eliza Wang

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TIM ZHOU AND ELIZA WANG

Letter Code: I-66
Date: September 5, 2025

Response to Comment I-66-1

This comment invites City staff to visit the Meadows community to meet with residents for a discussion regarding the proposed Project. The comment expresses opposition to the proposed Project and expresses concerns related to community character, traffic, roadway safety, noise, emergency response, General Plan consistency, and airborne pollutant emissions. The comment requests that the City address their comments by denying the proposed Project and the Western Realco Enterprise Way Industrial Project (Projects 1 and 2), reevaluating the existing zoning and planning framework, identifying alternative sites for industrial projects away from residential neighborhoods, and requiring the preparation of Environmental Impact Assessments (EIAs).

Refer to Master Response 7 regarding the compatibility of the proposed Project to surrounding land uses and General Plan consistency, Master Response 8 regarding traffic congestion and roadway safety associated with the proposed Project, Master Response 11 regarding noise pollution associated with the proposed Project, Master Response 13 regarding the adequacy of emergency access provided under the proposed Project, and Response to Comment O-1-4 and Master Response 9 regarding airborne pollutant emissions and health risks associated with the proposed Project. In addition, refer to Master Response 6 regarding the adequacy of the cumulative impacts analysis for the proposed Project. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: Lucy Chou
To: EnterpriseProjects
Subject: Opposition to Proposed Enterprise Way Warehouse Projects
Date: Sunday, September 7, 2025 11:13:13 AM

Dear Mayor and Members of the Lake Forest City Council,

I am writing as a concerned resident to express my strong opposition to the proposed warehouse and industrial projects on Enterprise Way.

These large-scale developments pose significant risks to our community:

- **Environmental Impact:** Increased diesel truck traffic will worsen air quality, contributing to pollution and potential health hazards for nearby families.
- **Public Safety:** Heavy truck circulation near residential neighborhoods raises concerns about traffic congestion, pedestrian safety, and emergency access.
- **Real Estate Values:** The presence of massive warehouse operations near homes and schools will negatively affect property values and the overall character of our city.

I-67-1

Lake Forest has always been valued for its livability, family-friendly neighborhoods, and green spaces. Approving projects of this scale undermines these qualities and sets a dangerous precedent for further industrialization in residentially adjacent areas.

I respectfully urge the Council to reconsider and reject these proposals. I also ask that the City prioritize development that enhances residents' quality of life, supports small businesses, and preserves the health, safety, and property values of our community.

Thank you for your attention and service to our city.

Hsintien Chou, Resident of Baker Ranch, Lake Forest

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HSINTIEN CHOU

Letter Code: I-67
Date: September 7, 2025

Response to Comment I-67-1

This comment expresses opposition to the proposed Project and expresses general concerns related to air quality, health hazards, public safety, traffic congestion, emergency access, and property values. The comment requests that the City address their comments by rejecting the proposed Project and the cumulative industrial warehouse projects and instead prioritizing other types of development.

Refer to Response to Comment O-1-4 and Master Response 9 regarding air quality and health risk impacts associated with the proposed Project, Master Response 8 regarding traffic congestion and safety associated with the proposed Project, Master Response 13 regarding the adequacy of emergency access provided under the proposed Project, and Response to Comment O-1-12 regarding impacts to property values associated with the proposed Project. In addition, refer to Master Response 6 regarding the adequacy of the cumulative impacts analysis for the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: linda gu-xie
To: Stonich, Amy; EnterpriseProjects; [redacted]
Cc: Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Subject: Public Comments on IPT Draft EIR for Proposed Warehouse and Manufacturing Complex in Lake Forest, CA
Date: Monday, September 8, 2025 8:47:01 AM

Dear Ms. Stonich and Members of the Lake Forest Planning Commission and the City Council,
I am writing as a concerned resident of Lake Forest, California ("The Meadows"), to submit public comments on the Draft Environmental Impact Report (EIR) in which I discovered some troubling claims (***yellow highlighted*** in the passage from the DEIR) that blatantly dismissed valid and widely accepted concern which is scientifically studied in multiple publications from the various government agencies from Federal to the State of California as well as public and private entities regarding the adverse impact of warehouses and their negative impact on the health and wellbeing of people living hear the facilities.

I-68-1

"4.3.3.1 Air Pollutants and Health Effects Both State and federal governments have established health-based ambient air quality standards (California Ambient Air Quality Standards [CAAQS] and National Ambient Air Quality Standards [NAAQS], respectively) for six criteria air pollutants:1 carbon monoxide (CO), ozone (O3), nitrogen dioxide (NO2), sulfur dioxide (SO2), lead (Pb), and suspended particulate matter (PM). In addition, the State has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety. Long-term exposure to elevated levels of criteria pollutants may result in adverse health effects. However, emission thresholds established by an air district are used to manage total regional emissions within an air basin based on the air basin's attainment status for criteria pollutants. These emission thresholds were established for individual projects that would contribute to regional emissions and pollutant concentrations and could adversely affect or delay the projected attainment target year for certain criteria pollutants. *Because of the conservative nature of the thresholds and the basin-wide context of individual project emissions, there is no known direct correlation between a single project and localized air quality-related health effects. One individual project that generates emissions exceeding a threshold does not necessarily result in adverse health effects for residents in the project vicinity.* This condition is especially true when the criteria pollutants exceeding thresholds are those with regional effects, such as ozone precursors like nitrogen oxides (NOX) and VOCs. Occupants of facilities such as schools, daycare centers, parks and playgrounds, hospitals, and nursing and convalescent homes are considered to be more sensitive than the general public to air pollutants because these population groups have increased susceptibility to respiratory disease. Persons engaged in strenuous outdoor work or exercise also have increased sensitivity to poor air quality. Residential areas are considered more sensitive to air quality conditions, compared to commercial and industrial areas, because people generally spend longer periods of time at their residences, with greater associated exposure to ambient air quality

conditions. Recreational uses are also considered sensitive compared to commercial and industrial uses due to greater exposure to ambient air quality conditions associated with exercise." (IPT DEIR page 4.3-2 to 4.3-3)

Specifically I am deeply concerned with the assertion in the Draft EIR (DEIR) that "***Because of the conservative nature of the thresholds and the basin-wide context of individual project emissions, there is no known direct correlation between a single project and localized air quality-related health effects. One individual project that generates emissions exceeding a threshold does not necessarily result in adverse health effects for residents in the project vicinity***." This statement appears unscientific and baseless, as it dismisses the well-documented links between localized emissions from industrial projects like warehouses and adverse health outcomes, particularly for nearby sensitive populations. By framing impacts solely in a regional context, the DEIR overlooks substantial evidence from peer-reviewed studies and regulatory guidance that individual projects can indeed cause measurable, harmful localized pollution, especially when sited near residential areas.

I-68-1 cont.

First, the DEIR's claim ignores the distinction between regional pollutants (e.g., ozone precursors like NOx and VOCs, which have basin-wide effects) and localized pollutants (e.g., particulate matter [PM2.5 and PM10], nitrogen dioxide [NO2], and diesel exhaust) that warehouses generate through truck traffic and operations. While regional thresholds under the South Coast Air Quality Management District (SCAQMD) and CEQA are designed for attainment planning, they do not preclude localized health risks from a single project. Numerous studies demonstrate direct correlations between warehouse proximity and elevated local pollution levels, leading to health effects like asthma, cardiovascular disease, and premature death (https://pmc.ncbi.nlm.nih.gov/articles/PMC11269699/). For instance, a nationwide analysis using satellite data found that U.S. warehouses increase local NO2 levels by nearly 20% on average, primarily from diesel trucks, with even higher spikes in disadvantaged communities near facilities like the proposed IPT warehouse (https://pmc.ncbi.nlm.nih.gov/articles/PMC11269699/). Another study in Southern California, a region with similar air quality challenges to Lake Forest, showed that warehouse expansion correlates with higher ambient PM2.5 and elemental carbon levels, disproportionately affecting nearby residents and contributing to respiratory illnesses (https://pmc.ncbi.nlm.nih.gov/articles/PMC11410679/). These effects are not merely theoretical; a report from the Environmental Defense Fund linked warehouse truck emissions to increased childhood asthma and heart disease risks in communities of color and low-income areas, where pollution burdens are already high (https://environmentalhealth.ucdavis.edu/air-pollution/californias-warehouse-boom-raises-health-concerns).

The assertion is further undermined by evidence that even projects emitting below regional thresholds can cause localized "hotspots" of pollution, particularly from diesel particulate matter (DPM) and ultrafine particles not fully captured by basin-wide models. For example, research on warehouse clusters in the Inland Empire (comparable to Lake Forest's proposed developments) revealed significant associations between warehouse activity and elevated air pollution, noise, and traffic-related health issues, including higher rates of asthma and cancer

(https://www.sciencedirect.com/science/article/abs/pii/S0966692322001636). A NASA-funded study in Los Angeles-area warehouses confirmed that particulate pollution from such facilities is linked to respiratory diseases, cancers, and adverse birth outcomes, with communities within 200–500 feet (like The Meadows and the senior apartments) facing the greatest exposure (https://www.nasa.gov/earth/nasa-funded-study-assesses-pollution-near-los-angeles-area-warehouses/). Dismissing these as non-correlated ignores the "conservative nature" of thresholds, which are meant to err on the side of caution precisely because individual projects can contribute to cumulative, localized harms that delay air basin attainment and endanger nearby residents.

Moreover, CEQA explicitly requires EIRs to analyze both regional and localized air quality impacts, including those from single projects, to ensure public disclosure and mitigation (https://www.slc.ca.gov/ceqa/). The Bay Area Air Quality Management District's CEQA Guidelines emphasize project-level assessments for localized pollutants, using tools like Localized Significance Thresholds (LSTs) to evaluate risks within the project vicinity (https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds). Similarly, SCAQMD and statewide guidelines mandate that EIRs consider sensitive receptors (e.g., seniors, children) near sources of toxic air contaminants, requiring mitigation if thresholds are exceeded—even for individual projects (https://www.airquality.org/LandUseTransportation/Documents/Ch2EnvRevThresholds4-25-2020.pdf). The DEIR's blanket dismissal contradicts this, potentially violating CEQA's requirement for substantial evidence in impact assessments (CEQA Guidelines §15126.2). If a single project like this warehouse can exceed emission thresholds for NO2 or PM, it logically contributes to localized health risks, as evidenced by studies showing 17.9%–20% higher NO2 near warehouses, directly linked to pediatric asthma and premature death (https://www.healio.com/news/allergy-asthma/20240801/warehouses-add-179-more-nitrogen-dioxide-to-their-communities).

I-68-1 cont.

In conclusion, the DEIR's assertion is not only baseless but also contrary to scientific consensus and CEQA mandates, which demand rigorous analysis of project-specific, localized effects. By understating these risks, the EIR fails to fulfill its purpose of informing decision-makers and protecting communities like The Meadows and the senior apartments from foreseeable harms. A revised EIR should incorporate site-specific modeling, health risk assessments, and mitigation measures, such as zero-emission trucks or enhanced buffers, to address these deficiencies.

I hope my concern will receive due attention and further assessment is required to in order to provide a more scientific and balanced view of the matter.

Please confirm the receipt of my comment letter and thanks for your time.

Warm regards,
Linda Gu

[redacted] mobile

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LINDA GU

Letter Code: I-68
Date: September 8, 2025

Response to Comment I-68-1

This comment, which generally states the opinion that the Draft EIR provides an inadequate analysis related to air quality, criticizes the Draft EIR's assertion that there is no known direct correlation between a single project and localized air quality-related health effects and states the opinion that even projects emitting below regional thresholds can cause localized hotspots of pollution, and that research shows warehouse activities are associated with elevated air pollution, noise, traffic, and health-related impacts. The comment states the opinion that the Draft EIR does not inform decision-makers and protect local communities and requests the Draft EIR be revised to address their comments regarding incorporation of site-specific modeling, HRAs, and mitigation measures such as zero-emission trucks or enhanced buffers.

Refer to Response to Comment O-1-4 and Master Response 9 regarding the air quality and potential health risk impacts associated with the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: Jian Wei
To: EnterpriseProjects; Stonich, Amy
Subject: Public Commnetson DEIR - IPT Enterprise Business Center Project
Date: Monday, September 8, 2025 5:41:30 PM

Dear Members of the Planning Commission and Honorable City Council Members,

I-69-1 My name is Jian Wei, a resident of the City of Lake Forest. I'm writing to formally submit our public comments on the EIR for the IPT Enterprise Business Project (SCH No. 2024030755). I'm writing to let you know as a resident of the Meadows, I'm strongly against the building of a business center that close to our neighborhood since it'll bring pollution, noise, heavy traffic to our beautiful peaceful neighborhood. We moved here to spend our retirement time, when we bought the property we have no idea what the business center would be right by our community. We urge you to imagine a enterprise business center with heavy trucks around it all time by your house, will you be happy and stay?

Thanks for your consideration.

-Jian

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JIAN WEI

Letter Code: I-69
Date: September 8, 2025

Response to Comment I-69-1

This comment expresses opposition to the proposed Project and expresses concern regarding pollution, noise, and traffic associated with the proposed Project.

Refer to Response to Comment O-1-4 and Master Response 9 regarding air quality and health risk impacts associated with the proposed Project, Master Response 11 regarding noise impacts associated with the proposed Project, and Master Response 8 regarding traffic congestion associated with the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: 韦俭
To: EnterpriseProjects; Stonich, Amy
Subject: Comments on DEIR for the IPT Enterprise Business Project - No please
Date: Monday, September 8, 2025 5:47:19 PM

Hi

My name is Jun Xie, a resident of the City of Lake Forest. I'm writing to formally submit our public comments on the DEIR for the IPT Enterprise Business Project (SCH No. 2024030755). I'm writing to let you know as a resident of the Meadows, I'm strongly against the building of a business center that close to our neighborhood since it'll bring pollution, noise, and heavy traffic to our beautiful peaceful neighborhood. We moved here to spend our retirement time, when we bought the property we had no idea what the business center would be right by our community. We urge you to imagine an enterprise business center with heavy trucks around it all the time by your house, will you be happy and stay? I-70-1

Thanks for your consideration.

Jun

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JUN XIE

Letter Code: I-70
Date: September 8, 2025

Response to Comment I-70-1

This comment expresses opposition to the proposed Project and expresses concern regarding pollution, noise, and traffic associated with the proposed Project.

Refer to Response to Comment O-1-4 and Master Response 9 regarding the air quality and potential health risk impacts associated with the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: Luka Zhao
To: EnterpriseProjects
Subject: object to builing massive marehouse in Lake Forest
Date: Monday, September 8, 2025 9:37:45 PM

Dear Civic Officer,

My name is Luka Zhao, living in Baker Ranch. I write this letter to express my opposition to the proposed Western Realco Enterprise Way Industrial Project 2.

I-71-1 The proposed project is very close to the residential communities of Meadows, Lake Forest residential area and Baker Ranch. The roads to be heavily impacted are Bake Parkway, Lake Forest Drive, and Alton PKWY, which are the main roads to the above densely residential communities and Foothill Ranch community. These three main roads have been under heavy tranffic pressure during the rush hours with the increased move-in population. If the proposed project is built, the trucks in and out of the warehouse will bring much more tranffic to the roads, imposing negative impact on the quality of live for all residents nearby and the small businesses.

I hereby express my opposition to the proposed project and will appreciate for you taking the locals' opposition into your overall city development plan.

Best regards,

Luka Zhao
[redacted]
Lake Forest

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LUKA ZHAO

Letter Code: I-71
Date: September 8, 2025

Response to Comment I-71-1

This comment expresses opposition to the proposed Project and expresses concern regarding traffic congestion associated with the proposed Project.

Refer to Master Response 8 regarding the proposed Project's impacts related to traffic congestion. This Master Response thoroughly addresses the topic raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: Bin Zhou
To: Stonich, Amy; EnterpriseProjects
Cc: Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Public Comments on DEIR of IPT Enterprise Business Center Project
Date: Tuesday, September 9, 2025 8:36:15 AM
Attachments: petition_signatures.pdf
Petition · Stop the Proposed Industrial .pdf
petition_comments_jobs_490363184_20250909041137.csv

Please have confirmation of receipt.
Dear the Honorable Members of the Lake Forest City Council and Planning Commission:

We have noted that the City of Lake Forest has released the Draft Environmental Impact Report (DEIR) for the proposed IPT Business Center Project, one of three planned industrial warehouse developments near our community, The Meadows at Lake Forest.
The deadline for public comments is Monday, August 25, 2025, at 5:00 p.m.

As nearby residents, we are deeply concerned about the potential adverse impacts of such large-scale warehouse projects, including but not limited to:

I-72-1

- The deterioration of air quality (due to emissions and dust from heavy diesel truck traffic);
- Persistent and increasing noise disturbances (such as nighttime loading, unloading, and logistics operations);
- Traffic congestion and safety hazards (with large trucks impacting community roads and pedestrian safety);
- Long-term negative effects on residents' quality of life and community livability (including health risks and potential property value impacts).

Attached is a petition signed by more than one thousand residents, including comments and signatures (https://urldefense.proofpoint.com/v2/url?u=https-3A__chng.it_VnzkjvRrMw&d=DwIFaQ&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=MKo8EeTviX57daqh6QYMpN_8GmNg3ojzy9PcoTx9gQs&m=2QGRVVxAvW1jxyjEhDh9L6vQhjyDKZaLPkdHRGB5-Wr8c80Nakyz08sWc6P5rLv4&s=470ZCCVE3_DDSaDLUSrWg_mpBBjABzhNajpJj01qbYc&e=), which fully reflect the community's strong concerns and united position. We respectfully urge the City Council and Planning Commission, in reviewing the DEIR, to carefully listen to and fully consider the voices of surrounding residents, and to thoroughly evaluate the project's actual impacts on the environment and community. Unless these risks can be clearly and sustainably eliminated or adequately mitigated, we ask that you deny approval for such warehouse developments that would severely impact our lives.

We sincerely appreciate your attention to our community's concerns and your careful deliberation of this matter. Should you require further information or wish for us to participate in public hearings, we are more than willing to cooperate.

Respectfully,
Bin Zhou
Petition Initiator and Resident of The Meadows Community

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Stop the Proposed Industrial Warehouse Manufacturing Projects in Lake Forest

Sponsored

1,096 signatures

Started Sept 24, '21

Petition to Lake Forest City Council and Planning Department

The Issue

Subject: Stop the Proposed Industrial Warehouse and Manufacturing Projects on Portola Pkwy, Lake Forest

Dear Honorable Members of the Lake Forest City Council and Planning Department, We are writing to express our strong opposition to the proposed three large-scale industrial development projects on Portola Pkwy in Lake Forest, which would result in significant negative impacts on the environment and public health. The projects in question are: 1. Project 1: 1,000,000 square feet of industrial warehouse and manufacturing space on the northeast corner of Portola Pkwy and Glenn Ranch Rd. 2. Project 2: 1,000,000 square feet of industrial warehouse and manufacturing space on the southeast corner of Portola Pkwy and Glenn Ranch Rd. 3. Project 3: 1,000,000 square feet of industrial warehouse and manufacturing space on the southwest corner of Portola Pkwy and Glenn Ranch Rd. We are concerned that the combined emissions from these projects will have a significant and cumulative impact on the environment and public health. Specifically, we are concerned about the following issues: 1. Increased air pollution: The projects will result in a significant increase in air pollution, including NOx, SOx, PM2.5, and PM 10, which will have a negative impact on the health of residents in the surrounding area. 2. Increased traffic congestion and noise pollution: The projects will result in a significant increase in traffic congestion and noise pollution, which will have a negative impact on the quality of life for residents in the surrounding area. 3. Loss of open space and habitat: The projects will result in the loss of open space and habitat for local wildlife, which will have a negative impact on the biodiversity of the area. 4. Increased greenhouse gas emissions: The projects will result in a significant increase in greenhouse gas emissions, which will contribute to climate change and have a negative impact on the environment. We urge you to carefully consider the following alternatives to the proposed projects: 1. Smaller-scale development: Consider smaller-scale development projects that would have a lesser impact on the environment and public health. 2. Alternative locations: Consider alternative locations for the projects that would have a lesser impact on the environment and public health. 3. Mitigation measures: Require the developers to implement mitigation measures to reduce the impacts of the projects on the environment and public health. We urge you to take these concerns seriously and to consider the alternatives we have proposed. We believe that it is possible to find a solution that balances the need for economic development with the need to protect the environment and public health. Thank you for your attention to this critical issue.

The Issue

Subject: Stop the Proposed Industrial Warehouse and Manufacturing Projects on Portola Pkwy, Lake Forest

Dear Honorable Members of the Lake Forest City Council and Planning Department,

We are writing to express our strong opposition to the proposed three large-scale industrial development projects on Portola Pkwy in Lake Forest. The projects in question are:

1. Project 1: 1,000,000 square feet of industrial warehouse and manufacturing space on the northeast corner of Portola Pkwy and Glenn Ranch Rd.
2. Project 2: 1,000,000 square feet of industrial warehouse and manufacturing space on the southeast corner of Portola Pkwy and Glenn Ranch Rd.
3. Project 3: 1,000,000 square feet of industrial warehouse and manufacturing space on the southwest corner of Portola Pkwy and Glenn Ranch Rd.

We are concerned that the combined emissions from these projects will have a significant and cumulative impact on the environment and public health. Specifically, we are concerned about the following issues:

1. Increased air pollution: The projects will result in a significant increase in air pollution, including NOx, SOx, PM2.5, and PM 10, which will have a negative impact on the health of residents in the surrounding area.
2. Increased traffic congestion and noise pollution: The projects will result in a significant increase in traffic congestion and noise pollution, which will have a negative impact on the quality of life for residents in the surrounding area.
3. Loss of open space and habitat: The projects will result in the loss of open space and habitat for local wildlife, which will have a negative impact on the biodiversity of the area.
4. Increased greenhouse gas emissions: The projects will result in a significant increase in greenhouse gas emissions, which will contribute to climate change and have a negative impact on the environment.

We urge you to carefully consider the following alternatives to the proposed projects:

1. Smaller-scale development: Consider smaller-scale development projects that would have a lesser impact on the environment and public health.
2. Alternative locations: Consider alternative locations for the projects that would have a lesser impact on the environment and public health.
3. Mitigation measures: Require the developers to implement mitigation measures to reduce the impacts of the projects on the environment and public health.

We urge you to take these concerns seriously and to consider the alternatives we have proposed. We believe that it is possible to find a solution that balances the need for economic development with the need to protect the environment and public health.

Thank you for your attention to this critical issue.

Sincerely,

Concerned Homeowners of Lake Forest, CA

[redacted], [redacted]

Why Active Is Needed Now

Supporting these projects will set a precedent that industrial warehouses are welcome in Lake Forest, which will encourage more similar projects to be proposed in the future. The Residents 4 Responsible Development Committee urges the Lake Forest City Council and Planning Department to act in the best interests of the community and to reject these projects. The proposed projects will have a significant negative impact on the environment, public health, and the quality of life for residents in the surrounding area. We urge you to consider the alternatives we have proposed and to work with us to find a solution that balances the need for economic development with the need to protect the environment and public health.

Thank you for your attention to this critical issue.

Sincerely,

Concerned Homeowners of Lake Forest, CA

[redacted], [redacted]

Why Active Is Needed Now

Supporting these projects will set a precedent that industrial warehouses are welcome in Lake Forest, which will encourage more similar projects to be proposed in the future. The Residents 4 Responsible Development Committee urges the Lake Forest City Council and Planning Department to act in the best interests of the community and to reject these projects. The proposed projects will have a significant negative impact on the environment, public health, and the quality of life for residents in the surrounding area. We urge you to consider the alternatives we have proposed and to work with us to find a solution that balances the need for economic development with the need to protect the environment and public health.

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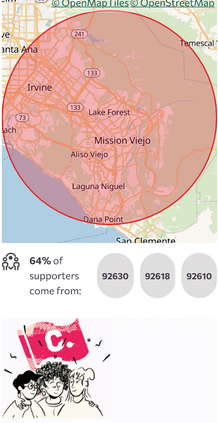
Why Active Is Needed Now



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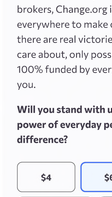

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Petition updates

The petition has been sent to Lake Forest City Council. Please continue to sign to support.
7 months ago
498 residents have already signed a petition strongly opposing the construction of new warehouses and factories around The Meadows...

The petition will be submitted to the City Council members and City Planning Commission members
8 months ago
The urgency of opposing the construction of new warehouses and factories around the Lake Forest community cannot be overstated. The situation is pressing!...

More updates

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Petition created on January 5, 2025

Change.org › environmental issue › Stop the Proposed Industrial Warehouse Manufacturing Projects in Lake Forest

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petition_signatures_jobs_490363184_20250909041113

Name	City	State	Postal Code	Country	Signed On
Bin Zhou	Buffalo Grove	IL	60089	United States	2025-01-05
Shuqin Jin	Los Angeles	CA	90065	United States	2025-01-05
Yingzi Peng	Irvine	CA	92620	United States	2025-01-05
Harrison Jiang	Lake	CA	92694	United States	2025-01-06
hua jiang	Lake Forest	CA	92630	United States	2025-01-06
Linda Gu	Lake Forest	CA	92630	United States	2025-01-06
Wayne Yang	Lake Forest	CA	92630	United States	2025-01-06
bo Chen	Lake Forest	CA	92630	United States	2025-01-06
Chenxin Cai	Laguna Niguel	CA	92603	United States	2025-01-06
Tingting Wan	Lake Forest	CA	92630	United States	2025-01-06
connie ding	Lake Forest	CA	92630	United States	2025-01-06
Mindy Li	Lake Forest	CA	92630	United States	2025-01-06
Vivian Zhao	Lake Forest	CA	92630	United States	2025-01-06
Sharon Hu	Mountain view	CA	ca 94040	United States	2025-01-06
Ming Chen	Lake Forest	CA	92630	United States	2025-01-06
Qianyu Ye	Anaheim	CA	92630	United States	2025-01-06
Kevin Xie	Lake Forest	CA	92630	United States	2025-01-06
Cherie Liu	Lake Forest	CA	92630	United States	2025-01-06
jason ye	irvine	CA	92603	United States	2025-01-06
Jeffrey Yu	Anaheim	CA	92801	United States	2025-01-06
xiangan cai	Lake Forest	CA	92630	United States	2025-01-06
Valeriya Hudson	Lake Forest	CA	92630	United States	2025-01-06
Jing Li	Lake Forest	CA	92630	United States	2025-01-06
Rose Liu	Foothill Ranch	CA	92610	United States	2025-01-06
Cindy Chen	Plano	TX	75025	United States	2025-01-06
Tao Wu	Ontario	CA	91761	United States	2025-01-06
Si Zheng	Lake Forest	CA	92630	United States	2025-01-06
Chao Huang	Lake Forest	CA	92630	United States	2025-01-06
Katherine Nagasawa	Oakland	CA	94607	United States	2025-01-06

Minmin Tian	Lake Forest	CA	92630	United States	2025-01-06
Rita Cox	Lebanon	TN	37090	United States	2025-01-06
Lin Zhu	Lake Forest	CA	92630	United States	2025-01-06
Haichen Liu	Lake forest	CA	92630	United States	2025-01-06
Susana Muñoz	Madrid		28019	Spain	2025-01-06
Hanneke Mol	Poortvliet	NE	4693EG	United States	2025-01-06
angelika+ thomas wegner			51399	Germany	2025-01-06
Hong Zhu	Lake Forest	CA	92630	United States	2025-01-06
Katalin Kónya-Jakus	Szatymaz			Hungary	2025-01-06
Gama Leong	George Town		11060	Malaysia	2025-01-06
xiuying zhou	Irvine	CA	92620	United States	2025-01-06
Lucky Hu	Lake Forest	CA	92630	United States	2025-01-06
Darcy Rubin	Los Angeles	CA	90023	United States	2025-01-06
Diana Lees	Thousand Oaks,	CA	91360	United States	2025-01-06
Eva Dyan	Los Angeles	CA	90017	United States	2025-01-06
Zhongdong Ma	Lake Forest	CA	92630	United States	2025-01-06
armer teufel reger	Nurnberg		90443	Germany	2025-01-06
Bill Chen	Ladera Ranch	CA	92694	United States	2025-01-06
Yolanda Schultes	Wittenbach		9300	Sweden	2025-01-06
Julie Port	Slough		SL1	United Kingdom	2025-01-06
zeit zhu	lake forest	CA	92630-8472	United States	2025-01-06
Yuxin Shi	lake forest	CA	92692	United States	2025-01-06
celine duburg anchen	montevideo			Uruguay	2025-01-06
hortencia mendoza			44260	Mexico	2025-01-06
Sachin Padhiyar	Lake Forest	CA	92630	United States	2025-01-06
Yishu zhu	Lake Forest	CA	92630	United States	2025-01-06
Vivian Gu	Yorba Linda	CA	92886	United States	2025-01-06
Cheng Zhu	Henderson	NV	89012	United States	2025-01-06
Nitin Divekar	Lake Forest	CA	92630	United States	2025-01-06
Jary Du	Lake Forest	CA	92630	United States	2025-01-06
Fournier Fernande	Luxembourg		1482	Luxembourg	2025-01-06
zhujia lu	Lake Forest	CA	92630	United States	2025-01-06

Mindy Zhang	Lake Forest	CA	92630	United States	2025-01-06
Stephen Bian	Lake Forest	CA	92630	United States	2025-01-06
Martine Cuisenaire	Heer		5543	Belgium	2025-01-06
Charles Cruz	Lake Forest	CA	92630	United States	2025-01-06
Reema Kanda	Fontana	CA	92337	United States	2025-01-06
Madelein Blundred	Lake Dallas	TX	75065	United States	2025-01-06
REZA BERENJFOROOSHA	Lake Forest	CA	92630	United States	2025-01-06
Perng nian Chu				Taiwan	2025-01-06
Anna Trella	Lake Forest	CA	92630	United States	2025-01-06
Shayna Tyler			10000	France	2025-01-06
Jiaoyang Li	Lake Forest	CA	92630	United States	2025-01-06
Susie Xu	Lake Forest	CA	92630	United States	2025-01-06
Bambi Mayr				Austria	2025-01-06
Kai Chen	Irvine	CA	92618	United States	2025-01-06
Basra Purdy	Lake Forest	CA	92630	United States	2025-01-06
Yizhou Xu	Anaheim	CA	92630	United States	2025-01-06
Hu Yu	Lake Forest	CA	92630	United States	2025-01-06
Jinlan Yang	Irvine	CA	92604	United States	2025-01-06
Susan Zhao	Lake Forest	CA	92630	United States	2025-01-06
Jim Chao	Lake Forest	CA	92630	United States	2025-01-06
Maria van Geel.	Poznan			Poland	2025-01-06
Aaron Xie	Irvine	CA	92618	United States	2025-01-06
marc huysmans	Edegem			Belgium	2025-01-06
Dominique Girard	Marseille		13001	France	2025-01-06
Fangxian Wei	Lake Forest	CA	92630	United States	2025-01-06
Fengwei Wu	Lake Forest	CA	92630	United States	2025-01-06
Xinyu Li	Lake Forest	CA	92630	United States	2025-01-06
Helen Yang	Irvine	CA	92618	United States	2025-01-06
Claudia Neuhalfen	Bonn		53117	Germany	2025-01-06
Shawn Liu	Lake Forest	CA	92630	United States	2025-01-06
Bob Zhou	Lake forest	CA	92630	United States	2025-01-06
Viola Yu	Lake Forest	CA	92630	United States	2025-01-06

Marilyn Gonzalez				Philippines	2025-01-06
jiwen ding	Corona	CA	92882	United States	2025-01-06
Jianhua Rong	Lake Forest	CA	92630	United States	2025-01-06
Sam Wang	Lake Forest	CA	92630	United States	2025-01-06
Tom Atha	Alhambra	CA	91801	United States	2025-01-06
Jian Xing	Huntington Beach	CA	92647	United States	2025-01-06
Sophia Zhu	Lake Forest	CA	92630	United States	2025-01-06
R S	Koln		51069	Germany	2025-01-06
Astrid Beatrix Geest	Stadskanaal		9502	Netherlands	2025-01-06
Mirjam Talma	Buitenpost		9285VZ	Netherlands	2025-01-06
jocelyne lapointe	terrebonne		j6w0b5	Canada	2025-01-06
Liao Tingwen	Lake Forest	CA	92630	United States	2025-01-06
Yuxiang Zhang	Lake Forest	CA	92630	United States	2025-01-07
Hong Chao	Lake Forest	CA	92630	United States	2025-01-07
Eric Zhou	Lake Forest	CA	92630	United States	2025-01-07
Liting Li	Lake Forest	CA	92630	United States	2025-01-07
Bingwen Zhang				Hong Kong SAR	2025-01-07
Claudette Guy	Highland	CA	92346	United States	2025-01-07
B o Song	Santa Ana	CA	92705	United States	2025-01-07
Liping wang	Lake Forest	CA	92630	United States	2025-01-07
Yin Sheng	Lake Forest	CA	92630	United States	2025-01-07
Nize Li	lake forest	CA	92630	United States	2025-01-07
sarika arora	Alpharetta	GA	30022	United States	2025-01-07
xinzhou wu	Irvine	CA	92618	United States	2025-01-07
xi yang	Cerritos	CA	90703	United States	2025-01-07
Kaixi Liu	Lake forest	CA	92630	United States	2025-01-07
Jieyu Zhang	Lake Forest	CA	92630	United States	2025-01-07
XIAO HONG	Lake Forest	CA	92630	United States	2025-01-07
Rui Wang	Ladera Ranch	CA	92694	United States	2025-01-07
Yu Hu	Lake Forest	CA	92630	United States	2025-01-07
Min Du	Lake Forest	CA	92630	United States	2025-01-07
Jiachen Dai	Tustin	CA	92782	United States	2025-01-07

Jiachen Chu	Lake Forest	CA	92630	United States	2025-01-07
Jing qin	lake forest	CA	92630	United States	2025-01-07
Maria Charney	Lake Forest	CA	92630	United States	2025-01-07
Mei Ma Fan	Lake Forest	CA	92630	United States	2025-01-07
Wendy J	Lake Forest	CA	92630	United States	2025-01-07
Quan Gao	Lake Forest	CA	92630	United States	2025-01-07
Song Feng	Lake Forest	CA	92630	United States	2025-01-07
Zhenyu Yan	Lake Forest	CA	92630	United States	2025-01-07
Dong Yan	Lake Forest	CA	92630	United States	2025-01-07
corine cathala	Pierrelatte		26700	France	2025-01-07
Yaxi Yue	lake forest	CA	92630	United States	2025-01-07
Michelle Bai	Lake Forest	CA	92630	United States	2025-01-07
Baohui Zhang	Lake Forest	CA	92630	United States	2025-01-07
Lily Z	Lake Forest	CA	92630	United States	2025-01-07
Carol Yu	Foothill Ranch	CA	92610	United States	2025-01-07
Dominique LANG	Vaison-la-Romaine		84110	France	2025-01-07
Andrew Vallender	Ventnor	ENG	PO38 1BH	United Kingdom	2025-01-07
Jun Jin	Rancho Santa Ma	CA	92688	United States	2025-01-07
barbara franchs	colorado springs	CO	80920	United States	2025-01-07
Christopher Evans	Shobdon		HR6	United Kingdom	2025-01-07
Rosa Cabrerizo	Hospitalet de Llobregat		8905	Spain	2025-01-07
Lu Lin	Lake Forest	CA	92630	United States	2025-01-07
Jun Xie	San Diego	CA	92127	United States	2025-01-07
Daniel Xu	Walnut	CA	91789	United States	2025-01-07
Chang Chang Zhang	Lake Forest	CA	92630	United States	2025-01-07
Consuelo Serena Velasco	Strambino Fr Cerone		10019	Italy	2025-01-07
Angela Hu	Lake Forest	CA	92630	United States	2025-01-07
michael Hu	Lake Forest	CA	92630	United States	2025-01-07
Petra Achtzehnter	Kaiserslautern		67663	Germany	2025-01-07
Yuna Li	Lake Forest	CA	92630	United States	2025-01-07
Sabine Möhler	esselbach		97839	Germany	2025-01-07
Sue Cone	Hull	ENG	HU13 9DS	United Kingdom	2025-01-07

Anke O.	Auerbach		8209	Germany	2025-01-07
Anneke Andries	Raamsdonksveer		4941JT	Netherlands	2025-01-07
Robert Nowak				Poland	2025-01-07
sara sang	los angeles	CA	91601	United States	2025-01-07
Baolin Zhou	Lake Forest	CA	92630	United States	2025-01-07
Anne Montarou	Ahrensburg		22926	Germany	2025-01-07
Nelly PRESTAT	Mouroux		77120	France	2025-01-07
Caroline Sévilla	Paris		75001	France	2025-01-07
Kate Kenner	Guilford	VT	5301	United States	2025-01-07
Maryann Staron	Hometown	IL	60456	United States	2025-01-07
Joyce Alexander	Edinburgh	SCT	EH15	United Kingdom	2025-01-07
Renee Wang	Los Angeles	CA	90003	United States	2025-01-07
Junhua Xu	Lake Forest	CA	92630	United States	2025-01-07
Yizhuang Kang	Lake Forest	CA	92630	United States	2025-01-07
Jiayi Zhu	Lake Forest	CA	92630	United States	2025-01-07
Christine Thörnwall	Norrköping		602 22	Sweden	2025-01-07
Yan Gu	Lake Foreat	CA	92630	United States	2025-01-07
Po-Yuan Lin	Lake Forest	CA	92630	United States	2025-01-07
Taiheng Jin	Orange	CA	92868	United States	2025-01-07
Fengyi Yang	311 Newton lake	CA	92630	United States	2025-01-07
Jingping Guo	Pittsburgh	PA	15212	United States	2025-01-07
Tracy Guo	Lake Forest	CA	92630	United States	2025-01-07
Anna Zhang	Lake Forest	CA	92630	United States	2025-01-07
Ana Gruber	Wolfratshausen		82515	Germany	2025-01-07
Dan Wang	Lake Forest	CA	92630	United States	2025-01-07
Weidong Zhao	Lake Forest	CA	92630	United States	2025-01-07
Chuan Zhan	Lake Forest	CA	92630	United States	2025-01-07
Zhu Wang	Lake Forest	CA	92630	United States	2025-01-07
Frédéric Jaubert	Pont de Chéruy		38230	France	2025-01-07
Gordon Hu	Lake Forest	CA	92630	United States	2025-01-07
Jinguo Wang	Santa Ana	CA	92703	United States	2025-01-07
Kevin Yin	Foothill Ranch	CA	92610	United States	2025-01-07

lucy liu	Foothill Ranch	CA	92610	United States	2025-01-07
Farshid Gh	Las Vegas	NV	89128	United States	2025-01-07
Janson Xu	Lake Forest	CA	92630	United States	2025-01-07
Jazmyne Byrd	Atlanta	GA		United States	2025-01-07
Shunhua ZHAN	Lake Forest	CA	92630	United States	2025-01-07
XIA CAO	Lake Forest	CA	92630	United States	2025-01-07
lucy hu	lake forest	CA	92630	United States	2025-01-07
Grace Shi	Lake Forest	CA	92630	United States	2025-01-07
YZ Lu	Lake Forest	CA	92630	United States	2025-01-07
Vivian Wu	Lake Forest	CA	92630	United States	2025-01-07
Roxana Moya	Santiago			Chile	2025-01-07
Bruce Forster	Newcastle upon Tyne		NE7	United Kingdom	2025-01-07
Peter Hu	Irvine	CA	92620	United States	2025-01-07
Elisabeth Bechmann	Polten		3100	Austria	2025-01-07
Debbie Peng	Lake Forest	CA	92630	United States	2025-01-07
Lynne Holt	Lake Forest	CA	92630	United States	2025-01-07
Cong Lu	Lake Forest	CA	92630	United States	2025-01-08
Jan Harvell	Funtington	ENG	PO18 9LH	United Kingdom	2025-01-08
Valérie Paillard	Savigny-le-Temple		77176	France	2025-01-08
jianyin chen	Lake Forest	CA	92630	United States	2025-01-08
Xiaoling Chai	Lake Forest	CA	92618	United States	2025-01-08
ling gong	231 burwood	CA	92630	United States	2025-01-08
Ethan Zeng	Lake Forest	CA	92630	United States	2025-01-08
Rita Gu	Lake Forest	CA	92630	United States	2025-01-08
Gia Wang	Santa Ana	CA	92703	United States	2025-01-08
lu zhang	Irvine	CA	92620	United States	2025-01-08
Xiaobo Zhang	Lake Forest	CA	92630	United States	2025-01-08
yaotong shang	Lake Forest	CA	92630	United States	2025-01-08
jackie chang	Dallas	TX	75247	United States	2025-01-08
Wendy Forster				United Kingdom	2025-01-08
Heidi Siebens	Muizen		2800	Belgium	2025-01-08
Weijie Wang	Tustin	CA	92782	United States	2025-01-08

Maria Eloisa Ruiz	Fort Collins	CO	80525	United States	2025-01-08
Gerald Hallead	Traverse City	MI	49684-6605	United States	2025-01-08
Hongen Wen	Lake Forest	CA	92630	United States	2025-01-08
Jifeng Jiang	Lake Forest	CA	92630	United States	2025-01-08
Ming lee	洛杉矶	CA	90089	United States	2025-01-08
Sarah de Sousa	Spring Branch	TX	78070	United States	2025-01-08
Tanya Lin	Ladera Ranch	CA	92694	United States	2025-01-08
Yong Lu	Lake Forest	CA	92630	United States	2025-01-08
youxing tao	Lake Forest	CA	92630	United States	2025-01-08
Sijia Powers	Lake Forest	CA	92630	United States	2025-01-08
David Ham	Lake Forest	CA	92630	United States	2025-01-08
Yuling Zou	Lake Forest	CA	92630	United States	2025-01-08
Jianzhong Zhu	Lake Forest	CA	92630	United States	2025-01-08
Ivan Lee	Mission Viejo	CA	92692	United States	2025-01-08
Raleigh Koritz	St Paul	MN	55114	United States	2025-01-08
Shelly Wang	Lake Forest	CA	92630	United States	2025-01-08
Min Xie	Santa Ana	CA	92703	United States	2025-01-08
shelley zagars	Torrance	CA	90505	United States	2025-01-09
Lucy Cai	Santa Ana	CA	92703	United States	2025-01-09
Darcy Rubin	Los Angeles	CA	90027	United States	2025-01-09
L Saunders	Masterton			New Zealand	2025-01-09
Elliot Liu	Lake Forest	CA	92630	United States	2025-01-09
Ezra Gibson				United States	2025-01-09
fiona Liu				Hong Kong SAR	2025-01-09
Sylvi Christiansen	Sarpsborg			Norway	2025-01-09
Pam Miller	Tolar	TX	76046	United States	2025-01-09
Brett Allen	North Hills	CA	91343	United States	2025-01-09
Mikey Sanchez	Mcallen	TX	78501	United States	2025-01-09
Sylvie Auger	Saint-georges		G5Y	Canada	2025-01-09
Devan McNeal	Aliso Viejo	CA	92656	United States	2025-01-09
Ying Zhang	Lake Forest	CA	92630	United States	2025-01-09
Guoliang Xu	Lake Forest	CA	92630	United States	2025-01-09

Dylan Liu	Irvine	CA	92618	United States	2025-01-09
Xiaobo Huang	Lake Forest	CA	92630	United States	2025-01-09
Hsiuching Kuo	Lake Forest	CA	92630	United States	2025-01-09
Cody Huang	Lake Forest	CA	92630	United States	2025-01-09
Julia Ge	Lake Forest	CA	92630	United States	2025-01-09
JIAN CHEN	Walnut	CA	91789	United States	2025-01-09
Freya Harris	Atlanta	GA	30342	United States	2025-01-09
Jocelyn Liang	Arcadia	CA	91006	United States	2025-01-09
xiaojuan lu	Lake Forest	CA	92630	United States	2025-01-09
Christine Li	lake forest	CA	92630	United States	2025-01-09
Sherry Liu	Huntington Beach	CA	92646	United States	2025-01-10
curtis wang	San Diego	CA	92104	United States	2025-01-10
Ping He	Irvine	CA	92603	United States	2025-01-10
Kristina Sedic	Zagreb		10000	Croatia	2025-01-10
Nan Liu	Lake Forest	CA	92630	United States	2025-01-10
Mei Zhan	Lake Forest	CA	92630	United States	2025-01-10
Zhiqi Gong	Lake Forest	CA	92630	United States	2025-01-10
Yanfeng Ye				United States	2025-01-10
yanli wu	Ladera Ranch	CA	92694	United States	2025-01-10
Xiaotong Li	Lake Forest	CA	92630	United States	2025-01-10
Ariana Wu	Lake Forest	CA	92630	United States	2025-01-10
Anna Hahm	Lake Forest	CA	92630	United States	2025-01-10
Ziyu Zhang	Westminster	CA	92683	United States	2025-01-10
Jessie Li	Lake Forest	CA	92630	United States	2025-01-11
Jinzhu Wu	Lake Forest	CA	92630	United States	2025-01-11
Tian Ding	Lake Forest	CA	92630	United States	2025-01-11
May Cai	Santa Ana	CA	92703	United States	2025-01-11
Juehong Chen				Hong Kong SAR	2025-01-11
Dan De Yo	Yorba Linda	CA	92886	United States	2025-01-11
Kevin Chiang	Lake Forest	CA	92603	United States	2025-01-11
Yue Hao zhuo	Anaheim	CA	92804	United States	2025-01-11
Shawna Zhang	Ladera Ranch	CA	92694	United States	2025-01-11

Sandra Rembis	Rancho Santa Ma	CA	92688	United States	2025-01-11
Yan Rong	Lake forest	CA	92630	United States	2025-01-11
Nanxiang Zhang	Lake Forest	CA	92630	United States	2025-01-11
dongmei han	Irvine	CA	92618	United States	2025-01-11
Jamie Dufault	Los Angeles	CA	90006	United States	2025-01-11
Yi Ma	Irvine	CA	92618	United States	2025-01-11
Frank Cristaldi	Lake Forest	CA	92630	United States	2025-01-11
Eric Yu	Lake Forest	CA	92630	United States	2025-01-11
Jing Xu	Lake Forest	CA	92630	United States	2025-01-11
Nancy Zhao	Lake Forest	CA	92630	United States	2025-01-11
Enoch Liu	Lake Forest	CA	92630	United States	2025-01-11
Zhixin Zheng	Lake Forest	CA	92630	United States	2025-01-11
Siqi Chen	Lake Forest	CA	92630	United States	2025-01-11
Jiyoon Jeong	Los Angeles	CA	90060	United States	2025-01-11
Roy Liu	Lake Forest	CA	92630	United States	2025-01-11
Tony Yang	Irvine	CA	92614	United States	2025-01-11
Sarah Wang	Lake Forest	CA	92630	United States	2025-01-11
Bing Wen Zhang				Hong Kong SAR	2025-01-11
Jenny Pham	Lake Forest	CA	92630	United States	2025-01-11
Ann Hij	Irvine	CA	92630	United States	2025-01-11
Reema Abuzir	Lake Forest	CA	92630	United States	2025-01-11
John N	Lake Forest	CA	92630	United States	2025-01-11
Gaurav Sharma	Mission Viejo	CA	92691	United States	2025-01-11
Kelvin Chong	Lake Forest	CA	92630	United States	2025-01-11
Yini Zhu	Lake Forest	CA	92630	United States	2025-01-11
Shaoli Huang	Lake Forest	CA	92630	United States	2025-01-11
Guang Wang	Lake Forest	CA	92630	United States	2025-01-11
Joanna Parker	Los Angeles	CA	90046	United States	2025-01-11
Tiffany Wooden	Oxnard	CA	93030	United States	2025-01-11
Xuanyi Ouyang	Lake Forest	CA	92630	United States	2025-01-11
Youwei Xia	Lake Forest	CA	92630	United States	2025-01-12
Alona Mashevska	Lake Forest	CA	92630	United States	2025-01-12

Rufang Chen	Lake Forest	CA	92630	United States	2025-01-12
Zhipeng Jia	Irvine	CA	92602	Denmark	2025-01-12
Huthyfah Abed	Lake Forest	CA	92630	United States	2025-01-12
Huey Chong	Lake Forest	CA	92630	United States	2025-01-12
Zhikun Wu	Lake Forest	CA	92630	United States	2025-01-12
xiuyi yu	Lake forest	CA	92630	United States	2025-01-12
Zhiqin Liao	Lake Forest	CA	92630	United States	2025-01-12
Xinyi Wang	Lake Forest	CA	92630	United States	2025-01-12
Yang Dong	Lake Forest	CA	92630	United States	2025-01-12
Yiyi Shi	Lake Forest	CA	92630	United States	2025-01-12
Grace Tsai	Lake Forest	CA	92630	United States	2025-01-12
Deping Ye	Lake Forest	CA	92630	United States	2025-01-12
Yin Yin	North Hollywood	CA	91606	United States	2025-01-12
Andrea Lewis	Hartford	CT	6112	United States	2025-01-12
Lilin Song	Lake Forest	CA	92630	United States	2025-01-12
Iman B	Trabuco Canyon	CA	92679	United States	2025-01-12
weitian zhou	Lake Forest	CA	92630	United States	2025-01-12
Christna Frutuoso	Esch		4069	Luxembourg	2025-01-12
Samuel Ka	Los Angeles	CA	90060	United States	2025-01-13
Marie-José CHOBERT	Orléans		45000	France	2025-01-13
Ryan Xu	Lake Forest	CA	92630	United States	2025-01-13
linda liu	Lake Forest	CA	92630	United States	2025-01-13
Kathy Bui	Lake Forest	CA	92630	United States	2025-01-13
Kristen Downey	Lake Forest	CA	92630	United States	2025-01-13
Makenna Petruzzi	Mission Viejo	CA	92691	United States	2025-01-13
Joshua Gould	Lake Forest	CA	92630	United States	2025-01-13
Veronique Dick			57700	France	2025-01-13
Elvera Nani	Mission Viejo	CA	92692	United States	2025-01-13
Janet Lee	Lake Forest	CA	92630	United States	2025-01-13
Veronica Woltman	Lake forest	CA	92630	United States	2025-01-13
Cheryl Chun	Foothill Ranch	CA	92610	United States	2025-01-13
Lily Bijdam	Lake Forest	CA	92630	United States	2025-01-13

Kandice Morruthers	Lake forest	CA	92630	United States	2025-01-13
April Howard	Foothill Ranch	CA	92610	United States	2025-01-13
Kim Winburn	Lake Forest	CA	92630	United States	2025-01-14
kathy Chen	Trabuco Canyon	CA	92679	United States	2025-01-14
Tian Lan	Lake Forest	CA	92630	United States	2025-01-14
Ali Hajisattari	Lake forest	CA	92630	United States	2025-01-14
Lisa Wang	Lake Forest	CA	92630	United States	2025-01-14
Annie Huang	Lake Forest	CA	92630	United States	2025-01-14
Tao Li	Lake Forest	CA	92630	United States	2025-01-14
Congyu Zhang	Indianapolis	IN	46260	United States	2025-01-14
Tony Lau	Sammamish	WA	98074	United States	2025-01-14
Yaling Zhou	Lake Forest	CA	92630	United States	2025-01-14
xuemei li	Garden Grove	CA	92840	United States	2025-01-14
Jiaxin Tang	Lake Forest	CA	92630	United States	2025-01-14
Wendi Li	Lake Forest	CA	92630	United States	2025-01-14
Diana De	Lake Forest	CA	92630	United States	2025-01-14
Yang Zheng	Ladera Ranch	CA	92694	United States	2025-01-14
Ruchi Mitra	Irvine	CA	92620	United States	2025-01-14
Bubu Cheng	Ladera Ranch	CA	92694	United States	2025-01-14
Neha Vaid	Lake Forest	CA	92630	United States	2025-01-14
Rui Lai	Lake Forest	CA	92630	United States	2025-01-14
Marion Renner	Lake Forest	CA	92630	United States	2025-01-14
Stephen Bian	Lake Forest	CA	92630	United States	2025-01-14
June Bian	Lake Forest	CA	92630	United States	2025-01-14
Carina Cai	Lake Forest	CA	92630	United States	2025-01-14
Bryan Li	Lake Forest	CA	92630	United States	2025-01-14
Xi Liu	Lake Forest	CA	92630	United States	2025-01-14
Peng Sun	Montpelier	VT	5602	United States	2025-01-14
Ty Shao	Lake Forest	CA	92630	United States	2025-01-14
Weinan Tseng	Lake Forest	CA	92630	United States	2025-01-14
Sid Menon	Lake Forest	CA	92630	United States	2025-01-14
Christine Lee-Kim	Lake Forest	CA	92630	United States	2025-01-14

Michael Gu	Lake Forest	CA	92630	United States	2025-01-14
Ally Wu	Lake Forest	CA	92630	United States	2025-01-14
Grace Li	Lake Forest	CA	92630	United States	2025-01-14
Lynn Cheng	Mission Viejo	CA	92691	United States	2025-01-14
Beibei Zhao	Lake Forest	CA	92630	United States	2025-01-14
Hsin Tien Chou	Lake Forest	CA	92630	United States	2025-01-14
Wenfang yin	Lake Forest	CA	92630	United States	2025-01-14
Ashlee Liu	Moreno Valley	CA	92555	United States	2025-01-14
Yan Li	Lake Forest	CA	92630	United States	2025-01-14
Katherine Li	Lake Forest	CA	92630	United States	2025-01-14
Wendi Alvarez	Lake forest	CA	92630	United States	2025-01-14
Trisha Bube	Trabuco Canyon	CA	92679	United States	2025-01-14
Alexsis Veal	Lake Forest	CA	92630	United States	2025-01-14
kylie van leeuwen	Lake Forest	CA	92630	United States	2025-01-14
Ting Wang	Lake Forest	CA	92630	United States	2025-01-14
Gol Golshani	Lake Forest	CA	92630	United States	2025-01-14
Joan Konkolewski	Lake Forest	CA	92630	United States	2025-01-14
Kailing Li	Indianapolis	IN	46260	United States	2025-01-14
Frank Wang	San Jose	CA	95123	United States	2025-01-14
Lixin Xu	Lake Forest	CA	92630	United States	2025-01-14
Sherry Chen	Lake Forest	CA	92630	United States	2025-01-14
John Wang	Irvine	CA	92618	United States	2025-01-14
Charles Xiong	Lake forest	CA	92630	United States	2025-01-14
Yuanyuan Jia	Lakeforest	CA	92630	United States	2025-01-14
Sunny Wu	Lake Forest	CA	92630	United States	2025-01-14
Shawna Newbern	Los Angeles	CA	90002	United States	2025-01-14
DEBBIE FAGAN	Yorba Linda	CA	92886	United States	2025-01-14
Tian Zhao	Irvine	CA	92602	United States	2025-01-14
Thelma Cerna	Ontario	CA	91762	United States	2025-01-14
May Xi	Lake Forest	CA	92630	United States	2025-01-15
Hongzheng Lu	Irvine	CA	92618	United States	2025-01-15
Yuhang Wu	Lake Forest	CA	92630	United States	2025-01-15

Vivian Tseng				Taiwan	2025-01-15
Emily Chiang	Lake Forest	CA	92630	United States	2025-01-15
Richard Chiang	Lake Forest	CA	92630	United States	2025-01-15
Christine Rong	Lake forest	CA	92630	United States	2025-01-15
Ke Martens	Lake Forest	CA	92630	United States	2025-01-15
Michael Liu	Lake Forest	CA	92630	United States	2025-01-15
Chi He				Singapore	2025-01-15
David Guia	Foothill Ranch	CA	92610	United States	2025-01-15
Meisi Huang	Lake Forest	CA	92630	United States	2025-01-15
Nicole Barrios	Lake Forest	CA	92630	United States	2025-01-15
Turpin John	Lake Forest	CA	92630	United States	2025-01-15
Kevin Xia	Lake Forest	CA	92630	United States	2025-01-15
Shaoqiang Peng				Hong Kong SAR	2025-01-15
Yang Xu	Lake Forest	CA	92630	United States	2025-01-15
Juan Dai	San Diego	CA	92124	United States	2025-01-16
Emily Wang	Santa Ana	CA	92712	United States	2025-01-16
Judy Huangsun	Lake Forest	CA	92630	United States	2025-01-16
Chris Jackson	Beverly Hills	CA	90210	United States	2025-01-16
Joann Chen				Hong Kong SAR	2025-01-16
Abner Juarez	Paramount	CA	90723	United States	2025-01-16
Liz valadez	Fontana	CA	92335	United States	2025-01-16
Paritar Winzaw	Lake Forest	CA	92630	United States	2025-01-16
Alyssa Soto	Lake Forest		92630	United States	2025-01-16
Doron Hikry	Agoura	CA	91301	United States	2025-01-16
raymond nino	Los Angeles	CA	90023	United States	2025-01-16
youyang yu	Anaheim	CA	92802	United States	2025-01-16
Zhengwei Liu	Lake Forest	CA	92630	United States	2025-01-16
Raiya Almomani	Rancho, Santa, M	CA	92688	United States	2025-01-16
George Saloum	Riverside	CA	92504	United States	2025-01-16
Javier Jaramillo	Los Angeles	CA	90039	United States	2025-01-16
Nancy Elist	Santa Monica	CA	90403	United States	2025-01-16
kelly zhang	Lake Forest	CA	92630	United States	2025-01-16

Audrey Oliverio	Satellite		32937	United States	2025-01-16
Sean Han	Lake Forest	CA	92630	United States	2025-01-16
Qingzhi Hu	Lake Forest	CA	92630	United States	2025-01-16
Xinran Su	Lake Forest	CA	92630	United States	2025-01-16
libo zhao	West Covina	CA	91790	United States	2025-01-16
Mike Hebert	El Cajon	CA	92021	United States	2025-01-16
Jocelyn Yu	Lake Forest	CA	92630	United States	2025-01-16
Cheng Ian	Lake Forest	CA	92630	United States	2025-01-16
Qing Zhang	Lake Forest	CA	92630	United States	2025-01-16
Anthony Lam	Lake Forest	CA	92630	United States	2025-01-16
Tian Chang	Lake Forest	CA	92630	United States	2025-01-16
charlene liu	Lake Forest	CA	92630	United States	2025-01-16
Katherine Vy	Hacienda Heights	CA	91745	United States	2025-01-16
Jason Zhang	Lake Forest	CA	92630	United States	2025-01-16
xiaoxu xing	Lake Forest	CA	92630	United States	2025-01-16
Bing Chen	Lake Forest	CA	92630	United States	2025-01-16
Helen Yun	Lake Forest	CA	92630	United States	2025-01-16
Kristen Moore	Trabuco Canyon	CA	92679	United States	2025-01-16
Andrew Kihn	Lake Forest	CA	92630	United States	2025-01-16
Loydette Ricci	Mission Viejo	CA	92692	United States	2025-01-16
Wally Salib	Van Nuys	CA	91405	United States	2025-01-17
Zhaojun Huang	Los Angeles	CA	90029	United States	2025-01-17
Yang Li	Los Angeles	CA	90022	United States	2025-01-17
Andrew St laurent	San Juan Capistr	CA	92675	United States	2025-01-17
Linda Harvey	Rancho Santa Ma	CA	92688	United States	2025-01-17
Rocio Sandoval	Irvine	CA	92604	United States	2025-01-17
TERESA WERNER	Mission Viejo	CA	92692	United States	2025-01-17
Edith Liao	Lake Forest	CA	92630	United States	2025-01-17
Natalie Alexander	Irvine	CA	92620-3846	United States	2025-01-18
lily chu	Newbury Park	CA	91320	United States	2025-01-19
Andy Wadin	Lake forest	CA	92630	United States	2025-01-19
Elizabeth LeVin	Tustin	CA	92780	United States	2025-01-19

Zhong Chen	Lake Forest	CA	92630	United States	2025-01-21
Jennifer Miller	Ladera Ranch	CA	92694	United States	2025-01-21
Denise Bermude	Lake Forest	CA	92630	United States	2025-01-22
Sara Wilhoit	Laguna Beach	CA	92651	United States	2025-01-22
ling gong	Lake Forest	CA	92630	United States	2025-01-22
wei wu	Orange	CA	92868	United States	2025-01-22
zhaohui li	Irvine	CA	92630	United States	2025-01-22
hong zhang	Lake Forest	CA	92630	United States	2025-01-23
Yanfang Liu	Lake Forest	CA	92630	United States	2025-01-23
Brenda Choi	Las Vegas	NV	89122	United States	2025-01-23
Carina Chen	Santa Ana	CA	92701	United States	2025-01-23
shaolin zhang	Lake Forest	CA	92630	United States	2025-01-24
sheng jiang	Lake forest	CA	92630	United States	2025-01-24
Charles Cheng	Lake Forest	CA	92630	United States	2025-01-24
Kongfeng Berger	Lake Forest	CA	92160	United States	2025-01-24
Cayla Wang	Lake Forest	CA	92630	United States	2025-01-24
Kai Berger	San Francisco	CA	94110	United States	2025-01-24
Jing Li	Lake Forest	CA	92630	United States	2025-01-24
Xinyue Chang	Lake Forest	CA	92630	United States	2025-01-26
Alina Gomez	Anaheim	CA	92804	United States	2025-01-27
Weihong Kong	Anaheim	CA	92802	United States	2025-01-28
Constance Clyde	Dana Point	CA	92629	United States	2025-01-29
Brian FitzGerald	Lake Forest	CA	92630	United States	2025-01-29
APRIL BODNAR	Lake Forest	CA	92630	United States	2025-01-29
Mylea H	North Hills		91343	United States	2025-01-29
Enrique Alcantara	Duarte	CA	91010	United States	2025-01-29
George Canty	Portage	IN	46368	United States	2025-01-29
dena zepeda	irwindale	CA	91706	United States	2025-01-29
Bellanira Tiguila	Pasadena	CA	91104	United States	2025-01-29
Demetria Ladalski	Los Angeles	CA	90068	United States	2025-01-29
ivette trejo	Desert Hot Spring	CA	92240	United States	2025-01-29
connie loveland	laguna hills	CA	91653	United States	2025-01-29

Ghada Haidar	Corona	CA	92881	United States	2025-01-29
Giselle gutierres	Placentia		92870	United States	2025-01-29
Morteza Rabbani	Santa Ana	CA	92704	United States	2025-01-29
Nicholas Ramirez	Irvine	CA	92612	United States	2025-01-29
Roseann Torrez	stanton	CA	90680	United States	2025-01-29
Erik Anonas	Corona	CA	92877	United States	2025-01-29
Dianna Ducharme	Encinitas	CA	92023	United States	2025-01-29
Aliyah Lopez	Eastvale	CA	92880	United States	2025-01-29
London Lion	San Clemente	CA	92672	United States	2025-01-29
Wyatt Steingraber	433 east los amig	CA	90640	United States	2025-01-30
Dadi Dadaboy	Fountain Valley	CA	92708	United States	2025-01-30
Randall Striff	Hawthorne	CA	90250	United States	2025-01-30
Theresa corrales	Lake Elsinore	CA	92530	United States	2025-01-30
Azam Bharoocha	Anaheim	CA	92801	United States	2025-01-30
Anayeli Cruz-Sanchez	Santa Ana	CA	92701	United States	2025-01-30
ROSSANA YANG	Cerritos	CA	90703	United States	2025-01-30
Bethany Bernhard	Altadena	CA	91001	United States	2025-01-30
Analia Alvarado	Los Angeles	CA	90020	United States	2025-01-30
Brooke Magill	Anaheim	CA	92801	United States	2025-01-30
Pamela Torres	Orange	CA	92868	United States	2025-01-30
Geenn Still	Laguna Hills	CA	92653	United States	2025-01-30
Amy McLeod	Carlsbad	CA	92008	United States	2025-01-30
Tony Sun	Toronto		M9N	Canada	2025-01-30
kat scott	Buena Park	CA	90620	United States	2025-01-30
Soheila Rashedi	Lake Forest	CA	92630	United States	2025-01-30
Ali Karimi	Lake Forest	CA	92630	United States	2025-01-30
Vanessa Wang	Irvine	CA	92612	United States	2025-01-30
xue wang	Portland	OR	97210	United States	2025-01-30
Dan Wang	Irvine	CA	92618	United States	2025-01-30
Carl Zhu	Irvine	CA	92618	United States	2025-01-30
Yvaine Yang	Irvine	CA	92618	United States	2025-01-30
Sophie Wang	Los Angeles	CA	91000	United States	2025-01-30

max duan	Rialto	CA	92376	United States	2025-01-30
Alan Cao	Orange	CA	92868	United States	2025-01-30
Sophie Sun	Los Angeles	CA	90022	United States	2025-01-30
Heeten Bhoot	Lake Forest	CA	92630	United States	2025-01-30
M Bhoot	Lake Forest	CA	92630	United States	2025-01-30
Alonso Liu				Singapore	2025-01-30
Loki S	Irvine	CA	92620	United States	2025-01-31
Arnav Eega	Edison	NJ	8820	United States	2025-01-31
Stella Shao	San Bernardino	CA	92404	United States	2025-01-31
Zhuo Zhao	Mission Viejo	CA	92692	United States	2025-01-31
Jacqueline Gaw	Irvine	CA	92618	United States	2025-01-31
Xingyu Gao	Irvine	CA	92620	United States	2025-01-31
Sangwoo An	Lake Forest	CA	92630	United States	2025-01-31
Sara Jung	Lake Forest	CA	92630	United States	2025-01-31
Tina Li	Los Angeles	CA	90039	United States	2025-02-01
Wilson Wang	Lake Forest	CA	92630	United States	2025-02-01
Suresh Devu	Lake Forest	CA	92630	United States	2025-02-01
Paul Rataj	Lake Forest	CA	92630	United States	2025-02-02
Helena Kirkendall	Lake Forest	CA	92630	United States	2025-02-03
Kate Zhang	Lake Forest	CA	92630	United States	2025-02-03
william sun	Berkeley	CA	94720	United States	2025-02-03
Xiaoan Sun	Lake Forest	CA	92630	United States	2025-02-03
SHOMITA MANDAL	Lake Forest	CA	92630	United States	2025-02-03
Adam Herro	Lake Forest	CA	92630	United States	2025-02-03
Beau Dunn	Lake Forest	CA	92630	United States	2025-02-03
Razan Duella	Lake Forest	CA	92630	United States	2025-02-03
Dave Huang	Lake Forest	CA	92630	United States	2025-02-03
Abhijit Rao	Lake Forest	CA	92630	United States	2025-02-03
Grace Peng	Lake Forest	CA	92630	United States	2025-02-03
Jason Raneses	Lake Forest	CA	92630	United States	2025-02-03
Nancy Mulvaney	Lake Forest	CA	92630	United States	2025-02-03
Kimberley Hart	Lake Forest	CA	92630	United States	2025-02-03

Hsin-Tien Chou	Lake Forest	CA	92630	United States	2025-02-03
Steven Fischer	Lake Forest	CA	92630	United States	2025-02-04
Daren Dano	Santa Ana	CA	92703	United States	2025-02-04
Deondrea Rosado	Hemet	CA	92545	United States	2025-02-04
Amanda Park	Lake Forest	CA	92630	United States	2025-02-04
Victor Rios	Lake Forest	CA	92630	United States	2025-02-04
Erik Nagashima	Lake Forest	CA	92630	United States	2025-02-04
Maryann Abalos	Lake Forest	CA	92630	United States	2025-02-04
Nidhi Prajapati	Lake Forest	CA	92630	United States	2025-02-04
Rohin Patel	Lake Forest	CA	92630	United States	2025-02-04
Sheri Hughes	Lake Forest	CA	92630	United States	2025-02-04
Luka Zhao	Lake Forest	CA	92630	United States	2025-02-04
Ping Liu	Lake Forest	CA	92630	United States	2025-02-04
Biayna Hartouni	Lake Forest	CA	92630	United States	2025-02-04
David Tran	Lake Forest	CA	92630	United States	2025-02-04
Chloe Chen	Lake Forest	CA	92630	United States	2025-02-04
Yuzi Zhang	Lake Forest	CA	92630	United States	2025-02-04
Bo Jiang	Lake Forest	CA	92630	United States	2025-02-04
Nazanin Marashi	Lake Forest	CA	92630	United States	2025-02-04
Lijuan Xue	Lake Forest	CA	92630	United States	2025-02-04
T Yung	Lake Forest	CA	92630	United States	2025-02-04
Mina Helvin	Santa Ana	CA	92703	United States	2025-02-04
Kawai Yumi	Lake Forest	CA	92630	United States	2025-02-04
Michael Helvin	Lake Forest	CA	9263p	United States	2025-02-04
Jen Sevilla	Lake Forest	CA	92630	United States	2025-02-04
Leila Soto	San Clemente	CA	92672	United States	2025-02-04
Andy Leung	FOOTHILL RANC	CA	92610	United States	2025-02-04
yuting ding	Lake Forest	CA	92630	United States	2025-02-05
lisa Avilez	Los Angeles	CA	91768	United States	2025-02-05
Rene Lopez	Van Nuys	CA	91405	United States	2025-02-05
KRISTINE KARLSEN	Lake Forest	CA	92630	United States	2025-02-05
Franklin Jones				United States	2025-02-05

Qinli Lu	Lake Forest	CA	92630	United States	2025-02-05
Jazmine Parra	Fontana	CA	92336	United States	2025-02-05
olivia aguilar	Lake forest	CA	92630	United States	2025-02-05
Man Cheung Kung	Lake Forest	CA	92610	United States	2025-02-05
Vanessa Joy	Riverside	CA	92506	United States	2025-02-05
Fred Zhu	Lake forest	CA	92630	United States	2025-02-05
Susan White	Lake Forest	CA	92630	United States	2025-02-05
jade burleigh	Huntington Beach	CA	92647	United States	2025-02-05
Boe thomas	Huntington Beach	CA	92648	United States	2025-02-05
Johana Duarte	Los Angeles	CA	90003	United States	2025-02-05
Judith Culp	Menifee	CA	92584	United States	2025-02-05
Alta Angulo	Fontana	CA	92337	United States	2025-02-05
Crystal Vargas	Corona	CA	92882	United States	2025-02-05
N V	Lake Forest	CA	92630	United States	2025-02-05
Renee Del Rincon	Lake Forest	CA	92630	United States	2025-02-05
Calvin Le	Lake Forest	CA	92630	United States	2025-02-05
Rene Torrico	Fontana	CA	92335	United States	2025-02-05
Diego Harrison	Aliso Viejo	CA	92656	United States	2025-02-05
John Sacranie	Lake Forest	CA	92630	United States	2025-02-05
Nicola Kwan	Lake Forest	CA	92630	United States	2025-02-05
Sean Litster	Lake Forest	CA	92630	United States	2025-02-05
Hua Rong Zhang	Lake Forest	CA	92630	United States	2025-02-05
Barbara Herzog	Laguna Woods	CA	92637	United States	2025-02-05
Robert Martinez	Irvine	CA	92602	United States	2025-02-05
Jon & Jackie Norris	Lake Forest	CA	92630	United States	2025-02-06
Faith Mercado	Lake Forest	CA	92630	United States	2025-02-07
Ana Rial	Poway	CA	92064	United States	2025-02-07
Rob Brindisi	Irvine	CA	92606	United States	2025-02-07
jonathan day	laguna beach	CA	92651	United States	2025-02-07
Alison Bassell	Rsm	CA	92688	United States	2025-02-07
Judith Garby	Lake Forest	CA	92630	United States	2025-02-07
Thomas Sullivan	Irvine	CA	92667	United States	2025-02-07

Jackie Berreth	Lake Forest	CA	92630	United States	2025-02-07
Patricia Purdy	Mission Viejo	CA	92691	United States	2025-02-08
Cassidy Johnston	Mission Viejo	CA	92691	United States	2025-02-08
Xiaoping Lu	Irvine	CA	92604	United States	2025-02-08
Shanthi Vedulla	Lake Forest	CA	92630	United States	2025-02-08
Jeff Lee	Lake Forest	CA	92630	United States	2025-02-08
Samar Farhangi	Lake Forest	CA	92630	United States	2025-02-08
Karen Sauls	Lake Forest	CA	92630	United States	2025-02-08
Stacy Hardin	Lake Forest	CA	92630	United States	2025-02-08
Matt Lillrose	Lake Forest	CA	92630	United States	2025-02-08
Isabel Duong	Lake Forest	CA	92630	United States	2025-02-08
Marie Le	Lake Forest	CA	92630	United States	2025-02-08
Daniel Park	Lake Forest	CA	92630	United States	2025-02-08
Priyanka Taranekar	Lake Forest	CA	92630	United States	2025-02-08
Keith Huen	Lake Forest	CA	92630	United States	2025-02-09
Quynn Reeder	Lake Forest	CA	92630	United States	2025-02-09
Winston Wong	Lake Forest	CA	92630	United States	2025-02-09
Christine Huen	Lake Forest	CA	92630	United States	2025-02-09
George Felix	Lake Forest	CA	92630	United States	2025-02-09
Chandni Reddy	Lake forest	CA	90027	United States	2025-02-09
Anna Woodworth	Lake forest	CA	92630	United States	2025-02-09
Polly Kim	Lake Forest	CA	92630	United States	2025-02-09
Jessie Taou	Lake Forest	CA	92630	United States	2025-02-09
Nate Joss	Corona	CA	92879	United States	2025-02-09
Carri Lang	Costa Mesa	CA	92626	United States	2025-02-09
Julia Feingold	Lake Forest	CA	92630	United States	2025-02-09
Zhenwei Qin	Lake Forest	CA	92630	United States	2025-02-09
Yesenia Zamora	Anaheim	CA	92802	United States	2025-02-09
ghazaryan nelli	Irvine	CA	92604	United States	2025-02-09
Sadik Haralson	Lake Elsinore	CA	92530	United States	2025-02-09
Jennifer Oh	Lake Forest	CA	92630	United States	2025-02-09
Eric Yoon	Lake Forest	CA	92630	United States	2025-02-09

Tia Yoon	Lake Forest	CA	92630	United States	2025-02-09
Blanca Figueroa	Costa Mesa	CA	92627	United States	2025-02-09
Tess Tran	Trabuco Canyon	CA	92679	United States	2025-02-09
Kristina Durst	Los Angeles	CA	90040	United States	2025-02-09
Faith Wilkinson	Lake Forest	CA	92630	United States	2025-02-09
Anthony Le	Lake Forest	CA	92630	United States	2025-02-09
Pablo Romero	Lake Forest	CA	92630	United States	2025-02-09
christina trevizo	Lake fiorest	CA	92630	United States	2025-02-09
Veronica Mohn	Lake Forest	CA	92610	United States	2025-02-09
Sergio Rangel	Lake Forest	CA	92630	United States	2025-02-09
Linda Werner	Lake Forest	CA	92630	United States	2025-02-09
Patrick Cahill	Lake Forest	CA	92630	United States	2025-02-09
Traci Turner	Lake Forest	CA	92630	United States	2025-02-09
Jaime Anti	Lake Forest	CA	92630	United States	2025-02-09
Kathy T	Lake Forest	CA	92630	United States	2025-02-09
Bonny Elrod	Mission Viejo	CA	92692	United States	2025-02-09
SARA HASSAN	Mission Viejo	CA	92692	United States	2025-02-09
Natalie Olgin	Mission Viejo	CA	92691	United States	2025-02-09
Louis Beltran	Lake Forest	CA	92630	United States	2025-02-09
Nita Panda	Lake Forest	CA	92630	United States	2025-02-09
Defne Batur	Corona	CA	92880	United States	2025-02-09
Wei Hsu	Lake Forest	CA	92630	United States	2025-02-09
Ann Irving	Lake Forest	CA	92630	United States	2025-02-10
Deborah Quartucy	Lake Forest	CA	92630	United States	2025-02-10
Megan Clarke	Lake Forest	CA	92630	United States	2025-02-10
Janice Bartlett	San Diego	CA	92122	United States	2025-02-10
Saifang Chen	Lake Forest	CA	92630	United States	2025-02-10
Philip Wong	Lake Forest	CA	92630	United States	2025-02-10
Sujith Somasekharan	Lake Forest	CA	92630	United States	2025-02-10
dehdashtian michael	Sacramento	CA	95821	United States	2025-02-10
Andrea Lee	Lake Forest	CA	92630	United States	2025-02-10
Menna Megahed	Lake Forest	CA	92630	United States	2025-02-11

Christopher Taylor	Lake Forest	CA	92630	United States	2025-02-11
rolf wiesler	Johannesburg		2041	South Africa	2025-02-11
Lynna Orbe	Lake Forest	CA	92630	United States	2025-02-12
Hwachul Shin	Lake Forest	CA	92630	United States	2025-02-12
Luka Zhao	Lake Forest	CA	92630	United States	2025-02-12
Stephanie Nunez	Van Nuys	CA	91405	United States	2025-02-12
June Evans	Corona	CA	92883	United States	2025-02-12
Lynn Guo	Los Angeles	CA	90002	United States	2025-02-14
Ana Tucci	Lake Forest	CA	92630	United States	2025-02-15
Sharon Ting	Lake Forest	CA	92630	United States	2025-02-16
David Brackett	Lake Forest	CA	92630	United States	2025-02-16
CoCo Chin	Lake Forest	CA	92630	United States	2025-02-16
Joan How	Luton	ENG	LU3 2PU	United Kingdom	2025-02-17
Mohammad Elqanni	Lake Forest	CA	92630	United States	2025-02-17
Bella Lam	Lake Forest	CA	92630	United States	2025-02-23
Rosemary SAATJIAN	Newport Beach	CA	92659	United States	2025-02-23
Daphna Wegner	New York	NY	10012	United States	2025-02-24
MICHELE PELLIZZON	Aliso Viejo	CA	92656	United States	2025-02-28
christina keenan	tustin	CA	92780	United States	2025-03-03
Pamela Saulter	Perris	CA	92571	United States	2025-03-05
Bernadette Giel	Newport Beach	CA	92660	United States	2025-03-07
DeLores Salter	Mira Loma	CA	91752	United States	2025-03-07
Jelica Roland	Buzet		10360	Croatia	2025-03-07
Lorena Cox	Irvine	CA	92612	United States	2025-03-09
Gurdiya Nijjar	Rocklin	CA	95765	United States	2025-03-11
Ana Florence	Las Vegas	NV	89129	United States	2025-03-17
David Wang	Santa Ana	CA	92703	United States	2025-03-17
Stephanie Aparicio	Montclair	CA	91763	United States	2025-03-21
Mike Esqueda	La Puente	CA	91744	United States	2025-03-28
Julie Z	Fountain Valley	CA	92708	United States	2025-03-28
Nevaeh Carrillo	Ontario	CA	91762	United States	2025-03-28
Linda Pydeski	Huntington Beach	CA	92648	United States	2025-03-28

Ryan Smith	Lake Forest	CA		United States	2025-03-28
Kim Tran	Santa Ana	CA	92707	United States	2025-03-29
Glenn Mullins	Buena Park	CA	90620	United States	2025-03-29
Hannah Lopez	Huntington Beach	CA	92646	United States	2025-04-01
Han Zhang	Lake Forest	CA	92630	United States	2025-04-24
Lexi Woods	Murrieta	CA	92563	United States	2025-04-24
Roberto Lopez	Fontana	CA	92335	United States	2025-04-24
Juan Navarro	Corona	CA	92882	United States	2025-04-24
Izzy Qu	Los Angeles	CA	90015	United States	2025-04-28
yijie lin	Lake Forest	CA	92630	United States	2025-04-28
Jing Chen	Lake Forest	CA	92630	United States	2025-04-28
Shelly WANG	Lake Forest	CA	92630	United States	2025-04-28
Nolan Wu	Irvine	CA	92602	United States	2025-04-28
Mei Ma Fan	Lake Forest	CA	92630	United States	2025-04-28
xinzhuo chen	lake forest	CA	92630	United States	2025-04-28
Alex Zhang	Lake Forest	CA	92630	United States	2025-04-28
Junyu Wu	Lake forest	CA	92630	United States	2025-04-29
Ibeth Cibrian	San Clemente	CA	92672	United States	2025-05-01
Kirra Wade	Laguna Niguel	CA	92677	United States	2025-05-01
michele stone	Santa Ana	CA	92707	United States	2025-05-01
Connie Moreno	Santa Ana	CA	92701	United States	2025-05-01
Elton Farmer	Burbank	CA	91506	United States	2025-05-01
raquel lomeli	Orange	CA	92869	United States	2025-05-01
David Jimenez	Orange	CA	92865	United States	2025-05-01
Lana Askarova	West Palm Beach	FL	33401	United States	2025-05-02
Danny Rodriguez	Lake forest	CA	92630	United States	2025-05-30
June Sun	Leander	TX	78641	United States	2025-07-20
Jack Chen	Lake Forest	CA	92630	United States	2025-07-20
Zhixuan Zheng	Lake Forest	CA	92630	United States	2025-07-21
Ying Wang	Lake Forest	CA	92630	United States	2025-07-21
Di Zhang	Lake Forest	CA	92630	United States	2025-07-21
Carrie Li	Irvine	CA	92630	United States	2025-07-21

TING YIN LIAO	Lake Forest	CA	92630	United States	2025-07-21
Shunhua Li	Lake Forest	CA	92630	United States	2025-07-22
Vivi Wang	Anaheim	CA	92801	United States	2025-07-22
Dylan Sherman	Whittier	CA	90602	United States	2025-07-22
Bella Testa	Aliso Viejo	CA	92656	United States	2025-07-23
Haibo Jiang	Irvine	CA	92602	United States	2025-07-26
Lynne Contreras	San Bernardino	CA	92404	United States	2025-07-26
Barthalomew Bethany	Fairfax	VA	22030	United States	2025-07-26
Eyhana B.		NY		United States	2025-07-26
Che Fang	Lake Forest	CA	92630	United States	2025-07-27
rosemary torossian	Sherman Oaks	CA	91423	United States	2025-07-27
Yajuan Chen	Lake forste	CA	92805	United States	2025-07-27
FIONA LI	Anaheim	CA	92801	United States	2025-07-27
Tim Maurer	Anaheim	CA	92808	United States	2025-07-27
Frank Ci	Santa Ana	CA	92704	United States	2025-07-27
Srinivas Varanasi	Irvine	CA	92620	United States	2025-07-27
Janis Engel	Lake Forest	CA	92630	United States	2025-07-28
MAryam Hamid	Rancho Santa Ma	CA	92688	United States	2025-07-28
Jelita Holmesly	Mission Viejo	CA	92692	United States	2025-07-28
Diane Reidel	Mission Viejo	CA	92692	United States	2025-07-28
Jodie Fung	Lake Forest	CA	92630	United States	2025-07-28
Kimberly Heileson	Trabuco Canyon	CA	92679	United States	2025-07-29
Rebecca Yu	Lake Forest	CA	92630	United States	2025-07-30
Laura Bond	Lake forest	CA	92630	United States	2025-08-01
Long Zeng	Lake Forest	CA	92630	United States	2025-08-02
Do Quyen Vu	Lake Forest	CA	92630	United States	2025-08-02
Sylvia Walker	Irvine	CA	92618	United States	2025-08-02
Jen Hackenburg	Ladera Ranch	CA	92694	United States	2025-08-02
Oylum Kalantri	Rancho Santa Ma	CA	92688	United States	2025-08-02
Zack Xu	Irvine	CA	92620	United States	2025-08-03
Jenni Robinson	Lake Forest	CA	92630	United States	2025-08-03
E Nelson	Lake Forest	CA	92610	United States	2025-08-03

Chaundra Gomer	Los Angeles	CA	90060	United States	2025-08-03
N. L.	Lake Forest	CA	92610	United States	2025-08-04
Ozzie Fazaeli	Trabuco Canyon	CA	92679	United States	2025-08-04
Peggy Gunawan	Lake Forest	CA	92630	United States	2025-08-04
Yongmei Chu	Lake Forest	CA	92630	United States	2025-08-04
Wid Sogata	Lake Forest	CA	92630	United States	2025-08-04
Danette G	Spring Branch	TX	78070	United States	2025-08-04
Mary Alice Wuerz	Mission Viejo	CA	92691	United States	2025-08-05
Jon Gomer	Lake Forest	CA	92692	United States	2025-08-05
Thomas Wang	Lake Forest	CA	92630	United States	2025-08-09
Jennifer Lee	Lake Forest	CA	92630	United States	2025-08-09
Emma Rauman	Lake Forest	CA	92630	United States	2025-08-09
Julian Mercado	Corona	CA	92882	United States	2025-08-11
Anna Oh	Irvine	CA	92612	United States	2025-08-11
Elle Sterner	San Clemente	CA	92672	United States	2025-08-11
Elizabeth Weiner	Chicago	IL	60007	United States	2025-08-11
Rupashree Goswami	Irvine	CA	92618	United States	2025-08-11
William Wang	Lake Forest	CA	92630	United States	2025-08-11
Shudong Wong	Lake Forest	CA	92630	United States	2025-08-11
jason yip	Ladera Ranch	CA	92694	United States	2025-08-11
Yang Gu	Los Angeles	CA	90022	United States	2025-08-11
Shih ling Huang	Lake Forest	CA	92630	United States	2025-08-11
Emma Xia	Irvine	CA	92618	United States	2025-08-11
Liuni Hu	Lake Forest	CA	92630	United States	2025-08-11
Coco Liu	Lake forest	CA	92630	United States	2025-08-11
yang pan	Lake Forest	CA	92630	United States	2025-08-11
Shuhua Du	Lake Forest	CA	92630	United States	2025-08-11
Calise Chang	Santa Ana	CA	92703	United States	2025-08-11
Tina Murillo	Lake Forest	CA	92705	United States	2025-08-11
Yuhe Zhu	Los Angele	CA	90018	United States	2025-08-11
Luke Li	Lake Forest	CA	92630	United States	2025-08-12
Nikolai Jardine	Riverside	CA	92506	United States	2025-08-12

Victor Anger	Ladera Ranch	CA	92694	United States	2025-08-12
Alka Ronvelia	Ladera Ranch	CA	92694	United States	2025-08-12
Jianquan Zhong	Lake Forest	CA	92630	United States	2025-08-12
Melissa Chu	San Diego	CA	92130	United States	2025-08-12
Vinay Sodha	Lake Forest	CA	92630	United States	2025-08-12
Vivian Gu	Yorba Linda	CA	92886	United States	2025-08-12
hu jianxin	121 longden	LA	92630	United States	2025-08-12
wen wei	Toyosu	LA	92630	United States	2025-08-12
Perng nian Chu	Lake Forest	CA	92630	United States	2025-08-12
Jessica INgles	Mission viejo	CA	92691	United States	2025-08-12
Anna Zhang	Lake Forest	CA	92630	United States	2025-08-12
yes no				United States	2025-08-12
Li Xu	Lake Forest	CA	92630	United States	2025-08-12
Seung H Choi	Canyon Lake	CA	92587	United States	2025-08-13
D. Coombs	Lake Forest	CA	92630	United States	2025-08-13
Yang Chen	San Antonio	TX	78213	United States	2025-08-13
Tootie McGowan				United States	2025-08-13
Gisselle Felix	Riverside	CA	92509	United States	2025-08-13
Yi Qin	Irvine	CA	92618	United States	2025-08-13
Sylvia Cisneros	Upland	CA	91786	United States	2025-08-13
Jun Hak Kim	Lake forest	CA	92630	United States	2025-08-14
Bryan Bello	Costa Mesa	CA	92627	United States	2025-08-14
Yang Qu	Los Angeles	CA	90044	United States	2025-08-14
Ethan Gomez	Anaheim	CA	92825	United States	2025-08-14
Trayce Carlyle	Anaheim	CA	92808	United States	2025-08-14
Kyla Briseno	Corona	CA	92879	United States	2025-08-14
Laurel Reid	San Clemente	CA	92673	United States	2025-08-14
Mike P	Fontana	CA	92336	United States	2025-08-14
Luke Johnson	Mission Viejo	CA	92692	United States	2025-08-14
Tia Ren	lake forest	CA	92630	United States	2025-08-14
Yubing Zhou	Lake Forest	CA	92630	United States	2025-08-14
Xinxin Wang	Lake Forest	CA	92630	United States	2025-08-14

yufeng Li	Lake Forest	CA	92630	United States	2025-08-14
Yunlian Zhou	Lake Forest	CA	92630	United States	2025-08-14
Lisa Song	Lake Forest	CA	92630	United States	2025-08-14
Brandon Li	Lake Forest	CA	92630	United States	2025-08-14
Stephanie Kwan	Lake Forest	CA	92630	United States	2025-08-14
Yuxiang Zhang	Garden Grove	CA	92841	United States	2025-08-14
Wenbin Liao	Lake Forest	CA	92630	United States	2025-08-14
Lucy Chen	Ladera Ranch	CA	92694	United States	2025-08-14
AMY Chen	Lake Forest	CA	92630	United States	2025-08-14
Soo Yun Hong	Lake Forest	CA	92630	United States	2025-08-14
Yoo Yun Kim	Lake Forest	CA	92630	United States	2025-08-14
James Lin	San Diego	CA	92130	United States	2025-08-14
Yushan Wang	Chino	CA	91710	United States	2025-08-14
Patty Wang	Lake Forest	CA	92630	United States	2025-08-14
Yan Ma	Castro Valley	CA	94546	United States	2025-08-14
Ryan Lee	Lake Forest	CA	92630	United States	2025-08-15
yue wu	Lake Forest	CA	92630	United States	2025-08-15
Binyun Xie	Lake Forest	CA	92630	United States	2025-08-15
yishan Cai	Brea	CA	92821	United States	2025-08-15
Karin Qiu	Pacoima	CA	91331	United States	2025-08-15
Jun She	Lake Forest	CA	92630	United States	2025-08-15
J J	Philadelphia	PA	19123	United States	2025-08-15
Xiaoyan Sun	Lake Forest	CA	92630	United States	2025-08-15
Chen Teng	San Jose	CA	95128	United States	2025-08-15
Yulan Lu	Mission Viejo	CA	92692	United States	2025-08-15
W W	San Jose	CA	95110	United States	2025-08-15
Junbo Gao	Irvine	CA	92620	United States	2025-08-15
Alice Zhou	Irvine	CA	92618	United States	2025-08-15
Elaine D	Mission Viejo	CA	92691	United States	2025-08-15
zhen li	Lake Forest	CA	92630	United States	2025-08-15
Wang Bin	Lake Forest	CA	92630	United States	2025-08-15
Xiaoyu Qiu	Lake Forest	CA	92630	United States	2025-08-15

Julie Huang	Lake Forest	CA	92609	United States	2025-08-15
PING RU I BAO	Lake Forest	CA	92630	United States	2025-08-15
Anna Huang	Irvine	CA	92618	United States	2025-08-15
Jenny Li	Ontario	CA	91762	United States	2025-08-15
haiying chen	Lake Forest	CA	92630	United States	2025-08-15
Jessica Cai	Lake Forest	CA	92630	United States	2025-08-15
Hongmei Cai	Lake Forest	CA	92630	United States	2025-08-15
Sharon Sun	New York	CA	92630	United States	2025-08-15
Sharon Xiaowen Hu	Ladera Ranch	CA	92694	United States	2025-08-15
Michelle Jiang	Santa Clara	CA	95050	United States	2025-08-15
Ashley He	Lake Forest	CA	92630	United States	2025-08-15
Wen Jia	Stratford	CT	6614	United States	2025-08-15
Fnu Natasha	Lake Forest	CA	92630	United States	2025-08-15
Gunawan Kusno	Lake Forest	CA	92630	United States	2025-08-15
Kurniati Tiodora	Lake Forest	CA	92630	United States	2025-08-15
Nan Zhuang	Sunnyvale	CA	94086	United States	2025-08-15
Isabelle Morales	Riverside	CA	92503	United States	2025-08-15
Xiaoqin Cao	Salt Lake City	UT	84117	United States	2025-08-15
Lucy Bai	Potomac	MD	20854	United States	2025-08-15
GS Lu	New York	NY	10065	United States	2025-08-15
Yolanda Lu	Lake Forest	CA	92630	United States	2025-08-15
Hannah Robles	Corona	CA	92879	United States	2025-08-15
Enoch Liu	Lake Forest	CA	92630	United States	2025-08-15
Joan Wang	Brookfield	WI	53045	United States	2025-08-15
Alex Wang	Lake Forest	CA	92630	United States	2025-08-15
Sandy Moon	Lake Forest	CA	92630	United States	2025-08-15
Sharon Liu	Rancho Palos Ver	CA	90275	United States	2025-08-15
Amr tulaimat	Lake forest	CA	92630	United States	2025-08-15
Min Lin	Hayward	CA	94544	United States	2025-08-15
Genevieve Q		CA		United States	2025-08-16
Diane Z	Anaheim	CA	92804	United States	2025-08-16
nan zhang	Las Vegas	NV	89145	United States	2025-08-16

Lu Gan	Santa Ana	CA	92701	United States	2025-08-16
tao hong	New Orleans	LA	70131	United States	2025-08-16
Zifeng Tang	Lake Forest	CA	92630	United States	2025-08-16
Xiaole Chen	Rancho Cucamor	CA	91730	United States	2025-08-16
Weiwei An	Santa Ana	CA	92701	United States	2025-08-16
Roy Foster	Lake Forest	CA	92630	United States	2025-08-16
Jennifer Chen	Irvine	CA	92612	United States	2025-08-16
Mei Tan	Mission Viejo	CA	92692	United States	2025-08-16
Min Du	Lake Forest	CA	92630	United States	2025-08-16
Shannon Payfer	Menifee	CA	92584	United States	2025-08-16
Emily Cusick	Lake Forest	CA	92630	United States	2025-08-16
Jennifer Busenkell	Lake Forest	CA	92630	United States	2025-08-16
Susan Jones	Foothill Ranch	CA	92610	United States	2025-08-16
Chunlan Yang	Lake Forest	CA	92630	United States	2025-08-16
Edwin Bonilla	Trabuco Canyon	CA	92679	United States	2025-08-16
Theresa Wu	Mission Viejo	CA	92691	United States	2025-08-16
yi dou	Santa Ana	CA	92701	United States	2025-08-16
Yao Yao	Ontario	CA	91761	United States	2025-08-16
Ying Chen	Anaheim	CA	92805	United States	2025-08-16
Yang Xiao	Lake Forest	CA	92630	United States	2025-08-16
Jackie Chen	Lake Forest	CA	92630	United States	2025-08-16
Tiffany Zhuo	Santa Ana	CA	92706	United States	2025-08-16
yu zhao	San Dimas	CA	91773	United States	2025-08-16
Rongzhi Zhu	Lake Forest	CA	92630	United States	2025-08-16
Gavin Lin	Irvine	CA	92618	United States	2025-08-16
Mason Mason	San Francisco	CA	94101	United States	2025-08-16
li H an	Tustin	CA	92780	United States	2025-08-16
Susan Matsumoto	Lake Forest	CA	92630	United States	2025-08-17
Guoxiang Wang	Naperville	IL	60540	United States	2025-08-17
Julian C	Los Angeles	CA	92880	United States	2025-08-17
Jenny Barrios	Ontario	CA	91764	United States	2025-08-17
Jane Rao	New York	NY	10010	United States	2025-08-17

Angela Hu	Santa Ana	CA	92701	United States	2025-08-17
Marc Shi	Cupertino	CA	95014	United States	2025-08-17
Hui XU	Lake Forest	CA	92630	United States	2025-08-17
Wayne Lason	Lake Forest	CA	92630	United States	2025-08-17
Frances Xu	West LA	CA	90025	United States	2025-08-17
Joe Beland	Los Angeles	CA	92630	United States	2025-08-17
Stacy Guan	Palo Alto	CA	94306	United States	2025-08-17
Asia Bonilla	New York	NY	10040	United States	2025-08-17
Janet Gavin	Lake Forest	CA	92630	United States	2025-08-17
Yongzhen Lu	Newark	NJ	7108	United States	2025-08-17
zhuying Zhou	Lake Forest	CA	92630	United States	2025-08-18
Leo Pivaroff	Menifee	CA	92584	United States	2025-08-18
XUE DING	Lake Forest	CA	92630	United States	2025-08-18
Benson Yan	Lake forest	CA	92630	United States	2025-08-18
Christine Zhou	Brooklyn	NY	11233	United States	2025-08-18
Krist Srivivatanakul	Lake Forest	CA	92630	United States	2025-08-18
Jianguo wang	Lake Forest	CA	92630	United States	2025-08-18
Chika Abigail	Loma Linda		92354	United States	2025-08-18
Bang Nguyen	Garden Grove	CA	92840	United States	2025-08-19
Audrey Arraiga	Fontana	CA	92335	United States	2025-08-19
Mary Ramage	Laguna Niguel	CA	92677	United States	2025-08-19
Melanie Button	San Diego	CA	92116	United States	2025-08-19
Luke Wilson		CA	92592	United States	2025-08-19
Ann Mundell-Noel	Mission Viejo	CA	92691	United States	2025-08-19
xiaojing xu	Lake Forest	CA	92630	United States	2025-08-19
Rohit Khanna	Lake Forest	CA	92630	United States	2025-08-19
Chetna Khanna	Lake Forest	CA	92630	United States	2025-08-19
Stephan An	Ladera Ranch	CA	92694	United States	2025-08-20
Rodolfo Galvez	Moreno Valley	CA	92553	United States	2025-08-20
Yifan Yang	Lake Forest	CA	92630	United States	2025-08-20
Xiu Zhou	Lake Forest	CA	92630	United States	2025-08-20
LYDIA PHAM	Lake Forest	CA	92630	United States	2025-08-20

Ely Manolache	Lake Forest	CA	92630	United States	2025-08-20
Marius Manolache	Lake Forest	CA	92630	United States	2025-08-20
Alec Marken	Ladera Ranch	CA	92694	United States	2025-08-21
Ellen Xue	Tustin	CA	92782	United States	2025-08-21
Raymond Zhao	Lake Forest	CA	92630	United States	2025-08-21
Connie Yang	Lake Forest	CA	92630	United States	2025-08-21
Watson Ko	Riverside	CA	92507	United States	2025-08-21
Arlene Robertson	Riverside	CA	92504	United States	2025-08-21
Eric Xie	Lake Forest	CA	92630	United States	2025-08-21
Zhe Xu	Lake Forest	CA	92630	United States	2025-08-21
Yang Liu	Lake Forest	CA	92630	United States	2025-08-21
Kelly Roschewski	Costa Mesa	CA	92626	United States	2025-08-21
Richard Shi	Irvine	CA	92782	United States	2025-08-21
David Ye	Lake Forest	CA	92630	United States	2025-08-21
Diane Calderon	Lake Forest	CA	92630	United States	2025-08-22
Max Yao	Irvine	CA	92618	United States	2025-08-22
Noemí Delrio	Wildomar	CA	92595	United States	2025-08-22
Amina Bokhari	Lake Forest	CA	92630	United States	2025-08-22
Jaspal Singh	San Jacinto	CA	92582	United States	2025-08-22
Amrit Dhillon	Irvine	CA	92618	United States	2025-08-22
harinder batth	Corona	CA	92882	United States	2025-08-22
Marisel Macola	Hollywood	FL	33027	United States	2025-08-22
Surjit Singh Sandhu	Fontana	CA	92336	United States	2025-08-23
Harjinder Singh	Ontario	CA	91761	United States	2025-08-23
Andrea Pedroza	Moreno Valley	CA	92553	United States	2025-08-23
Jada Gutierrez	Mission Viejo	CA	92691	United States	2025-08-23
Vikram No given name	Corona	CA	92883	United States	2025-08-23
Kathy Kosky	Lake Forest	CA	92630	United States	2025-08-24
weiwei zhang	Lake forest	CA	92630	United States	2025-08-24
Angelic Bloomfield	Redlands	CA	92374	United States	2025-08-24
Tiffany Tran	Irvine	CA	92602	United States	2025-08-24
Dawn Arthur	Lake Forest	CA	92630	United States	2025-08-24

Kathryn Purdy	Foothill Ranch	CT	92610	United States	2025-08-24
Amandeep Kaur	Lake Forest	CA	92630	United States	2025-08-25
Riley Bosch	San Bernardino	CA	92410	United States	2025-08-25
Kelly Yakuby	Lake Forest	CA	92630	United States	2025-08-25
nicole lehman	Menifee	CA	92584	United States	2025-08-26
Terri G	Mission Viejo	CA	92692	United States	2025-08-27
Hayli Cuevas	Claremont	CA	91711	United States	2025-08-27
Regina Mata	San Bernardino	CA	92404	United States	2025-08-27
Arp Yt	Indio	CA	92553	United States	2025-08-28
Kathy Alvanos	Orange County	CA	92679	United States	2025-08-28
Alberta Rangel	Romoland	CA	92585	United States	2025-08-28
Steve Alvanos	Trabuco Canyon	CA	92679	United States	2025-08-28
Alex Reza	San Clemente	CA	92673	United States	2025-08-28
Audrey Smith	Foothill Ranch	CA	92610	United States	2025-08-29
Dorothy Missett	Mission Viejo	CA	92691	United States	2025-08-29
John Singhh	Rancho Santa Ma	CA	92688	United States	2025-08-29
Elizabeth LeVin	Tustin	CA	92780	United States	2025-08-29
Julie King	Irvine	CA	92612	United States	2025-08-29
Clifford Bass	LAKE FOREST	CA	92630	United States	2025-08-29
Mauricio Hermoso	Beaumont	CA	92223	United States	2025-08-31
AMANDA STOICAN	Hemet	CA	92545	United States	2025-08-31
Melissa Gallegos	Chino	CA	91710	United States	2025-08-31
Michael Friedmann	Bronx	NY	10461	United States	2025-09-01
Sujan Mandal	Maldha		732102	India	2025-09-01
Erik Rodriguez	Perris	CA	92570	United States	2025-09-02
Luis Enrique Esquivel Card	Riverside	CA	92504	United States	2025-09-02
Rose Murillo	Santa Ana	CA	92704	United States	2025-09-03
Hannah Kim	Lake Forest	CA	92630	United States	2025-09-03
Son Jae Park	Irvine	CA	92618	United States	2025-09-03
Suzy Park	Lake Forest	CA	92630	United States	2025-09-03
Nancy Cooper	Lake Forest	CA	92630	United States	2025-09-04
Eliana Castro	Moreno valley	CA	92553	United States	2025-09-04

Ryan Chen	Lake Forest	CA	92630	United States	2025-09-04
Oliver Pan	Lake Forest	CA	92630	United States	2025-09-04
Araceli Villalobos	Corona	CA	92882	United States	2025-09-04
Lynn Pan	Lake Forest	CA	92630	United States	2025-09-04
Johanne Galloway	Irvine	CA	92618	United States	2025-09-04
Ryan Jackson	Lake Forest	CA	92630	United States	2025-09-04
Naveen Vuppalapati Nagara	Lake Forest	CA	92630	United States	2025-09-04
Maria Ortiz	Corona	CA	92881	United States	2025-09-05
Rhonda Lee	Lake Forest	CA	92630	United States	2025-09-05
Kaycee Fortanasce	Corona	CA	92879	United States	2025-09-05
Alex Wang	Lake Forest	CA	92630	United States	2025-09-05
Kaitlyn Shepard	Trabuco Canyon	CA	92678	United States	2025-09-05
Chloe damknoco	San Clemente	CA	92672	United States	2025-09-06
Erica Nguyen	Lake Forest	CA	92630	United States	2025-09-06
shushan Zhu	Lake Forest	CA	92610	United States	2025-09-06
Alaina Jarboe	Lake Forest	CA	92610	United States	2025-09-06
Stephen Tran	Lake Forest	CA	92630	United States	2025-09-06
Jackson Stephen	Westminster	CA	92683	United States	2025-09-06
Maha Rahel	Lake Forest	CA	92610	United States	2025-09-06
Adar Cadir	Lake Forest	CA	92610	United States	2025-09-06
Omar Moursi	Santa Ana	CA	92703	United States	2025-09-06
Michael Sauls	Lake Forest	CA	92630	United States	2025-09-06
Jamie Ota	Lake Forest	CA	92630	United States	2025-09-06
Antoni Castro-Graham	Lake foreat	CA	92630	United States	2025-09-06
Holly Mesa	Lake Forest	CA	92610	United States	2025-09-06
Steve Borsch	Lake Forest	CA	92630	United States	2025-09-06
Brian FitzGerald	Lake Forest	CA	92630	United States	2025-09-06
Huixin Ke	Lake forest	CA	92630	United States	2025-09-06
Ousama Alkhatib	Lake Forest	CA	92610	United States	2025-09-06
Maria Ebrahimji	Lake Forest	CA	92630	United States	2025-09-06
Nianxin Guo	Lake Forest	CA	92610	United States	2025-09-06
Carolina Klevestav	Lake Forest	CA	92630	United States	2025-09-07

ZIMING CHENG	Lake Forest	CA	92630	United States	2025-09-07
Anonymous Anonymous		CA		United States	2025-09-07
Norena Welcome-Goins	Moreno Valley	CA	92553	United States	2025-09-08
Lea McKnight	Riverside	CA	92505	United States	2025-09-08
Christine King	Irvine	CA	92612	United States	2025-09-08
Keyur Shah	Lake Forest	CA	92630	United States	2025-09-08
Eric Chen	Lake Forest	CA	92630	United States	2025-09-09
Anne Akers	Lake Forest	CA	92630	United States	2025-09-09
Raj Singh	Lake Forest	CA	92630	United States	2025-09-09
Lisa Karsten	Lake Forest	CA	92630	United States	2025-09-09

Name	City	State	Postal Code	Country	Commented Date	Comment
Kevin Xie	Waunakee	WI	53597	United States	1/6/2025	"It's a grave concern touching multiple aspects of people's lives in the immediate vicinity of those three proposed manufacturing and warehouse facilities with additional ones possibly to follow posing significant potential negative impacts to the many communities around Lake Forest, not to mention a nearby affordable senior living community which is slated to open by about this time. The city needs to stop those projects and consider instead alternative use for the plots of land currently under consideration for those projects."
Cherie Liu	Lake Forest	CA	92630	United States	1/6/2025	"It is common sense to build warehouses and factories far away from residential areas."
Cindy Chen	Plano	TX	75025	United States	1/6/2025	"I believe this project is not good for our residents"
xiuying zhou	Irvine	CA	92620	United States	1/6/2025	"Noise,poison, big trucks will be not safe,"
Diana Lees	Thousand Oaks,	CA	91360	United States	1/6/2025	"Diana Lees"
Fournier Fernande	Luxembourg		1482	Luxembourg	1/6/2025	"C'es l'argent qui compte"
Fangxian Wei	Lake Forest	CA	92630	United States	1/6/2025	"As a resident of Lake Forest, I am deeply concerned about the three proposed industrial warehouse projects on Enterprise Way. These developments threaten the very fabric of our community, bringing significant environmental, health, and safety risks to our neighborhoods. Protecting Our Neighborhoods: Lake Forest is a beautiful, family-oriented city, and projects like these disrupt the residential character that attracted so many of us to live here. High-density industrial developments are simply incompatible with the surrounding neighborhoods, including Baker Ranch and Meadows, which are located just steps from the proposed sites. Environmental and Health Risks: The potential for increased air pollution from diesel trucks and industrial activities is alarming. Residents—especially children and seniors—will be directly exposed to harmful pollutants. The noise from 24/7 operations will further degrade our quality of life. Living within 100 feet of truck routes or loading docks is not what we signed up for when choosing to call Lake Forest home. Traffic and Infrastructure Strain: The roads we rely on, like Bake Parkway and Alton Parkway, are already busy during peak hours. Adding heavy truck traffic from these warehouses will only make things worse. The limited road improvements planned for these projects don't come close to addressing the long-term damage and congestion they'll create. Impact on Vulnerable Populations: The Meadows Senior Apartments, home to over 100 residents aged 62 and older, will be directly affected. Our seniors deserve peace and safety, not constant noise, polluted air, and the dangers of increased traffic. The Need for Transparency and Community Input: These projects seem to have progressed without meaningful engagement with residents. We deserve to have our voices heard through public hearings and to see comprehensive Environmental Impact Reports that fully address the cumulative risks to our community. The Bigger Picture: Allowing industrial facilities to encroach on residential areas sets a dangerous precedent. What will stop more of these projects from spreading in the future? If these warehouses are approved, we risk losing the safe, family-friendly environment that makes Lake Forest special. I urge the City Council and Planning Department to reject these projects and instead pursue developments that align with our city's vision of community well-being and sustainability. We must prioritize the health, safety, and quality of life for all residents over industrial expansion. Let's protect what makes Lake Forest a great place to live—today and for generations to come."
Jianhua Rong	Lake Forest	CA	92630	United States	1/6/2025	"I don't want to live beside a factory or warehouse!"
Yin Sheng	Lake Forest	CA	92630	United States	1/7/2025	"As residents of meadows, I cannot imagine having warehouse so close to our community, especially with young children in many our families. We are deeply concerned about the constant noise and non-stop traffic that would come with this development. Please consider the well-being of our community when making decisions about this projects"
Baohui Zhang	Chino Hills	CA	91709	United States	1/7/2025	"I am opposed to the proposal of industrial construction of factory or storage in the residential area of lake Forest."
Yuna Li	Lake Forest	CA	92630	United States	1/7/2025	"Slay I care because of environmental pollution"
Kate Kenner	Guilford	VT	5301	United States	1/7/2025	"Wildlife will suffer too as their homes are destroyed and polluted. Keep up the fight and I wish you all success."
Yan Gu	Mission Viejo	CA	92691	United States	1/7/2025	"Pollution, noise, unsafe for our community and kids. Strongly disagree to have those big trucks around our neighborhood."
Gordon Hu	Lake Forest	CA	92630	United States	1/7/2025	"The facility will bring an influx of large trucks that will increase noise pollution, emit harmful pollutants, and create substantial traffic congestion in residential areas. These trucks not only endanger the safety of pedestrians, including children and seniors, but also degrade the quality of life for residents who rely on a peaceful environment. Furthermore, the continuous operation of a warehouse of this scale will lead to long-term environmental damage, such as increased air and noise pollution, which will adversely impact public health. Studies consistently show that neighborhoods near heavy industrial activity experience higher rates of respiratory and cardiovascular issues due to poor air quality. Approving this project will prioritize industrial interests at the expense of the residents' safety, health, and quality of life. I urge the city to explore alternative locations for this facility that are better suited for industrial activity and away from residential areas."
Gordon Hu	Lake Forest	CA	92630	United States	1/7/2025	"The facility will bring an influx of large trucks that will increase noise pollution, emit harmful pollutants, and create substantial traffic congestion in residential areas. These trucks not only endanger the safety of pedestrians, including children and seniors, but also degrade the quality of life for residents who rely on a peaceful environment. Furthermore, the continuous operation of a warehouse of this scale will lead to long-term environmental damage, such as increased air and noise pollution, which will adversely impact public health. Studies consistently show that neighborhoods near heavy industrial activity experience higher rates of respiratory and cardiovascular issues due to poor air quality. Approving this project will prioritize industrial interests at the expense of the residents' safety, health, and quality of life. I urge the city to explore alternative locations for this facility that are better suited for industrial activity and away from residential areas."
Kevin Yin	Foothill Ranch	CA	92610	United States	1/7/2025	"Support the petition!"
jianyin chen	Bellevue	WA	98006	United States	1/8/2025	"The pollution will be caused"
Lisa Cao	Lake Forest	CA	92630	United States	1/8/2025	"Warehouse opposition"

Name	City	State	Postal Code	Country	Commented Date	Comment
Tingting Wan	Lake Forest	CA	92630	United States	1/8/2025	"Warehouse opposition"
Lisa Cao	Lake Forest	CA	92630	United States	1/8/2025	"Warehouse opposition"
Jackie Chang	Sarasota	FL	34243	United States	1/8/2025	"Please stop the Indurstrial Warehouse Manufacturing Projects!"
Hsiuching Kuo	Lake Forest	CA	92630	United States	1/9/2025	"It's inappropriate to build an industrial warehouse next to such a large residential community. I'll do everything I can to stop this project."
Cody Huang	Lake Forest	CA	92630	United States	1/9/2025	"The extra noise, traffic, road hazard, pollution that this could produce are not compatible with the direction that we want this part of our beloved Lake Forest to go to."
Cody Huang	Lake Forest	CA	92630	United States	1/9/2025	"Stop this project that would damage the local community"
xiaojuan lu	Irvine	CA	92618	United States	1/9/2025	"It's our beautiful peace community!"
John N	Lake Forest	CA	92630	United States	1/11/2025	"It is highly irresponsible for the city planning board to continue expanding commercial and industrial activities within what has become a predominantly residential neighborhood. The absence of an adequate buffer between residential and commercial zones heightens concerns about the environment, safety, noise, traffic, and pollution, all of which adversely affect the community. The city planning commission must prioritize more compatible uses for the site—such as commercial office spaces, daycare centers, or plazas—to effectively address these concerns and enable a balanced, sustainable development."
Yidan Chen	Irvine	CA	92618	United States	1/12/2025	"We need to have a better and peaceful neighborhood. Please make the industry zone away from residential zone. Thanks so much!"
xiuyi yu	Lake forest	CA	92630	United States	1/12/2025	"I'm a mother of two, and my daughter's preschool is 4 minutes from our home. Our family strongly opposes the construction of warehouses and industrial buildings so close to our neighborhood."
Debbie Peng	Lake Forest	CA	92630	United States	1/12/2025	"The extra noise, traffic, road hazard, pollution that this could produce are not compatible with the direction that we want this part of our beloved Lake Forest to go to."
Grace Tsai	Lake Forest	CA	92630	United States	1/12/2025	"I lived within 1 mile radius from those projects. My major concern regarding to the renovations / expansions of the existing buildings are 1. traffic, 2. noise, and 3. pollutions. 1. Traffic: Lots of commuters drive from Foothill Ranch to I-5 to work. Please consider to restrict the number of cars to the on Bake parkway or Lake Forest drive so it won't cause bad traffic jams when local people needs to go to work or go home. 2. Noise: Please make sure the noise from the business buildings won't cause trouble to the sleeping qualities of the residents between 9PM to 8AM. 3. Pollution: My major concerns are chemical pollution to the air. This is more to the type of business. I assume the number and types of the cars to the parking lots will be the same as before. Please restrict the industry types of the future tenants. Thank you for your time to take a look at my concerns. Grace Tsai"
Lilin Song	Lake Forest	CA	92630	United States	1/12/2025	"Please keep this community beautiful and peaceful"
tim zhou	Tacoma	WA	98466	United States	1/12/2025	"the building of huge warehouse inside the residential dense area is on the conflicting direction and against Lake Forest 2040 Vision. not consider ing community citizen well being and health. and not good for city revenue either(red one to residential will bring in more tax revenue for the city for medium and long run)"
Vera Nani	Lake Forest	CA	92630	United States	1/13/2025	"As a senior citizen I know how important we need good air quality not just outside but in inside our homes. This type of construction bringing all sorts of equipment will definitely bring the air quality to a dangerous level for our lungs and bodies. All that dust/dirt and tiny unhealthy particles traveling in the air spreading everywhere will be bringing it into our environment breathing into it somehow, somewhere and someway which in time will cause people harm. As you know one can get that disease where your hands shake a lot at present I can't remember the name. My cousin used to drive those caterpillars leveling land and he cintracted the disease at the young sge of 45 years old. The dirt particles build up in your body in time. I urgently suggest to look elsewhere where it is not heavily populated. Also it's not just senior citizens like myself but young children and adults who have allergies and pulmonary issues too. Thank you Elvera Nani"
RUI WANG	Lake Forest		92630	United States	1/14/2025	"Save the safe air for all people"
ashlee liu	Ladera Ranch	CA	92694	United States	1/14/2025	"No more warehouses in Lake Forest!!! Enough is enough!!!"
Charles Xiong	Eastvale	CA	92880	United States	1/14/2025	"The warehouse is 100 feet to my community."
Yang Xu	Los Angeles	CA	90025	United States	1/15/2025	"Please do not destroy this family friendly neighborhood. Please let the kids grow up with a healthy environment."
kelly zhang	Lake Forest	CA	92630	United States	1/16/2025	"We need to work together to keep our community safe, peaceful and livable."
kelly zhang	Lake Forest	CA	92630	United States	1/16/2025	"Let's work together to make our community more safe, peaceful and livable."
Tian Chang	Willowbrook	IL	60527	United States	1/16/2025	"Please stop Proposed Industrial Warehouse Manufacturing Projects, due to air quality, traffic issue, noise, and fire possibility."
Tian Chang	Willowbrook	IL	60527	United States	1/16/2025	"{"videoUrl":"https://customer-g2wndu9j9b1p498o.cloudflarestream.com/8d2d41db682301f8761866be2aa2e99f/downloads/default.mp4","cloudflareUid":"8d2d41db682301f8761866be2aa2e99f"}"
Yanfang Liu	Mission Viejo	CA	92692	United States	1/23/2025	"I am against building warehouses"
RUI WANG	Lake Forest		92630	United States	1/23/2025	"It may destroy the community"
Lisa Cao	Lake Forest	CA	92630	United States	2/10/2025	"Warehouse opposition"
Kai Chen	Irvine	CA	92618	United States	4/28/2025	"We don't want to see big trucks moving around where we live, dangerous for our kids running around."
yijie lin	Lake Forest	CA	92630	United States	4/28/2025	"stop ruining our community"
Kimberly Heileson	Lake Forest	CA	92610	United States	7/29/2025	"Too many homes are being built here in the canyon and it's displacing the Wildlife and there's gonna be way too much traffic and if there's fires, it's a hard place for people to get out and the congestion on Eltoro and Santiago would be hell that's just my opinion"
Oylum Kalantri	Burbank	CA	91504	United States	8/2/2025	"We want our community to remain peaceful, healthy and safe. Reject industrial projects and protect Lake Forest beautiful fabric."
Izzy Qu	Glendale	CA	91202	United States	8/10/2025	"Think about the air pollution and 24/7 noise near our homes that hurts our family, life, health and house value. Stop this madness and share your voice. Protect our home!"
Shudong Wang	Lake Forest	CA	92630	United States	8/11/2025	"Clean air, no noice!"
Shudong Wang	Lake Forest	CA	92630	United States	8/11/2025	"Stop warehouse!"
Shelly Wang	Lake Forest	CA	92630	United States	8/11/2025	"Stop building warehouses"

Name	City	State	Postal Code	Country	Commented Date	Comment
Shudong Wang	Lake Forest	CA	92630	United States	8/11/2025	"Stop warehouse"
Yuxin Shi	lake forest	CA	92692	United States	8/11/2025	"As a resident of Lake Forest, I am deeply concerned about the three proposed industrial warehouse projects on Enterprise Way. These developments threaten the very fabric of our community, bringing significant environmental, health, and safety risks to our neighborhoods. Protecting Our Neighborhoods: Lake Forest is a beautiful, family-oriented city, and projects like these disrupt the residential character that attracted so many of us to live here. High-density industrial developments are simply incompatible with the surrounding neighborhoods, including Baker Ranch and Meadows, which are located just steps from the proposed sites. Environmental and Health Risks: The potential for increased air pollution from diesel trucks and industrial activities is alarming. Residents—especially children and seniors—will be directly exposed to harmful pollutants. The noise from 24/7 operations will further degrade our quality of life. Living within 100 feet of truck routes or loading docks is not what we signed up for when choosing to call Lake Forest home. Traffic and Infrastructure Strain: The roads we rely on, like Bake Parkway and Alton Parkway, are already busy during peak hours. Adding heavy truck traffic from these warehouses will only make things worse. The limited road improvements planned for these projects don't come close to addressing the long-term damage and congestion they'll create. Impact on Vulnerable Populations: The Meadows Senior Apartments, home to over 100 residents aged 62 and older, will be directly affected. Our seniors deserve peace and safety, not constant noise, polluted air, and the dangers of increased traffic. The Need for Transparency and Community Input: These projects seem to have progressed without meaningful engagement with residents. We deserve to have our voices heard through public hearings and to see comprehensive Environmental Impact Reports that fully address the cumulative risks to our community. The Bigger Picture: Allowing industrial facilities to encroach on residential areas sets a dangerous precedent. What will stop more of these projects from spreading in the future? If these warehouses are approved, we risk losing the safe, family-friendly environment that makes Lake Forest special. I urge the City Council and Planning Department to reject these projects and instead pursue developments that align with our city's vision of community well-being and sustainability. We must prioritize the health, safety, and quality of life for all residents over industrial expansion. Let's protect what makes Lake Forest a great place to live—today and for generations to come."
Sachin Padhiyar	Anaheim	CA	92825	United States	8/12/2025	projects on Enterprise Way. These developments pose serious environmental, health, and safety risks that threaten the heart of our community. Protecting Our Neighborhoods: Lake Forest is a beautiful, family-oriented city—a place where families choose to settle for safety, community, and quality of life. High-density industrial projects like these are simply incompatible with the surrounding neighborhoods, including Baker Ranch and Meadows, which sit just steps from the proposed sites. Approving such projects would undermine the very character that drew us here. Environmental and Health Risks: The increase in diesel truck traffic and industrial activity will directly expose residents to harmful pollutants, including fine particulate matter that can cause respiratory and cardiovascular issues. Children, seniors, and those with pre-existing health conditions are especially vulnerable. The constant noise from around-the-clock operations will further diminish the peace and quiet we value. Living within 100 feet of truck routes and loading docks is not what any of us envisioned when making Lake Forest our home. Traffic and Infrastructure Strain: Our primary roads—Bake Parkway and Alton Parkway—already struggle during peak hours. Adding heavy truck traffic will intensify congestion, increase the likelihood of accidents, and put additional strain on our infrastructure. The limited road improvements planned for these projects are nowhere near enough to offset the long-term congestion and road wear they will cause. Impact on Vulnerable Populations: The Meadows Senior Apartments, which house over 100 residents aged 62 and older, will be directly impacted. These residents deserve peace, safety, and clean air—not constant noise, hazardous traffic, and industrial pollution. The Need for Transparency and Community Input: These projects appear to have advanced without meaningful public engagement. Residents have a right to be informed and involved, with full public hearings and comprehensive Environmental Impact Reports that assess the cumulative risks to our neighborhoods. The Bigger Picture: If industrial warehouses are allowed to encroach on residential areas, it sets a dangerous precedent for the future. What will prevent more of these incompatible projects from appearing near our homes? If approved, these warehouses could irreversibly alter the safe, family-friendly environment that makes Lake Forest unique. I urge the City Council and Planning Department to reject these industrial warehouse projects and instead support development that aligns with our city's vision of sustainability, health, and community well-being. We must place the safety, health, and quality of life for all residents above industrial expansion. Let us protect
Lucy Chen	San Jose	CA	95122	United States	8/14/2025	"Against to build warehouse in my community"
Yushan Wang	Chino	CA	91710	United States	8/14/2025	"It's our beautiful peace community!"

Name	City	State	Postal Code	Country	Commented Date	Comment
Alice Zhou	Irvine	CA	92618	United States	8/15/2025	"Fangxian 7 months ago As a resident of Lake Forest, I am deeply concerned about the three proposed industrial warehouse projects on Enterprise Way. These developments threaten the very fabric of our community, bringing significant environmental, health, and safety risks to our neighborhoods. Protecting Our Neighborhoods: Lake Forest is a beautiful, family-oriented city, and projects like these disrupt the residential character that attracted so many of us to live here. High-density industrial developments are simply incompatible with the surrounding neighborhoods, including Baker Ranch and Meadows, which are located just steps from the proposed sites. Environmental and Health Risks: The potential for increased air pollution from diesel trucks and industrial activities is alarming. Residents—especially children and seniors—will be directly exposed to harmful pollutants. The noise from 24/7 operations will further degrade our quality of life. Living within 100 feet of truck routes or loading docks is not what we signed up for when choosing to call Lake Forest home. Traffic and Infrastructure Strain: The roads we rely on, like Bake Parkway and Alton Parkway, are already busy during peak hours. Adding heavy truck traffic from these warehouses will only make things worse. The limited road improvements planned for these projects don't come close to addressing the long-term damage and congestion they'll create. Impact on Vulnerable Populations: The Meadows Senior Apartments, home to over 100 residents aged 62 and older, will be directly affected. Our seniors deserve peace and safety, not constant noise, polluted air, and the dangers of increased traffic. The Need for Transparency and Community Input: These projects seem to have progressed without meaningful engagement with residents. We deserve to have our voices heard through public hearings and to see comprehensive Environmental Impact Reports that fully address the cumulative risks to our community. The Bigger Picture: Allowing industrial facilities to encroach on residential areas sets a dangerous precedent. What will stop more of these projects from spreading in the future? If these warehouses are approved, we risk losing the safe, family-friendly environment that makes Lake Forest special. I urge the City Council and Planning Department to reject these projects and instead pursue developments that align with our city's vision of community well-being and sustainability. We must prioritize the health, safety, and quality of life for all residents over industrial expansion. Let's protect what makes Lake Forest a great place to live—today and for generations to come."
sharon hu	CA	CA	95120	United States	8/15/2025	"As a resident in the meadows, I against to build a monster warehouse in my community."
Zhu Wang	Lake Forest	CA	92630	United States	8/15/2025	"I strongly oppose the construction of a warehouse facility in such close proximity to existing residential communities, senior housing, schools and parks."
Haichen Liu	Richardson	TX	75081	United States	8/15/2025	"Industrial warehouses should not be built next to a residential community, it's not good for health and value of the city. Such a beautiful and well organized City should not let this thing happen. Hope all the city council and staff members work with residents and the warehouse project leaders and resolve this for the benefit of all."
Chunlan Yang	Lake Forest	CA	92630	United States	8/16/2025	"No massive warehouses next to residential."
Chunlan Yang	Lake Forest	CA	92630	United States	8/16/2025	"No massive warehouse next o residential"
William Wang	Lake Forest	CA	92630	United States	8/16/2025	"Stop warehouse"
Jeff Lee	Lake Forest	CA	92630	United States	9/4/2025	"There are only 2 lanes on Bake, if big trucks are going to drive up to the warehouses, the traffic's will be really bad and could possible be dangerous..."
Keyur Shah	Lake Forest	CA	92630	United States	9/8/2025	"Building a warehouse so close to homes would ruin the air quality and worsen the traffic. Air quality issues are the most significant, hurting people of all ages!!"

BIN ZHOU

Letter Code: I-72
Date: September 9, 2025

Response to Comment I-72-1

This comment expresses opposition to the proposed Project and expresses general concerns related to large-scale warehouse projects, including air quality, noise disturbance, traffic congestion, safety hazards, and quality of life. The comment references the attached petition, which the comment states is signed by over 1,000 residents. The comment requests that the City address their comments by thoroughly evaluating potential impacts of the proposed Project and rejecting the proposed Project in the event that these impacts cannot be eliminated or adequately mitigated.

Refer to Response to Comment O-1-4 and Master Response 9 regarding the proposed Project's impacts related to air quality and health risks, Master Response 11 regarding the proposed Project's impacts related to noise, Master Response 8 regarding the proposed Project's impacts related to traffic congestion and safety, and Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses and the Project's effect on quality of life. Additionally, refer to Master Response 4 regarding the adequacy of the proposed Project's mitigation under CEQA. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: [redacted]
To: Stonich, Amy; enterpriseprojects@lakeforstca.gov
Cc: Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Villwock, Jordan; Voigts, Scott; rpegueno@lakeforstca.gov; Cirbo, Doug; Tettemer, Mark; Smith, Amy; Stannard, Michael; Yu, Benjamin
Subject: Comments on DEIR IPT and Western Realco Warehouse Projects
Date: Tuesday, September 9, 2025 11:28:01 AM
Attachments: Over 150 Cancer Cases Reported amid North Carolina Stat.pdf
California Attorney General Letter to City of Lake Forest on Warehouse Project by IPT Enterprise Business Center LLC - Rob Bonta 05April2024.pdf

Dear Amy and IPT and related Warehouses Applicants,

My name is Diana Lees and I am sending this letter to express my strong feeling against the warehouse proposals in such a beautiful city: Lake Forest.

I-73-1

Huge warehouses with size of 35 feet tall (not including AC and other equipment on top of the roof), with 48 commerical docks, with 24/7 hours operation, with trucks (heavy loading, 24 feet or 48 feet long with four wheels or extension to 8 wheels or 14 wheels) are not suitable to be in Lake Forest, especially in the high density residential neighborhood.

First, Traffic Impact:

Three years ago, when I was driving at Baker Parkway going to Rancho Parkway, the traffic was not heavy. Last week for three days, September 3, 4, and 5, at 7:45 PM, we (five residents of Lake Forest) did a specific study of the traffic between Dimension Dr and Baker Parkway. We stopped at traffic light, we counted there were so many cars rushing through just for one direction, on one lane, about 14 cars. We did this investigation for three nights, at 7:45 PM, almost at the same time. We were speechless to see this heavy traffic.

I-73-2

In addition to this heavy traffic, we should also accept the fact that: this Baker Parkway only has two lanes, and these two lanes are standard two lanes, not wider lanes, with a standard bike lane. If the street at 7:45 PM is so busy, how about at traffic time? Will there be more accidents happening with the warehouse trucks?

The DEIR report failed to identify this impact.

Second, Pollution and Noise Impact:

As we all know, the fuels from the trucks are poisonous , just like the fuels from the cigarettes. Please check ChatGPT. Can city of Lake Forest allow people to smoke in the city hall? Is this permitted? Is this forbidden in the city office areas?

I-73-3

The DEIR report failed to indicate the impact of these fuels. It did not take the residents living in this high density neighborhood into consideration: their health: Can these fuels from trucks cause lung cancers, Can the fumes from any manufacturing projects produce varies diseases that are incurable? And these disease can carry on generation to generation?

Please read the attached article published last year regarding 150 cancer cases found in one university building.

As we also know, the trucks loading on and off at the docks, roaming on parking lot street in and out next to the senior apartment, and next to the Meadows residents, with 24 hours and 7 days (unchartered, uncontrolled) operation, **CAN PRODUCE** long and unbearable noises to the neighborhood. Imagine: If your gardener tells you he can come every Sunday morning at 8 o'clock to mowing your grass, will you have a second thought of : will that disturb your morning quietness? Will you

have second thought of asking your gardener for a best day in the afternoon to cut your grass in your yard?

I-73-3

And these noises are only last for ten minutes, they are only temporary. If you can not bear with these noises, , then how can the residents bear with these constant noises. NOT ten minutes, BUT constant. 24/7.

With all these impacts, we are strongly against the warehouse proposals. They are not healthy to the community. They do not fit the City planning for long term environment development. They go to the opposite direction. Residents will appreciate the good decision of the city: planned an environmental city for people to live. Ten years later, 50 years later, or 100 years later, people will come up to see what a beautiful place to live in Lake forest. They see people can ride bicycles on the street, jogging on the sidewalks, they see people are smiling. They do not see huge warehouses with fumes, gray or white smokes rising from the warehouse roofs. And they do not see sick people, coughing and depressed.

I-73-4

We all know and want to thank this Lake Forest City Officials, Members and Employees, they are committed to the city's future and also concerned about its residents' living and wellbeing conditions.

At same time, we really want city really take the Attorney General's letter into consideration and really care for the people. Lake Forest city, has a beautiful name. With lake and Forest. It should be a beautiful place to live for generation and generation.

Please read attached letter from Rob Bonta, Attorney General from Department of Justice, State of California.

Thank you very much,

Diana Lees

Resident at Lake Forest.

P.S. This DEIR report only reflects one warehouse, what about other two warehouses? There seems to be a potential misleading impression t to the residents?

I-73-5

CAUTION: Think Security! This email is not from someone at the City of Lake Forest. **Do not click any links or open any attachments you are not expecting.**

ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE

1300 I STREET, SUITE 125
P.O. BOX 944255
SACRAMENTO, CA 94244-2550

E-Mail: EJ@doj.ca.gov

April 5, 2024

Amy Stonich, Assistant Director of Community Development
City of Lake Forest
100 Civic Center Drive
Lake Forest, CA 92630

RE: IPT Enterprise Business Center LLC, SCH #2024030755

Dear Ms. Stonich:

Thank you for the opportunity to provide comments on the Notice of Preparation for the IPT Enterprise Business Center LLC project. While the logistics industry is an important component of our modern economy, [redacted]. For example, diesel trucks visiting warehouses emit nitrogen oxide (NO_x)—a primary precursor to smog formation and a significant factor in the development of [redacted]—and diesel particulate matter (a subset of fine particular matter that is smaller than 2.5 micrometers)—a contributor to [redacted].[1] Trucks and on-site loading activities can also be loud, bringing [redacted] during 24/7 operation that can cause [redacted] after prolonged exposure.[2] The hundreds, and sometimes thousands, of daily truck and passenger car trips that warehouses generate can contribute to [redacted]. Depending on the circumstances of an individual project, warehouses may also have other environmental impacts.

To help lead agencies avoid, analyze, and mitigate warehouses' environmental impacts, the Attorney General Office's Bureau of Environmental Justice has published a document containing best practices and mitigation measures for warehouse projects. We have attached a

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[1] California Air Resources Board, Nitrogen Dioxide & Health, https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health (NOx); California Air Resources Board, Summary: Diesel Particular Matter Health Impacts, https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts; Office of Environmental Health Hazard Assessment and American Lung Association of California, Health Effects of Diesel Exhaust, https://oehha.ca.gov/media/downloads/calenviroscreen/indicators/diesel4-02.pdf (DPM).

[2] Noise Sources and Their Effects, https://www.chem.purdue.edu/chemsafety/Training/PPETrain/dblevels.htm (a diesel truck moving 40 miles per hour, 50 feet away, produces 84 decibels of sound).

copy of this document to this letter, and it is also available online.[3] We encourage you to consider the information in this document as you prepare the draft environmental impact report for this project.

However, even projects located far from sensitive receptors may contribute to harmful regional air pollution, so you should consider measures to reduce emissions associated with the project to help the State meet its air quality goals. A distant warehouse may also impact sensitive receptors if trucks must pass near sensitive receptors to visit the warehouse.

We are available to discuss as you prepare the draft environmental impact report and consider how to guide warehouse development in your jurisdiction. Please do not hesitate to contact the Environmental Justice Bureau at ej@doj.ca.gov if you have any questions.

Sincerely,

CHRISTIE VOSBURG
Supervising Deputy Attorney General

For ROB BONTA
Attorney General

[3] https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf.

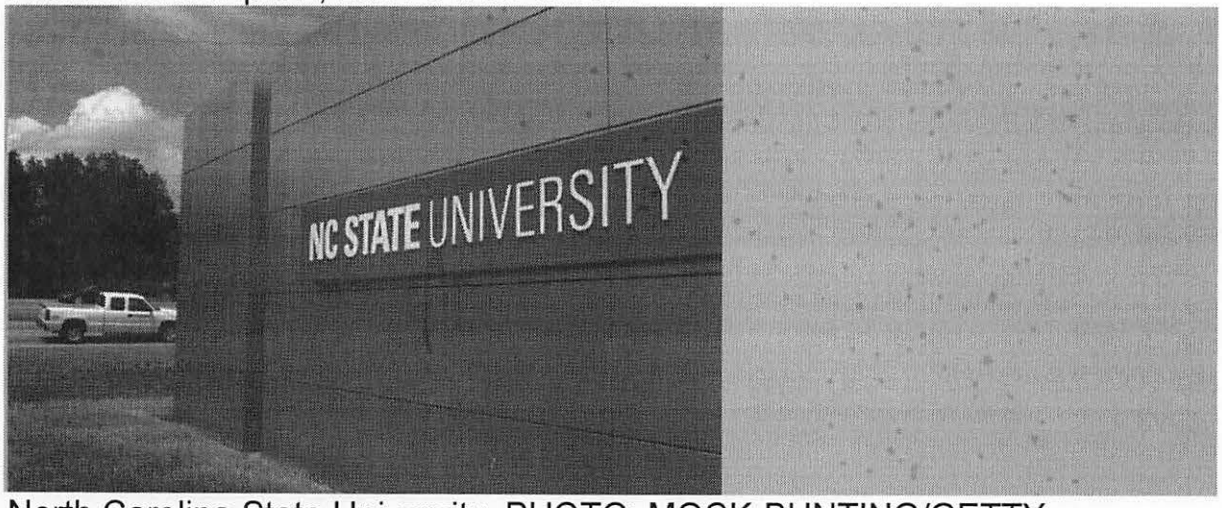
Over 150 Cancer Cases Reported amid North Carolina State University's Investigation of Toxic Chemicals on Campus

NC State University has closed Poe Hall and launched an investigation after elevated levels of cancer-causing chemicals known as PCBs were detected

By
Vanessa Etienne

https://people.com/nc-state-university-150-cancer-cases-campu-pcb-chemicals-8623825

Published on April 2, 2024 04:52PM EDT



North Carolina State University. PHOTO: MOCK-BUNTING/GETTY

North Carolina State University has launched an investigation after elevated levels of cancer-causing polychlorinated biphenyls (PCBs) were detected in a campus building.

Due to their harmful effects on human and environmental health, PCBs were banned in the U.S. in 1979. However, products made prior to the ban can still contain PCBs.

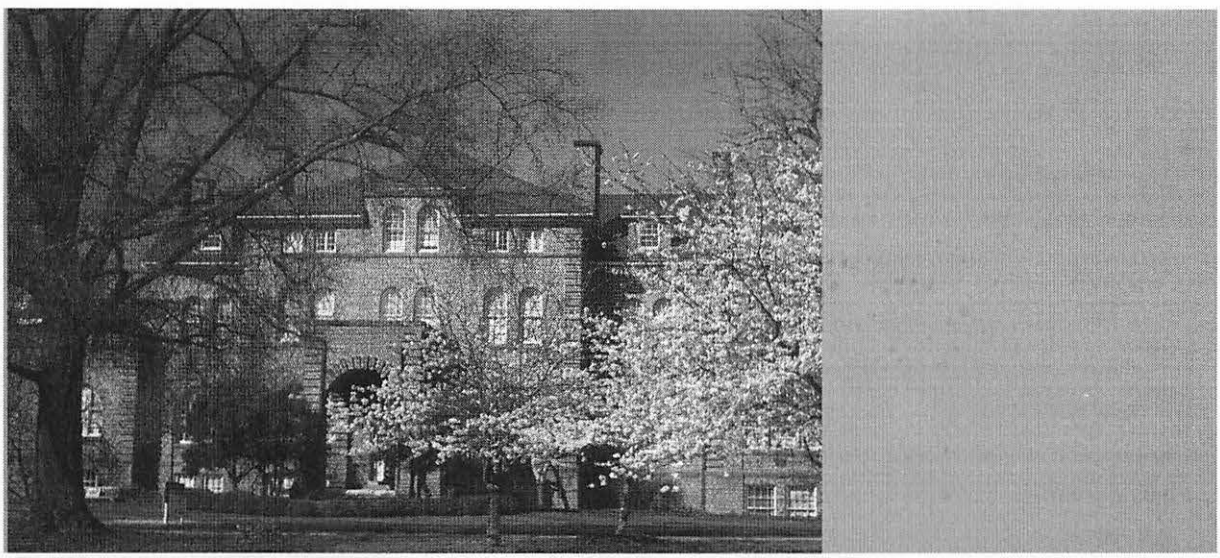
In August 2023, an NC State employee reported health concerns about Poe Hall on the school's main campus to the school's environmental health and safety unit. In November the university conducted testing of building materials, Vice Chancellor Warwick Arden said in a webinar last week.

"The concerns specifically mentioned PCBs, along with lead and asbestos," Arden said.

The preliminary testing found that asbestos and heavy metals were "within the acceptable limits," however, PCBs were detected in the building in October 2023 and November 2023. According to the U.S. Environmental Protection Agency (EPA), PCBs are "probable human carcinogens" that can cause negative reproductive, neurological, immune and endocrine effects. It is not known if the cancer cases at NC State are indeed linked to the PCBs.

"After receiving analytical results from the laboratory in November that reported detections of PCBs in some dust and some bulk samples, NCSU closed Poe Hall and shut down the HVAC systems out of an abundance of caution, pending further investigation," a university report, published February 2024, states.

The report also notes that Poe Hall was built in 1971, when PCBs were "widely used in building materials, such as paint, caulk, and some mastics, across the United States" before being banned in 1979.



North Carolina State University.

Never miss a story — sign up for PEOPLE's free daily newsletter to stay up-to-date on the best of what PEOPLE has to offer, from celebrity news to compelling human interest stories.

The investigation has now led to numerous alumni reporting health conditions that they claim may be linked to Poe Hall.

Over 150 people have reported cases of cancer or other serious illnesses to WRAL in Raleigh, North Carolina. The local outlet has been collecting health data from current and former students and employees since the university's investigation was launched.

These cases have not been officially linked to Poe Hall and cannot be considered a "cancer cluster," which is "the occurrence of a greater than expected number of cancer cases among a group of people in a defined geographic area over a specific time period," according to the National Cancer Institute.

During last week's webinar, State Epidemiologist Zack Moore said that the North Carolina Department of Health and Human Services has also "heard directly from some of those people who are dealing with cancer or other serious health illnesses."

NC State Chancellor Randy Woodson said that the university will not be commenting substantially on the investigation, however, they will be providing updates "as appropriate."

"I recognize that people are very eager for answers to their questions," he said. "This is very stressful, and I understand that. It's a particular concern to us that we move through this as quickly, but as thoroughly as we can."

"No agencies at this point have completed the work to understand if the building conditions could have contributed to health issues," Woodson continued. "I want to stress that we've had no such evaluative outcome."

A spokesperson for North Carolina State University tells PEOPLE that updates on Poe Hall will be shared to a website dedicated to the ongoing investigation.

"This is an evolving situation, and the university remains committed to following best practices in consultation with outside agencies," the school said

in a statement. "As part of that process, we've engaged professionals to conduct a comprehensive analysis of the building - that testing is still ongoing. No state or federal agency has completed the work to determine if there are health impacts related to Poe Hall."

DIANNA LEES

Letter Code: I-73
Date: September 9, 2025

Response to Comment I-73-1

This comment is introductory and expresses opposition to the proposed Project, stating the opinion that the proposed Project is not suitable for its location.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-73-2

This comment expresses concern regarding traffic congestion and states the opinion that the Draft EIR does not identify an impact related to traffic congestion and potential safety issues.

Refer to Master Response 8 regarding the proposed Project's impacts related to traffic congestion and related safety issues. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-73-3

This comment expresses concern regarding air quality and noise pollution, stating the opinion that the Draft EIR fails to disclose the impact of truck fuels and expressing concern about cancer risk and 24/7 noise disturbances.

Refer to Response to Comment O-1-4 and Master Response 9 regarding the proposed Project's impacts related to air pollution, cancer risk associated with the proposed Project, and sensitive receptors adjacent to the Project site and Master Response 11 regarding the proposed Project's impacts related to noise. In addition, refer to Response to Comment O-6-4 regarding 24/7 operations associated with the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-73-4

This comment expresses opposition to the proposed industrial warehouse projects, including the proposed Project, stating the opinion that they are not healthy and do not fit City planning, and requests the City address their comments by considering the California Attorney General's NOP comment letter (*IPT Enterprise Business Center LLC, SCH #2024030755*, April 5, 2024; located in Appendix A of the Draft EIR).

Refer to Master Response 7 regarding the compatibility of the proposed Project with the surrounding land uses and local and regional plans. The City acknowledges the California Attorney General's NOP comment letter and considered the issues presented in the letter during preparation of the Draft EIR. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-73-5

This comment questions why the Draft EIR does not evaluate the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) and states the opinion that their omission is misleading.

Refer to Master Response 6 regarding the adequacy of the cumulative analysis conducted for the proposed Project and Response to Comment I-36-4 for an explanation of why the proposed Project is considered a separate project from other ongoing warehouse projects under CEQA. No further response is required. These responses thoroughly address the topics raised in this comment.

From: Connie Ding
To: Stonich, Amy; EnterpriseProjects
Cc: Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT (SCH NO. 2024030755) PROJECT: IPT Corporate Business Center
Date: Wednesday, September 10, 2025 3:15:51 PM

To: Ms. Amy Stonich
From: Connie Ding, Resident of the Meadows Sub-community Redwoods
Date: 9/10/2025
Dear Ms. Stonich,
I am writing to submit formal comments regarding the Draft Environmental Impact Report (DEIR) for the proposed IPT Corporate Business Center project (State Clearinghouse No. 2024030755). As a resident of the Meadows sub-community, which is immediately adjacent to the project site, I have significant concerns about the adequacy of the DEIR's analysis, particularly related to geology and soils (Section 4.7). Below, I outline critical deficiencies and recommendations for addressing these issues.

1. Deficiency in Threshold 4.7.1(ii) – Seismic Ground Shaking

Pseudo-Mitigation in GEO1 Measure:
- Lack of Independence: The requirement for a Project Geotechnical Consultant hired and paid by the developer creates a conflict of interest, as the consultant's financial dependence on the developer may compromise objectivity.
"- Post-Construction Review Gap: The DEIR only requires submission of a ""final test report"" but fails to mandate real-time geotechnical monitoring during construction (e.g., seismic sensors)."
- Outdated Report: The 2021 geotechnical report referenced is no longer valid per California guidelines, which require updates every two years.

I-74-1

Recommendation:
- Revise GEO1 to require an independent geotechnical consultant funded by a municipal bond and reporting directly to the City.
- Mandate continuous seismic monitoring during construction and make raw data publicly accessible.
- Void the 2021 report and require a new geotechnical investigation in 2025.

2. Deficiency in Threshold 4.7.1(iii)/(iv) – Liquefaction/Landslide Risks

Misjudgment of Risks:
"- No Groundwater Data: The assertion that ""no liquefaction risk exists"" is unsupported by groundwater monitoring data, which is essential to evaluate saturation conditions."
- Excavation-Induced Landslides: The DEIR fails to assess slope stability risks during excavation, especially where cutting exceeds the angle of repose of geological layers.
Recommendation:
- Require comprehensive groundwater monitoring and slope stability analysis conducted by an independent party.
- Include real-time data logging and periodic reporting to the City during earthmoving activities.

3. Deficiency in Threshold 4.7.3 – Corrosive Soils

Inadequate Mitigation in GEO2 Measure:
- Pre-Construction Testing Only: Soil corrosivity may change during construction (e.g., due to acid rain infiltration), but the DEIR only requires pre-construction testing.
- Missing Protections for Utilities: The DEIR does not address corrosion protection for

underground utilities (e.g., cathodic protection for iron pipes).
"- Violation of California Building Code (§1605.3.1): The ""post-permit testing"" approach violates state requirements for continuous monitoring during construction."
Recommendation:
- Revise GEO2 to require quarterly soil corrosivity testing until project completion.
- Specify corrosion mitigation measures for all underground infrastructure.
- Grant the City authority to conduct random field sampling and verification.
---
4. Systemic Regulatory Failures

Measure	Responsible Party	Deficiency	Potential Consequence
GEO1	Developer-Hired Consultant	Conflict of interest; no independence	Concealed seismic design flaws
GEO2	Public Works (Paper-Based)	No field verification authority	Corrosion mitigation may not be implemented
Energy Compliance	Unclear Authority	Relies solely on applicant assertions	|Actual energy efficiency may be 30% below standard

5. Legal and Engineering Recommendations
A. Energy Chapter:
- Require monthly energy consumption simulation reports compliant with Title 24.
- Mandate renewable energy offsets (e.g., ≥40% rooftop solar coverage).
B. Geology and Soils Chapter:
I-74-1 cont.
- Fund geotechnical consultants through municipal bonds to ensure independence.
- Implement quarterly corrosion testing and real-time seismic monitoring.
C. Regulatory Mechanisms:
- Authorize the City to conduct random onsite sampling (e.g., soil corrosivity, concrete aggregates).
- Require public disclosure of all raw geotechnical monitoring data.
Conclusion
The DEIR exhibits three systemic failures:
1. Data Failure: Outdated reports and missing energy/geotechnical data.
2. Regulatory Failure: Developer-controlled quality assurance.
3. Legal Failure: Violations of California Building Code §1605.3.1 and Energy Code §25402.
If these issues are not addressed, the project could result in:
- Criminal liability due to building collapse during earthquakes;
- Environmental contamination and liability from corroded pipelines;
- Daily penalties of $1,000 for energy non-compliance.
Immediate actions must include:
1. Invalidating the 2021 geotechnical report and conducting a new investigation in 2025.
2. Incorporating mandatory third-party monitoring clauses into all development agreements.
Thank you for considering these comments. I request that these concerns be addressed in the Final EIR and that necessary revisions be made to ensure public safety and regulatory compliance.
Sincerely,
Connie Ding

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CONNIE DING

Letter Code: I-74
Date: September 10, 2025

Response to Comment I-74-1

This comment expresses concern regarding the Draft EIR's geology and soils analysis, including opinions related to conflict of interest, absence of geotechnical monitoring requirements, unsupported liquefaction analysis, absence of slope stability risks, and inadequate corrosion protection. This comment also requests the City address their comments be addressed by revising the Draft EIR's Geotechnical Investigation, requiring monthly energy consumption simulation reports, mandating renewable energy offsets, and requiring public disclosure of geotechnical monitoring data. The comment requests the Draft EIR be revised to address their comments by incorporating mandatory third-party monitoring clauses into all development agreements, and revising the Draft EIR accordingly.

It is standard practice for project applicants/developers to hire independent consultants to prepare technical analyses to analyze property conditions or a proposed development, as indicated by the various appendices provided to the Draft EIR. Each of these consultants, including the geotechnical consultant, operates under a standard of legally enforceable professional ethics that require unbiased conclusions supported by accurately collected and reported data. Being under contract with the Project Applicant, in itself, does not constitute a conflict of interest. As stated on page 26 of the Geotechnical Investigation prepared for the proposed Project (Appendix E to the Draft EIR), the report was intended to objectively aid in the evaluation of the property and to assist the architects and engineers in the design and preparation of the Project plans and specifications. Page 26 also states that the analysis, conclusions, and recommendations contained within the report have been promulgated in accordance with generally accepted professional geotechnical engineering practice. This comment does not provide any evidence to substantiate the claim that a conflict of interest exists in the preparation of the Geotechnical Investigation.

As described in Section 4.7.9.2, Mitigation Measures, starting on page 4.7-19 of Section 4.7 Geology and Soils, of the Draft EIR, with implementation of Mitigation Measure (MM) GEO-1, MM GEO-2, and MM GEO-3, the proposed Project would not result in any significant impacts related to geology and soils. This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. Therefore, there is no nexus to require additional mitigation such as continuous geotechnical monitoring; refer to Master Response 4 regarding the adequacy of the proposed Project's mitigation under CEQA.

This comment vaguely references "California guidelines" requiring updates to geotechnical reports every two years. It is unclear which guidelines the commenter is referring to, as no regulations have been established to limit the span of a geotechnical report's validity. A geotechnical report prepared in 2021 can be valid for the analysis of a Project site in 2025 in the event that site conditions have not changed since the report's preparation. As stated on page 4.7-1 of the Draft EIR, there have been no changes to existing conditions since the Geotechnical Investigation was prepared in 2021, and the conclusions of the investigation remain valid for the Project-specific analysis. This comment

does not provide any evidence to substantiate the claim that the conclusions of the Geotechnical Investigation would no longer be valid.

As discussed on page 4.7-4 of the Draft EIR, water level readings in the nearest groundwater well to the Project site indicate a groundwater level of approximately 72 feet below ground surface (bgs). According to the Geotechnical Investigation, groundwater was not encountered during the drilling of any on-site borings. Based on the lack of water within the borings, and the moisture content of the recovered soil samples, the static groundwater table was considered to have been at a depth in excess of 30 feet below ground surface (bgs) at the time of the borings. Page 4.7-5 of the Draft EIR then states that liquefaction occurs primarily in saturated, loose, fine-to-medium grained alluvial soils in areas where the groundwater table is within 50 feet of the surface. Therefore, the Draft EIR appropriately accounts for groundwater depth in its analysis of liquefaction impacts.

Pursuant to MM GEO-1, the proposed Project would comply with the recommendations of the Geotechnical Investigation, the most current CBC, and the City Building Code. MM GEO-1 also requires the submittal of a Final Testing and Observation Geotechnical Report for Rough Grading to the City of Lake Forest Director of Public Works/City Engineer, or designee, prior to issuance of the final grading permit. The Project's adherence to the site grading recommendations provided in the Geotechnical Investigation would address potential concerns related to slope stability risks during excavation.

As described on page 13 of the Geotechnical Investigation, soil corrosion potential testing conducted in accordance with guidelines published by the Ductile Iron Pipe Research Association (DIPRA) indicated that the on-site soils are considered to be moderately corrosive to ductile iron pipe. Therefore, the Geotechnical Investigation notes that polyethylene protection may be required for cast iron or ductile iron pipes. Pursuant to MM GEO-1, the Project's adherence to the recommendations provided in the Geotechnical Investigation would address potential concerns related to soil corrosion potential. While the Geotechnical Investigation did not identify conditions warranting additional soil corrosion potential testing, page 14 of the Geotechnical Investigation notes that the client may contact a corrosion engineer to provide additional evaluation. Therefore, the Geotechnical Investigation does not preclude additional soil corrosion potential testing. As stated in *State CEQA Guidelines* Section 15064(d)(3), "An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable." It is acknowledged that it is possible that acid rain could occur during construction of the proposed Project. However, this occurrence would be rare and could not be accurately predicted. Therefore, any potential soil impacts related to acid rain are speculative and cannot be considered reasonably foreseeable at this time. Based on geotechnical engineering standard practices, additional testing would be required in the event that unexpected soil conditions are encountered during grading activities. This may include further assessment of soil corrosion potential, as necessary. Should unexpected soil conditions be encountered during construction of the proposed Project, the geotechnical consultant would be notified and would develop updated construction procedure recommendations. Therefore, soil conditions are appropriately analyzed and mitigated in the Draft EIR, and no revisions are necessary.

As described throughout the Draft EIR, the proposed Project would comply with all applicable provisions of Title 24, including building efficiency standards enforced through the local building permit process. In addition, the proposed Project will be seeking LEED certification through the Project Applicant's LEED Volume program. Some of the features included in the design include, but are not limited to, drought tolerant landscaping, low flow fixtures, high efficiency lighting, and infrastructure for EV charging.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: Connie Ding [redacted]
Sent: Wednesday, September 10, 2025 3:33 PM
To: Stonich, Amy; EnterpriseProjects
Cc: Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Formal Objection to the Draft Environmental Impact Report (SCH No. 2024030755) for the IPT Enterprise Business Center Project – Deficiencies in Traffic, Safety, and Cumulative Impact Analysis

Dear Ms. Stonich,

As a resident of the Meadows community adjacent to the proposed IPT Enterprise Business Center project (26200 Enterprise Way), I am submitting this formal objection to the Draft Environmental Impact Report (DEIR). The DEIR contains critical deficiencies that undermine its adequacy under the California Environmental Quality Act (CEQA). Specifically, its traffic, safety, and cumulative impact analyses fail to meet CEQA's standards of transparency, rigor, and full disclosure. My key concerns are summarized below:

I-75-1

1. Deficient and Opaque VMT Analysis (SB 743 Violation)

The DEIR asserts compliance with SB 743's Vehicle Miles Traveled (VMT) metric but conceals the underlying methodology:

- Contradictory Data: The report cites a residential VMT of 19.3 miles per person for TAZ 45, yet claims 24.6 miles per employee for an industrial site (Table 4.17.B). This 25% discrepancy lacks explanation and suggests unreliable or fabricated modeling.

I-75-2

- Lack of Transparency: The "LFTAM model" referenced in the report is not included in the appendices. Likewise, the Traffic Impact Analysis (Appendix J) is absent, denying public review in direct conflict with CEQA §15131(d).
- Ineffective Mitigation: The proposed bike lane measure (TRA1) achieves only a 0.5% VMT reduction—33 times less than needed to address the project's 20% VMT exceedance.

Request: Disclose the full VMT model and inputs, recalculate VMT using SCAG regional standards, and replace TRA1 with a CARB-compliant mitigation strategy achieving at least a 15% reduction.

I-75-3

2. Failure to Address Truck Safety Risks

The DEIR dismisses 59 public comments regarding truck traffic and safety with conclusory statements unsupported by evidence:

- Improper Routing: Policy M9.1 requires trucks to use "major roads," yet 269 daily truck trips (37% of traffic) are routed through Enterprise Way—a 25 mph private road—without a dedicated truck analysis.

I-75-3 cont.

- Turn Radius Misrepresentation: The claim that the Dimension/Commercentre intersection accommodates WB67 trucks ignores physical constraints such as underground utilities that preclude radius expansion.
- Omission of Sightline Hazards: A 2024 billboard on Enterprise Way blocks approximately 30% of sight distance but was excluded from the safety assessment, contrary to Caltrans HDM §201.5 requirements.

Request: Commission an independent truck impact study, including peak-hour simulations, roadway geometry verification, and resident evacuation testing.

3. Improper Segmentation of Cumulative Impacts

The DEIR evaluates the IPT project in isolation from adjacent Western Realco developments, despite shared roadways (Enterprise Way, Dimension Drive). This segmentation violates CEQA §15130(b):

- Traffic Overload: Combined projects will generate 649 daily truck trips, exceeding Dimension Drive's peak capacity (2,200 vehicles/hour) by 37%, resulting in gridlock (Caltrans simulation CT230871).

I-75-4

- Emergency Access Failure: The Orange County Fire Authority (OCFA) already struggles to meet its 5-minute response standard; additional truck traffic will delay emergency vehicles by 4+ minutes (OCFA Report 2024089).

Request: Require a joint EIR to evaluate cumulative roadway capacity and life-safety impacts before any approvals.

4. Noncompliance with Fire Access Standards

The DEIR incorrectly certifies compliance with OCFA and California Fire Code standards:

I-75-5

- Insufficient Roadway Width: Enterprise Way measures 18 feet, below the 20-foot fire access requirement, with no mitigation for on-street parking obstructions.
- Dead-End Lane Violations: Internal roadways exceed 210 feet, violating the 150-foot limit under California Fire Code §503.

I-75-5 cont. Request: Conduct live fire apparatus access tests and revoke the "less-than-significant impact" finding until compliance is demonstrated.

Conclusion – Recirculation Required

The DEIR's reliance on concealed data (VMT), misrepresentation of truck safety conditions, and unlawful segmentation of cumulative impacts violate CEQA and controlling case law (e.g., Neighbors for Smart Rail v. Exposition Metro Line, 2013). Approval under these conditions exposes the City to:

I-75-6

- CEQA Litigation: For inadequate mitigation and failure to disclose significant impacts (Pub. Res. Code §21081.5).
- Federal Enforcement: Potential Clean Air Act §176(c) sanctions for induced congestion.

Immediate Actions Required:

1. Recirculate the DEIR with complete VMT/truck analyses and cumulative project assessment.
2. Reject TRA1 as ineffective and require CARB-compliant VMT reductions.
3. Verify fire access via third-party live testing.

Until these deficiencies are remedied, the DEIR is legally inadequate and should not proceed to certification.

Sincerely,

Connie Ding

9/10/2025

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CONNIE DING

Letter Code: I-75
Date: September 10, 2025

Response to Comment I-75-1

This introductory comment expresses opposition to the proposed Project and states the opinion that the Draft EIR contains inadequacies pertaining to its traffic and safety analyses under CEQA.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-75-2

This comment expresses concerns regarding the VMT analysis presented in the Draft EIR, stating the opinion that the analysis relies upon incorrect data, withholds modeling results from public review, and proposes ineffective mitigation. The comment requests their comments be addressed by providing the full VMT model to the public, calculating VMT impacts using SCAG regional standards, and the rejecting Mitigation Measure (MM) TRA-1.

Refer to Response to Comment I-36-2 regarding the VMT analysis conducted for the proposed Project. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-75-3

This comment expresses concerns regarding truck safety risks associated with the proposed Project, particularly the truck routing, turn radius, and blind spot analyses contained in the Draft EIR. The comment requests their comments be addressed by preparing an independent truck impact study, including peak-hour simulations and resident evacuation testing.

Refer to Response to Comment I-36-3 regarding truck safety risks resulting from the proposed Project. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-75-4

This comment expresses concerns regarding cumulative impacts of the proposed Project, particularly with respect to the related Western Realco Enterprise Way Industrial Project (Projects 1 and 2), which would utilize some of the same roadways as the proposed Project. The comment states the opinion that cumulative traffic volumes would exceed the roadway's peak capacity and delay emergency response times. The comment requests their comments be addressed by withholding approval of the proposed Project and reevaluating the proposed Project and the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) in a singular EIR.

Refer to Response to Comment I-36-4 regarding the proposed Project's cumulative impacts including impacts related to traffic. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-75-5

This comment expresses concerns regarding fire protection standards, stating the opinion that Enterprise Way does not meet OCFA roadway width or dead-end requirements.

Refer to Response to Comment I-36-5 regarding fire protection standards. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-75-6

This concluding comment restates the opinion that the Draft EIR violates CEQA and could face litigation and/or federal action. This comment concludes the letter, states the opinion that the DEIR's omissions regarding cumulative impacts, hazardous materials, and emergency preparedness are unacceptable, and requests their comments be addressed by recirculating of the Draft EIR with updated VMT data and inclusion of the Western Realco Enterprise Way Industrial Project (Projects 1 and 2), replacement of MM TRA-1 with CARB-compliant VMT reductions, and verifying fire access via third-party testing.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses above. No further response is required.

From:	Lily Chu
To:	Stonich, Amy; EnterpriseProjects
Cc:	Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject:	Public Comments on DEIR of IPT Enterprise Business Center Project
Date:	Thursday, September 11, 2025 9:03:47 AM

Dear Planning Committee and City Council Team,

I hope this message finds you well. I am writing as a concerned resident of Meadows to formally express my strong opposition to the proposed construction of a large warehouse within 300 feet of our residential community.

This development raises serious concerns regarding the health, safety, and overall well-being of the families living in the immediate vicinity. Specifically:

- **Noise Pollution:** Continuous operations, including truck traffic and loading activities, would severely disrupt the peace and quiet of our neighborhood, especially during early morning or late-night hours.

I-76-1

- **Air Quality and Traffic:** Increased diesel truck traffic will contribute to harmful emissions and significantly increase congestion on roads not designed for industrial transport, posing safety risks for pedestrians and school children.
- **Property Values:** The presence of an industrial facility so close to homes is likely to lower property values, undermining the investment and stability of our community. In the long term, property value will impact the city's financial performance.
- **Environmental Concerns:** The potential for water runoff, waste, and light pollution poses a threat to our local environment and quality of life.

We urge you to consider alternative locations for this warehouse—preferably in areas already zoned for industrial use and at a safer distance from residential neighborhoods.

The character of our community must be preserved. We ask that you prioritize the health, safety, and interests of the residents you represent.

Thank you for your time and consideration, please confirm receipt of this email.

Best,

Lily

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LILY CHU

Letter Code: I-76
Date: September 11, 2025

Response to Comment I-76-1

This comment expresses opposition to the proposed Project and expresses general concerns related to large-scale warehouse projects, including noise pollution, air quality, traffic congestion, property values, water runoff, waste, light pollution, and quality of life. The comment requests that the City address their comments by considering alternative locations for the proposed Project, including areas already zoned for industrial use and located away from residential uses.

Refer to Master Response 11 regarding noise pollution associated with the proposed Project, Response to Comment O-1-4 and Master Response 9 regarding air quality and health risk impacts associated with the proposed Project, Master Response 8 regarding traffic congestion associated with the proposed Project, Response to Comment O-1-12 regarding impacts to property values associated with the proposed Project, Response to Comment I-10-10 for a detailed response regarding stormwater runoff generated on the Project site, Response to Comment I-21-108 and Response to Comment I-21-109 regarding solid waste associated with the proposed Project, Master Response 12 regarding light pollution associated with the proposed Project, and Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: Wenjing Yang
To: Stonich, Amy; EnterpriseProjects
Cc: Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Public Comments on DEIR of IPT Enterprise Business Center Project
Date: Thursday, September 11, 2025 9:07:05 AM

Dear Lake Forest City Management Team,
I am writing as a resident on Burwood street to express my strong opposition to the proposed construction of a large warehouse within 300 feet of our residential area.

While there are multiple concerns regarding this development, I want to highlight one that is particularly alarming: **the noise impact from truck traffic during nighttime hours**.

Warehouses often operate 24/7, and the presence of large trucks arriving, idling, and departing late at night or in the early morning hours would cause **significant noise pollution**, disrupting the sleep and daily lives of nearby families. The sound of diesel engines, backup alarms, loading docks, and general activity is simply not compatible with a quiet, residential setting.

I-77-1

Many residents in this neighborhood include young children, elderly individuals, and shift workers who rely on nighttime rest. Constant disturbances from truck operations will have a serious impact on both mental and physical health, not to mention quality of life.

We urge you to reconsider the proposed location for this facility and to explore alternative sites that are appropriately zoned for industrial activity—away from homes and schools.

Please take into account the long-term effects on our community before moving forward with this development.

Thank you for your attention to this matter.

Best,
Wenjing

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WENJING YANG

Letter Code: I-77
Date: September 11, 2025

Response to Comment I-77-1

This comment expresses concerns regarding noise impacts associated with the proposed Project, stating the opinion that warehouses often operate 24/7, leading to potential noise pollution during late night or early morning hours that could disrupt daily life and lead to health impacts for nearby residents. The comment requests that the City address their comments by considering alternative locations for the proposed Project away from homes and schools.

Refer to Master Response 11 regarding noise impacts associated with the proposed Project and Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project. In addition, refer to Response to Comment O-6-4 regarding 24/7 operations associated with the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: Connie Ding [redacted]
Sent: Thursday, September 11, 2025 4:34 PM
To: Stonich, Amy; EnterpriseProjects
Cc: Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Public Comment on Draft Environmental Impact Report (SCH No. 2024030755)

Public Comment on Draft Environmental Impact Report (SCH No. 2024030755)
Project: IPT Enterprise Way Industrial Warehouse Project, 26200 Enterprise Way

Submitted by: Connie Ding
Date:9/11/2025

Comment:

I strongly oppose the proposed IPT Enterprise Way industrial warehouse project (SCH No. 2024030755) due to serious and unacceptable impacts on traffic safety, local roads, school zones, emergency response, air quality, noise, and community quality of life.

1. Traffic Safety:

I-78-1

• Large trucks accessing I-5, I-405, and the 241 Toll Road via Bake Parkway and Lake Forest Drive will create hazardous conditions.
• Bake Parkway and Lake Forest Drive are primary routes used daily by nearly all Lake Forest residents; adding frequent heavy truck traffic will significantly increase congestion and accident risk.
• The Bake Parkway to I-5/I-405 interchange is already one of the busiest and most complex in Orange County; trucks increase the risk of serious collisions.
• Lake Forest Drive, a scenic residential arterial, may carry truck traffic to the 241 Toll Road, compromising neighborhood safety and quality of life.

2. School Zones and Local Roads:

• Trucks on Dimension Drive (through Serrano Creek Trail near two schools) pose a direct risk to children, pedestrians, and cyclists.
• Other local roads, including Commercentre Drive, will face increased congestion and accident risk.

3. Emergency Response Concerns:
• Fire trucks and emergency vehicles may be unable to reach residential areas promptly during peak traffic or truck congestion.
• The DEIR should require evaluation by fire safety experts and the Lake Forest Fire Department to assess emergency response impacts and risks.

4. Air Quality:
• Diesel truck emissions will increase NOx and PM2.5, harming respiratory and cardiovascular health, particularly for children and elderly residents.

5. Noise Pollution:
I-78-1 cont.
• Industrial operations will generate significant noise, reducing residential quality of life in Meadows and surrounding neighborhoods.

6. Disproportionate Community Costs:
• The project's limited economic benefits are far outweighed by risks to life safety, emergency response, health, traffic, and quality of life.

Requested Actions:
1. Deny the current project proposal due to its location near residential neighborhoods, schools, and sensitive traffic corridors.
2. Require a fully independent Traffic Impact Study (TIS) to evaluate:
• Safety impacts at Bake Parkway, Lake Forest Drive, and I-5/I-405 interchanges.
• Pedestrian and cyclist risks on Dimension Drive and Commercentre Drive.
• Heavy truck impacts on Lake Forest Drive used for 241 Toll Road access.
• Emergency response accessibility for fire trucks and first responders.

3. Hold a dedicated public hearing with expert testimony from Caltrans, traffic engineers, and fire safety authorities for transparency and public participation.

I-78-1 cont.

Conclusion:
This project (SCH No. 2024030755) poses clear, severe, and unacceptable risks to the safety, emergency response, health, and quality of life of Lake Forest residents. I strongly urge the Planning Commission to reject this project.

Sincerely,
Connie Ding

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CONNIE DING

Letter Code: I-78
Date: September 11, 2025

Response to Comment I-78-1

This comment expresses opposition to the proposed Project and expresses general concerns related to traffic safety, local roads, school zones, emergency response, air quality, noise, and quality of life. The comment requests their comments be addressed by rejection of the proposed Project, preparation of an independent Traffic Impact Study, and a dedicated public hearing with expert testimony from Caltrans and other transportation and safety agencies. The comment restates the opinion that the proposed Project would pose unacceptable risks to the community.

Refer to Master Response 8 regarding traffic safety and local roads associated with the proposed Project, Master Response 13 regarding emergency response associated with the proposed Project, Response to Comment O-1-4 and Master Response 9 regarding air quality impacts and the potential health risks associated with the proposed Project, Master Response 11 regarding noise impacts associated with the proposed Project, and Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses and the Project's effect on quality of life. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: Jason Y. [redacted]
Sent: Friday, September 12, 2025 8:37 AM
To: Pequeno, Robert; Stonich, Amy
Subject: Comments on the Draft Environmental Impact Report (DEIR) for 26200 Enterprise New Industrial Building Project Section 4.3 Air Quality SCH No. 2024030755

Dear Ms. Stonich,

As a resident of the Meadows community, which is directly adjacent to the proposed 26200 Enterprise New Industrial Building Project (SCH No. 2024030755), I am submitting these comments to express strong concerns regarding the Draft Environmental Impact Report (DEIR), specifically Section 4.3 Air Quality. Our community includes sensitive land uses such as residences and senior housing, and we have a direct interest in ensuring that any development nearby does not compromise public health, safety, or environmental quality.

I-79-1 We strongly urge the Planning Commission to reject the current, flawed air quality analysis and require substantial revisions in accordance with the official guidance issued by the South Coast Air Quality Management District (SCAQMD) on April 18, 2024, regarding the Notice of Preparation (NOP) for this project (hereinafter, the "SCAQMD Letter").

1. Failure to meet AAQS compliance analysis requirements
- The SCAQMD Letter requires analysis to "identify any potential adverse air quality impacts that may occur during all phases of the project," beyond simply comparing emissions to thresholds.
- The DEIR fails to perform dispersion modeling and concentration stacking analysis to evaluate whether project emissions combined with already elevated background concentrations could exceed federal and state Ambient Air Quality Standards (AAQS) at sensitive receptors. AAQS are legally enforceable health protection standards, and threshold compliance alone is insufficient, especially in a community with elevated cancer risks as documented by SCAQMD's MATES V study.
- Request: Conduct dispersion modeling for key pollutants (e.g., PM2.5, NO2), quantify incremental ground-level

concentrations at nearby residences (e.g., 85 feet from the Meadows community), overlay with background levels, and directly compare to AAQS.

2. Underestimation of health risks to already burdened communities
- The SCAQMD Letter expresses concern over potential health impacts of warehouses sited near sensitive land uses in
communities already heavily affected.
- The DEIR's Health Risk Assessment (HRA) focuses only on cancer risk, ignoring non-cancer effects from pollutants such
as PM2.5 and NO2, including asthma, cardiovascular disease, and impaired lung development in children. Diesel truck
emissions exacerbate both cancer and non-cancer risks.
- Request: Acknowledge the project will increase pollution burdens in an environmental justice community and assess all
relevant health endpoints.

I-79-1 cont.

3. Failure to include SCAQMD-recommended mitigation measures
- DEIR concludes "no mitigation is required," ignoring SCAQMD recommendations, including:
- Compliance with Rule 2305 (WAIRE Program) for emission reductions.
- Use of zero-emission (ZE) or near-zero-emission (NZE) trucks, minimum 2010 model year.
- Design measures to protect health, such as routing trucks away from sensitive receptors, orienting entrances/exits away
from residences, on-site truck inspection and nighttime parking.
- Request: Revise DEIR to include all feasible mitigation measures and evaluate their effectiveness, changing the conclusion
to: "Impacts can be reduced to less-than-significant levels through adoption of SCAQMD-recommended measures."

4. Oversimplified assessment of filtration systems
- DEIR fails to evaluate limitations of building filtration (e.g., MERV 13+), including cost, energy use, inefficiency with
open windows, and inability to filter toxic gases.
- Request: If filtration is considered, rigorously evaluate its effectiveness, cost, and secondary environmental impacts.
Filtration cannot replace fundamental source control measures such as zero-emission vehicles.

Summary and Requests:
Planning Commission:
The current DEIR air quality analysis is inadequate, flawed, and inconsistent with SCAQMD guidance. We request that the
1. Halt the current review based on insufficient analysis.

I-79-1 cont.

2. Direct the applicant to perform full dispersion modeling and AAQS compliance analysis per the SCAQMD Letter.
3. Require a comprehensive DEIR revision including all SCAQMD-recommended mitigation measures and design
considerations, with detailed effectiveness analysis.
4. Provide the revised analysis for an additional round of public and SCAQMD review and comment.
Approving a project that fails to fully disclose health impacts would violate the spirit of CEQA and compromise the
well-being of our community. We urge the Commission to follow expert guidance and ensure all risks are fully understood
before making any decision.
Community Support and Public Participation:
Our concerns reflect the views of many residents in the Meadows community and nearby neighborhoods who rely on safe,clean air for their families and senior populations. We strongly encourage the Planning Commission to consider public input
during the review process, ensuring that community health and environmental justice are fully represented in your
decision-making.

Thank you for your consideration.

Sincerely,

Jason Ye
9/11/2025

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JASON YE

Letter Code: I-79
Date: September 12, 2025

Response to Comment I-79-1

This comment expresses the opinion that the Draft EIR provides an inadequate analysis related to air quality, including opinions that the document does not meet AAQS compliance analysis requirements, underestimates health risks to burdened communities, does not include SCAQMD-recommended mitigation measures, and oversimplifies assessment of filtration systems. The comment requests their comments be addressing by halting the proposed Project, provision of full dispersion modeling and AAQS compliance analysis, and revision and recirculation of the Draft EIR.

Refer to Response to Comment O-1-4 and Master Response 9 regarding the air quality and health risk analysis presented in the Draft EIR and Response to Comments S-2-1 through S-2-10 for detailed responses to SCAQMD's comments. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: Carina Cai [redacted]
Sent: Friday, September 12, 2025 6:13 PM
To: EnterpriseProjects
Subject: Strongly opposed to the manufacturing warehouse project

I-80-1 Hi, I'm a homeowner in baker ranch community. My family is strongly opposed to the manufacturer and warehouse projects in lake Forest. It really creates an unsafe and polluted living environment for the residents nearby

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CARINA CAI

Letter Code: I-80
Date: September 12, 2025

Response to Comment I-80-1

This comment expresses opposition to the proposed Project and states the opinion that the Project would create an unsafe and polluted environment for nearby residents.

Refer to Master Response 8 regarding traffic safety and local roads associated with the proposed Project, Master Response 13 regarding emergency response associated with the proposed Project, Response to Comment O-1-4 and Master Response 9 regarding air quality impacts and the potential health risks associated with the proposed Project, Master Response 11 regarding noise impacts associated with the proposed Project, and Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses and the Project's effect on quality of life. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From:	Bin Zhou [redacted]
Sent:	Saturday, September 13, 2025 8:43 AM
To:	Stonich, Amy; EnterpriseProjects
Cc:	Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject:	Public Comments on DEIR of IPT Enterprise Business Center Project

Dear AMY, the following is my comments.

1. DEIR failed to consider the combined air pollution and traffic impacts of several proposed projects.
2. DEIR's proposal to add bike lanes for commuters and large trucks to use electric power is completely unfeasible and self-defeating.
3. DEIR focused solely on the IPT project, projecting that 269 truck trips per day from this project alone would flood Enterprisey Way, a private road with a 25 mph speed limit.
4. The IPT project and the Western Regal project would introduce 48 truck stops near sensitive residential areas. DEIR evaluated the IPT project separately from the adjacent Western Realco project, even though the two projects share Enterprise Way and Dimension Drive, with a combined daily truck traffic of 649. DEIR's focus on truck traffic, while ignoring commuter vehicle trips (estimated to add 800-1,200 trips per day), would result in significant air pollution.

I-81-1

5. The DEIR only looks at whether the Project's emissions are below the South Coast AQMD's "daily thresholds." It never checks if the Project will actually violate the official state and federal air quality standards (AAQS).

This is a big problem. The AAQS are the law — they are set under the Clean Air Act after full public review to protect public health. They don't need any extra "rulemaking" for cities or developers to use them.

By pretending that being under AQMD's thresholds means "no problem," the DEIR ignores the fact that pollution levels around our community could still exceed safe limits. The City must revise the DEIR to directly compare Project emissions with the real health-based AAQS. Otherwise, it fails to disclose how harmful this warehouse could be to residents Thanks, Bin Zhou

[redacted] Lake Forest CA 92630

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BIN ZHOU

Letter Code: I-81
Date: September 13, 2025

Response to Comment I-81-1

This comment expresses the opinion that the Draft EIR provides an inadequate analysis related to cumulative air quality and transportation impacts. The comment requests the City address their comments by revising the Draft EIR to directly compare emissions of the proposed Project with AAQS.

Refer to Master Response 6 regarding the adequacy of the cumulative impact analysis presented in the Draft EIR and Master Response 8 regarding the transportation analysis presented in the Draft EIR.

Master Response 9 discusses the potential health risks associated with the proposed Project. In addition, as described on page 4.3-35 to 4.3-36 of the Draft EIR, the SCAQMD developed a methodology to assist lead agencies in analyzing localized air quality impacts from a proposed Project as they relate to CO, NOX, PM2.5, and PM10. This methodology is collectively referred to as the Localized Significance Threshold (LST) as further described in Section 4.3.5.3, Localized Impacts, starting on page 4.3-19 of Section 4.3, Air Quality, of the Draft EIR. LSTs differ from the numeric regional mass daily emission thresholds in that LSTs are based on (1) the amount of emissions generated from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable NAAQS or AAQS, and (2) the ambient concentrations of the pollutant and the relative distance to the nearest sensitive receptor (the SCAQMD performed air dispersion modeling to determine what amount of emissions generated a particular concentration at a particular distance). The air quality analysis in the Draft EIR evaluated the localized air quality impact of the proposed Project for emissions of CO, NOX, PM2.5, and PM10 by estimating the proposed Project's on-site emissions using CalEEMod and comparing the resulting pollutant concentrations at surrounding sensitive receptors to the AAQS. As shown in Tables 4.3.O and 4.3.P (pages 4.3-37 and 4.3-38, respectively) of the Draft EIR, the proposed Project emissions would not be expected to exceed the most stringent applicable NAAQS or AAQS for CO, NOX, PM2.5, and PM10. The AAQS are developed and represent levels at which the most susceptible persons (children and the elderly) are protected. In other words, the AAQS are purposefully set low to protect children, the elderly, and those with existing respiratory problems. As the AAQSs are specifically designed to prevent human health impacts, and as the LST is a very conservative analysis by design, if a project is below the AAQS, this demonstrates that the project would not cause a significant health risk impact from construction or operation to any nearby sensitive receptor.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: [redacted]
Sent: Saturday, September 13, 2025 6:59 PM
To: Stonich, Amy; EnterpriseProjects; Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Public Comments on DEIR of IPT Enterprise Business Center Project

Dear City of Lake Forest Planning Department,

Comment 1: General – Incomplete Traffic Impact Analysis

Citation: Draft EIR, Section 4.13, pp. 4.13-10 to 4.13-15

The Draft EIR does not adequately assess cumulative traffic impacts in the surrounding area. While the report includes baseline counts, it fails to consider peak-hour congestion at nearby intersections, school commute traffic, and overlapping truck routes from adjacent developments. Without accounting for these realities, the traffic analysis underestimates queuing, delay, and safety hazards for residents. I-82-1

Requested Action: Revise and recirculate the traffic analysis using updated counts during school drop-off and evening peak hours. Include cumulative truck trips from adjacent projects and propose mitigations such as signal timing improvements, truck curfews, or designated alternate routes.

Comment 2: Air Quality and Public Health Risks

Citation: Section 4.3, Tables 4.3.L and 4.3.M (pp. 4.3-35, 4.3-36)

Although the EIR identifies diesel truck emissions as a significant impact, the mitigation measures (Tier 4 engines and idle restrictions) are insufficient to address long-term health risks. The modeling assumes an unrealistically low number of daily trips, and it does not include cumulative exposure for sensitive receptors such as schools, daycares, and senior facilities within one mile. I-82-2

Requested Action: Require updated air quality and health risk assessments based on higher trip counts and longer operating hours. Additional mitigations should include

I-82-2 cont. requirements for zero-emission delivery vehicles, installation of air filtration systems at nearby schools, and enforceable idling enforcement mechanisms.

Comment 3: Noise and Community Impacts

Citation: Section 4.10.2, pp. 4.10-14 to 4.10-18

I-82-3 The EIR's noise analysis fails to evaluate nighttime warehouse operations and early-morning truck departures. These activities can generate disruptive noise above ambient levels, particularly for households located along [Street Name]. Without a cumulative analysis of operational noise and traffic, the report underrepresents the true impact on community quality of life.

Requested Action: Recalculate noise levels assuming simultaneous operation of all proposed facilities and extended delivery hours. Require buffer walls, restricted truck routes, and limitations on nighttime operations to protect nearby residents.

Comment 4: Lack of Environmental Justice Analysis

Citation: Omission throughout Chapter 4

I-82-4 The Draft EIR does not contain a dedicated Environmental Justice (EJ) section, even though the project site is located adjacent to communities identified as disadvantaged under CalEnviroScreen. Failure to evaluate disproportionate exposure to pollution, noise, and traffic burdens is inconsistent with CEQA's equity obligations.

Requested Action: Add a standalone Environmental Justice section with mapping of vulnerable populations and analysis of disproportionate impacts. Proposed mitigations should include enhanced air monitoring, targeted outreach to affected families, and relocation of truck routes away from sensitive communities.

I-82-5 Comment 5: Insufficient Consideration of Alternatives

Citation: Section 5.3.2, pp. 5-12 to 5-15

The EIR only evaluates a reduced-size alternative, which does not meaningfully lessen environmental impacts. No alternatives were considered that would relocate truck-intensive uses farther from residential areas or transition the project toward low-impact commercial uses.

I-82-5 cont.

Requested Action: Evaluate additional alternatives including:

- A clean technology/light industrial alternative with reduced trucking intensity
- A zero-emission vehicle distribution center
- A mixed-use alternative that buffers residential communities from industrial activities

Thank you
Luna

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LUNA

Letter Code: I-82
Date: September 13, 2025

Response to Comment I-82-1

This comment expresses the opinion that the Draft EIR provides a flawed analysis related to transportation, and that the document does not consider peak-hour congestion, school commute traffic, overlapping truck routes with the Western Realco Enterprise Way Industrial Project (Projects 1 and 2), and safety hazards. The comment requests revisions to the Draft EIR based on these comments.

Refer to Master Response 6 regarding the adequacy of the cumulative impacts analysis conducted for the proposed Project. In addition, refer to Master Response 8 regarding the proposed Project's impacts related to transportation. The Project TIA (included as Appendix J of the Draft EIR) evaluated typical weekday a.m. peak-hour conditions (inclusive of area school drop-offs) and p.m. peak-hour (evening) conditions, which is the industry standard and consistent with the City's traffic analysis requirements. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-82-2

This comment expresses the opinion that the Draft EIR provides an inadequate analysis related to air quality, the prescribed mitigation measures are insufficient to address long-term health risks, and that the modeling underestimates daily trips and does not include cumulative exposure of sensitive receptors. The comment requests their comments be addressed by the provision of updated air quality and health risk assessments, as well as additional mitigation.

Refer to Response to Comment O-1-4 and Master Response 9 regarding the proposed Project's impacts related to air quality and associated health risks, Master Response 6 regarding the adequacy of the cumulative impacts analysis conducted for the proposed Project, and Master Response 4 regarding the adequacy of the proposed mitigation for the Project under CEQA. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-82-3

This comment expresses the opinion that the Draft EIR provides an inadequate analysis related to noise and that the document fails to evaluate nighttime and early morning truck departures as well

as cumulative noise analysis. The comment requests their comments be addressed by the provision of recalculated noise levels and additional noise abatement measures.

Refer to Master Response 11 regarding the adequacy of the noise analysis prepared for the proposed Project and Master Response 6 regarding the adequacy of the cumulative analysis conducted for the proposed Project. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-82-4

This comment expresses the opinion that the Draft EIR provides an inadequate analysis related to environmental justice, that the Project site is located adjacent to disadvantaged communities, and the document does not evaluate disproportionate exposure to pollution, noise, and traffic impacts. The comment requests their comments be addressed by adding a standalone environmental justice section to the Draft EIR, including mitigation.

Refer to Master Response 14 regarding disproportionate environmental burdens and the requirements for an analysis of environmental justice impacts. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-82-5

This comment expresses the opinion that the Draft EIR provides an inadequate analysis related to alternatives and that the alternative considered in the Draft EIR does not meaningfully lessen environmental impacts. The comment requests their comments be addressed by evaluating additional alternatives, including a clean technology/light industrial alternative, a zero-emission vehicle distribution center, or a mixed-use development.

Refer to Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: shelly 626 [redacted]
Sent: Sunday, September 14, 2025 8:39 AM
To: Stonich, Amy; EnterpriseProjects
Cc: Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Public Comments on DEIR – IPT Enterprise Business Center Project

Dear Amy, Members of the Planning Commission, and Honorable City Council Members,

My name is Shelly Wang, I am a resident of The Meadows at Lake Forest. I recently learned that the City of Lake Forest has released the Draft Environmental Impact Report (DEIR) for the IPT Enterprise Business Center Project. According to the report, the project plans to build three new industrial storage facilities adjacent to our community.

As residents living directly next to the proposed project site, we are deeply concerned about the many problems that may arise from such a large-scale development—especially since the project site is only a wall away from our homes. We sold our house in another city and used all our savings to move to this beautiful and quiet community in Lake Forest to prepare for retirement. However, since learning about the project, we have experienced significant anxiety and insomnia, and our normal lives have been seriously disrupted.

I-83-1 We also understand that opposition to this project is very strong among residents both within and around our community. The core concerns are primarily focused on the following points:

1. Risk of Air Quality Deterioration
After project completion, the high volume of heavy-duty diesel freight vehicles will continue emitting exhaust. In addition, dust from cargo loading, unloading, and vehicle movement will elevate concentrations of pollutants such as PM2.5 and nitrogen oxides in the community and surrounding areas. This will cause long-term harm to residents' respiratory health—particularly among the elderly and children—and degrade the currently livable air environment.

2. Noise Pollution
Daily warehousing operations—including nighttime loading and unloading, logistics dispatching, and equipment use—will generate persistent noise. Because of the project's close proximity to our community, this noise will inevitably penetrate residential areas, severely disrupting nighttime rest, daily activities, and the quiet environment that residents currently enjoy.

3. Traffic Safety and Congestion Risks
Freight vehicles entering and exiting the warehouse area will frequently use nearby municipal roads, worsening peak-hour traffic congestion and reducing residents' commuting efficiency. In addition, the constant passage of large trucks poses a direct safety hazard and significantly increases the risk of traffic accidents.

4. Pressure on Public Services and Infrastructure
The community's existing infrastructure—such as water supply, electricity, and drainage systems—was planned and designed to meet the needs of the residential population. Once a large-scale storage project is operational, the substantial water and electricity demands for facility maintenance, cleaning, and freight operations will place added pressure on these public resources. This may result in unstable water pressure and power outages during peak hours. In addition, the project will generate large amounts of waste, including packaging materials and vehicle-related refuse, which will significantly increase the burden on local waste management. If not promptly addressed, this could foster mosquito breeding and produce unpleasant odors, further undermining community sanitation.

5. Compatibility with Urban Planning
Lake Forest's urban planning has long emphasized the vision of a "livable residential city." The surrounding area is primarily residential, with schools, medical facilities, supermarkets, and parks designed to meet the daily needs of residents. By contrast, the proposed industrial storage project is a production and logistics facility whose functions directly conflict with this "residential-focused, service-oriented" planning framework. Forcing its construction would not only disrupt the coordinated development of the region, but also risk the disorderly expansion of related industries and logistics operations. Over time, this could erode Lake Forest's "livable city" identity and undermine the long-term development goals carefully cultivated by the municipal government.

I-83-1 cont.

Based on the above genuine concerns, we respectfully make the following requests to the City Council and Planning Commission:

Our Position and Recommendations

We, the residents of Lake Forest, strongly oppose the approval of these warehouse developments in their current form. We urge the City to:

1. Reject the current DEIR and require a comprehensive revision that addresses cumulative impacts, tenant uncertainty, and clearly monitorable mitigations.
2. Fully evaluate alternative land uses that are both economically viable and more compatible with surrounding residential communities, such as: Mixed-use developments ;Business office complexes; school, medical etc.
3. Prioritize community engagement and the long-term well-being of residents over short-term industrial gains.

Thank you for your attention to these urgent and important matters.

Sincerely,

ShellyWang

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SHELLY WANG

Letter Code: I-83
Date: September 14, 2025

Response to Comment I-83-1

This comment expresses opposition to the proposed Project and expresses general concerns related to air quality, noise pollution, traffic safety, congestion risks, public service and infrastructure capacity, and land use compatibility. The comment requests the City address their comments by rejecting and revising the Draft EIR letter, evaluating alternative land uses for the Project site, and participating in community engagement.

Refer to Response to Comment O-1-4 and Master Response 9 regarding impacts to air quality and the potential health risks associated with the proposed Project, Master Response 11 regarding noise pollution associated with the proposed Project, Master Response 8 regarding traffic safety and congestion associated with the proposed Project, Response to Comment I-49-9 regarding impacts to public services and infrastructure associated with the proposed Project, and Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses. In addition, Master Response 5 discusses the adequacy of the range of alternatives considered for the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: Haibo Jiang [redacted]
Sent: Sunday, September 14, 2025 9:25 AM
To: Stonich, Amy; EnterpriseProjects
Cc: Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Additional Public Comment on Missing Cumulative Projects in DEIR – IPT and Western Realco Projects

Hi Amy,

Please see my additional public comment on the DEIR below:

Comment: Failure to Analyze Consistency with Ambient Air Quality Standards (AAQS)

Reference: DEIR, Section 4.3 Air Quality; Appendix C, Air Quality/Health Risk Assessment

The DEIR improperly relies on the South Coast Air Quality Management District's ("SCAQMD") daily mass emission thresholds of significance as set forth in its CEQA Handbook, without conducting a direct analysis of whether the Project will cause or contribute to violations of the applicable federal and state Ambient Air Quality Standards ("AAQS").

I-84-1 Unlike other thresholds of significance that must be formally adopted by a lead agency through public review and rulemaking, the AAQS already carry the force of law. They were promulgated under the federal Clean Air Act and the California Clean Air Act, and have already undergone full public rulemaking at the federal and state levels. Accordingly, no further rulemaking is required for lead agencies to use the AAQS directly as CEQA thresholds of significance.

By treating compliance with the SCAQMD's daily mass emission thresholds as equivalent to compliance with the AAQS, the DEIR fails to address whether Project emissions will cause or exacerbate violations of the AAQS. The CEQA Handbook itself makes no mention of AAQS exceedances, but rather implies that any project below the District's thresholds is automatically in compliance with air quality standards. This assumption is legally and technically flawed.

California courts have made clear that CEQA thresholds cannot be applied mechanically without a reasoned analysis of whether the threshold ensures that significant adverse impacts are avoided (see *Communities for a Better Environment v. Resources Agency* (2002) 103 Cal.App.4th 98; *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692). Reliance on SCAQMD's thresholds without also demonstrating compliance with the AAQS violates CEQA's requirement for a full disclosure and evaluation of significant impacts.

Requested Revision: The DEIR must be revised to evaluate Project emissions against the applicable federal and state AAQS, and to determine whether the Project would cause or contribute to an existing or projected violation of those standards. Without this analysis, the DEIR is legally inadequate.

Thank you,

Harrison Jiang

[redacted]
Lake Forest, CA 92630
Email: [redacted]

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HARRISON JIANG

Letter Code: I-84
Date: September 14, 2025

Response to Comment I-84-1

This comment expresses the opinion that the Draft EIR provides an inadequate analysis related to air quality and that the document improperly relies on SCAQMD daily mass emission thresholds rather than applicable federal and state AAQS in violation of CEQA. The comment requests that the Draft EIR be revised to address their comments regarding the reevaluation of emissions of the proposed Project against applicable federal and state AAQS.

Refer to Response to Comment I-81-1 which discusses SCAQMD's methodology and AAQS. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: [redacted]
Sent: Sunday, September 14, 2025 10:02 AM
To: Stonich, Amy; EnterpriseProjects
Cc: Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Public Comments on DEIR of IPT Enterprise Business Center Project
Attachments: Petition to the Lake Forest City Council and Plann.pdf

Importance: High

Petition to the Lake Forest City Council and Planning Commission

Dear Members of the Lake Forest City Council and Planning Commission,

Greetings!

I am a resident of The Meadows at Lake Forest community. Recently, I learned that the City of Lake Forest has released the Draft Environmental Impact Report (DEIR) for the IPT Corporate Business Center Project, which plans to construct three new industrial warehouse facilities near our community. As residents directly adjacent to the project site, we are deeply concerned about a series of potential issues brought by this large-scale warehouse project. Some residents even suffer from insomnia, anxiety, and other conditions due to worries about the project's impacts, which have significantly disrupted their normal lives and mental states.

I-85-1 Before The Meadows residential area was built, the land was originally used for agricultural nurseries. When this area was rezoned for residential use, the surrounding areas remained designated as industrial zones, resulting in a clear mismatch between the two land uses. Moreover, no protective facilities such as isolation belts or ecological buffer zones were established. This abnormal "seamless connection between residential and industrial areas" not only exposes residents to potential industrial pollution and noise interference for a long time but also has become a "time bomb" that has triggered the full outbreak of regional development conflicts today. Currently, the intensive advancement of these three high-density industrial projects is pushing residents to the brink of a survival crisis. The three warehouse proposals are submitted by two developers simultaneously, and all require the demolition of existing office park buildings. The scale and intensity of this development have exceeded the environmental carrying capacity of the region. We understand that there is widespread opposition to the project among residents in and around the community, with core concerns focusing on the following aspects:

1.

I-85-2 Risk of Deteriorating Air Quality: After the project is completed, a large number of heavy-duty diesel freight vehicles will continuously emit exhaust during transportation. Meanwhile, dust generated during cargo loading/unloading and vehicle operation will directly increase the concentration of pollutants such as PM2.5 and nitrogen oxides in the community and surrounding areas. This will have long-term impacts on the respiratory health of residents (especially the elderly and children) and damage the current livable air environment.

2.

I-85-3 Noise Pollution Disrupting Daily Life: The daily operation of industrial warehouses (including nighttime cargo loading/unloading, logistics vehicle scheduling, and equipment operation) will produce continuous noise. Given the close distance between the project and our community, the noise will penetrate the residential area, seriously affecting residents' nighttime rest and daily home life, disrupting the existing quiet environment of the community, and impairing residents' quality of life.

3.

I-85-4 Traffic Safety and Congestion Risks: A large number of freight vehicles entering and exiting the warehouse area will frequently use the municipal roads around the community. On one hand, this will exacerbate traffic congestion during peak hours and affect the efficiency of residents' daily commutes. On the other hand, the movement of large trucks will also pose a direct safety threat to community residents and increase the probability of traffic accidents.

4.

I-85-5 Impairment of Community Livability and Property Values: The combination of the aforementioned air quality, noise, and traffic issues will long-term reduce the livability of the community and lower residents' quality of life. At the same time, the existence of industrial warehouse projects will also have a negative impact on the market value of surrounding properties, harming residents' property rights. This is contrary to Lake Forest's urban positioning of building a "livable community".

5.

I-85-6 Pressure on Public Services and Infrastructure Capacity: The existing infrastructure of the community (such as water supply, power supply, and drainage systems) is designed based on the scale of the residential population. After the operation of the large-scale warehouse project, the water and electricity demand for cleaning a large number of freight vehicles and the daily operation of the warehouse area will occupy additional public resources. This may lead to problems such as unstable water pressure for residents and power outages during peak electricity consumption periods. Meanwhile, cargo packaging waste from the warehouse and waste from transportation vehicles will significantly increase the pressure of waste removal in the surrounding areas. If not handled in a timely manner, it may also breed mosquitoes, emit odors, and further damage the sanitary environment of the community.

6.

I-85-7 Compatibility Issues with Urban Planning Positioning: Lake Forest's urban planning has always centered on the core positioning of a "livable residential area". The existing surrounding supporting facilities are mostly residential buildings, schools, medical institutions, shopping malls, parks, and other living service facilities, which are highly compatible with residents' living needs. However, industrial warehouse projects are productive logistics facilities, and their functional attributes are contrary to the surrounding planning pattern of "residential use as the mainstay and service use as the supplement". Forced construction will not only disrupt the coordination of regional functions but also may lead to the unordered expansion of subsequent related industrial and logistics formats, gradually weakening Lake Forest's "livable" urban brand and conflicting with the long-term urban image and development goals built by the municipal government.

I-85-8 What makes residents even more desperate is that all planned construction sites are designed with truck loading/unloading areas equipped with commercial loading doors. This means that large trucks will travel around the residential area day and night in the future: exhaust pollution will worsen air quality,

high-frequency noise will disrupt residents' normal work and rest, and frequent vehicle flow will pose serious traffic safety risks to the travel of the elderly and children. Residents' daily lives will be fully "invaded" by industrial activities. However, when faced with residents' inquiries about their demands and the project's environmental hazards, the two developers have always evaded answers, showing disregard for public rights and interests through their silence.

To make matters worse, the relevant authorities initially planned to adopt a "Mitigated Negative Declaration (MND)" to simplify the review process, attempting to bypass comprehensive and strict environmental impact assessments and "pave the way" for the rapid approval of the project. If residents had not spoken up in a timely manner, protested strongly, and successfully stopped this, this reckless decision that might sacrifice residents' health would have been directly implemented. Currently, the hidden environmental disasters and social conflicts behind the project are visibly escalating, and the future of The Meadows residential area is at stake.

As we all know, Irvine, our neighboring city, always prioritizes the will of the people in its urban development decisions. In the past, many major projects were terminated because they did not conform to the fundamental interests of residents and encountered strong opposition from the public. This decision-making concept and responsibility of "putting the people first" not only effectively safeguard residents' rights and interests but also win wide praise from all sectors of society.

I-85-8 cont.

We sincerely believe that the Lake Forest municipal government is also a proactive, responsible, and accountable government that always puts residents' interests first. "Livable" is the core urban feature of Lake Forest. Only by effectively safeguarding residents' quality of life and residential rights can the city continue to attract more outstanding talents to settle down and more high-quality enterprises to invest and start businesses, injecting sustained vitality into the long-term development of the city.

Based on the above genuine concerns, we solemnly put forward the following requests to the City Council and Planning Commission:

- When reviewing the Draft Environmental Impact Report for the IPT Corporate Business Center Project, fully attach importance to and comprehensively adopt the opinions of surrounding residents. Conduct a more rigorous and objective assessment of the potential environmental, safety, and living impacts of the project, rather than drawing conclusions solely based on materials provided by the project party.

- Focus on verifying the objectivity and authenticity of the materials submitted by the project party. Be alert to potential misleading practices such as "distorting the impact scope", "downplaying the hazard level", and "evading key concerns" to ensure that the assessment results can truly reflect the actual impact of the project on residents' lives.

- Before scientific and sustainable measures can be taken to completely eliminate or fully mitigate the above risks and before the professional review of the expert committee, we earnestly request the rejection of the application for the construction of this large-scale industrial warehouse project to effectively protect residents' right to health, right to life, and property rights.

I-85-8 cont.

We are well aware that urban planning and project approval need to take into account multiple considerations, but the survival rights and quality of life of residents have always been an unshakable bottom line. Here, we once again urge the City Council and Planning Commission to attach great importance to the issues and demands reflected in this petition, incorporate the voices of residents into the core considerations of the project review, and we look forward to receiving an official response and feedback on this petition within a reasonable time frame, so that we can know the progress and handling direction of our demands.

We sincerely thank all members for their attention to the concerns of community residents and are willing to actively cooperate with subsequent hearings, investigations, and other work, providing more resident feedback and references to the actual situation. We hope that the City Council and Planning Commission will make a prudent and fair decision centered on "protecting residents' interests and maintaining the livable environment of the community".

Sincerely,
Petitioners: Residents of The Meadows at Lake Forest Community

Signature: Amy Ouyang

September 14, 2025

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Petition to the Lake Forest City Council and Planning Commission

Dear Members of the Lake Forest City Council and Planning Commission,

Greetings!

I am a resident of The Meadows at Lake Forest community. Recently, I learned that the City of Lake Forest has released the Draft Environmental Impact Report (DEIR) for the IPT Corporate Business Center Project, which plans to construct three new industrial warehouse facilities near our community. As residents directly adjacent to the project site, we are deeply concerned about a series of potential issues brought by this large-scale warehouse project. Some residents even suffer from insomnia, anxiety, and other conditions due to worries about the project's impacts, which have significantly disrupted their normal lives and mental states.

Before The Meadows residential area was built, the land was originally used for agricultural nurseries. When this area was rezoned for residential use, the surrounding areas remained designated as industrial zones, resulting in a clear mismatch between the two land uses. Moreover, no protective facilities such as isolation belts or ecological buffer zones were established. This abnormal "seamless connection between residential and industrial areas" not only exposes residents to potential industrial pollution and noise interference for a long time but also has become a "time bomb" that has triggered the full outbreak of regional development conflicts today. Currently, the intensive advancement of these three high-density industrial projects is pushing residents to the brink of a survival crisis. The three warehouse proposals are submitted by two developers simultaneously, and all require the demolition of existing office park buildings. The scale and intensity of this development have exceeded the environmental carrying capacity of the region. We understand that there is widespread opposition to the project among residents in and around the community, with core concerns focusing on the following aspects:

1. **Risk of Deteriorating Air Quality:** After the project is completed, a large number of heavy-duty diesel freight vehicles will continuously emit exhaust during transportation. Meanwhile, dust generated during cargo loading/unloading and vehicle operation will directly increase the concentration of pollutants such as PM2.5 and nitrogen oxides in the community and surrounding areas. This will have long-term impacts on the respiratory health of residents (especially the elderly and children) and damage the current livable air environment.

2. **Noise Pollution Disrupting Daily Life:** The daily operation of industrial warehouses (including nighttime cargo loading/unloading, logistics vehicle

scheduling, and equipment operation) will produce continuous noise. Given the close distance between the project and our community, the noise will penetrate the residential area, seriously affecting residents’ nighttime rest and daily home life, disrupting the existing quiet environment of the community, and impairing residents’ quality of life.

3. **Traffic Safety and Congestion Risks:** A large number of freight vehicles entering and exiting the warehouse area will frequently use the municipal roads around the community. On one hand, this will exacerbate traffic congestion during peak hours and affect the efficiency of residents’ daily commutes. On the other hand, the movement of large trucks will also pose a direct safety threat to community residents and increase the probability of traffic accidents.

4. **Impairment of Community Livability and Property Values:** The combination of the aforementioned air quality, noise, and traffic issues will long-term reduce the livability of the community and lower residents’ quality of life. At the same time, the existence of industrial warehouse projects will also have a negative impact on the market value of surrounding properties, harming residents’ property rights. This is contrary to Lake Forest’s urban positioning of building a "livable community".

5. **Pressure on Public Services and Infrastructure Capacity:** The existing infrastructure of the community (such as water supply, power supply, and drainage systems) is designed based on the scale of the residential population. After the operation of the large-scale warehouse project, the water and electricity demand for cleaning a large number of freight vehicles and the daily operation of the warehouse area will occupy additional public resources. This may lead to problems such as unstable water pressure for residents and power outages during peak electricity consumption periods. Meanwhile, cargo packaging waste from the warehouse and waste from transportation vehicles will significantly increase the pressure of waste removal in the surrounding areas. If not handled in a timely manner, it may also breed mosquitoes, emit odors, and further damage the sanitary environment of the community.

6. **Compatibility Issues with Urban Planning Positioning:** Lake Forest’s urban planning has always centered on the core positioning of a "livable residential area". The existing surrounding supporting facilities are mostly residential buildings, schools, medical institutions, shopping malls, parks, and other living service facilities, which are highly compatible with residents’ living needs. However, industrial warehouse projects are productive logistics facilities, and their functional attributes

are contrary to the surrounding planning pattern of "residential use as the mainstay and service use as the supplement". Forced construction will not only disrupt the coordination of regional functions but also may lead to the unordered expansion of subsequent related industrial and logistics formats, gradually weakening Lake Forest’s "livable" urban brand and conflicting with the long-term urban image and development goals built by the municipal government.

What makes residents even more desperate is that all planned construction sites are designed with truck loading/unloading areas equipped with commercial loading doors. This means that large trucks will travel around the residential area day and night in the future: exhaust pollution will worsen air quality, high-frequency noise will disrupt residents’ normal work and rest, and frequent vehicle flow will pose serious traffic safety risks to the travel of the elderly and children. Residents’ daily lives will be fully "invaded" by industrial activities. However, when faced with residents’ inquiries about their demands and the project’s environmental hazards, the two developers have always evaded answers, showing disregard for public rights and interests through their silence.

To make matters worse, the relevant authorities initially planned to adopt a "Mitigated Negative Declaration (MND)" to simplify the review process, attempting to bypass comprehensive and strict environmental impact assessments and "pave the way" for the rapid approval of the project. If residents had not spoken up in a timely manner, protested strongly, and successfully stopped this, this reckless decision that might sacrifice residents’ health would have been directly implemented. Currently, the hidden environmental disasters and social conflicts behind the project are visibly escalating, and the future of The Meadows residential area is at stake.

As we all know, Irvine, our neighboring city, always prioritizes the will of the people in its urban development decisions. In the past, many major projects were terminated because they did not conform to the fundamental interests of residents and encountered strong opposition from the public. This decision-making concept and responsibility of "putting the people first" not only effectively safeguard residents’ rights and interests but also win wide praise from all sectors of society.

We sincerely believe that the Lake Forest municipal government is also a proactive, responsible, and accountable government that always puts residents’ interests first. "Livable" is the core urban feature of Lake Forest. Only by effectively safeguarding residents’ quality of life and residential rights can the city continue to attract more outstanding talents to settle down and more high-quality enterprises to invest and start businesses, injecting sustained vitality into the long-term development of the city.

Based on the above genuine concerns, we solemnly put forward the following

requests to the City Council and Planning Commission:

- When reviewing the Draft Environmental Impact Report for the IPT Corporate Business Center Project, fully attach importance to and comprehensively adopt the opinions of surrounding residents. Conduct a more rigorous and objective assessment of the potential environmental, safety, and living impacts of the project, rather than drawing conclusions solely based on materials provided by the project party.

- Focus on verifying the objectivity and authenticity of the materials submitted by the project party. Be alert to potential misleading practices such as "distorting the impact scope", "downplaying the hazard level", and "evading key concerns" to ensure that the assessment results can truly reflect the actual impact of the project on residents' lives.

- Before scientific and sustainable measures can be taken to completely eliminate or fully mitigate the above risks and before the professional review of the expert committee, we earnestly request the rejection of the application for the construction of this large-scale industrial warehouse project to effectively protect residents' right to health, right to life, and property rights.

We are well aware that urban planning and project approval need to take into account multiple considerations, but the survival rights and quality of life of residents have always been an unshakable bottom line. Here, we once again urge the City Council and Planning Commission to attach great importance to the issues and demands reflected in this petition, incorporate the voices of residents into the core considerations of the project review, and we look forward to receiving an official response and feedback on this petition within a reasonable time frame, so that we can know the progress and handling direction of our demands.

We sincerely thank all members for their attention to the concerns of community residents and are willing to actively cooperate with subsequent hearings, investigations, and other work, providing more resident feedback and references to the actual situation. We hope that the City Council and Planning Commission will make a prudent and fair decision centered on "protecting residents' interests and maintaining the livable environment of the community".

Sincerely,

Petitioners: Residents of The Meadows at Lake Forest Community

Signature: Amy Ouyang

September 14, 2025

AMY OUYANG

Letter Code: I-85
Date: September 14, 2025

Response to Comment I-85-1

This introductory comment expresses concerns regarding the compatibility of the proposed Project with the community and surrounding land uses and stating the opinion that the proposed Project in combination with the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) would exceed the environmental carrying capacity of the area.

Refer to Master Response 7 regarding the compatibility of the proposed Project to surrounding land uses and Master Response 6 regarding the cumulative impacts analysis conducted for the proposed Project. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-85-2

This comment expresses general concerns related to air quality, including heavy truck exhaust, dust and particulate matter, and respiratory health of residents.

Refer to Response to Comment O-1-4 and Master Response 9 regarding the potential air quality and health risks associated with the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-85-3

This comment expresses general concerns related to noise pollution, including disruptions to residents' daily lives.

Refer to Master Response 11 regarding the proposed Project's impacts related to noise. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-85-4

This comment expresses general concerns related to transportation, including worsened traffic congestion and accident risk.

Refer to Master Response 8 regarding traffic safety risks and congestion related to the proposed Project. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-85-5

This comment expresses general concerns related to quality of life and property values for surrounding communities.

Refer to Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses, including the Project's impacts related to quality of life and Response to Comment O-1-12 regarding the proposed Project's impacts related to property values. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-85-6

This comment expresses general concerns related to public services and infrastructure, including water pressure, power outages, and solid waste.

As described in Section 4.19, Utilities and Service Systems, page 4.19-13, of the Draft EIR, the proposed Project would comply with IRWD's standard requirements for facility planning, and adequate water distribution facilities would exist to serve the proposed Project. As described on page 4.19-15 of the Draft EIR, the proposed Project would only represent a small fraction of electricity demand in SCE's service area, would meet Title 24 requirements, and would be served by sufficient electricity supplies. As described on pages 4.19-14 and 4.19-15 of the Draft EIR, the proposed Project's adherence to Regulatory Compliance Measures WQ-3 and RCM WQ-4 would ensure that peak discharge would not adversely affect the capacity of downstream stormwater drainage networks. As described on page 4.19-18 of the Draft EIR, solid waste generated by the proposed Project would not exceed the capacity at the Frank R. Bowerman Landfill. Further, the proposed Project would comply with applicable federal, State, and local statutes and regulations related to solid waste, including OC Waste & Recycling's Countywide Integrated Waste Management Plan (CIWMP) and agency permits, AB 341, SB 1016, and the CALGreen Code. Therefore, the Draft EIR found that the proposed Project would have less than significant impacts related to water,

electrical, stormwater drainage, and solid waste infrastructure, even during peak consumption periods. Based on the information above, this conclusion remains valid.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-85-7

This comment expresses general concerns related to land use compatibility, including the opinion that the proposed Project would result in additional industrial uses and reduce the livability of the City.

Refer to Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required

Response to Comment I-85-8

This comment expresses general concerns related to the proposed loading docks and heavy truck presence, including air pollution, noise pollution, transportation safety, and quality of life. The comment also expresses concerns regarding community engagement/coordination and information available to the public pertaining to the proposed Project and the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) and the level of environmental document prepared for the proposed Project. The comment requests that the City address their comments by considering resident opinions during review of the Draft EIR, verifying the authenticity of the Draft EIR's supporting materials, and ultimately rejecting the proposed Project.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses above. No further response is required.

Weiss, Jennifer

From: vivian wu [redacted]
Sent: Sunday, September 14, 2025 10:16 AM
To: Stonich, Amy; EnterpriseProjects
Cc: Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Public Comments on DEIR of IPT Enterprise Business Center Project

Dear Commissioners,

I strongly urge you to vote NO on the proposed warehouse conversion projects next to the Forest Lake community.

I-86-1
- Out of place: The area was built as a quiet office park. Warehouses and heavy truck traffic are not compatible with nearby homes and senior housing.
- Severe traffic & pollution: The IPT project alone adds 269 truck trips daily; combined with the Western Realco project, this totals 649 truck trips plus 800–1,200 commuter vehicles. The DEIR improperly separates the projects and ignores cumulative impacts.
- Health & safety risks: 48 truck bays so close to families and seniors will bring air pollution, diesel exhaust, noise, lighting, and traffic hazards. This is especially harmful to children, elderly, and vulnerable residents. In my home, I care for an ill patient and a child with autism — this project would seriously impact our quality of life.
- Infeasible mitigation: Many proposed measures are not realistic or enforceable.
- Better alternatives: Mixed-use, clean-tech R&D, or modern office uses would fit the community far better.

I invite you to visit our neighborhood to see the close proximity and the real impacts this project would cause. For the health, safety, and well-being of Lake Forest residents, please reject warehouse projects.

Sincerely

Vivian (Shaoxia) Wu
CELL: [redacted] EMAIL: [redacted]
[redacted] lake Forest

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VIVIAN WU

Letter Code: I-86
Date: September 14, 2025

Response to Comment I-86-1

This comment requests the City address their comments by rejecting the proposed Project and the Western Realco Enterprise Way Industrial Project (Projects 1 and 2), and expresses general concerns related to land use compatibility, traffic congestion, air pollution, noise, lighting, mitigation, and alternatives. The comment invites members of the Planning Commission to visit the neighborhood.

Refer to Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses, Master Response 8 regarding traffic congestion and related safety issues associated with the proposed Project, Response to Comment O-1-4 and Master Response 9 regarding air pollution and the potential health risks associated with the proposed Project, Master Response 11 regarding noise impacts associated with the proposed Project, Master Response 12 regarding lighting impacts associated with the proposed Project, Master Response 4 regarding the adequacy of the mitigation provided in the Draft EIR, and Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From:	Vivian wu [redacted]
Sent:	Sunday, September 14, 2025 10:20 AM
To:	Stonich, Amy; EnterpriseProjects
Cc:	Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject:	Strong Opposition to Proposed Warehouse Projects Adjacent to Forest Lake Residences

Dear Commissioners,

Please confirm if you have received this email!

I am writing as a concerned resident of the Forest Lake community regarding the proposed warehouse conversion projects adjacent to our neighborhood. I urge you to vote against these projects, as they will cause severe and irreversible harm to the health, safety, and quality of life of nearby residents.

1. Incompatible Land Use

I-87-1 These warehouse projects are entirely out of place next to residential communities. The original development was a relatively quiet office park, which is compatible with nearby homes. Converting it into a truck-intensive warehouse district fundamentally changes its nature and is not appropriate for such a sensitive location.

2. Traffic and Air Pollution Impacts

The Draft Environmental Impact Report (DEIR) is inadequate and misleading:

- The IPT project alone is expected to generate 269 daily truck trips on Enterprise Way, a private road with a 25 mph speed limit.
- Together with the adjacent Western Realco project, the combined impact reaches 649 truck trips per day, not counting an additional estimated 800–1,200 commuter vehicle trips daily.
- The DEIR improperly evaluated the projects separately even though they share Enterprise Way and Dimension Drive. This underestimates cumulative traffic, congestion, and pollution impacts.
- The DEIR focuses narrowly on truck traffic while ignoring overall vehicle impacts, air quality degradation, and cumulative pollution burdens.

Such massive truck traffic will bring significant air pollution, diesel emissions, and greenhouse gases, which will disproportionately affect nearby families, children, and elderly residents.

3. Proximity to Sensitive Populations

These projects would bring 48 truck bays directly adjacent to residential neighborhoods and a senior housing complex. The noise, exhaust, lighting, and round-the-clock traffic will directly harm residents' health, including those with preexisting medical conditions.

In my own home, I care for an ill family member and a child with autism. We specifically chose this community because of its quiet and safe environment. This proposal threatens not only our health, but also the peace and stability our family depends on.

I-87-1 cont.

4. Infeasible Mitigation Measures

The DEIR suggests many mitigation measures, but most are not feasible or enforceable. Without realistic solutions, the harmful impacts will fall squarely on residents.

5. Reasonable Alternatives Ignored

The DEIR fails to seriously consider better alternatives that could provide economic development while protecting residents, such as mixed-use development, modern office space, clean-tech R&D facilities, or neighborhood-serving commercial uses. These would be far more appropriate and beneficial to Lake Forest than a warehouse and trucking hub.

Conclusion

This proposal will bring severe air pollution, traffic congestion, noise, and safety hazards to our community. It is incompatible with the existing neighborhood and will degrade the health and well-being of families who live here.

I-87-1 cont.

I respectfully request that the Planning Commission visit our neighborhood, see firsthand the close proximity to the proposed warehouses, and listen to the concerns of residents. For the sake of community health and quality of life, I strongly urge you to vote NO on these warehouse projects.

Thank you for your consideration.

Victor Zhao

[redacted], Lake Forest

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VICTOR ZHAO

Letter Code: I-87
Date: September 14, 2025

Response to Comment I-87-1

This comment requests the City address their comments by rejecting the proposed Project and expresses general concerns related to land use compatibility, traffic congestion, air pollution, greenhouse gas emissions, noise, lighting, quality of life, mitigation, and alternatives. The comment requests that members of the Planning Commission visit the Forest Lake community and reject the proposed Project and the Western Realco Enterprise Way Industrial Project (Projects 1 and 2).

Refer to Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses and the Project's effect on quality of life , Master Response 8 regarding traffic congestion associated with the proposed Project, Response to Comment O-1-4 and Master Response 9 regarding air pollution and potential health risks associated with the proposed Project, Master Response 10 regarding greenhouse gas emissions associated with the proposed Project, Master Response 11 regarding noise impacts associated with the proposed Project, Master Response 12 regarding lighting impacts associated with the proposed Project, Master Response 4 regarding the adequacy of the mitigation provided in the Draft EIR, and Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From:	Vivian Zhao [redacted]
Sent:	Sunday, September 14, 2025 11:55 AM
To:	Stonich, Amy; EnterpriseProjects
Cc:	Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject:	Public Comment and Request for Acknowledgment of Receipt – Draft EIR (SCH No. 2024030755), IPT Enterprise Business Center LLC Project
Attachments:	IPT_DEIR_Questions.docx

Dear City Staff, Planning Commissioners, and Councilmembers,

Thank you for the significant effort that went into preparing the Draft Environmental Impact Report (DEIR) for the IPT Enterprise Business Center. As a nearby resident, I appreciate the City's commitment to a transparent CEQA process and to protecting community health, safety, and quality of life.

I respectfully submit the attached document containing chapter-by-chapter questions on the DEIR. These questions summarize and expand on the concerns I shared in my oral comment: the project's proximity to homes, children's playgrounds, and an affordable senior community; the potential for 24/7 truck operations to affect noise, vibration, and air quality; traffic circulation concerns given the single primary access in a residential area; and the DEIR's own finding of significant and unavoidable impacts related to VMT and greenhouse gas emissions.

I-88-1 The questions are organized to facilitate review, following the DEIR's structure (Sections 4.1–4.20). They are intended to be constructive and specific so that the City and its consultants can provide clear, written responses in accordance with CEQA. My goal is to help ensure the final environmental analysis fully addresses neighborhood conditions and sensitive receptors adjacent to the site.

I would also welcome a meeting or call with City staff and the consultant team to walk through these questions, compare assumptions, and clarify data sources. If additional information or site-specific monitoring would be helpful, I am happy to assist in coordinating access and logistics.

Kindly confirm receipt of this email and attachments at your earliest convenience so I know my comments have been entered into the public record. Please also keep me informed of future hearings, notices, and any supplemental analyses related to this DEIR.

Thank you again for your time and for all you do for Lake Forest residents. I appreciate your thoughtful consideration of these comments.

Sincerely,

Vivian Zhao

Lake Forest Resident

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Sent from my iPhone

Public Comment Questions on IPT Enterprise Business Center Draft EIR

Prepared for submission to the City of Lake Forest
September 2025

Introduction

I-88-2

The following document contains more than 150 detailed questions organized by chapter of the Draft Environmental Impact Report (DEIR) for the IPT Enterprise Business Center project. These questions highlight gaps, omissions, and concerns in the analysis. Under CEQA, the City and consultants are required to respond to each substantive comment. The questions are organized in the same order as the DEIR chapters for clarity.

4.1 Aesthetics

I-88-3

1. 1. Why were no visual simulations prepared from the perspective of the children's playgrounds and senior housing adjacent to the site?
2. 2. How can a 35-foot warehouse wall not be considered a significant change in visual quality for residents separated only by a 6-foot block wall?
3. 3. Was glare from truck headlights and security lighting at night modeled for nearby backyards?
4. 4. Were shade/shadow impacts on adjacent open spaces analyzed?
5. 5. Why does the DEIR conclude no cumulative aesthetic impact when multiple large warehouses are being proposed nearby?
6. 6. How were landscaping plans evaluated for long-term maintenance and screening effectiveness?
7. 7. Why were alternative façade designs not considered to reduce visual massing?
8. 8. Was nighttime light trespass measured at residential windows adjacent to the project?
9. 9. Did the analysis consider the visual impact of rooftop equipment and truck staging areas?
10. 10. Why was the visual character of family recreation areas ignored in the assessment?

4.2 Agriculture and Forestry Resources

I-88-4

11. 1. Even if no farmland exists on site, why was there no discussion of the project's contribution to permanent loss of open space?
12. 2. Did the DEIR consider indirect impacts of truck emissions on nearby community gardens or landscaping?

13. 3. Why does the DEIR not address the cumulative effect of converting multiple former nursery lands in the city to industrial use?
14. 4. Was the Williamson Act status of adjacent parcels confirmed?
15. 5. Why were forestry resources dismissed without considering urban forest canopy impacts?
16. 6. Was tree removal on the site quantified, and were replacement ratios analyzed?
17. 7. Does the City have policies protecting mature landscape trees, and if so, why were they not discussed?
18. 8. Why were carbon sequestration benefits of existing vegetation not evaluated?

I-88-4 cont.

4.3 Air Quality

19. 1. Why does the Health Risk Assessment fail to include continuous 24/7 truck operations in its modeling assumptions?
20. 2. What was the assumed daily truck trip volume, and why was a worst-case maximum scenario not analyzed?
21. 3. Why were no on-site air quality monitors used at sensitive receptors such as the affordable senior home and playgrounds?
22. 4. Why does the DEIR not analyze cumulative toxic air contaminant exposure from multiple industrial projects in the same area?
23. 5. What enforceable mechanism will ensure that future tenants use only Tier 4 trucks and equipment?
24. 6. How will enforcement of truck idling restrictions be monitored and reported?
25. 7. Why was no mitigation proposed to require electric or near-zero-emission trucks?
26. 8. How does the project comply with SCAQMD's Warehouse Indirect Source Rule (ISR)?
27. 9. Why was ultrafine particulate matter (PM2.5) not measured at nearby playgrounds?
28. 10. How will diesel emissions be controlled during overnight operations when families are sleeping?
29. 11. Why was background cumulative air quality from nearby freeways not factored into the risk analysis?
30. 12. Why were vulnerable populations such as children and seniors not specifically modeled as sensitive receptors in the risk calculations?

I-88-5

4.4 Biological Resources

31. 1. Were surveys conducted during appropriate seasonal windows for all sensitive species?
32. 2. How will nighttime lighting affect bird migration or roosting?
33. 3. Why were no surveys conducted for pollinator species in landscaped and open space areas?
34. 4. How will construction noise affect nesting birds in nearby trees?
35. 5. Was indirect habitat fragmentation considered, given the project's scale?
36. 6. How will landscaping choices mitigate habitat loss for native species?

I-88-6

I-88-6 cont.

37. 7. Why were cumulative impacts to regional wildlife corridors not addressed?
38. 8. Were mitigation measures considered for potential loss of tree canopy used by raptors?
39. 9. Why were wetlands dismissed without detailed hydrological analysis of stormwater basins?
40. 10. How will the project ensure compliance with the Migratory Bird Treaty Act during year-round operations?

4.5 Cultural Resources

I-88-7

41. 1. Was consultation with Native American tribes conducted early in the process?
42. 2. Why does the DEIR dismiss potential subsurface cultural resources given the area's long history of habitation?
43. 3. Were ground-disturbing activities evaluated for archaeological monitoring?
44. 4. Why was the Sacred Lands File consultation result not disclosed?
45. 5. What contingency plans exist if artifacts or remains are discovered during construction?
46. 6. Why was no cultural landscape analysis conducted for nearby historic ranch lands?
47. 7. Were potential impacts to historic irrigation systems from the former nursery studied?
48. 8. How were cumulative cultural resource impacts across Lake Forest considered?

4.6 Energy

I-88-8

49. 1. Why does the DEIR not require on-site renewable energy generation such as solar panels?
50. 2. Was life-cycle energy consumption for warehouse refrigeration or HVAC considered?
51. 3. How will 24/7 operations increase electricity load beyond typical assumptions?
52. 4. Why was energy demand for heavy truck charging infrastructure not analyzed?
53. 5. How will the project meet California's Title 24 energy efficiency standards in practice?
54. 6. Why was no commitment made to all-electric building design?
55. 7. What contingency exists if natural gas supplies face future restrictions?
56. 8. Why were cumulative regional energy demands from nearby industrial projects not modeled?

4.7 Geology and Soils

I-88-9

57. 1. How was soil liquefaction potential analyzed for this site?
58. 2. Were slope stability and seismic hazards adequately studied given proximity to residences?
59. 3. Why was expansive soil potential not discussed?
60. 4. Were geotechnical borings representative of the entire site?

I-88-9 cont.

61. 5. How will soil compaction during construction affect stormwater infiltration?
62. 6. Were erosion impacts on adjacent residential lots considered?
63. 7. How will construction vibration affect soil stability under adjacent block walls?
64. 8. What contingency plans exist for discovery of contaminated soils during grading?

4.8 Greenhouse Gas Emissions

I-88-10

65. 1. Why was the project found to conflict with the State Scoping Plan but still allowed to proceed?
66. 2. Why was no binding commitment to net-zero operations included?
67. 3. How will tenant operations be monitored for compliance with emission targets?
68. 4. Why were carbon sequestration losses from vegetation removal ignored?
69. 5. How were future regulatory tightening and climate goals accounted for?
70. 6. Why was truck electrification not made mandatory mitigation?
71. 7. How does the project address SB 743's VMT requirements if impacts remain significant and unavoidable?
72. 8. Why does the DEIR not require purchase of offsets for GHG emissions?
73. 9. Why were long-term cumulative GHG projections not extended beyond 2045?
74. 10. Why is Alternative 3 still inconsistent with climate policy goals?

4.9 Hazards and Hazardous Materials

I-88-11

75. 1. Why was only a Phase I ESA conducted without Phase II testing?
76. 2. Were potential residual pesticides from the former nursery land tested in soils?
77. 3. How will hazardous material spills from trucks be contained and remediated?
78. 4. Why was the risk of diesel fuel leakage into storm drains minimized?
79. 5. What safety measures are in place for seniors and children during a hazardous release event?
80. 6. Were fire hazards from truck yards evaluated in coordination with OCFA?
81. 7. Why were cumulative hazardous material transport risks not analyzed?
82. 8. What measures will prevent illegal truck idling and fueling practices on-site?

4.10 Hydrology and Water Quality

I-88-12

83. 1. How will the project ensure no runoff contamination into nearby residential drainage systems?
84. 2. Why was groundwater depletion not addressed?
85. 3. Were cumulative impacts to local watersheds modeled?
86. 4. How will stormwater be managed during heavy rainfall events?
87. 5. What measures will ensure compliance with NPDES permit standards?
88. 6. Why was no green infrastructure commitment made beyond minimum WQMP?
89. 7. How will pollutants from truck washing or spills be contained?
90. 8. Why was no flood risk analysis conducted for adjacent residential basements?

I-88-12 cont.

91. 9. How will impervious surface increase affect infiltration rates nearby?

4.11 Land Use and Planning

92. 1. How does the project comply with General Plan policies prioritizing residential quality of life?
93. 2. Why was land use incompatibility with senior housing not acknowledged?
94. 3. How does the warehouse align with the City's long-term housing element goals?

I-88-13

95. 4. Why were alternative zoning-compatible uses not studied?
96. 5. What analysis confirms consistency with SCAG's sustainable communities strategy?
97. 6. Why does the DEIR fail to address land use conflicts with nearby recreational facilities?
98. 7. How does this project further CEQA's mandate to avoid environmental justice burdens?
99. 8. Why was the project not relocated to an area zoned for industrial buffering?

4.12 Mineral Resources

I-88-14

100. 1. Why was the impact dismissed without considering regional aggregate demand from construction?
101. 2. Were cumulative demands for mineral resources from concurrent projects considered?
102. 3. Why was no discussion of secondary resource extraction impacts included?

4.13 Noise

103. 1. Were baseline nighttime noise levels collected in backyards of the adjacent residential community?
104. 2. Why does the DEIR not model low-frequency vibrations from heavy trucks impacting nearby homes?
105. 3. How will the City enforce noise restrictions for 24/7 operations including backup alarms and truck idling?
106. 4. Were potential impacts on senior residents, who are more sensitive to sleep disturbance, addressed?

I-88-15

107. 5. Why are playgrounds and recreation areas not listed as sensitive receptors in the noise analysis?
108. 6. Were interior noise impacts for residential bedrooms analyzed against Title 24 standards?
109. 7. How were truck refrigeration units accounted for in nighttime noise modeling?
110. 8. What mitigation exists if actual noise levels exceed modeled predictions?
111. 9. How will vibration from constant truck movements affect structural integrity of adjacent homes?
112. 10. Were cumulative noise impacts from nearby warehouses evaluated?

4.14 Population and Housing

113. 1. Why does the DEIR not acknowledge displacement impacts on community livability?
114. 2. How does increased industrial development align with the City's housing element obligations?
I-88-16
115. 3. Why were population health impacts ignored under this section?
116. 4. What analysis demonstrates that this warehouse contributes to balanced jobs-housing ratio?
117. 5. Why was gentrification pressure on nearby affordable housing not considered?
118. 6. How does increased truck traffic affect neighborhood desirability and long-term population trends?

4.15 Public Services

119. 1. How will added traffic affect fire department response times?
I-88-17
120. 2. Were school traffic and pedestrian safety near truck routes analyzed?
121. 3. Why were library or community services impacts dismissed?
122. 4. How will police address enforcement of truck idling or routing restrictions?
123. 5. Were demands on waste collection services modeled given 24/7 operations?
124. 6. Why were park and recreation services not addressed under public services?

4.16 Recreation

125. 1. Why were playgrounds adjacent to the project not recognized as sensitive recreation facilities?
126. 2. How does diesel truck pollution affect usability of outdoor recreational areas?
I-88-18
127. 3. Why was noise impact on ballfields and play areas minimized?
128. 4. Were surveys conducted of residents regarding use of nearby parks and potential impacts?
129. 5. Why does the DEIR not require buffer zones or barriers to protect recreational spaces?

4.17 Transportation and Traffic

130. 1. Why does the DEIR not evaluate emergency evacuation when only one access road serves the warehouse and surrounding neighborhoods?
131. 2. How can the EIR conclude safety for pedestrians and children when large trucks
I-88-19
will share the same roads to schools and playgrounds?
132. 3. Why does the traffic analysis assume only a 0.5% reduction in Vehicle Miles Traveled when this project type inherently generates high truck trips?
133. 4. What mitigation measures ensure that trucks do not cut through local residential streets?

I-88-19 cont.

134. 5. Why was a cumulative traffic analysis not expanded to include buildout of nearby warehouse projects?
135. 6. Were turning radii at intersections measured for WB-67 trucks, and what conflicts were found?
136. 7. Why does the DEIR fail to address congestion during school pick-up and drop-off times?
137. 8. Were traffic safety impacts at crosswalks studied with increased truck flows?
138. 9. What contingency exists if accident rates increase along truck routes?
139. 10. Why were bicycle and pedestrian counts not updated with post-Meadows development data?

I-88-20

4.18 Tribal Cultural Resources

140. 1. Which tribes were contacted, and what responses were received?
141. 2. Why were concerns of tribal representatives not summarized in detail?
142. 3. How will construction monitoring ensure tribal resources are protected?
143. 4. What mitigation exists if sacred or burial sites are discovered?
144. 5. Why were tribal cultural landscapes not considered beyond the immediate project site?

I-88-21

4.19 Utilities and Service Systems

145. 1. How will sewer capacity handle increased industrial wastewater?
146. 2. Why was no cumulative demand analysis conducted for water supply reliability?
147. 3. What mitigation exists if water demand conflicts with long-term drought restrictions?
148. 4. Why were regional solid waste disposal capacity constraints not analyzed?
149. 5. How will increased electricity demand affect SCE grid reliability in this area?
150. 6. Why was no analysis of recycled water availability included?
151. 7. How will utility outages affect emergency preparedness for adjacent residents?

I-88-22

4.20 Wildfire

152. 1. Why was wildfire risk dismissed given the site's location within urban-wildland interface areas of Lake Forest?
153. 2. How will increased truck congestion affect wildfire evacuation times?
154. 3. Why was no cumulative analysis conducted for wildfire evacuation with surrounding projects?
155. 4. Were ember intrusion risks to adjacent residences considered?
156. 5. Why was no discussion of OCFA recommendations regarding wildfire evacuation incorporated?

VIVIAN ZHAO

Letter Code: I-88
Date: September 14, 2025

Response to Comment I-88-1

This comment provides an introduction to the comments for which responses are provided below. The comment also offers to participate in a meeting with the City and/or consultant or assist with site access for further monitoring, if necessary, and requests to be informed of future hearings, notices, and analyses related to the Draft EIR.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-88-2

This comment explains that the comments provided in the remainder of the letter are designed to challenge the analysis presented in the Draft EIR and are aligned with CEQA requirements.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-88-3

This comment raises questions regarding the Draft EIR's aesthetics analysis, including visual simulation locations, warehouse height, glare modeling, shade/shadow impacts, cumulative impacts, landscaping plan maintenance and screening effectiveness, façade design, nighttime light trespass to residential windows, visual impact of rooftop equipment, and the visual character of family recreation areas.

As shown in Figure 4.1-1, page 4.1-3, of the Draft EIR, visual simulations were prepared for the proposed Project, showing three-dimensional renderings of the proposed Project in comparison to the existing setting, as viewed from the property line of the Meadows community. Due to distance, topography, landscaping, and intervening development, it is unlikely that the Project site would be visible from the children's playgrounds and senior housing referenced in this comment. Further, CEQA does not require the analysis or protection of views from private properties. As upheld in *Mira Mar Mobile Cmty. v. City of Oceanside,* the Court of Appeal held that impacts to views from private land do not constitute environmental impacts under CEQA unless the lead agency has adopted a specific standard or policy protecting such views (119 Cal. App. 4th 477, 494 [2004]). The City of Lake Forest, as the lead agency for the proposed Project, has not adopted any policy or standard that protects views from private properties, therefore no CEQA analysis of private views is required.

Consistent with Appendix G of the *State CEQA Guidelines*, Section 4.1.6, Project Impacts, starting on page 4.1-16 of Section 4.1, Aesthetics, of the Draft EIR analyzed the potential for the proposed

Project to have a substantial adverse effect on a scenic vista, substantially damage scenic resources within a state scenic highway, conflict with applicable zoning and other regulations governing scenic quality, or create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. The Draft EIR ultimately found, based on substantial evidence, that the proposed Project would result in less than significant impacts related to aesthetics, and no mitigation was warranted. As stated above, CEQA does not require the analysis or protection of views from private properties. Nevertheless, the proposed Project incorporates both architectural screening and buffering elements to reduce potential visual impacts, as described in Response to Comment I-49-10.

Refer to Master Response 12 regarding the potential impacts of light and glare from the proposed Project. Further, landscaping elements and a 16-foot-high, 60-foot-long sound wall would be located at the eastern end of the loading docks in order to further screen lighting from the Project site. Therefore, no further light or glare analysis, including light trespass measurement, is required.

As discussed under Threshold 4.1.1, starting on page 4.1-16 of Section 4.1, Aesthetics, of the Draft EIR, the proposed structure would be 35 feet tall and would replace an existing 35-foot-tall structure. Therefore, the height and mass of the proposed structure would also be similar to the existing structure and similar to the surrounding development. Further, due to distance, topography, landscaping, and intervening development, the proposed Project is not anticipated to cast shadows on nearby open spaces.

Warehouse development, in itself, does not constitute a cumulative impact related to aesthetics. Under CEQA, cumulative aesthetic impacts are based upon the incremental effects of an individual project when viewed in connection with the effects with related projects with respect to Appendix G of the *State CEQA Guidelines*. Section 4.1.7, Cumulative Impacts, starting on page 4.1-26 of the Draft EIR included a cumulative impacts discussion related solely to potential visual impacts. Because the Draft EIR found that the proposed Project would have no impact on scenic vistas or scenic resources within a State Scenic Highway and would not conflict with applicable zoning and other regulations governing scenic quality, the Draft EIR concluded that it would not contribute to a cumulatively considerable impact to scenic vistas, scenic resources within a State Scenic Highway, or conflicts with applicable zoning and other regulations governing scenic quality. Further, development within the cumulative study area would also be required to comply with existing regulatory requirements related to aesthetics and if significant impacts are anticipated, appropriate mitigation measures would be implemented as part of the CEQA environmental review process. Therefore, the Draft EIR found that the proposed Project would not result in cumulatively considerable impacts related to aesthetics. Refer to Master Response 6 regarding the adequacy of the cumulative analysis prepared for the proposed Project.

As described on page 3-14 of the Draft EIR, the proposed landscaping on the Project site would be provided in accordance with the requirements outlined in the Pacific Commercentre Planned Community District Regulations and the Citywide Design Guidelines. Both of these represent long-term plans developed by the City to maximize consistency and quality of landscaped areas. Based on adherence to these plans, no further evaluation of the proposed Project's landscaping is required.

As described on page 4.1-22 of the Draft EIR, the overall building treatment and façade is compatible with the existing architecture of the industrial buildings in the Pacific Commercentre Planned Community. The proposed building would be constructed of architecturally enhanced tilt-up concrete panels and would be painted different shades of gray with a blue accent. The proposed building architecture utilizes scoring, color transitions, and windows to provide articulation to long facades of the building. Because the Draft EIR found that the proposed Project would have no impact on scenic vistas or scenic resources within a State Scenic Highway and would not conflict with applicable zoning and other regulations governing scenic quality, there is no nexus to require additional mitigation; refer to Master Response 4 regarding the adequacy of the proposed mitigation for the Project under CEQA .

The visual impact analysis presented in the Draft EIR evaluates all aspects of the Project's appearance, including rooftop equipment and truck staging areas. As described on page 4.1-24 of the Draft EIR, the proposed building has been designed with a built-in roof top well to screen the roof-top mechanical equipment (as required by the Architecture and Building Design section of the Design Guidelines). Further, vehicular entrances to the site would be flanked by landscaping that includes, trees, hedges and landscaped berms. Therefore, potential aesthetic impacts related to rooftop equipment and truck staging areas have been addressed.

As previously stated, the Project site is not necessarily visible from all nearby land uses due to distance, topography, landscaping, and intervening development. Further, the proposed structure would be similar in height and scale to the existing building it is replacing. Therefore, potential visual impacts to nearby recreation areas can be considered less than significant.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-88-4

This comment raises questions regarding the Draft EIR's agriculture and forestry resource analysis, including the loss of open space, impacts of truck emissions on nearby community gardens and landscaping, conversion of former nursery land, Williamson Act status, urban forest canopy impacts, tree removal and replacement ratios, mature tree protection policy, and carbon sequestration benefits.

As described on page 3-1 of the Draft EIR, under existing conditions, the Project site is developed with a two-story office/industrial building, surface parking, and associated landscaping. Given the developed nature of the Project site, no open space uses are present. Therefore, the proposed Project would not contribute to the permanent loss of open space.

Air pollutant emissions are evaluated in Section 4.3.6, Project Impacts, starting on page 4.3-22 of Section 4.3, Air Quality, of the Draft EIR. While this section does not specifically analyze impacts to gardens or landscaping, it analyzes air quality as a whole and the potential for adverse effects on the environment surrounding the Project site. As discussed therein, of the Draft EIR, all potentially

significant impacts of the proposed Project with respect to air quality would be reduced to a less than significant level with implementation of Mitigation Measure (MM) AQ-1, MM AQ-2, and MM AQ-3. Therefore, there would not be an impact to nearby community gardens or landscaping from the proposed Project.

Refer to Master Response 7 regarding the compatibility of the proposed Project on surrounding land uses. The proposed Project would continue the trend of industrial operations on the Project site and would not convert any current or planned nursery lands to industrial use.

Appendix G of the *State CEQA Guidelines* requires an evaluation of whether a proposed Project would conflict with existing zoning for agricultural use, or a Williamson Act contract. Given that the Williamson Act applies to individual parcels, the Draft EIR appropriately analyzes the Williamson Act status of the Project site. As described on page 3-1 of the Draft EIR, the Project site is bordered to the north, south, and west by existing industrial buildings that include a mix of permitted uses, including office, manufacturing, and warehouse uses. The recently constructed Meadows community (formerly the Nakase Nursery site) is to the northeast/east of the Project site. Therefore, adjacent parcels are fully developed and do not contain active agricultural uses or are under a Williamson Act Contract.

Forest land, as required for analysis under CEQA, is specifically defined in Public Resources Code Section 12220(g) as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits". Therefore, the non-native, ornamental landscaping associated with the existing landscaped areas on the Project site are not considered forestry resources under CEQA.

The Draft EIR provides a conceptual overview of proposed landscaping removal and replacement based upon the information available at the time. Further specificity, including quantification, would be provided during the construction permitting phase, during which specific plans and procedures would be outlined in collaboration with the contractor(s), once known, and approved by appropriate regulatory agencies. It should be noted that the trees present on the Project site under existing conditions generally consist of non-native, ornamental trees and are not subject to local tree protections or conditions. The City of Lake Forest Municipal Code Chapter 6.20, Regulations Pertaining to Conversion, Maintenance and Removal of Eucalyptus Trees, requires a permit to prune and transport eucalyptus trees during the restricted period (April 1 through October 31). However, none of the trees present on the Project site under existing conditions are eucalyptus trees. Further, under the proposed Project, the existing landscaping around the eastern, western, and southern perimeters of the Project site would remain in place and would not be removed. In addition, the proposed Project would include the planting of a variety of trees, shrubs, and groundcover surrounding the proposed industrial building and hardscape areas. Therefore, any potential impacts related to the loss of trees on the Project site, including carbon sequestration, would be addressed through the planting of new vegetation on the Project site under the proposed Project.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more

severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-88-5

This comment raises questions regarding the Draft EIR's air quality analysis, including HRA modeling assumptions, daily truck trip volume assumptions, on-site air quality monitors, cumulative toxic air contaminant exposure, Tier 4 equipment enforcement, idling restriction enforcement, electric or near-zero-emission trucks, SCAQMD Warehouse Indirect Source Rule compliance, ultrafine particulate matter, diesel emissions controls, background cumulative air quality from freeways, and sensitive receptor modeling.

Refer to Response to Comment O-1-4 regarding the potential air quality impacts resulting from the proposed Project and Master Response 9 regarding HRA modeling assumptions, vehicle daily trips and number of truck trips generated, cumulative toxic air contaminant exposure, Tier 4 equipment enforcement, diesel emissions controls, and sensitive receptor modeling. In addition, Master Response 6, Cumulative Analysis, discusses the adequacy of the cumulative analysis prepared for the proposed Project. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

The inclusion of on-site air quality monitors is not warranted because, as demonstrated in Table 4.3.K, page 4.3-29, Project operational emissions of PM do not exceed any applicable thresholds of significance and, as demonstrated in Table 4.3.N, page 4.3-35, Project operations would not expose sensitive receptors to substantial pollutant concentrations. Similarly, mitigation to require electric or near-zero emission trucks is not warranted because, as demonstrated in Table 4.3.K, the Project's modeled operational emissions, which accounts for emissions from trucks, would not exceed any applicable thresholds of significance. As a result, there is no nexus for requiring mitigation; refer to Master Response 4 regarding CEQA mitigation requirements. In addition, compliance with truck idling restrictions is required by the CARB's Airborne Toxic Control Measures (ACTMs). Enforcement with this regulation and penalties associated with noncompliance are outlined in 13 CCR § 2485.

As described in Section 3.7, Sustainability Features, page 3-19 of Chapter 3.0, Project Description, and Response to Comment S-2-7 should the Project move forward, the Project would be required to secure all applicable air district permits and comply with applicable air district rules, including Rule 2305 – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program which may include the acquisition and use of NZE or ZE trucks.

The construction and operational health risk assessments prepared for the Project consider potential impacts to all sensitive receptors, including playgrounds.

The analysis and conclusions of the Draft EIR regarding the air quality analysis remain valid. This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-88-6

This comment raises questions regarding the Draft EIR's biological resource analysis, including survey timing, nighttime lighting and bird migration/roosting, pollinator species surveys, construction noise and nesting birds, indirect habitat fragmentation, habitat loss, regional wildlife corridor impacts, tree canopy loss, wetlands, and operational Migratory Treaty Bird Act (MBTA) compliance.

As discussed on page 4.4-2 of the Draft EIR, a qualified biologist conducted a biological resource survey of the Project site on May 21, 2021. In addition, a qualified biologist conducted an additional field survey of the Project site and surrounding areas on December 20, 2024 to confirm there were no changes to existing site conditions since the 2021 survey. Therefore, biological surveys were conducted during multiple seasons and appropriately analyzed the presence of sensitive species.

Refer to Response to Comment I-21-49 regarding the potential for Project-related lighting to affect bird species.

The purpose of the database research and field surveys conducted on the Project site were to determine the presence or potential presence of sensitive biological resources. Certain pollinator species, such as the Crotch bumble bee, are considered sensitive biological resources. Therefore, potential impacts to these species were analyzed as required under CEQA. The Draft EIR concluded, based on the suitability of habitat on site and observations from the field surveys, that no special-status pollinator species would be adversely affected by the proposed Project.

As described in Response to Comment O-1-5, the proposed Project's implementation of RCM BIO-1 would ensure potential impacts to nesting birds are reduced to less-than-significant levels for the proposed Project through requiring pre-construction nesting bird surveys and buffer establishment in the event of an avian nest discovery. Specifically, if an active avian nest is discovered during the pre-construction clearance survey, construction activities would stay outside of a no-disturbance buffer. In general, the no-disturbance buffer would be a minimum of 50 feet for passerines and 250 feet for raptors. However, a species' sensitivity to disturbance can vary among species, the level of noise or construction disturbance, and the line of sight between the nest and the disturbance. Limits of construction to avoid an active nest would be established based on observations by a qualified biological monitor with experience in monitoring active nests. Therefore, the Draft EIR appropriately analyzes construction noise impacts to nesting birds.

As described in Response to Comment O-1-5, the Project site contains no native habitat, riparian areas, creeks, or other features that provide suitable foraging, breeding, or sheltering areas for wildlife. Therefore, the proposed Project would have no impact on sensitive species, plant communities, habitat fragmentation, jurisdictional waters, wildlife movement, migratory corridors, nursery sites, habitat conservation plans, or local regulations protecting biological resources.

As previously stated, existing landscaping on the Project site generally consists of non-native, ornamental landscape shrubs and trees typically used in industrial/office parks in the vicinity of the Project site. There are no native plant communities or natural communities of special concern on

site. The site supports one land-cover type that is classified as developed. Therefore, the proposed Project would not result in any habitat loss for native species.

Refer to Response to Comment I-21-48 regarding potential impacts to wildlife movement corridors.

As previously stated, the proposed Project's adherence to RCM BIO-1 would ensure less-than-significant impacts to nesting birds, including raptors. Further, the proposed Project would involve new landscaping on the Project site, including ornamental trees that could be utilized by raptors.

The analysis of wetland resources presented in the Draft EIR is supported by substantial evidence, including a review of the United States Fish and Wildlife Service (USFWS) National Wetland Inventory and field surveys conducted by qualified biologists. As discussed on page 4.4-4 of the Draft EIR, a query of the USFWS National Wetland Inventory determined that no riverine or other freshwater resources are mapped within the boundaries of the Project site. Additionally, no discernible drainage courses, inundated areas, or wetland features that would be considered jurisdictional by the United States Army Corps of Engineers (USACE), the Regional Water Quality Control Board (RWQCB), or the California Department of Fish and Wildlife (CDFW) were observed within the limits of the Project site during the field survey. Therefore, the Draft EIR appropriately analyzed wetland resources on the Project site.

While RCM BIO-1 would ensure compliance with the MBTA during Project construction, it is likely that any wildlife already living and/or moving in close proximity to the Project site would temporarily alter their normal functions during active construction activities, and then re-establish those functions once temporary construction activities have ceased, such as during dawn and dusk or during the operational stage of the Project. Project operational activities would not place any permanent barriers within any known wildlife movement corridors or interfere with habitat connectivity. Therefore, operation of the proposed Project would not result in any potential conflicts with the MBTA that would require mitigation.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-88-7

This comment raises questions regarding the Draft EIR's cultural resource analysis, including Native American consultation, potential subsurface cultural resources, archaeological monitoring, Sacred Lands File consultation results, artifact discovery contingency plans, cultural landscape analysis for nearby historic ranch lands, historic irrigation systems, and cumulative cultural resource impacts.

Refer to Response to Comment O-1-6 regarding the Native American consultation process and the potential for subsurface cultural resources on the Project site. As discussed in this response, the City conducted Native American consultation in accordance with required timing and procedure guidelines established by AB 52. In addition, regarding subsurface cultural resources, the Draft EIR

considers and addresses the potential for the discovery of previously unidentified resources during ground disturbance activities associated with the proposed Project.

Refer to Response to Comment I-49-11 regarding archaeological monitoring during construction of the proposed Project. As discussed in this response, the Cultural Resources Assessment prepared for the proposed Project determined that encountering buried cultural resources during Project construction is unlikely and that no additional cultural resources work or monitoring is necessary during proposed activities associated with the development of the Project site. Nevertheless, as stated on page 4.5-9 of the Draft EIR, in the unlikely event that archaeological resources are discovered at any time during construction, those activities would be halted in the vicinity of the find until the find can be assessed for significance by a qualified archaeologist, pursuant to Regulatory Compliance Measure CUL-1. With implementation of RCM CUL-1, the Draft EIR found that potential impacts to previously undiscovered archaeological resources would be less than significant.

Refer to Response to Comment I-21-51 regarding cultural landscape analysis as well as a definition of a historical resource pursuant to CEQA. Based on the records search results for the Project site and the extent of site disturbance associated with the existing development on site, there are no existing structures on the Project site, including remains of irrigation, that would qualify as a historical resource under CEQA, or that would be considered part of a cultural landscape.

Refer to Section 4.5.7 (beginning on page 4.5-9) of the Draft EIR for an explanation of how cumulative cultural resource impacts were considered.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-88-8

This comment raises questions regarding the Draft EIR's energy analysis including on-site renewable energy generation, refrigeration and HVAC life-cycle energy consumption, electricity load under 24/7 operations, heavy truck charging energy demand, Title 24 energy efficiency standards compliance, all-electric building design, natural gas restriction contingencies, and cumulative regional energy demand from the Western Realco Enterprise Way Industrial Project (Projects 1 and 2).

Mitigation to require on-site renewable energy generation or a commitment to all-electric building design is not warranted because, as described in Section 4.6.6, Project Impacts, starting on page 4.6-7 of Section 4.6, Energy, of the Draft EIR, implementation of the Project would result in less than significant impacts related to energy resources. As a result, there is no nexus for requiring mitigation; refer to Master Response 4 regarding CEQA mitigation requirements. Nevertheless, is it noted that the Project is planned to be all-electric.

Life-cycle energy consumption for warehouse refrigeration or HVAC, and energy demand for heavy truck charging was not considered in the analysis and is not required to adequately address the applicable questions from Appendix G of the *State CEQA Guidelines*.

An estimate of increased energy consumption during construction and operations of the Project was presented in Tables 4.6.A and 4.6.B (pages 4.6-8 and 4.6-9, respectively) of Section 4.6, Energy, of the Draft EIR.

The proposed Project would be required to meet all applicable building code standards, including the Title 24 energy efficiency standards. Compliance with such standards would be ensured as part of the City's plan review and building permit process, and then further verified through inspections.

Refer to Master Response 6 regarding the adequacy of the cumulative analysis prepared for the proposed Project.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-88-9

This comment raises questions regarding the Draft EIR's geology and soils analysis, including liquefaction potential, slope stability and seismic hazards, expansive soil potential, geotechnical borings, stormwater infiltration following soil compaction, erosion impacts, the effect of vibration on soil stability, and contaminated soils contingency plans.

Refer to Response to Comment O-1-8 regarding the geology and soils analysis conducted for the proposed Project. In addition, contrary to this comment's claim, expansive soil potential under the proposed Project is discussed under Threshold 4.7.4 (beginning on page 4.7-15) of the Draft EIR, and was concluded to be less than significant.

In addition, refer to Response to Comment O-1-11 regarding the water quality and stormwater runoff analysis conducted for the proposed Project and Master Response 11 regarding construction vibration resulting from the proposed Project.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-88-10

This comment raises questions regarding the Draft EIR's greenhouse gas emissions analysis, including State Scoping Plan conflicts, net-zero operations commitment, operational emission target compliance monitoring, carbon sequestration losses from vegetation removal, future regulatory tightening and climate goals, truck electrification as mandatory mitigation, SB 743 compliance,

purchasable emissions offsets, long-term cumulative GHG projections, and Alternative 3's inconsistency with climate policy goals.

As described under Threshold 4.8.2, starting on page 4.8-16 of Section 4.8, Greenhouse Gas Emissions, of the Draft EIR, the significant and unavoidable impact conclusion is based specifically on the Project's inability to reduce VMT to below the City's VMT threshold and is not related to greenhouse gas emissions. Therefore, mitigation to require net-zero operations, truck electrification, or the purchase of carbon offsets is not warranted because there is no nexus for requiring mitigation; refer to Master Response 4 regarding CEQA mitigation requirements. However, refer to Response to Comment S-2-7 regarding compliance with WAIRE and the potential acquisition and use of NZE or ZE trucks. Tenant operations do not need to be monitored because there is not a specific quantitative emissions target established by the SCAQMD for which the tenants must comply. If future operations at the Project site are determined to be a major source of emissions, then the Project would be subject to federal Title V permitting.

The Project site is currently developed with a two-story office/industrial building and surface parking. Any carbon sequestration losses from landscape vegetation removal would be offset by landscaping proposed as part of the Project.

Refer to Master Response 10 regarding conflicts with the State Scoping Plan, California's long-term climate goals, SB 743 compliance, and consistency with climate policy goals. In addition, refer to Master Response 6 regarding the adequacy of the cumulative analysis prepared for the proposed Project, which included an analysis of GHG.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-88-11

This comment raises questions regarding the Draft EIR's hazards and hazardous materials analysis, including Phase II ESA testing, potential residual pesticides from former nursery land, hazardous material spill containment and remediation, diesel fuel leakage minimization, hazardous release event safety measures, fire hazard coordination with OCFA, cumulative hazardous materials transportation risks, and truck idling and fueling practice compliance.

Refer to Master Response 13 regarding the analysis of hazards and hazardous materials presented in the Draft EIR and Master Response 6 regarding the adequacy of the cumulative analysis prepared for the proposed Project.

As stated on page 4.3-38 of the Draft EIR, idling of trucks under the proposed Project would be limited by the CARB's In-Use Off-Road Diesel Vehicles regulation, which limits idling to 5 minutes or less. Enforcement of this regulation is a matter of State law and is not required for detailed analysis under CEQA.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-88-12

This comment raises questions regarding the Draft EIR's hydrology and water quality materials analysis, including runoff contamination, groundwater depletion, cumulative local watershed impacts, stormwater management during heavy rainfall events, NPDES permit compliance, green infrastructure commitment, truck washing or spill pollutant containment, residential basement flood risk analysis, and infiltration rates.

Refer to Response to Comment O-1-11 regarding the Project's impact on water quality and stormwater runoff and proposed mitigation. In addition, refer to Master Response 6 regarding the cumulative impacts analysis conducted for the proposed Project, including cumulative impacts related to hydrology and water quality. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

Given the information noted above, there is no nexus to require additional mitigation such as green infrastructure commitments; refer to Master Response 4 regarding the adequacy of the proposed mitigation for the Project under CEQA.

Groundwater depletion was addressed under Threshold 4.10.2 (beginning on page 4.10-31) of the Draft EIR and was concluded to be less than significant. As discussed on page 4.10-32 of the Draft EIR, existing soils on the Project site possess very poor infiltration characteristics; Therefore, the Project site is not a location of considerable infiltration or groundwater recharge. Therefore, the Project site is not a significant source of groundwater recharge, and the increase in impervious surface area that would result from the development of the proposed Project would not significantly decrease groundwater supplies or interfere with groundwater recharge in a manner that may impede sustainable groundwater management.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-88-13

This comment raises questions regarding the Draft EIR's land use and planning analysis, including General Plan quality of life policy consistency, senior housing land use compatibility, General Plan Housing Element goal consistency, alternative zoning-compatible land uses, SCAG RTP/SCS consistency, recreational facility land use compatibility, environmental justice mandate consistency, and relocation to an area zoned for industrial buffering.

Refer to Master Response 7 regarding the proposed Project's impacts related to qualify of life, land use compatibility, General Plan and zoning consistency. The requirements for conducting an

environmental justice analysis is discussed in Master Response 14. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-88-14

This comment raises questions regarding the Draft EIR's mineral resource analysis, including regional aggregate construction demand, cumulative demands for mineral resources, and secondary resource extraction impacts.

Appendix G to the *State CEQA Guidelines* requires the analysis of whether a proposed Project would result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state; or result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. As discussed on pages 4.12-3 and 4.12-4 of the Draft EIR, the Project site does not contain any known mineral resources or mineral resource recovery sites. Therefore, the Draft EIR concluded that no impacts related to mineral resources would occur.

The *State CEQA Guidelines* do not require an analysis of off-site indirect impacts to mineral resources, including impacts related to construction material demand. Further, the proposed Project would require an amount of construction materials that is consistent with other industrial warehouse projects in the region. A cumulative analysis related to mineral resources was included in Section 4.12.7, Cumulative Impacts, starting on page 4.12-4 of Section 4.12, Mineral Resources, of the Draft EIR.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-88-15

This comment raises questions regarding the Draft EIR's noise analysis, including baseline residential nighttime noise data, low-frequency vibrations from heavy trucks, noise restriction enforcement, impacts to senior residents, playgrounds and recreation area impacts, Title 24 interior noise standard consistency, truck refrigeration unit noise, mitigation options, vibration impacts on residential structural integrity, and cumulative noise impacts.

Refer to Master Response 11 regarding the noise and vibration analysis conducted for the proposed Project including vibration from Project-related traffic on-site or on adjacent roadways, noise reduction features for daily operations, the potential for cumulative impacts related to noise, and potential vibration impacts on adjacent structures, and Master Response 4 regarding the adequacy

of the proposed Project's mitigation under CEQA. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

In addition, Table H of the Noise and Vibration Technical Study (Appendix H of the Draft EIR) presents ambient noise level measurements, both during daytime and nighttime conditions, at the surrounding uses, including nearby residential uses. The analysis completed for operational noise at the Project site, presented on page 31 of the Noise and Vibration Technical Report, does include truck activities such as release of air brakes and other ancillary activities for both daytime and nighttime conditions. The City's noise standards do account for the more sensitive conditions (i.e. nighttime hours as compared to daytime hours), however, there is no age-specific noise levels standards that are required for operational compliance. Playgrounds and recreational areas were not specifically addressed as they are located further from the Project site as compared to the closer, more-sensitive, residential uses. Furthermore, playgrounds and recreational sites are also noise producing; therefore, the sensitivity is not as great as residential uses. There is no specific assessment of interior noise impacts at the adjacent uses as the City's exterior noise levels standards require a conformance level such that if exterior compliance is achieved, interior noise levels would remain below the Title 24 interior noise level standards. There is no refrigeration truck idling expected at the Project site as there is no cold storage component of daily operations.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-88-16

This comment raises questions regarding the Draft EIR's population and housing analysis, including displacement impacts on community livability, General Plan Housing Element obligations, health impacts to the general population, jobs-housing ratio, gentrification pressure, neighborhood desirability, and long-term population trends.

As stated on page 4.14-18 of the Draft EIR, under existing conditions, the Project site does not contain any residential uses, and neither construction nor operation of the proposed Project would displace existing residents on site or from the nearby residential areas. Therefore, no displacement impacts would occur that could affect community livability.

The City's requirement to construct additional housing units pursuant to SCAG's Residential Housing Needs Allocation (RHNA) is completely independent from the proposed Project and is not intended to preclude other types of development in the City, such as the proposed Project. As previously stated, the proposed Project would replace an existing industrial structure and associated landscaping and hardscaping. The Project site currently has a Lake Forest General Plan land use designation of Light Industrial. The Project site is located within the Pacific Commercentre Planned Community and has a zoning designation of LI – Light Industrial. Therefore, the construction of residential development on the Project site is not permitted. The proposed Project is consistent with the City's land use plans for the Project site.

Appendix G to the *State CEQA Guidelines* requires the analysis of whether a proposed Project would induce substantial unplanned population growth in an area or displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Therefore, the discussion of population health impacts is not required in Section 4.14, Population and Housing, of the Draft EIR. However, potential impacts related to human health are provided in Sections 4.3.6, Project Impacts, starting on page 4.3-22 of Section 4.3 Air Quality, and 4.9.6, Project Impacts, starting on page 4.9-9 of Section 4.9 Hazards and Hazardous Materials of the Draft EIR and Master Response 9 describes the potential health risks associated with the proposed Project.

Refer to Response to Comment O-1-14 regarding the proposed Project's impacts related to the City's jobs-housing balance.

State CEQA Guidelines Section 21082.2(c) limits evaluation of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment, such as gentrification pressure and neighborhood desirability. No further response is required related to these topics.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-88-17

This comment raises questions regarding the Draft EIR's public services analysis, including fire department response times, school traffic and pedestrian safety near truck routes, library/community services impacts, truck idling and routing restriction enforcement, waste collection service modeling, and parks and recreational facility impacts.

Refer to Master Response 13 regarding emergency response timing and Master Response 8 regarding the proposed Project's impacts related to public safety in relation to truck traffic. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

The proposed Project's potential impacts related to libraries and other community facilities is addressed on page 4.15-16 of the Draft EIR. As discussed in this analysis, it is anticipated that a majority of the jobs generated by the proposed Project would be filled by existing City and County residents that already utilize such facilities under existing conditions. Further, the proposed Project is consistent with allowable development on the Project site and would not result in substantial unplanned growth. Thus, the Draft EIR concludes that the proposed Project would not result in a demand for more services at public facilities, including libraries.

As stated on page 4.3-38 of the Draft EIR, idling of trucks under the proposed Project would be limited by the CARB's In-Use Off-Road Diesel Vehicles regulation, which limits idling to 5 minutes or less. Enforcement of this regulation is a matter of State law and is not required for detailed analysis under CEQA. Enforcement of truck routing restriction (e.g., truck travel on prohibited roads) would

be enforced through standard traffic law enforcement and is not required for detailed analysis under CEQA.

Anticipated solid waste generation under the proposed Project is discussed in Section 4.19.6, Project Impacts, starting on page 4.19-12, of Section 4.19, Utilities and Service Systems, of the Draft EIR. Based on the CalEEMod outputs, the proposed Project is estimated to generate approximately 156 tons per year or 855 pounds of solid waste per day during operation. The increase in solid waste generated by the proposed Project would constitute approximately 0.01 percent of the average daily capacity (3,000 tpd) at the Frank R. Bowerman Landfill. Therefore, solid waste generated by the proposed Project would not cause the capacity at the Frank R. Bowerman Landfill to be exceeded. In addition, according to wastewater generation factors included in the CalEEMod emissions model, the proposed Project is anticipated to generate approximately 105,046 gallons per day. This modeling is based upon reasonably foreseeable office, manufacturing, and warehouse operations based on information provided by the Project Applicant. Therefore, the Draft EIR appropriately characterizes the waste generation potential of the proposed Project.

The proposed Project's impacts related to parks and recreational services is discussed in Section 4.15.6, Project Impacts, starting on page 4.15-10 of Section 4.15, Public Services, and Section4.16.6, Project Impacts, starting on page 4.16-4 of Section 4.16 Recreation of the Draft EIR. These impacts were concluded to be less than significant.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-88-18

This comment raises questions regarding the Draft EIR's recreation analysis, including recognition of playgrounds as sensitive recreation facilities, diesel truck pollution impacts to outdoor recreational areas, noise impacts to ballfields and play areas, resident surveys regarding the use of nearby parks, and the use of buffer zones or barriers to protect recreational spaces.

The SCAQMD defines structures that house persons (e.g., children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise) or places where persons gather (i.e., residences, schools, playgrounds, child-care centers, convalescent centers, retirement homes, and athletic fields) as sensitive receptors. Sensitive receptors are defined as people who have an increased sensitivity to air pollution or environmental contaminants. Although playgrounds are considered to be sensitive receptors, the nearest playground is located approximately 603 feet southeast of the Project site. Based on the HRA results, the sensitive maximally exposed individual (MEI), which is the individual with the highest probability of contracting cancer as a result of exposure, was determined to be the residences located approximately 82 feet from the Project site's eastern boundary limit. However, as shown in Table 4.3.M, page 4.3-34, with implementation of MM AQ-1, the cancer risk at the sensitive MEI was determined to be 5.12 in 1 million during construction and 3.06 in 1 million during operation of the Project, which would not exceed the SCAQMD cancer risk threshold of 10 in 1 million. The nearest

playground is located farther away than the identified sensitive MEI. Therefore, health risk at the playground would be lower than the risks identified for the sensitive MEI and would also be considered to be below thresholds. It is also important to note that people and children visiting the playground do not typically remain on site for an extended period, such as an 8-hour works shift or school day, or the full 24 hours of a residential receptor; but rather are present for shorter periods of time. Therefore, people visiting the nearest playground would have lower exposure than people living and working near the Project site.

Refer to Master Response 9 regarding diesel (diesel particulate matter [DPM]) emissions under the proposed Project. As stated in this response, the HRA prepared for the proposed Project (Appendix C to the Draft EIR) concluded that all health risk levels to nearby receptors from operation-related emissions of TACs (including PM_{10}, used to represent DPM) would be well below the SCAQMD's HRA thresholds, and no significant health risks would occur from Project operation. Therefore, the proposed Project would not interfere with the usability of outdoor recreational areas.

As summarized on page 4.13-24, the proposed Project would result in less than significant impacts related to noise and vibration with adherence to standard regulatory measures. Therefore, the proposed Project would not interfere with the usability of ballfields and play areas in the Project site vicinity.

While resident surveys may be conducted for projects that would result in considerable population growth with the potential to impact recreational facilities, this methodology is not required under CEQA. Further, the proposed Project does not propose any residential uses and would not result in an employment demand that would result in a large influx of residents. Therefore, the extent of analysis provided in the Draft EIR is appropriate given the potential for the proposed Project to impact recreational facilities.

As stated in Section 4.16.6, Project Impacts, starting on page 4.16-4 of Section 4.16, Recreation, of the Draft EIR, the proposed Project's impacts to recreational facilities were determined to be less than significant, and there is no nexus to require additional mitigation, such as buffer zones. Refer to Master Response 4, CEQA mitigation requirements regarding the adequacy of the proposed mitigation for the Project under CEQA. Further, it should be noted that the Project design already includes a 16-foot high, 65-foot long wall located at the eastern end of the loading docks and vegetative buffering along the Project site boundaries. Therefore, buffering elements between the Project site and adjacent land uses is already in place.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-88-19

This comment raises questions regarding the Draft EIR's transportation analysis, including emergency evacuation access roads, pedestrian and children safety, VMT reduction, mitigation options relating to the use of local residential streets, cumulative traffic impacts, turning radii,

school pick-up and drop-off congestion, crosswalk safety, truck route accident contingency, and bicycle and pedestrian counts.

Refer to Master Response 8 and Master Response 13 regarding emergency evacuation and response times. Master Response 8 also addresses truck and traffic safety, VMT, cumulative traffic impacts, truck turning movements (turning radii), and school pick-up and drop-off congestion. Response to Comment I-88-17 addresses the enforcement of truck routing restrictions. The proposed Project is not anticipated to increase accident rates. Therefore, it is not subject to contingency plans. Vehicular traffic to and from the Project site would utilize the existing network of regional and local roadways that currently serve the Project site and surrounding area, and the proposed Project would not introduce any new roadways. Additionally, all vehicular traffic traveling to and from the Project site is subject to current traffic laws and regulations similar to other drivers in the Project vicinity along the public roadways. The Traffic Impact Analysis (TIA) was prepared based on the City of Lake Forest's Transportation Analysis (TA) Guidelines (July 21, 2020). The City's TA Guidelines do not require pedestrian or bicycle counts.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-88-20

This comment raises questions regarding the Draft EIR's tribal cultural resource analysis, including tribal contacts and responses, tribal concerns, construction monitoring, mitigation options, and tribal cultural landscapes beyond the immediate Project site.

Refer to Response to Comment O-1-6 and Section 4.18, Tribal Cultural Resources, of the Draft EIR for the requested details regarding the Native American consultation process. Specifically, the list of tribes contacted and a discussion of their responses are provided on pages 4.18-2 and 4.18-3 of the Draft EIR.

Given that Native American consultation is a government-to-government process and often involves the exchange of sensitive or confidential information, the concerns of tribal representatives were not summarized in detail in the Draft EIR. The Draft EIR provides enough detail to allow for meaningful analysis and informed decision-making, as required by CEQA.

Mitigation Measures (MM) TCR-1 through MM TCR-3, as included in Section 4.18.9.2, starting on page 4.18-12 of the Draft EIR, outline how ground-disturbing activities would be monitored and how unanticipated discoveries would be treated. TCR-1 requires a qualified Native American monitor to be present during initial grading and excavation activities within native soils; TCR-2 establishes procedures for evaluating and protecting any unanticipated tribal cultural resource discoveries; and TCR-3 provides requirements for coordination with the County Coroner and the NAHC in the event human remains or associated funerary objects are found. The monitoring of ground-disturbing activities ensures that previously unidentified resources are appropriately identified and handled in the event of an unanticipated discovery, thereby reducing potential impacts to these resources.

In the unlikely event that human remains are discovered during construction activities, the Construction Contractor would be required to implement Regulatory Compliance Measure CUL-2, which requires compliance with the State's Health and Safety Code for the treatment of human remains, including halting disturbance, notification of the County Coroner, and notification of the NAHC in the event that the remains are determined to be Native American. Further, as stated above, MM TCR-3 provides requirements for coordination with the County Coroner and the NAHC in the event human remains or associated funerary objects are found. These measures provide a clear-enforceable framework for proper handling and treatment of previously unidentified resources in the event human remains or associated funerary objects are found.

Refer to Response to Comment I-21-51 regarding potential cultural landscape impacts of the proposed Project.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-88-21

This comment raises questions regarding the Draft EIR's utilities and service systems analysis, including sewer capacity, cumulative water demand analysis, long-term drought restriction compliance, regional solid waste disposal capacity constraints, SCE grid reliability, recycled water availability, and emergency preparedness in the event of a utility outage.

As stated on page 4.19-14 of the Draft EIR, proposed connections to the existing wastewater lines would be reviewed and approved by the City's Public Works Department and IRWD, as applicable, to ensure consistency with system capacity and operations. Additionally, the IRWD's Michelson Water Recycling Plant has sufficient capacity to serve the proposed Project in addition to its existing commitments. Therefore, the Draft EIR concludes that the proposed Project could be adequately served by wastewater treatment and collection facilities.

Refer to Response to Comment O-4-2 regarding individual water demand associated with the proposed Project. As described on page 4.19-19 of the Draft EIR (cumulative impacts subsection), the proposed Project would not contribute to a substantial increase in utility demand, including water demand, as analyzed based on the growth projections provided in the City's General Plan, which includes all cumulative reasonably foreseeable development within the City. Further, all projects within the cumulative study area would be required to implement appropriate mitigation measures to ensure adequate water supply/service capacity and infrastructure for each individual project. Therefore, the proposed Project would not contribute to a cumulatively considerable increase in water demand.

As stated on page 4.19-13 of the Draft EIR, IRWD's supplies remain relatively unchanged between normal, single-dry, and five-year drought scenarios. Therefore, sufficient water supplies exist to serve the proposed Project and other projects within the IRWD service area even under a drought scenario, and a water supply shortage is not anticipated to occur as a result of the proposed Project.

Further, the proposed Project would include sustainability features such as drought tolerant landscaping and low flow fixtures to minimize water demand to the extent feasible.

As described on page 4.19-18 of the Draft EIR, solid waste generated by the proposed Project would not exceed the capacity at the Frank R. Bowerman Landfill. Further, the proposed Project would comply with applicable federal, State, and local statutes and regulations related to solid waste, including OC Waste & Recycling's Countywide Integrated Waste Management Plan (CIWMP) and agency permits, AB 341, SB 1016, and the CALGreen Code.

As described on page 4.19-15 of the Draft EIR, the proposed Project would only represent a small fraction of electricity demand in SCE's service area, would meet Title 24 requirements, and would be served by sufficient electricity supplies. Therefore, the proposed Project's electricity demand would not interfere with SCE grid reliability.

As discussed on page 4.19-2 of the Draft EIR, approximately 25 percent of the IRWD's current water supply consists of recycled water, which provides landscape irrigation for 80 percent of the IRWD's business and community customers including parks, school grounds, and golf courses. Under existing conditions, the Project site receives domestic and recycled water service from the IRWD. Therefore, it is likely that some, if not all, of the landscaping needs identified under the proposed Project would be served by IRWD's recycled water supplies.

Refer to Master Response 13 regarding emergency preparedness under the proposed Project. As concluded on page 4.19-20 of the Draft EIR, the proposed Project would result in less than significant impacts related to utilities and service systems. Therefore, the proposed Project is not anticipated to result in conditions that would cause a utility outage. Any outage experienced on adjacent properties would likely also be experienced on the Project site, and it is anticipated that future operational activities could be temporarily paused in the event of a power outage and there would be no urgent safety-related need for continuous power.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-88-22

This comment raises questions regarding the Draft EIR's wildfire analysis, including location within an urban-wildland interface, effect of increased truck congestion on evacuation times, cumulative impact analysis related to wildfire evacuation, ember intrusion risks, and OCFA evacuation recommendations.

As described in Section 4.20.3, Existing Environmental Setting, starting on page 4.20-1 of Section 4.20, Wildfire, of the Draft EIR, the proposed Project is located in a non- Very Fire Hazard Severity Zone, as designated by CAL FIRE. In addition, the Draft EIR analyzes wildfire risk and describes that the likelihood of wildfires affecting the Project site or the vicinity of the Project site is minimal due

to intervening development, as the Project site is already fully developed and is not adjacent to wildlands. Therefore, the Draft EIR adequately analyses wildfire risk given the Project site's location.

Refer to Master Response 13 regarding congestion and wildfire evacuation times and Master Response 6 regarding the adequacy of the cumulative impacts analysis conducted in the Draft EIR. The Draft EIR provides a cumulative analysis for emergency response and evacuation in Section 4.20.7, Cumulative Impacts (starting on page 4.20-12), of Section 4.20, Wildfire, of the Draft EIR.

The Draft EIR takes into consideration the proposed Project's potential to expose Project occupants to wildfire or uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors in Section 4.20, Wildfire, of the Draft EIR. While the *State CEQA Guidelines* Appendix G questions do not specifically require analysis related to ember intrusions, this CEQA threshold adequately covers the commenter's concern as it analyzes the potential for wildfire to spread to the Project site and its vicinity. Therefore, this concern is adequately addressed in the Draft EIR, and no further analysis is necessary.

As described in Master Response 13, the proposed Project would involve further coordination with OCFA and the incorporation of OCFA recommendations into the final design of the proposed Project.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is necessary.

Weiss, Jennifer

From: 朱忆曙 [redacted]
Sent: Sunday, September 14, 2025 1:01 PM
To: Stonich, Amy; EnterpriseProjects
Cc: Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Public Comments on DEIR of IPT Enterprise Business Center Project

Good evening Mayor, Councilmembers, and staff.

My name is Yishu Zhu, a resident of Lake Forest. I am here to express my deep opposition to the proposed IPT Enterprise Business Center warehouse project.

This project places a massive 24/7 industrial warehouse immediately next to homes, children's playgrounds, and an affordable senior housing community. A six-foot wall does not protect our families from diesel truck noise, vibration, or toxic air pollution.

The Draft EIR itself admits that the project will cause significant and unavoidable impacts in transportation and greenhouse gas emissions. If those impacts are already "unavoidable," how can this project possibly be compatible with our neighborhoods?

The air quality analysis is especially weak. The report relies on averages and assumptions, not real monitoring at the sensitive receptors right next door. Our seniors, children, and families will bear the health risks from diesel exhaust, yet the EIR does not adequately study or mitigate this. I-89-1

Traffic is another major flaw. There is only one road in and out of this "sack" location, completely surrounded by residential neighborhoods. Large trucks will funnel through the same streets our children use to go to school and play. This is unsafe and unacceptable.

Noise impacts are downplayed. A warehouse that operates 24/7 means trucks at 2:00 a.m., back-up beepers, loading docks, and vibrations against our walls. The so-called mitigations cannot erase that reality.

Finally, the alternatives are inadequate. A reduced-size warehouse that still runs 24/7 with diesel trucks is not a true solution. The only responsible choice is the No Project Alternative.

This project sacrifices community health, safety, and quality of life for private gain. I urge the City to reject it, or at the very least, require a full and independent re-analysis of air quality, traffic, and noise impacts.

Our neighborhoods deserve protection. Please put residents first.

Thank you.
Best regards
Yishu Zhu

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YISHU ZHU

Letter Code: I-89
Date: September 14, 2025

Response to Comment I-89-1

This comment expresses opposition to the proposed Project, expressing concerns related to land use compatibility, traffic, safety, greenhouse gas emissions, air quality, noise, and alternatives. The comment requests that the City address their comments by either rejecting the proposed Project or requiring full and independent re-analysis of air quality, traffic, and noise impacts.

Refer to Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses, Master Response 10 regarding greenhouse gas emissions associated with the proposed Project, Response to Comment O-1-4 and Master Response 9 regarding potential air quality and health risk impacts associated with the proposed Project, Master Response 11 regarding noise impacts associated with the proposed Project, and Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project. In addition, refer to Master Response 8 regarding traffic and traffic safety impacts associated with the proposed Project. It should be noted that the VMT impact and traffic operation impact are fundamentally separated. The VMT impact is related to long-distance travel to/from the Project site. The significant and unavoidable VMT impact resulting from the proposed Project does not imply any impact on local traffic operation. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: Ye Jianyan [redacted]
Sent: Sunday, September 14, 2025 1:08 PM
To: Stonich, Amy; EnterpriseProjects
Cc: Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Re: Public Comments on DEIR of IPT Enterprise Business Center Project

> Good morning Mayor, Council members, and staff.
>
> My name is Yishu Zhu, a resident of Lake Forest. I am here to express my deep opposition to the proposed IPT Enterprise Business Center warehouse project.
>
> This project places a massive 24/7 industrial warehouse immediately next to homes, children's playgrounds, and an affordable senior housing community. A six-foot wall does not protect our families from diesel truck noise, vibration, or toxic air pollution.
>
> The Draft EIR itself admits that the project will cause significant and unavoidable impacts in transportation and greenhouse gas emissions. If those impacts are already "unavoidable," how can this project possibly be compatible with our neighborhoods?
>
> The air quality analysis is especially weak. The report relies on averages and assumptions, not real monitoring at the sensitive receptors right next door. Our seniors, children, and families will bear the health risks from diesel exhaust, yet the EIR does not adequately study or mitigate this.
I-90-1
>
> Traffic is another major flaw. There is only one road in and out of this "sack" location, completely surrounded by residential neighborhoods. Large trucks will funnel through the same streets our children use to go to school and play. This is unsafe and unacceptable.
>
> Noise impacts are downplayed. A warehouse that operates 24/7 means trucks at 2:00 a.m., back-up beepers, loading docks, and vibrations against our walls. The so-called mitigations cannot erase that reality.
>
> Finally, the alternatives are inadequate. A reduced-size warehouse that still runs 24/7 with diesel trucks is not a true solution. The only responsible choice is the No Project Alternative.
>
> This project sacrifices community health, safety, and quality of life for private gain. I urge the City to reject it, or at the very least, require a full and independent re-analysis of air quality, traffic, and noise impacts.
>
> Our neighborhoods deserve protection. Please put residents first.
>

> Thank you.
> Best regards
Jianyan Ye
CAUTION: Think Security! This email is not from someone at the City of Lake Forest. Do not click any links or open any attachments you are not expecting.

JIANYAN YE

Letter Code: I-90
Date: September 14, 2025

Response to Comment I-90-1

This comment expresses opposition to the proposed Project, expressing concerns related to land use compatibility, traffic, safety, greenhouse gas emissions, air quality, noise, and alternatives. The comment requests that the City address their comments by either rejecting the proposed Project or requiring full and independent re-analysis of air quality, traffic, and noise impacts.

Refer to Response to Comment I-89-1 for response to this comment. This response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From:	Stephen-House [redacted]
Sent:	Sunday, September 14, 2025 1:14 PM
To:	Stonich, Amy; EnterpriseProjects
Cc:	Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy; EJ@doj.ca.gov; Rose, Debra
Subject:	Public Comment on Draft Environmental Impact Report (DEIR) for the IPT Enterprise Business Center LLC Project (SCH#2024030755) and Related Warehouse Projects
Attachments:	IPT DEIR commnets letter 9-14-2025 StephenB.pdf; Attorney General - Rob Bonta Comment letter Apr'24 .pdf

Dear Lake Forest city officials and reviewing team:

I-91-1 I am writing to provide comments on the Draft Environmental Impact Report (DEIR) for the Lake Forest IPT Project. We appreciate the effort to evaluate potential impacts. However, the DEIR contains deficiencies that must be addressed to meet CEQA's informational requirements, ensure adequate mitigation, and protect nearby residents and sensitive receptors.

Environmental Justice and Attorney General's Concerns

1.1 The California Attorney General's Office raised similar concerns in its April 2024 comment letter on the IPT Notice of Preparation (NOP), emphasizing public health and environmental justice risks of siting warehouse/logistics operations near sensitive receptors.

1.2 Please include the AG's April 2024 letter in the administrative record, provide a written response to each issue raised, and show how the DEIR has been revised accordingly.

I-91-2

1.3 Prepare an environmental justice analysis that:

a) Identifies sensitive receptors and potentially overburdened populations (e.g., Meadows residences and senior apartments, nearby childcare facilities, schools, parks, and trails) using CalEnviroScreen or similar tools.

b) Evaluates whether impacts would be disproportionately borne by these populations.

c) Commits to design and operational changes that reduce exposures and inequities.

Combined/Programmatic Cumulative Review of Related LAS Projects

I-91-3 2.1 Two additional, similar warehouse projects by the same proponent (LAS) are reportedly under DEIR review. Across the three projects, there are over 48 truck dock stations and proposals for 24/7 operations.

2.2 Because these projects are proximate, similar in scope, and share truck networks and airsheds, they must be analyzed together for cumulative impacts (Guidelines §15130). Consider a coordinated cumulative analysis or a programmatic/tiered EIR approach (Guidelines §§15168, 15152) covering:

a) Combined truck trips, roadway operations, safety, and VMT.

I-91-3 cont.

b) Combined criteria pollutant and DPM health risks with near-field dispersion to homes, senior housing, schools, childcare, parks, and trails.

c) Combined noise, stormwater pollutant loading, hydromodification, and biological/habitat effects.

2.3 Update the cumulative projects list to include the two LAS DEIR projects, analyze all three on a consistent horizon year/network, and recirculate if impacts are new or more severe (Guidelines §15088.5). Extend the public comment period following recirculation.

Fundamental Land-Use Conflict and Compatibility/Rezoning

3.1 The Meadows area was recently rezoned from agriculture to residential, establishing a clear policy direction for neighborhood livability.

3.2 High-intensity warehouse/truck operations within roughly 100 feet of homes present a direct land-use incompatibility that cannot be fully mitigated.

3.3 In line with the AG's guidance and CARB's Land Use Handbook recommendations (targeting 500+ feet separation where feasible), the City and project proponents should:

I-91-4 a) Pursue alternatives, site redesigns, or rezoning to ensure compatibility with adjacent residential uses.

b) Increase buffers/setbacks; relocate truck drive aisles, docks, and access driveways away from homes; reduce operational intensity and hours.

c) Consider reduced-intensity or alternative land uses compatible with the residential context to protect sensitive receptors (including Meadows senior apartments, childcare, schools, parks, and trails).

3.4 Given the fundamental incompatibility, the City should select a No Project or compatibility-focused alternative rather than rely on a Statement of Overriding Considerations.

Project Description, Operations Envelope, and Mapping Accuracy

4.1 Mapping accuracy: The DEIR's map/narrative mischaracterize the Meadows development location. Meadows is about 100 feet from the IPT truck route; focusing only on the final Meadows phase understates exposure. Correct figures/text to show the full Meadows community and nearest receptors; provide precise separation distances to truck aisles, loading docks, and driveways; and update air quality/health risk, noise, traffic, and safety analyses accordingly (Guidelines §§15124, 15125).

I-91-5

4.2 Unknown tenants and uses: The DEIR identifies unknown future tenants and indicates potential manufacturing but does not define the full operational envelope. CEQA requires an accurate, stable, and

finite project description. If specific tenants are unknown, analyze a conservative worst-case for allowable uses under the entitlement, including manufacturing with associated emissions, process equipment, solvents, and hazardous materials handling.

4.3 Hours of operation: The DEIR and related LAS projects indicate 24/7 operations. Analyze nighttime scenarios for noise, health risk, light/glare, safety, and sleep disturbance, using corrected receptor distances.

4.4 Dock count disclosure: Disclose the number and location of truck docks by building for all three projects (over 48 combined), with associated truck trip rates per dock and per square foot, cold-start/idling patterns, and peak-hour profiles.

I-91-5 cont.

4.5 Enforceable limits: If the City intends to avoid worst-case impacts, adopt binding restrictions as conditions of approval/CUP:

a) Prohibit manufacturing/industrial processes with toxic air contaminants or require separate discretionary review and CEQA if proposed in the future.

b) Limit hours of operation and/or loading dock hours; prohibit nighttime outdoor loading near residences.

c) Cap total dock counts and truck trip ceilings; require post-occupancy monitoring with enforceable remedies if exceeded.

d) Require Hazardous Materials Business Plan compliance, spill prevention, and tenant-specific WAIRE compliance plans before occupancy.

4.6 Recirculation: If clarifications/limits change the project description or show new/more severe impacts, recirculate (Guidelines §15088.5).

Traffic and Transportation (including Truck Operations)

5.1 Provide refined operational analysis:

a) Hourly truck trip generation and arrival/departure profiles.

b) Driveway LOS/queuing and on-street spillback during peak delivery windows.

c) Safety analysis for residential-adjacent segments and intersections.

I-91-6

5.2 Provide VMT analysis consistent with CEQA Guidelines §15064.3, OPR Technical Advisory, and City thresholds, including freight VMT where applicable.

5.3 Provide a Truck Circulation and Management Plan: designated truck routes; prohibition of residential cut-through; time-of-day restrictions; on-site queuing capacity; enforcement mechanisms.

5.4 Provide cumulative traffic analysis including the two LAS DEIR projects and other related projects on a consistent network/horizon year.

5.5 Mitigation requests:

a) Binding truck route restrictions (ordinance/conditions), wayfinding signage, and GPS geofencing.

I-91-6 cont.

b) Delivery window limits to avoid school and nighttime hours.

c) On-site staging sized to prevent off-site idling/queuing.

d) Fair-share funding and timely implementation of signal timing/ITS improvements.

Air Quality, Health Risk, and Public Health

6.1 Prepare a Health Risk Assessment (HRA) using SCAQMD and OEHHA 2015 Guidance covering:

a) Construction and operational diesel particulate matter (DPM) from trucks, off-road equipment, loading, idling, and backup generators.

b) Near-field dispersion modeling (e.g., AERMOD) with receptor grids covering Meadows residences, senior apartments, schools, childcare, parks, and trails; apply age sensitivity factors.

c) Cumulative sources including the two LAS/WECO projects (Guidelines §15130).

6.2 Demonstrate compliance with SCAQMD Rule 2305 (WAIRE): quantify points and commit to specific actions (ZE/NZE truck use, onsite charging, solar, high-efficiency filtration).

6.3 Actively enforce CARB's anti-idling ATCM (signage, monitoring, penalties).

6.4 Mitigation requests (to be enforceable via the MMRP; Guidelines §15097):

I-91-7

a) ZE/NZE truck adoption schedule with minimum percentages and deadlines; immediate use of 2010+ engines or cleaner for all tenants/contractors.

b) Onsite DC fast charging and electrical capacity installed at building permit to meet ZE commitments at opening.

c) Electric or Tier 4 Final construction equipment; restrict diesel generators unless Tier 4 with aftertreatment.

d) High-efficiency MERV 16 filtration for onsite occupied spaces; offer MERV 13–16 upgrades and HVAC sealing for the closest Meadows homes and senior apartments.

e) Solid sound/air-dispersion walls and vegetative barriers between docks/drive aisles and residences; modeling to justify height/extent.

f) Idling elimination plan with geofencing and automatic shutoff; third-party monitoring and reporting.

I-91-8

Noise and Vibration

7.1 Refine modeling of truck pass-bys, backup alarms, loading/unloading, and nighttime operations using corrected receptor distances, including façade effects.

7.2 Analyze construction and operational vibration for human annoyance and building damage.

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a) Nighttime restrictions on dock operations; broadband “white noise” backup alarms.

b) Acoustically rated dock enclosures, continuous sound walls, and quiet pavement on onsite truck routes.

c) Vibration controls and monitoring with stop-work triggers near residences and sensitive facilities.

Biological Resources

8.1 Conduct protocol-level surveys for special-status species and nesting birds; delineate jurisdictional waters.

I-91-9 8.2 Address potential permitting needs with USACE/RWQCB/CDFW (CWA §§404/401; Fish & Game Code §§1600 et seq.).

8.3 Mitigation requests:

a) No-disturbance buffers for identified resources.

b) Pre-construction nesting bird surveys with species-appropriate buffers and monitoring.

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9.1 Provide a project-specific LID plan and SWPPP with:

a) Hydromodification control sizing.

b) Oil/grit separators for truck/travel lanes and loading areas.

I-91-10 c) Spill prevention/response procedures and staff training.

9.2 Analyze runoff increases, pollutant loading from truck operations, and cumulative watershed effects; include post-construction monitoring.

9.3 Identify responsible party and funding for long-term BMP inspection and maintenance.

Greenhouse Gases and Climate Consistency

I-91-11 10.1 Analyze GHG consistency with SB 32 targets, State carbon neutrality goals, SCAQMD guidance, and any applicable local Climate Action Plan.

10.2 Mitigation requests:

a) ZE/NZE truck commitments; building electrification readiness; rooftop solar and storage sized to tenant/process loads; cool roofs.

I-91-11 cont.

b) EV charging ratios exceeding code for passenger vehicles and MD/HD trucks.

c) Embodied-carbon measures (EPDs, SCMs, low-carbon concrete/steel) and robust construction waste diversion.

Alternatives

11.1 Provide a reasonable range of alternatives (Guidelines §15126.6) that feasibly attain most project objectives while reducing impacts, including:

a) Reduced-intensity alternative lowering truck trips and dock counts.

I-91-12

b) Rerouted-access/layout alternative that increases buffers to at least 1000 feet from residences (or greater, where feasible).

c) Enhanced mitigation alternative with ZE/NZE fleets and dock enclosure.

d) Rezoning or mixed-use/less intensive employment alternatives compatible with adjacent residential uses, consistent with AG guidance and recent residential rezoning.

Mitigation Commitments, Monitoring, and Community Impacts

12.1 Revise all mitigation measures to be specific, measurable, and enforceable; identify responsible parties, timelines, performance standards, and verification methods in the MMRP (Guidelines §15097). Include contingency actions if standards are not met.

I-91-13

12.2 While CEQA focuses on physical environmental effects rather than economic outcomes, acknowledge community concerns about quality of life and potential property value effects associated with increased pollution, noise, and heavy truck activity, and reduce those effects through the design, siting, and operational commitments above.

Land Use and Zoning Consistency and Application History

13.1 The Meadows site was rezoned from agriculture to residential, reflecting a community and policy shift to protect housing and neighborhood livability.

I-91-14

13.2 The IPT and WECO sites are zoned light industrial but have been described/marketed as a “business park.” This historical land-use mismatch should have been addressed when applications were submitted in spring/summer 2021.

13.3 Please provide a detailed land-use consistency analysis demonstrating:

a) Consistency with the General Plan, zoning code, specific plan (if any), and recent residential rezoning decisions.

b) Whether proposed 24/7 logistics and 48+ dock operations are consistent with "light industrial/business park" intent and performance standards (noise, hours, truck routing).

I-91-14 cont. c) Whether manufacturing or other higher-intensity uses would be permitted by right; if so, adopt conditions limiting uses or requiring discretionary review and CEQA for any such tenant.

13.4 If the project, as actually operated, would exceed light industrial/business park performance standards or conflict with adjacent residential uses, the City should pursue rezoning/plan amendments or select alternatives that achieve compatibility.

Requested Actions

A. Correct mapping and proximity data; revise and recirculate the DEIR if new or more severe impacts are shown (Guidelines §15088.5), and extend the public comment period following recirculation.

B. Incorporate and respond to the Attorney General's April 2024 comment letter on the IPT NOP; include it in the administrative record.

C. Include the two other LAS warehouse projects in a combined cumulative analysis and consider a programmatic/tiered EIR approach for all related projects (with the combined total of 48+ dock stations and any 24/7 operations explicitly analyzed).

D. Recognize the fundamental land-use conflict; select a No Project or compatibility-focused alternative, or pursue rezoning consistent with AG guidance to protect sensitive receptors.

I-91-15 E. Provide the additional technical studies and revised impact analyses outlined in Sections 4–11, including worst-case operations for unknown tenants, potential manufacturing, 24/7 operations, and dock counts.

F. Commit to specific, enforceable mitigation and monitoring measures as detailed above.

We urge the Department and the project proponents to act with social responsibility and to work proactively with City officials to ensure development that protects public health, neighborhood livability, and Lake Forest's long-term future. Please add me to the notification list for all future hearings and documents related to this project. I am available to discuss these comments and provide any needed clarifications.

Thank you very much for your consideration and support!

Sincerely,

Stephen Bian

Resident of Lake Forest

[redacted]

Lake Forest. CA 92630

Attach file

CAUTION: Think Security! This email is not from someone at the City of Lake Forest. **Do not click any links or open any attachments you are not expecting.**

ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE

1300 I STREET, SUITE 125
P.O. BOX 944255
SACRAMENTO, CA 94244-2550

E-Mail: EJ@doj.ca.gov

April 5, 2024

Amy Stonich, Assistant Director of Community Development
City of Lake Forest
100 Civic Center Drive
Lake Forest, CA 92630

RE: IPT Enterprise Business Center LLC, SCH #2024030755

Dear Ms. Stonich:

Thank you for the opportunity to provide comments on the Notice of Preparation for the IPT Enterprise Business Center LLC project. While the logistics industry is an important component of our modern economy, warehouses can bring various environmental impacts to the communities where they are located. For example, diesel trucks visiting warehouses emit nitrogen oxide (NO_x)—a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation—and diesel particulate matter (a subset of fine particular matter that is smaller than 2.5 micrometers)—a contributor to cancer, heart disease, respiratory illnesses, and premature death.[1] Trucks and on-site loading activities can also be loud, bringing disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure.[2] The hundreds, and sometimes thousands, of daily truck and passenger car trips that warehouses generate can contribute to traffic jams, deterioration of road surfaces, traffic accidents, and unsafe conditions for pedestrians and bicyclists. Depending on the circumstances of an individual project, warehouses may also have other environmental impacts.

To help lead agencies avoid, analyze, and mitigate warehouses' environmental impacts, the Attorney General Office's Bureau of Environmental Justice has published a document containing best practices and mitigation measures for warehouse projects. We have attached a

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[2] Noise Sources and Their Effects, https://www.chem.purdue.edu/chemsafety/Training/PPETrain/dblevels.htm (a diesel truck moving 40 miles per hour, 50 feet away, produces 84 decibels of sound).

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copy of this document to this letter, and it is also available online.[5] We encourage you to consider the information in this document as you prepare the draft environmental impact report for this project.

Priority should be placed on avoiding land use conflicts between warehouses and sensitive receptors and on mitigating the impacts of any unavoidable land use conflicts. However, even projects located far from sensitive receptors may contribute to harmful regional air pollution, so you should consider measures to reduce emissions associated with the project to help the State meet its air quality goals. A distant warehouse may also impact sensitive receptors if trucks must pass near sensitive receptors to visit the warehouse.

The Bureau will continue to monitor proposed warehouse projects for compliance with the California Environmental Quality Act and other laws. We are available to discuss as you prepare the draft environmental impact report and consider how to guide warehouse development in your jurisdiction. Please do not hesitate to contact the Environmental Justice Bureau at ej@doj.ca.gov if you have any questions.

Sincerely,

CHRISTIE VOSBURG
Supervising Deputy Attorney General

For ROB BONTA
Attorney General

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Subject: Comments on the Draft Environmental Impact Report (DEIR) for the Lake Forest IPT Project

Dear Lake Forest city officials and reviewing team:

I am writing to provide comments on the Draft Environmental Impact Report (DEIR) for the Lake Forest IPT Project. We appreciate the effort to evaluate potential impacts. However, the DEIR contains deficiencies that must be addressed to meet CEQA's informational requirements, ensure adequate mitigation, and protect nearby residents and sensitive receptors.

Environmental Justice and Attorney General's Concerns

1.1 The California Attorney General's Office raised similar concerns in its April 2024 comment letter on the IPT Notice of Preparation (NOP), emphasizing public health and environmental justice risks of siting warehouse/logistics operations near sensitive receptors.

1.2 Please include the AG's April 2024 letter in the administrative record, provide a written response to each issue raised, and show how the DEIR has been revised accordingly.

1.3 Prepare an environmental justice analysis that:

a) Identifies sensitive receptors and potentially overburdened populations (e.g., Meadows residences and senior apartments, nearby childcare facilities, schools, parks, and trails) using CalEnviroScreen or similar tools.

b) Evaluates whether impacts would be disproportionately borne by these populations.

c) Commits to design and operational changes that reduce exposures and inequities.

Combined/Programmatic Cumulative Review of Related LAS Projects

2.1 Two additional, similar warehouse projects by the same proponent (LAS) are reportedly under DEIR review. Across the three projects, there are over 48 truck dock stations and proposals for 24/7 operations.

2.2 Because these projects are proximate, similar in scope, and share truck networks and airsheds, they must be analyzed together for cumulative impacts (Guidelines §15130). Consider a coordinated cumulative analysis or a programmatic/tiered EIR approach (Guidelines §§15168, 15152) covering:

a) Combined truck trips, roadway operations, safety, and VMT.

b) Combined criteria pollutant and DPM health risks with near-field dispersion to homes, senior housing, schools, childcare, parks, and trails.

c) Combined noise, stormwater pollutant loading, hydromodification, and biological/habitat effects.

2.3 Update the cumulative projects list to include the two LAS DEIR projects, analyze all three on a consistent horizon year/network, and recirculate if impacts are new or more severe (Guidelines §15088.5). Extend the public comment period following recirculation.

Fundamental Land-Use Conflict and Compatibility/Rezoning

3.1 The Meadows area was recently rezoned from agriculture to residential, establishing a clear policy direction for neighborhood livability.

3.2 High-intensity warehouse/truck operations within roughly 100 feet of homes present a direct land-use incompatibility that cannot be fully mitigated.

3.3 In line with the AG's guidance and CARB's Land Use Handbook recommendations (targeting 500+ feet separation where feasible), the City and project proponents should:

a) Pursue alternatives, site redesigns, or rezoning to ensure compatibility with adjacent residential uses.

b) Increase buffers/setbacks; relocate truck drive aisles, docks, and access driveways away from homes; reduce operational intensity and hours.

c) Consider reduced-intensity or alternative land uses compatible with the residential context to protect sensitive receptors (including Meadows senior apartments, childcare, schools, parks, and trails).

3.4 Given the fundamental incompatibility, the City should select a No Project or compatibility-focused alternative rather than rely on a Statement of Overriding Considerations.

Project Description, Operations Envelope, and Mapping Accuracy

4.1 Mapping accuracy: The DEIR's map/narrative mischaracterize the Meadows development location. Meadows is about 100 feet from the IPT truck route; focusing only on the final Meadows phase understates exposure. Correct figures/text to show the full Meadows community and nearest receptors; provide precise separation distances to truck aisles, loading docks, and driveways; and update air quality/health risk, noise, traffic, and safety analyses accordingly (Guidelines §§15124, 15125).

4.2 Unknown tenants and uses: The DEIR identifies unknown future tenants and indicates potential manufacturing but does not define the full operational envelope. CEQA requires an accurate, stable, and finite project description. If specific tenants are unknown, analyze a conservative worst-case for allowable uses under the entitlement, including manufacturing with associated emissions, process equipment, solvents, and hazardous materials handling.

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public health, neighborhood livability, and Lake Forest's long-term future. Please add me to the notification list for all future hearings and documents related to this project. I am available to discuss these comments and provide any needed clarifications.

Thank you for your consideration.

Sincerely,

Stephen Bian

Resident of Lake Forest

[redacted]

Lake Forest. CA 92630

Attach file



Attorney General
- Rob Bonta Com

ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE

1300 I STREET, SUITE 125
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SACRAMENTO, CA 94244-2550

E-Mail: EJ@doj.ca.gov

April 5, 2024

Amy Stonich, Assistant Director of Community Development
City of Lake Forest
100 Civic Center Drive
Lake Forest, CA 92630

RE: IPT Enterprise Business Center LLC, SCH #2024030755

Dear Ms. Stonich:

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Priority should be placed on avoiding land use conflicts between warehouses and sensitive receptors and on mitigating the impacts of any unavoidable land use conflicts. However, even projects located far from sensitive receptors may contribute to harmful regional air pollution, so you should consider measures to reduce emissions associated with the project to help the State meet its air quality goals. A distant warehouse may also impact sensitive receptors if trucks must pass near sensitive receptors to visit the warehouse.

The Bureau will continue to monitor proposed warehouse projects for compliance with the California Environmental Quality Act and other laws. We are available to discuss as you prepare the draft environmental impact report and consider how to guide warehouse development in your jurisdiction. Please do not hesitate to contact the Environmental Justice Bureau at ej@doj.ca.gov if you have any questions.

Sincerely,

CHRISTIE VOSBURG
Supervising Deputy Attorney General

For ROB BONTA
Attorney General

STEPHEN BIAN

Letter Code: I-91
Date: September 14, 2025

Response to Comment I-91-1

This introductory comment states the opinion that the Draft EIR contains deficiencies that should be addressed for compliance with CEQA and to protect nearby residents and sensitive receptors.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-91-2

This comment states the opinion that the Draft EIR provides an inadequate analysis related to environmental justice, citing the California Attorney General's NOP comment letter (*IPT Enterprise Business Center LLC, SCH #2024030755*, April 5, 2024; located in Appendix A of the Draft EIR) and the risk of locating warehouse operations near sensitive receptors. The comment requests their comments be addressed by preparation of an environmental justice analysis.

Refer to Master Response 14 regarding disproportionate environmental burdens and the requirements for an analysis of environmental justice impacts. This response thoroughly addresses the topics raised in this comment.

The City acknowledges the California Attorney General's NOP comment letter and takes into consideration the issues presented in the letter during preparation of the Draft EIR.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-91-3

This comment states the opinion that the Draft EIR provides an inadequate analysis related to cumulative impacts and that the proposed Project must be analyzed in coordination with the Western Realco Enterprise Way Industrial Project (Projects 1 and 2). The comment requests their comments be address by the provision of an organized or tiered environmental analysis, including combined transportation, air quality, noise, hydrology and water quality, and biological resource analyses.

Refer to Master Response 6 regarding the adequacy of the proposed Project's cumulative impacts analysis. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-91-4

This comment states the opinion that the Draft EIR provides an inadequate analysis related to land use compatibility and that the introduction of warehouse operations would result in a land use incompatibility. The comment requests that the City and the Applicant address their comments by pursuing alternatives or redesigning the Project site to increase buffers and relocate truck drive aisles.

Refer to Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses and Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-91-5

This comment states the opinion that the Draft EIR contains inadequacies related to mapping accuracy, tenant identification, hours of operation, and dock quantification. The comment requests that the City address their comments by adopting conditions of approval to prohibit manufacturing/light industrial processes involving toxic air contaminants or requiring separate CEQA review, limiting hours of operation, capping total dock counts, requiring Hazardous Materials Business Plan compliance, and recirculating the Draft EIR based on the revisions requested in this comment letter.

It is unclear which maps this comment is referencing when claiming that the location of the Meadows community is mischaracterized. Figure 3.2, Project Location, page 3-5 of the Draft EIR shows the Project site in relation to the Meadows community using the most recent aerial imagery available at the time the Draft EIR was published.

Refer to Response to Comment O-1-10 regarding tenant uncertainty associated with the proposed Project and Master Response 7 regarding the allowable uses of the Project site. In addition, although the tenant is unknown and therefore, hours of operation and/or loading dock hours are unknown, the Draft EIR assumed 24/7 operations which is reflected in the noise analysis. Refer to Master Response 11 regarding the potential noise impacts resulting from the proposed Project and Response to Comment O-6-4 regarding 24/7 operations associated with the proposed Project. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

The Draft EIR already appropriately analyzes the proposed Project's operations under both daytime and nighttime scenarios with the correct distance of the Project site to the Meadows community.

The Draft EIR discloses the number of docks proposed under the Project but is not required to disclose the number of docks proposed under the related industrial warehouse projects. The Draft EIR provides the appropriate level of detail for each related project in order to inform a complete and accurate analysis of cumulative impacts. Refer to Master Response 6 regarding the adequacy of the proposed Project's cumulative impacts analysis.

A discussion of potential impacts and compliance with federal, State, and local regulatory programs related to hazardous materials is included in Master Response 13.

Refer to Master Response 2 regarding the need to recirculate the Draft EIR.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. Therefore, there is no nexus to require additional mitigation; refer to Master Response 4, regarding the adequacy of the proposed mitigation for the Project under CEQA. No revisions are necessary, and no further response is required.

Response to Comment I-91-6

This comment states the opinion that the Draft EIR provides an inadequate analysis related to traffic and transportation, requesting that the document be revised to address their comments regarding the inclusion of hourly truck trip generation and arrival/departure profiles, driveway queuing and spillback, safety analysis, VMT analysis consistent with *State CEQA guidelines*, a Truck Circulation and Management Plan, and a cumulative traffic analysis with the other cumulative industrial warehouse projects. The comment also requests their comments be addressed regarding additional mitigation, including truck route restrictions, delivery window limits, on-site staging, and fair-share funding of signal timing and ITS improvements.

Refer to Master Response 6 regarding the adequacy of the proposed Project's cumulative impacts analysis and Master Response 4 regarding the adequacy of the proposed mitigation for the Project under CEQA. In addition, refer to Master Response 8 regarding the traffic and VMT analysis conducted for the proposed Project. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

Table C of the Project TIA (Appendix J of the Draft EIR) provides the peak-hour truck estimation. As shown in Table C, the proposed Project is estimated to generate 35 a.m. peak-hour and 36 p.m. peak-hour truck trips in PCEs. Given the fact that the future tenants are unknown, the specific arrival/departure truck profiles cannot be determined.

The Project TIA demonstrates that the proposed Project (including proposed off-site improvements at five study area intersections) is not expected to significantly affect the intersection operation (LOS and queuing) within the study area in either the Existing or Opening Year (cumulative) horizon. The Project TIA does not identify any LOS deficiencies at the Project driveways. In addition, there is no stop control for trucks turning into the Project driveways along Enterprise Way; therefore, no

queuing issue is expected at the Project driveways. It should be noted that the Project truck trips would travel to/from the Project site over the course of the day or peak hours, rather than occurring simultaneously.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-91-7

This comment requests their comments be addressed by preparation of an HRA (using SCAQMD and OEHHA 2015 Guidance) that analyzes construction and operation DPM, near-field dispersion modeling, cumulative sources including the other cumulative warehouse projects, SCAQMD Rule 2035 (WAIRE) compliance, and CARB anti-idling requirement compliance. The comment also requests their comments be addressed by the provision of additional mitigation, including zero emission/near zero emission (ZE/NZE) trucks, onsite electrical truck chargers, electric or Tier 4 construction equipment, high efficiency MERV 16 interior air filters for closest homes, dispersion walls, vegetative barriers, and an idling elimination plan.

Consistent with the comment, the Draft EIR included construction and operational health risks assessments, prepared using AERMOD in accordance with SCAQMD and OEHHA guidance, to evaluate potential impacts associated with DPM emissions (refer to Appendix C of the Draft EIR for details regarding HRA methodology).

The commenter's request for the inclusion of additional mitigation measures, such as MERV 16 filters and vegetative barriers, is not warranted because, as discussed under Threshold 4.3.3, impacts were determined to be reduced to a less than significant level with incorporation of Mitigation Measure (MM) AQ-1. Additional mitigation is not required.

Refer to Master Response 9 regarding the potential health risks related to the proposed Project, and Master Response 4 regarding the adequacy of the proposed mitigation for the Project under CEQA. In addition, refer to Response to Comment S-2-7 for a discussion of the proposed Project's compliance with SCAQMD Rule 2305 (WAIRE) and Response to Comment I-21-15 regarding the use of near-zero-emission (NZE) and zero-emission (ZE) trucks during construction. Refer to Response to Comment I-21-53 regarding the inclusion of electric truck charging stations at the Project site. As stated on page 4.3-38 of the Draft EIR, idling of trucks under the proposed Project would be limited by the CARB's In-Use Off-Road Diesel Vehicles regulation, which limits idling to 5 minutes or less. Therefore, the proposed Project would not violate any applicable anti-idling regulations. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-91-8

This comment states the opinion that the Draft EIR provides an inadequate analysis related to noise and vibration, requesting their comments be addressed by provision of refined modeling using corrected receptor distances as well as a refined vibration analysis. The comment also requests their comments be addressed by the provision of additional mitigation, including nighttime restrictions on dock operations, acoustically rated dock enclosures, and vibration controls and monitoring.

Refer to Master Response 4 regarding the adequacy of the proposed mitigation for the Project under CEQA and Response to Comment I-91-5 regarding mapping accuracy and receptor distances. In addition, refer to Master Response 11 regarding the proposed Project's impacts related to noise and vibration, including construction and operational vibration. Additional responses regarding the points raised in this comment are provided in the remainder of this response, as warranted.

The potential noise impacts presented in Table P of the Noise and Vibration Technical Report (Appendix H of the Draft EIR) during nighttime operations assess the expected noise level at the property line, consistent with the City's noise levels standards. A noise level contribution of 50 dBA Leq is expected during nighttime hours at the Project property line. Given the additional distance attenuation, noise levels at the nearest building façade would be lower. Furthermore, the SoundPLAN noise model does appropriately account for potential building reflections.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-91-9

This comment states the opinion that the Draft EIR provides an inadequate analysis related to biological resources, requesting their comments be addressed by conducting protocol-level surveys for special-status species and nesting birds, jurisdictional delineation, and permitting compliance. The comment also requests their comment be addressed by the provision of additional mitigation, including buffers for identified resources and pre-construction nesting bird surveys/monitoring.

As described in Response to Comment O-1-5, the proposed Project would have no impact on sensitive species, plant communities, habitat fragmentation, jurisdictional waters, wildlife movement, migratory corridors, nursery sites, habitat conservation plans, or local regulations protecting biological resources. As described under Threshold 4.4.1, starting on page 4.4-10 of Section 4.4, Biological Resources, of the Draft EIR, the Project could affect nesting birds if construction occurs during the nesting season and nests are present in existing vegetation. However, the proposed Project would be required to comply with the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code. Implementation of RCM BIO-1 ensures potential impacts to nesting birds are reduced to less-than-significant levels.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more

severe than those identified in the Draft EIR. No revisions to the Draft EIR are necessary, and no further response is required.

Response to Comment I-91-10

This comment states the opinion that the Draft EIR provides an inadequate analysis related to hydrology and water quality, requesting their comments be addressed by preparation of a Project-specific LID plan and SWPPP with hydromodification control sizing, oil/grit separators, spill prevention/response procedures and staff training, analysis of runoff increase, pollutant loading, cumulative watershed effects, and inclusion of long-term BMP inspection/maintenance plans.

As required by Regulatory Compliance Measure WQ-1 (page 4.10-39 of the Draft EIR), the General Construction Permit requires the preparation of a Storm Water Pollution Prevention Plan (SWPPP) to identify construction BMPs to be implemented as part of the proposed Project to reduce impacts on water quality during construction, including those impacts associated with soil erosion and siltation. Construction BMPs would include, but are not limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site as well as Good Housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters.

As discussed on page 4.10-26 of the Draft EIR, the North Orange County MS4 Permit requires preparation of a Water Quality Management Plan (WQMP) and implementation of post-construction BMPs for new development and significant redevelopment projects that qualify as Priority Projects. As stated in Regulatory Compliance Measure WQ-3, a Final WQMP would be prepared prior to the issuance of a grading permit. This Final WQMP would include proposed LID BMPs to be incorporated into the grading and development plans submitted to the City of Lake Forest for review and approval.

Therefore, specific practices and measures will be identified during preparation of the SWPPP and Final WQMP, and are not required for inclusion in the Draft EIR. The analysis and conclusions of the Draft EIR regarding evaluation of hydrology and water quality remain valid. No revisions are necessary, and no further response is required.

Response to Comment I-91-11

This comment requests their comments be addressed by the provision of an analysis of consistency with SB 32 targets, State carbon neutrality goals, SCAQMD guidance, and any applicable local Climate Action Plan. The comment also requests their comments be addressed by the provision of additional mitigation, including ZE/NZE truck commitments, building electrification readiness, rooftop solar, cool roofs, EV charging, embodied-carbon measures, and robust construction waste diversion.

Threshold 4.8.2 evaluated the Projects consistency with SB 32 targets and State carbon neutrality goals by considering Project consistency with the 2022 Scoping Plan, which is the State plan for achieving those goals.

The air quality and GHG analysis presented in the Draft EIR was conducted in accordance with applicable SCAQMD guidance.

Refer to Response to Comment O-1-4 regarding the air quality analysis conducted for the proposed Project, Master Response 10 regarding the GHG analysis conducted for the proposed Project, and Master Response 4 regarding the adequacy of the proposed mitigation for the Project under CEQA. Refer to Response to Comment S-2-7 regarding compliance with WAIRE and the potential acquisition and use of NZE or ZE trucks. It should be noted that the City of Lake Forest has not adopted a Climate Action Plan. However, the Public Safety Element of the City's General Plan outlines the City's climate change and resiliency planning strategies and the analysis in Section 4.11.6, Project Impacts, starting on page 4.11-8 of Section 4.11, Land Use and Planning, of the Draft EIR determined that the proposed Project would not conflict with these planning strategies.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-91-12

This comment states the opinion that the Draft EIR provides an inadequate analysis related to alternatives, requesting their comments be addressed by the provision of a reasonable range of alternatives, including a reduced truck trip and dock count alternative, a re-routed access or revised layout alternative, an enhanced mitigation alternative with ZE/NZE fleets, and a mixed-use alternative.

Refer to Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-91-13

This comment states the opinion that the Draft EIR provides inadequate mitigation, requesting that their comments be addressed by revising existing mitigation measures to be consistent with *State CEQA Guidelines* Section 15097 and revising the Draft EIR to acknowledge quality of life and property value impacts.

Refer to Master Response 4 regarding the adequacy of the proposed mitigation for the Project under CEQA, Master Response 7 regarding the compatibility of the proposed Project with the surrounding land uses and the Project's effect on quality of life, and Response to Comment O-1-12 regarding impacts to property values associated with the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-91-14

This comment states the opinion that the Draft EIR provides an inadequate analysis related to land use and zoning consistency and that the introduction of warehouse operations would result in a land use incompatibility. The comment requests their comments be addressed by preparation of a detailed land-use consistency analysis, including General Plan, Zoning Code, specific plan, performance standards, and CEQA consistency.

Refer to Master Response 7 regarding the proposed Project's impacts related to land use and zoning consistency. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-91-15

This comment restates requested actions from the preceding comments, including correct mapping data, Draft EIR revisions, an extended comment period, incorporation of the California Attorney General's NOP comment letter (*IPT Enterprise Business Center LLC, SCH #2024030755*, April 5, 2024; located in Appendix A of the Draft EIR), cumulative analysis of the other cumulative industrial warehouse projects, selection of a No Project or compatibility-focused alternative to the proposed Project, updated technical studies, and commitment to specific, enforceable mitigation. The comment also urges the City to ensure the proposed Project protects the health, livability, and future of the community, and requests to be added to the notification list for the proposed Project.

Residents who have requested to be added to the Project notification list will be notified of future public hearing(s) for the proposed Project, at which time verbal comments can be made by members of the public.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses above. No further response is required.

From: June Sun
To: Stonich, Amy; EnterpriseProjects
Cc: Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy; Rose, Debra
Subject: Public Comment on Draft Environmental Impact Report (DEIR) for the IPT Enterprise Business Center LLC Project (SCH#2024030755)
Date: Sunday, September 14, 2025 2:53:11 PM

Dear Review Team,

I am writing as the adult daughter of residents who recently purchased a home in The Meadows community in Lake Forest. This is a personal and serious matter for my family. My parents invested their retirement savings and so much hope into this home after careful research and due diligence. We were excited for a peaceful, healthy place for them to age in place. The possibility of approving a massive warehouse/manufacturing project with 24/7 operations, dozens of truck docks, and unknown future tenants so close to their home has caused my family significant worry.

1. Why this matters to my family 1.1 My parents are seniors, and their health and safety are my highest concern. Diesel truck emissions, constant noise, nighttime lights, and truck traffic near homes pose real risks to seniors and children. 1.2 We did our homework before purchase, but we did not expect around-the-clock logistics and possible manufacturing next to a newly built residential community—especially within roughly 100 feet of the truck route. 1.3 The stress and uncertainty have already affected my parents' quality of life. Please protect the neighborhood they chose for a safe retirement.
2. Sensitive receptors and Attorney General's concerns 2.1 The Meadows includes senior residents and is near childcare, schools, parks, and trails—sensitive receptors that need extra protection. 2.2 The California Attorney General's Office (April 2024 letter on the IPT NOP) expressed serious concerns about siting warehouse/logistics projects near homes and other sensitive receptors. Please include that letter in the record and address those issues directly.
3. Multiple related projects and cumulative effects 3.1 My understanding is that there are three related projects by the same proponent in DEIR review, with over 48 total truck dock stations and proposed 24/7 operations. 3.2 Please analyze all three projects together for cumulative impacts on truck traffic, air pollution and health risk, noise, safety, water quality, and neighborhood livability. If the combined analysis shows new or more severe impacts, please recirculate the DEIR and extend the comment period.
4. Mapping accuracy and proximity 4.1 The DEIR figures appear to understate how close The Meadows homes are to the truck route. Please correct the maps to reflect the nearest homes (about 100 feet) and update the air quality/health risk, noise, traffic, and safety analyses accordingly.
5. Health, noise, and nighttime operations 5.1 Please evaluate a realistic worst-case scenario: unknown tenants, potential manufacturing, 24/7 operations, and high truck activity across 48+ docks. Seniors and children are more vulnerable to diesel particulate matter and nighttime noise and sleep disruption. 5.2 If health risk, noise, or light/glare exceed safe levels, please adopt enforceable protections: increased buffers, moving docks/drive aisles away from homes, restricted nighttime operations, clean truck requirements, and strong anti-idling enforcement.
6. Land-use compatibility 6.1 The Meadows was rezoned from agriculture to residential to support neighborhood livability. In contrast, these projects would function like high-intensity logistics/industrial operations next to homes. 6.2 No matter how much mitigation is added, this location feels fundamentally incompatible with 24/7 truck-based operations. Please choose a No Project or a compatibility-focused alternative, or work toward rezoning/design changes that truly fit the residential surroundings.
7. Specific requests 7.1 Include and respond to the Attorney General's April 2024 letter in the record. 7.2 Correct the maps and receptor distances; revise the analyses and recirculate if impacts worsen. 7.3 Analyze the three related projects together for cumulative effects; extend the public comment period after any recirculation. 7.4 Commit to enforceable protections:

I-92-1

I-92-1 cont.

designated truck routes away from homes, no residential cut-through, on-site queuing to prevent street idling, limits on nighttime dock operations, and clean truck/zero-emission timelines with onsite charging. 7.5 If compatibility cannot be ensured, select the No Project or a redesigned, lower-intensity alternative that increases buffers (e.g., 500 feet or more where feasible) and relocates truck activity away from The Meadows.

I respect the Lake Forest City's role and the developer's interest, but for my parents and their neighbors, this is not just a project—it's their health, peace, and retirement. Please safeguard the community they call home.

Thank you for your consideration of my family's perspective. Please add me to the notification list for future hearings and documents on this project.

Sincerely,

Serena Bian

[redacted]

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SERENA BIAN

Letter Code: I-92
Date: September 14, 2025

Response to Comment I-92-1

This introductory comment expressing general concerns regarding health risks, sensitive receptors, cumulative impacts, mapping accuracy, sleep disruption, noise, light and glare, air quality, and land use compatibility. This comment requests their comments be addressed by including the California Attorney General's NOP comment letter (*IPT Enterprise Business Center LLC, SCH #2024030755*, April 5, 2024; located in Appendix A of the Draft EIR) in the official Project record, corrections to maps and receptor distances, additional cumulative analysis related to the Western Realco Enterprise Way Industrial Project (Projects 1 and 2), extension of the public comment period, commitment to additional mitigation, selection of the No Project Alternative or another more compatible alternative, and addition to the notification list for the proposed Project.

Refer to Response to Comment O-1-4 and Master Response 9 regarding the air quality and health risks impacts to sensitive receptors associated with the proposed Project, Master Response 6 regarding the adequacy of the cumulative impacts analysis presented in the Draft EIR, Master Response 11 regarding noise impacts associated with the proposed Project, Master Response 12 regarding light and glare impacts associated with the proposed Project, and Master Response 7 regarding compatibility of the proposed Project with surrounding land uses. The mapping included in the Draft EIR (and associated technical studies) used the most recent aerial imagery/data available at the time the Draft EIR was published and is therefore accurate.

Residential sleep patterns are not required to be analyzed under CEQA, as *State CEQA Guidelines* Section 21082.2(c) limits evaluation of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment. Refer to Master Response 1 regarding the adequacy of the public circulation period under CEQA, Master Response 4 regarding the adequacy of the proposed mitigation for the Project under CEQA, and Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project. The City acknowledges the California Attorney General's NOP comment letter and considered the issues presented in the letter during preparation of the Draft EIR.

Residents who have requested to be added to the Project notification list will be notified of future public hearing(s) for the proposed Project, at which time verbal comments can be made by members of the public.

These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: Connie Ding
To: Stonich, Amy; EnterpriseProjects
Cc: Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Comments and Questions on the Draft Environmental Impact Report (DEIR) for the IPT Enterprise Business Center Project (SCH No. 2024030755)
Date: Sunday, September 14, 2025 3:44:46 PM

Comments and Questions on the Draft Environmental Impact Report (DEIR) for the IPT Enterprise Business Center Project (SCH No. 2024030755)

Dear Members of the Planning Commission and City Staff,

I-93-1

As residents of Lake Forest, we are deeply concerned that many community members remain unaware of the proposed large-scale warehouse project. Even residents along Bake Parkway and Lake Forest Drive—roads that will be directly impacted by heavy truck traffic—have not been adequately informed. The DEIR process has failed to ensure that the public is fully aware of the potential long-term traffic, safety, and environmental impacts of this project.

The proposed project would route 24/7 freight truck traffic along Bake Parkway, Lake Forest Drive, Dimension Drive, and Commercentre Drive. Dimension Drive is of particular concern, as it passes directly by Serrano Creek Trail, Nature Park, Bella Montessori School, Fulbright Montessori Academy, and New Thought Montessori. Many families in the community use bicycles to escort their children to and from school, creating significant safety and health risks, which the DEIR does not adequately assess.

I-93-2

According to the draft EIR, the IPT project alone is expected to generate 269 truck trips per day. If the two Western Realco warehouse projects are included, the total daily truck volume will increase substantially, potentially overwhelming already narrow and congested roads.

Emergency Response Concerns

Emergency response is also a pressing issue. The DEIR claims that fire

I-93-2 cont.

trucks can reach the project site in under seven minutes. However, public 911 data shows that the average response time in 90% of cases is 8 minutes and 44 seconds. This discrepancy calls into question the accuracy and reliability of the DEIR's conclusions. Heavy truck congestion will only further delay fire, ambulance, and police response times, increasing risks to both the project site and surrounding community.

I-93-3

Environmental Impacts and Water Agency Involvement

Truck emissions may pollute Serrano Creek along Dimension Drive. Serrano Creek flows through Lake Forest and is managed by the Irvine Ranch Water District (IRWD) for water quality and runoff. If the proposed project could lead to Serrano Creek contamination, it is essential that IRWD and all affected water agencies along the creek participate in an independent evaluation and provide written technical comments to ensure water quality and public safety are not compromised. This action aligns with the California Environmental Quality Act (CEQA) requirements for a thorough, independent assessment of environmental impacts with input from affected public agencies.

I-93-4

Public Notification Requirements

Given the potentially significant impacts of the project on the entire community, we strongly request that the City of Lake Forest require IPT to distribute printed flyers to all residents, ensuring that every household is fully informed about the warehouse project, including expected truck volumes, potential environmental impacts, and ways to participate in the public review process. Every resident has the right to be fully aware of this development and its potential effects on daily life.

I-93-5

Insurance Concerns

In light of California's recent frequent wildfires, some areas have experienced significant increases in homeowner insurance premiums or even policy refusals. Constructing a large warehouse near the Meadows community will increase traffic and fire risk, further affecting residents' insurance coverage. We strongly urge the city to consult with major

I-93-5 cont.

insurance providers to assess potential risks and premium changes associated with the warehouse project, and to include the analysis in the DEIR revisions and public information.

Specific Questions and Requests for Clarification:

1. Truck Volumes: The DEIR states that the IPT project will generate 269 truck trips per day. What is the total daily truck volume if the Western Realco projects are included?
2. Emergency Response: Actual 911 reports show an average response time of 8 minutes and 44 seconds, not under seven minutes as the DEIR claims. How will emergency services realistically reach the project site and surrounding community under increased traffic congestion? Will the fire department provide an independent analysis?

I-93-6

3. Insurance Impacts: Has the city consulted with insurance companies to evaluate how the warehouse development and truck routes may affect accident and fire risks, insurance premiums, and coverage for residents?
4. Serrano Creek Pollution and Water Agency Involvement: Could truck-related pollution (e.g., oil, particulate matter, runoff) enter Serrano Creek? If so, we request that IRWD and all affected water agencies participate in an independent evaluation and provide written technical comments to ensure water quality and public safety. This action is consistent with CEQA requirements.
5. Public Notification: In addition to distributing printed flyers, why have residents along Bake Parkway, Lake Forest Drive, Dimension Drive, and Commercentre Drive not been adequately informed? Will the city require IPT to send comprehensive project information via email to all Lake Forest residents?

Conclusion and Position

The current DEIR underestimates the real impacts on traffic, public safety,

I-93-6 cont.

emergency response delays, insurance risks, and environmental hazards. Based on these serious deficiencies, we strongly urge the Planning Commission and City of Lake Forest not to approve the IPT warehouse project. A comprehensive analysis must be conducted with full consultation from fire department experts, insurance providers, and water agencies before any project approval.

Please confirm receipt of this email.

Sincerely,

Yu Ting Ding

Lake Forest, CA

9/14/2025

CAUTION: Think Security! This email is not from someone at the City of Lake Forest. **Do not click any links or open any attachments you are not expecting.**

YU TING DING

Letter Code: I-93
Date: September 14, 2025

Response to Comment I-93-1

This introductory comment expresses concerns regarding the proposed Project and states the opinion that affected residents have not been adequately informed.

The City has provided adequate opportunities for public participation in the environmental process in compliance with *State CEQA Guidelines* Section 15201, as discussed in Section 1.0, Introduction of this Final EIR. Additionally, please refer to Master Response 1 for a discussion of the Draft EIR public review period. This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. No further response is required.

Response to Comment I-93-2

This comment states the opinion that the Draft EIR provides an inadequate analysis related to transportation, including bicyclist impacts, cumulative traffic congestion, and emergency response timing.

Refer to Master Response 8 regarding the proposed Project's impacts related to transportation and safety and Master Response 13 regarding emergency response timing. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-93-3

This comment expresses concerns related to water quality and runoff, stating the opinion that truck emissions from the proposed Project may result in water pollution and requests their comments be addressed by the provision of an independent review of the Draft EIR by Irvine Ranch Water District (IRWD) and other relevant agencies if the proposed Project has the potential to contaminate Serrano Creek.

Refer to Response to Comment O-1-11 regarding the proposed Project's impacts related to water quality. As described on page 4.9-13 of the Draft EIR, the proposed Project would comply with IRWD's standard requirements for facility planning. Further, IRWD has had the opportunity to review and provide comments on the Draft EIR (Refer to Comment Letter O-4). These responses thoroughly address the topics raised in this comment

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more

severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-93-4

This comment expresses concerns related to public noticing, requesting the distribution of printed flyers to all City residents to increase awareness.

Refer to Response to Comment I-93-1 regarding public noticing for the proposed Project. This response thoroughly addresses the topic raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-93-5

This comment expresses concerns related to homeowner insurance, stating the opinion that the proposed Project would increase traffic and fire risk, therefore affecting residents' insurance coverage. The comment requests that the City address their comments by consulting with major insurance providers to assess potential premium changes and including this information in a revised Draft EIR.

This comment, which does not raise concerns regarding the adequacy of the information or analysis provided in the Draft EIR, is noted. California Public Resource Code Section 21082.2(c) limits evaluation of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment. No further response is required.

Response to Comment I-93-6

This comment provides specific questions regarding the proposed Project and the Draft EIR, including cumulative daily truck volumes, emergency response times, impacts to homeowner insurance, impacts to Serrano Creek, and public notification. The comment states the opinion that the Draft EIR underestimates potential impacts and urges the City and the Planning Commission to deny the proposed Project.

Refer to Appendix E, Cumulative Projects, to the Traffic Impact Analysis prepared for the proposed Project (Appendix J to the Draft EIR) for trip generation tables for each cumulative project. Western Realco Project 1 (Number 4 in the Cumulative Projects Trip Generation Table) is anticipated to generate 113 total daily tuck trips, while Western Realco Project 2 (Number 5 in the Cumulative Projects Trip Generation Table) is anticipated to generate 36 total daily tuck trips. As stated on page 25 of the Traffic Impact Analysis, the study area intersections are forecast to operate at an acceptable LOS (D or better) during the a.m. and p.m. peak hours under the Opening Year (2027) with Cumulative Projects scenario. Therefore, the analysis and conclusions of the Draft EIR regarding evaluation of cumulative truck volumes remain valid, and no further response is required.

This comment does not provide a source for the assertion that actual 911 reports show an average response time of 8 minutes and 44 seconds. The Draft EIR's reference to a 7-minute response time is derived directly from OCFA data. Refer to Master Response 13, regarding emergency response timing. This response thoroughly addresses the topic raised in this comment.

Regarding impacts to homeowner insurance, California Public Resource Code Section 21082.2(c) limits evaluation of social or economic impacts, such as insurance rates, that do not contribute to, or are not caused by, physical impacts on the environment. No further response is required.

As discussed on page 4.10-2 of the Draft EIR, receiving waters for stormwater runoff generated on the Project site include Serrano Creek. As summarized on page 4.10-35 of the Draft EIR, the proposed Project would comply with existing NPDES permit requirements, including the CGP and North Orange County MS4 Permit, and would implement construction and operational BMPs to reduce pollutants of concern in stormwater runoff as detailed in RCM WQ-1, RCM WQ-2, RCM WQ-3, and RCM WQ-4. Compliance with these regulatory requirements would ensure that the proposed Project would not degrade or alter water quality, cause the receiving waters to exceed the water quality objectives, or impair the beneficial use of receiving waters. As discussed in Response to Comment I-93-3, IRWD reviewed and commented on the proposed Project in Comment Letter O-4. As a Responsible Agency for the proposed Project, the State Water Resources Control Board (SWRCB) will also have an opportunity to review the proposed Project when reviewing Permit Registration Documents, including a Notice of Intent to comply with the NPDES North Orange County Permit, to be submitted by the Project Applicant. Therefore, the analysis and conclusions of the Draft EIR regarding water quality impacts remain valid, and no further response is required.

Refer to Response to Comment I-93-1 regarding public noticing for the proposed Project. Residents who have requested to be added to the Project notification list will be notified of future public hearing(s) for the proposed Project, at which time verbal comments can be made by members of the public.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: Kai Chung [redacted]
Sent: Sunday, September 14, 2025 4:15 PM
To: Stonich, Amy; EnterpriseProjects
Cc: Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy; Kai Chung
Subject: Re: Public Comments on DEIR and Strong Opposition to the IPT Enterprise Business Center Project

Hi All,

Please kindly confirm receipt of my comment.

Thanks,

On Thu, Sep 11, 2025 at 11:35 PM Kai Chung <[redacted] wrote:

Dear Amy, Planning Commission Members, and Honorable City Councilmembers,

I am a resident of the Meadows in Lake Forest. The proposed project is right outside of my backyard. I am writing to express my strong and unequivocal opposition to the proposed IPT Enterprise Business Center Project, as detailed in the Draft Environmental Impact Report (DEIR) currently under review. Below are my comments with requests for action.

1) Transportation – VMT is "Significant and Unavoidable"

Summary: The City's notice/DEIR indicates the project's Vehicle Miles Traveled (VMT) remains significant and unavoidable even after proposed mitigation.

I-94-1

CEQA Analysis: Under CEQA Guidelines §15064.3 (SB 743), VMT—not LOS—governs transportation significance. Exceeding the City's VMT threshold is a significant impact requiring feasible mitigation or, if none, a Statement of Overriding Considerations backed by substantial evidence.

Request to the City: Deny the project or require additional, enforceable VMT-reduction measures (e.g., binding commute programs, on-site services, parking unbundling/pricing, ZE fleet commitments). If still significant, explain infeasibility clearly; otherwise do not approve.

Community Impact: Higher VMT means more driving, more emissions, safety risks on local streets, and conflicts with adopted mobility/climate goals.

2) Greenhouse Gas Emissions – "Significant and Unavoidable (Cumulative)"

Summary: The DEIR identifies cumulative GHG impacts as significant and unavoidable.

CEQA Analysis: CEQA requires feasible mitigation for significant effects (PRC §21002.1; Guidelines §§15091–15093). If impacts remain significant, the agency must adopt a MMRP and a Statement of

Overriding Considerations, after demonstrating additional mitigation/alternatives are infeasible.

Request to the City: Add enforceable measures: all-electric building design, on-site solar + storage, ZE yard equipment, truck charging infrastructure, and binding TDM. If the City cannot reduce GHG below significant, deny the project.

Community Impact: Increased GHGs undermine regional/state climate targets and local air quality, burdening residents already exposed to basin-wide pollution.

3) Cumulative Impacts – Evaluate with Adjacent Enterprise Way Projects

Summary: Multiple adjacent industrial proposals (e.g., Western Realco at 26250 and 26110/26140/26160 Enterprise Way) create overlapping truck/air/noise/light impacts.

CEQA Analysis: Guidelines §15130 requires analysis of "past, present, and probable future projects" with related impacts. Omitting or under-scoping reasonably foreseeable adjacent projects can necessitate recirculation under §15088.5 if it constitutes significant new information.

Request to the City: Verify the cumulative list includes the adjacent projects with accurate sizes/operations; if not, revise and recirculate the DEIR to provide full cumulative air/noise/traffic/VMT analysis.

Community Impact: Corridor-wide approval would compound diesel emissions, truck traffic, nighttime noise/lighting, and neighborhood cut-through, far beyond any single project.

I-94-1 cont.

4) Air Toxics & Health Risk – Require a Mobile-Source HRA

Summary: Warehouses attract heavy-duty diesel trucks; diesel particulate matter (DPM) drives cancer risk.

CEQA Analysis: Agencies rely on SCAQMD/OEHHA risk procedures for project-level HRAs. When mobile diesel sources are central to operations, a project-specific HRA using current methodologies is required to disclose MEIR cancer risk, chronic/acute hazard indices, and to evaluate idling/queuing controls.

Request to the City: Require a full HRA (OEHHA/SCAQMD methods), disclose worst-case operations, and adopt enforceable conditions (idling limits, queue management, anti-idling signage, ZE yard equipment, post-occupancy air monitoring with corrective actions).

Community Impact: Without a robust HRA and hard controls, nearby residents—including seniors and children—face elevated cancer and respiratory risks.

5) Sensitive Receptors – Buffers and Siting

Summary: Homes and other sensitive receptors are near the site; best practices call for buffers and physical/operational protections.

CEQA Analysis: CEQA's significance determinations consider proximity/intensity of exposure. State AG/CARB guidance recommends separation from sensitive receptors or equivalent protections

(enclosures, barriers, filtration, ZE operations) to substantially lessen effects.

Request to the City: Require minimum buffers (or functional equivalents), enclosed/loading controls, nighttime dock limits, and designated/enforced truck routes. If protections aren't feasible, deny or relocate to a less-sensitive site.

Community Impact: Buffers and strong operating limits reduce diesel exhaust, noise, and light spill affecting nearby neighborhoods.

6) Alternatives – Range Too Narrow Without a True ZE/All-Electric Option

I-94-1 cont.

Summary: The alternatives omit a credible Zero-Emission Operations/all-electric design that could substantially lessen significant impacts.

CEQA Analysis: Guidelines §15126.6 requires a reasonable range that could feasibly attain most project objectives while avoiding or substantially lessening significant effects. A ZE alternative (all-electric building, ZE yard equipment, phased ZE truck strategy) is both reasonable and potentially effective.

Request to the City: Add and carry a Zero-Emission Operations alternative and a Reduced-Dock/No-Dock alternative; re-evaluate air/GHG/noise/VMT with enforceable commitments.

Community Impact: A genuine ZE alternative can materially reduce risk and nuisance; if infeasible, the record should say so with evidence rather than omitting the option.

7) Project Description Stability – Recirculate if Key Features Shift

Summary: If key operational features changed during review (e.g., dock counts, hours, routing, building area), public review may have been compromised.

I-94-2

CEQA Analysis: Guidelines §15124 requires a stable, accurate project description. Recirculation under §15088.5 is required when significant new information is added—such as material changes to the project or setting that deprive the public of a meaningful opportunity to comment.

Request to the City: Confirm the description is complete and stable; if not, revise and recirculate with corrected dock counts, truck routing, and operational details.

Community Impact: Residents deserve review of the project as it will actually operate, not a moving target.

8) Mitigation Monitoring & Enforcement – Make Measures Enforceable

Summary: Paper mitigations without clear performance standards, monitoring, and penalties won't protect neighborhoods.

I-94-3

CEQA Analysis: Guidelines §15097 requires agencies to adopt a Mitigation Monitoring or Reporting Program ensuring implementation/enforcement. Measures must be specific, measurable, and enforceable as conditions of approval.

I-94-3 cont.

Request to the City: Adopt hard conditions: anti-idling rules with penalties, truck-route enforcement and signage, nighttime dock restrictions, broadband backup alarms, full-cutoff lighting with compliance checks, and post-occupancy air/noise monitoring with corrective actions.

Community Impact: Real enforcement is the difference between ongoing nuisance/health burdens and a livable neighborhood.

In conclusion, given the significant impact and unavoidable VMT plus cumulative GHG impacts, I urge the planning commission to deny the project proposal.

Sincerely,

Kai Zhong

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KAI ZHONG

Letter Code: I-94
Date: September 14, 2025

Response to Comment I-94-1

This comment expresses opposition to the proposed Project and general concerns related to transportation/VMT, GHG emissions, air toxics and health risk, sensitive receptors, and alternatives. The comment requests the City address their comments by providing additional, enforceable VMT-reduction measures, enforceable clean energy mitigation measures, verifying or revising cumulative impacts, providing a full HRA, requiring minimum buffers, nighttime dock limits, and other protections, and including a zero-emissions operation alternative.

Refer to Master Response 8 regarding the proposed Project's impacts related to transportation and VMT, including feasible mitigation, Response to Comment O-1-4 and Master Response 10 regarding the GHG analysis conducted for the proposed Project including enforceable mitigation, Master Response 6 regarding the adequacy of the proposed Project's cumulative impacts analysis, Master Response 9 regarding the proposed Project's impacts related to health risks and sensitive receptors, Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project, and Master Response 4, regarding the adequacy of the proposed mitigation for the Project under CEQA. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-94-2

This comment expresses concern regarding the potential for changes to the project description, and requests the City confirm the project description is complete and address their comments by providing a stable or revised and recirculated Draft EIR with correct information.

At this time, no changes to the proposed Project's design are planned or proposed. In the event that design modifications arise at a later date (e.g., as a result of OCFA review of site plans), the need for recirculation under *State CEQA Guidelines* Section 15088.5 will be evaluated.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-94-3

This comment expresses concern regarding the enforceability of mitigation for the proposed Project and requests the City address their comments by adopting hard conditions, including anti-idling

rules with penalties, truck-route enforcement and signage, nighttime dock restrictions, broadband backup alarms, and full-cutoff lighting, and requests the Planning Commission address their comments by denying the proposed Project.

Refer to Master Response 4 regarding the adequacy of the proposed mitigation for the Project under CEQA. This Master Response thoroughly addresses the topics raised in this comment.

Weiss, Jennifer

From: Paul R [redacted]
Sent: Sunday, September 14, 2025 7:11 PM
To: EnterpriseProjects
Subject: Massive Warehouses Next to Homes in Lake Forest

Dear Planning Commission,

I want to add my voice to the others regarding the proposed project to add manufacturing/warehouse projects in Lake Forest.

I-95-1

1. Added traffic, especially at night and early morning when Bake Parkway becomes much quieter. This traffic includes big rigs, other trucks, auto traffic from the employees. I believe the warehouse are planned for 24 hour operation – there would be a shift change at night.
    a. A potential concern for added pollution from idling trucks.
    b. Added congestion on Bake, Lake Forest and El Toro from the added trucks and employees vehicles. Big rigs struggle coming up the hills. Added risk for accidents and collisions.
2. Added fire risk. Warehouses have cardboard boxes, other packing material and wooden pallets that could catch fire. This would be especially concerning during the Santa Ana wind conditions. If you recall the pallet fire under the 10 freeway in Los Angeles a couple of years ago that caused damage to the freeway. We also have the much more recent example of the devastating fires in Palisades and Eaton Canyon.
3. Potential for hazardous material spills for items stored on site, especially if the site is a manufacturing facility. The prevailing wind would carry a toxic cloud towards the Meadows community.

This you for your time and consideration. I hope you fully evaluate all the issues and reject the application.

Regards,
Paul Rataj

Resident of Meadows

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PAUL RATAJ

Letter Code: I-95
Date: September 14, 2025

Response to Comment I-95-1

This comment expresses general concerns regarding traffic congestion, pollution from idling trucks, accident risk, fire and wildfire risk, hazards, and hazardous materials, and requests the City address their comments by rejecting the proposed Project.

Refer to Master Response 8 regarding traffic congestion and accident risk associated with the proposed Project, Master Response 9 regarding potential health risk impacts from the proposed Project, Response to Comment O-1-4 and Master Response 9 regarding pollution and potential health risks associated with the proposed Project, Response to Comment O-1-10 regarding wildfire risk, and Master Response 13 regarding hazards and hazardous materials associated with the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

From: Tim L
To: Stonich, Amy; EnterpriseProjects
Cc: Ackerman, Gayle; Smith, Amy; Yu, Benjamin; Cirbo, Doug; Barajas, Francisco; Villwock, Jordan; Stannard, Michael; Tettemer, Mark; Pequeno, Robert; Voigts, Scott; Grable, Tom; Ludden, Thomas
Subject: Public Comment and Request for Acknowledgment of Receipt – Draft EIR (SCH No. 2024030755), IPT Enterprise Business Center LLC Project
Date: Sunday, September 14, 2025 10:27:32 PM

Dear City Council Members, Planning Division, and City Officials,

I received the Draft Environmental Impact Report (DEIR) for the IPT Enterprise Business Center, and I'm writing as a resident of Lake Forest who truly cares about the future of this city. I strongly oppose the proposal to turn the Panasonic office buildings on Enterprise Way into massive warehouses. This project doesn't belong in the middle of our neighborhoods, and I believe it would harm—not help—our community.

Traffic is already bad enough on Bake Parkway. I drive it every day coming back from the I-5/I-405 around rush hour, and it's a mess. Sometimes it takes two or even three green lights just to get through one intersection. We all know it's over capacity. Adding fleets of trucks from new warehouses will make that situation unbearable. And on top of the congestion, the heavy trucks tear up our roads. Anyone who's driven from Irvine into Lake Forest knows exactly what I'm talking about—the difference in road quality is obvious. Our city deserves better than to let warehouses make things worse.

I'm also very worried about the people who live right next to these sites. One warehouse is barely 80 feet from senior apartments. Imagine being retired, hoping to enjoy a quiet life, and instead being stuck next to nonstop truck traffic, engine noise, and exhaust fumes. Seniors, kids, and families are the ones who will pay the price.

I-96-1

There's also the fire risk. Warehouses, especially those with manufacturing, come with forklifts, propane, power tools, and flammable materials. That's not something we should be putting right in the middle of residential neighborhoods. It's just not safe. Dozens of insurance companies have refused to provide coverage for Southern California residents and we don't want our place to turn into a "non-coverable" area.

And let's be honest—the project owners are multi-billion-dollar conglomerates. Sure, they have property rights, just like we do. **But there's a fundamental difference: THEY DON'T LIVE HERE. WE DO.** They won't have to deal with the traffic, the diesel fumes, or the trucks rattling by at night. Thousands of residents' health and peace of mind are at stake, and that's not something you can measure in dollars.

But more than pointing out the problems, I want to talk about what could be here instead. Instead of stuffing Lake Forest with more warehouses (we already have dozens of them), why not create something that actually benefits residents? A new school, a community center, maybe even a mix of housing and small businesses. Something that adds to the quality of life here. That's the kind of development that will raise property values, attract new families, and make our city stronger in the long run.

Lake Forest has always been a place known for its neighborhoods, its trails, its parks—for being livable. We should be building on that reputation, not moving toward being just another

I-96-1 cont.

industrial hub. I urge you to do the right thing: reject this DEIR and keep Lake Forest the kind of city we're all proud to call homes.

Sincerely,

Tim Liu

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TIM LIU

Letter Code: I-96
Date: September 14, 2025

Response to Comment I-96-1

This comment requests the City address their comments by rejecting the proposed Project. This comment also expresses general concerns related to traffic congestion, truck traffic, noise, air quality, on-site fire risk, wildfire risk, hazards and hazardous materials, health risks, property values, land use incompatibility, and recreation.

Refer to Master Response 8 regarding traffic congestion and truck traffic associated with the proposed Project, Master Response 11 regarding noise impacts associated with the proposed Project, Response to Comment O-1-4 and Master Response 9 regarding air quality and potential health risk impacts associated with the proposed Project, Master Response 13 regarding the potential for hazards and hazardous materials as a result of the proposed Project, Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project, Response to Comment O-1-10 regarding on-site fire and wildfire risk, Response to Comment O-1-12 regarding property values, Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses, and Response to Comment O-1-16 regarding impacts to recreation associated with the proposed Project. These responses thoroughly address the topics raised in this comment

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: [redacted]
Sent: Sunday, September 14, 2025 11:59 PM
To: EnterpriseProjects
Subject: Manufacturing/Warehouse projects on Enterprise

I-97-1 I am against the proposed manufacturing and warehouse projects on Enterprise Way. I believe such project would significantly affect the quality of life in the adjacent and nearby neighborhoods of Lake Forest. The added noise, air pollution, and traffic created by such facilities would be quite detrimental to the quality of life in these communities. Please reject the applications for the projects.

Tim Huang
[redacted]
Lake Forest

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TIM HUANG

Letter Code: I-97
Date: September 14, 2025

Response to Comment I-97-1

This comment expresses opposition to the proposed Project and general concerns regarding noise, air pollution, traffic, and quality of life associated with the proposed Project and requests the City address their comments by rejecting the proposed Project.

Refer to Master Response 11 regarding noise impacts associated with the proposed Project, Response to Comment O-1-4 and Master Response 9 regarding air pollution and potential health risk impacts associated with the proposed Project, and Master Response 8 regarding traffic impacts associated with the proposed Project. In addition, Master Response 7 discusses the compatibility of the proposed Project with surrounding land uses and the Project's effect on quality of life. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: linda gu-xie [redacted]
Sent: Monday, September 15, 2025 9:44 AM
To: Stonich, Amy; Stonich, Amy; EnterpriseProjects; EnterpriseProjects; Ackerman, Gayle; Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy; cuiqin gu
Subject: Subject: Public Comments on IPT Draft EIR for Proposed Warehouse and Manufacturing Complex in Lake Forest, CA

Dear Ms. Stonich and Members of the Lake Forest Planning Commission and the City Council,

I am writing as a concerned resident of Lake Forest, California, to submit public comments on the Draft Environmental Impact Report (EIR) for the proposed 165,000 square foot warehouse and manufacturing complex (approximately 35 feet tall with 23 loading docks) on land zoned for light industrial use, currently occupied by a vacant office building. As a member of the community directly impacted by this and related projects, I urge the City to carefully consider the significant environmental, traffic, and quality-of-life concerns outlined below. The project's proximity to newly developed residential areas, including The Meadows (a 600+ unit single-family home community) and an adjacent 60+ unit affordable senior apartment building, raises serious questions about compatibility, public health, and the City's long-term vision. Furthermore, the Draft EIR's limited scope fails to adequately address cumulative impacts from this project and two additional warehouse proposals under review, totaling over 321,000 square feet of industrial space and 41 loading docks. I-98-1

1. Significant Environmental and Health Impacts on Adjacent Residential Communities

The proposed warehouse is located less than 200 feet from The Meadows and the affordable senior apartment building, both situated on land rezoned from agricultural (formerly a nursery) to residential use in 2020. This rezoning was intended to promote family-friendly housing and senior living, yet the project introduces incompatible industrial activity that could generate noise, air pollution, light pollution, and increased diesel emissions from truck traffic. The senior apartment building, in particular, is within 500 feet of this warehouse but less than 200 feet from one of the other two proposed warehouses (combined 156,000 square feet with 18 loading docks). Vulnerable populations, such as seniors and children in The Meadows, are at heightened risk from particulate matter, nitrogen oxides, and other pollutants, potentially exacerbating respiratory issues and reducing quality of life. I-98-2

The Draft EIR downplays these impacts, claiming "no significant impact after mitigation" for noise and pollution, but fails to provide robust data on long-term health effects or enforcement of mitigations. Given the site's history as agricultural land and the recent residential rezoning, the City must prioritize community health over industrial expansion.

2. Severe Traffic Congestion on Narrow Local Roads

I-98-3 The project site is accessed via a narrow two-lane road (one direction) that serves not only the proposed warehouses but also The Meadows, the senior apartments, and nearby communities like Baker Ranch (a massive residential development built in the last 6–8 years) and others within a mile

radius. This road is ill-equipped for the projected increase in heavy truck traffic from 23 loading docks at this site alone, plus 18 from the other two projects. Peak-hour congestion, safety hazards for pedestrians and cyclists, and emergency vehicle access could be compromised.

I-98-3 cont. The Draft EIR acknowledges traffic as a critical issue but underestimates cumulative effects from all three warehouses. With Baker Ranch and other neighborhoods adding thousands of daily trips, the road's capacity is already strained. I request a supplemental traffic study incorporating all projects and exploring infrastructure upgrades, such as road widening or dedicated truck lanes.

3. Zoning Oversight and Need for Buffer Zones

When the City rezoned the land for The Meadows and the senior apartments from agricultural to residential in 2020, it overlooked the adjacent light industrial zoning for the warehouse sites. This has created an incompatible juxtaposition of high-density residential and heavy industrial uses without adequate separation. A buffer zone (e.g., green space or setbacks) should have been mandated to mitigate impacts, as is common in urban planning to protect residential areas from industrial encroachment. I-98-4

The failure to downgrade the industrial zoning or implement buffers contradicts best practices for sustainable development and could set a precedent for further mismatches. I urge the City to reassess the zoning for the warehouse sites, potentially redesignating them for lighter commercial use compatible with surrounding residential growth.

4. Inadequate Cumulative Impact Analysis in the Draft EIR

The Draft EIR primarily focuses on the single 165,000 square foot warehouse, with only cursory mention of the two additional projects (156,000 square feet combined). CEQA requires a comprehensive analysis of cumulative impacts (Guidelines §15130), including combined effects on air quality, noise, traffic, and greenhouse gases from all three developments. The current EIR's siloed approach underestimates the total burden on the community, such as ~41 loading docks generating hundreds of daily truck trips. I-98-5

I request a revised or supplemental EIR that fully evaluates these cumulative effects, incorporating data from all projects and considering alternatives like scaling down or relocating the warehouses.

5. Contradiction with Lake Forest's Long-Term Strategic Plan

Approval of these warehouses would conflict with the City's General Plan and Community Vision, which emphasize residential quality of life, environmental sustainability, and balanced growth. The Public Safety Element and Municipal Code updates aim to align with community priorities, including noise standards and reduced greenhouse gas emissions. Industrial expansion next to new housing undermines these goals, potentially lowering property values in The Meadows and Baker Ranch while prioritizing short-term economic gains over long-term livability. I-98-6

A more scary fact is the possibility of any approval of those warehouse projects could open the door to additional warehouse projects in the same vicinity within a mile of our community that could translate this part of the City of Lake Forest from a quaint and loving place into something resembling the horrible scene of the giant cluster of warehouses in the Inland Empire of east LA.

Recommendations and Request for Action

In light of these concerns, I strongly oppose the project as proposed and recommend the following:

- Reject the current plan and require a supplemental EIR addressing cumulative impacts from all three warehouses.
- Rezone the industrial land or mandate buffer zones to separate it from residential areas.
- Explore alternatives, such as converting the site to community park or mixed-use development aligned with the City's strategic plan.
- Extend the public comment period if needed to allow further community input.

I-98-6 cont.

Thank you for considering these comments. I look forward to the City's response and participation in upcoming hearings. Please confirm the receipt of this comment letter and feel free to reach out to me for any questions or follow up.

Sincerely,
Linda Gu
[redacted]

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LINDA GU

Letter Code: I-98
Date: September 15, 2025

Response to Comment I-98-1

This comment raises questions regarding traffic, quality of life, land use incompatibility, public health, and cumulative impacts associated with the proposed Project.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-98-2

This comment expresses concern regarding health impacts, stating the opinion that the Draft EIR does not fully disclose the potential health impacts (including noise, air pollution, light pollution, and increased diesel emissions from truck traffic) and does not provide robust data on the long-term health effects or enforcements, putting nearby sensitive receptors at heightened risk.

Refer to Master Response 9 regarding the potential health risks of the proposed Project, Master Response 11 regarding potential noise impacts from the proposed Project, Master Response 12 regarding the potential for light pollution as a result of the proposed Project, Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-98-3

This comment expresses concern regarding traffic impacts, stating the opinion that a two-land road providing access to the Project site would result in safety hazards for pedestrians and cyclists and impacts to emergency vehicle access under peak traffic conditions. The comment states the opinion that the Draft EIR underestimates the combined cumulative impact on traffic from the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) and requests their comments be addressed by the provision of a supplemental traffic study.

Refer to Master Response 8 regarding the analysis of traffic impacts, including safety for pedestrians and cyclists and emergency access. Master Response 6 regarding the adequacy of the cumulative impacts analysis presented in the Draft EIR. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-98-4

This comment expresses the opinion that the adjacent light industrial zoning use was overlooked when the City rezoned the land for the Meadows community and states the opinion that a buffer zone should have been mandated. The comment requests the City address their comments by reassessing the zoning for the warehouse sites for a use more compatible with surrounding residential growth.

Refer to Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses. This Master Response thoroughly addresses the topics raised in this comment

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-98-5

This comment states the opinion that the Draft EIR contains an inadequate cumulative impact analysis and requests the Draft EIR be revised to address their comments regarding the provision of a full evaluation of the combined impacts to air quality, noise, traffic, and GHG from all cumulative industrial warehouse projects.

Refer to Master Response 6 regarding the adequacy of the cumulative impacts analysis presented in the Draft EIR. This Master Response thoroughly addresses the topics raised in this comment

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-98-6

This comment expresses concern regarding land use incompatibility and changes to community character, stating the opinion that all cumulative warehouse projects would conflict with the City's General Plan and Community Vision which emphasize residential quality of life, environmental sustainability, and balanced growth. The comment also expresses concerns related to property values and opposition to the proposed Project. In addition, this comment requests the City address their comments by rejecting the Project and requiring a supplemental EIR addressing cumulative impacts and exploring alternatives. This comment also requests the City address their comments by providing an extension of the public comment period and re-zoning industrial land or buffer zones from residential uses.

Refer to Master Response 7 regarding the compatibility of the proposed Project on surrounding land uses and community character, Master Response 6 regarding the adequacy of the cumulative impacts analysis provided in the Draft EIR, Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project, and Master Response 1 regarding the requirements for public review under CEQA. In addition, refer to Response to Comment O-1-12 regarding property values. These responses thoroughly address the topics raised in this comment

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses above. No further response is required.

Weiss, Jennifer

From: Chao Huang [redacted]
Sent: Monday, September 15, 2025 10:48 AM
To: EnterpriseProjects
Subject: Public Comments on DEIR – IPT Enterprise Business Center Project

Dear Amy,

I am writing to formally submit my public comments regarding the Draft Environmental Impact Report (DEIR) for the IPT Enterprise Business Center Project. As a local resident, I strongly oppose the construction of this warehouse development near our residential neighborhood.

This project poses several serious concerns for our community. I'd like to address the following three major aspects among numerous others.

1. Traffic and Safety Hazards
The project will significantly increase truck traffic on streets not designed to handle heavy commercial vehicles. It raises major safety concerns, especially for children, senior residents, pedestrians, cyclists, and school zones in the vicinity. The DEIR assumes a certain number of daily truck trips based on a generic warehouse but does not align this assumption with the operational scope described in Chapter 2. It underestimates the cumulative impact of increased congestion and the heightened risk of accidents.

I-99-1

2. Air and Noise Pollution
Warehouses of this scale often lead to substantial increases in diesel emissions and noise, especially from idling trucks and 24/7 operations. The health implications for nearby families, especially those with young children and seniors, are unacceptable. Long-term exposure to particulate matter is linked to asthma, respiratory issues, and other serious health risks. The DEIR cites the nearest ambient air monitoring station but does not disclose whether new emissions from the project will affect regional air quality coverage adequacy. It models air emissions assuming average industrial warehouse operations, but does not account for tenant-specific variations such as cold storage, hazardous materials handling, or e-commerce logistics. It does not evaluate emissions or odors from cleaning agents commonly used in warehouse maintenance. Janitorial activities may involve solvents, bleach, and VOC-rich cleaners, which can create localized air quality and odor impacts.

3. Impact on Quality of Life
This industrial project does not belong in or near a residential zone. Its presence would disrupt the peace, safety, and livability of our community. It may also lower property values and undermine the character of the neighborhood that many of us have worked hard to build. The DEIR fails to assess the long-term psychological toll on residents who will live next to a 24/7 industrial facility. Chronic exposure to noise, light pollution, diesel exhaust, and visual blight — especially without breaks — contributes to stress, anxiety, and diminished quality of life.

In light of these concerns, I urge the planning commission to reject this proposal. Industrial development should not come at the cost of public health, safety, and neighborhood integrity.

Sincerely,

Chao Huang

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CHAO HUANG

Letter Code: I-99
Date: September 15, 2025

Response to Comment I-99-1

This comment requests the City address their comments by rejecting the proposed Project. This comment also expresses general concerns related to traffic and safety hazards, cumulative impacts related to traffic, air quality, health risks, noise, odor, land use incompatibility, light pollution, property values, and quality of life.

Refer to Master Response 8 regarding traffic and safety impacts associated with the proposed Project, Master Response 6, regarding the adequacy of the cumulative impacts analysis for the proposed Project, Response to Comment O-1-4 and Master Response 9 regarding air quality and potential health risk impacts associated with the proposed Project, Master Response 11 regarding noise impacts associated with the proposed Project, Response to Comment I-21-30 regarding odor impacts associated with the proposed Project, Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses and the Project's effect on quality of life, Master Response 12 regarding light pollution impacts associated with the proposed Project, and Response to Comment O-1-12 regarding property values. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: Alex Wang [redacted]
Sent: Monday, September 15, 2025 12:08 PM
To: EnterpriseProjects; Stonich, Amy
Cc: Ackerman, Gayle; Smith, Amy; Yu, Benjamin; Cirbo, Doug; Barajas, Francisco; Villwock, Jordan; Stannard, Michael; Tettemer, Mark; Pequeno, Robert; Voigts, Scott; Grable, Tom; Ludden, Thomas
Subject: Public Comment and Request for Acknowledgment of Receipt – Draft EIR (SCH No. 2024030755), IPT Enterprise Business Center LLC Project

Dear City Staff, Planning Commissioners, and Council Members,

I-100-1 I hope this letter finds you well. As a resident of Lake Forest, I'm reaching out because I'm deeply concerned about the proposal to convert the old Panasonic office buildings on Enterprise Way into massive warehouses. I love this city and our neighborhoods, and I worry this project will bring lasting harm to the people who live here.

This isn't just about buildings on a map—it's about families. Take my neighbor Nielsen, for example. His home is directly across from the proposed warehouse site 2, only about 80 feet away. He lives there with his wife, his elderly mom, and two toddlers. I recently visited his home, and I encourage you to see that location in person. If you stand in his backyard, it's impossible not to imagine what life would be like with a 150,000+ square-foot warehouse towering over his fence. Picture dozens of 53-foot trailers rumbling in and out all day, backup alarms beeping, diesel engines roaring from dawn until late into the night. And it's not just Nielsen—hundreds, even thousands of families within a mile of the site will feel the impact. Can you imagine raising your kids in that kind of environment? I can't—and I wouldn't wish it on anyone.

Noise alone is a huge issue. I know firsthand what constant trailer noise and vibration can do—I was exposed to it for just a week and ended up with hearing damage and PTSD. That experience made me realize how destructive warehouse traffic really is. The air pollution is one problem, but the relentless noise might be even worse for the families nearby.

And it's not just one project—we're talking about three warehouse proposals. The DEIR completely overlooked the combined effect they'll have, especially with one site only 80 feet from a senior apartment building.

I-100-1 cont.

Traffic is already a nightmare on Bake Parkway. I drive that stretch daily, and during rush hour, it can take me twice as long as it should. Add fleets of heavy trucks into that mix, and congestion will go from bad to unbearable. On top of that, big rigs beat up our roads. Anyone who drives here already knows the potholes and uneven pavement are bad enough—more trucks will just make it worse, and less safe.

Then there's the safety of our kids. Every day, I see middle schoolers and high schoolers riding their e-bikes to school. It's already nerve-racking watching them weave through traffic. Throw more tailers into the mix, and their commute becomes far more dangerous. Protecting our young residents has to come before warehouses.

Let's be real—the companies behind this project are massive, multi-billion-dollar corporations. Yes, they have property rights, just like we do, but there's an important difference: they don't live here. They won't be breathing in the diesel fumes, stuck in traffic every evening, or trying to put their kids to sleep while trucks are backing up outside. That's our reality if this goes through. Our health, our well-being, and our peace at home are on the line. These things can't be measured in dollars, and they should never be sacrificed for corporate profits.

And let's be honest—more warehouses aren't just bad for health and safety. They'll hurt property values, which affects all of us, and in the long run even reduces tax revenue for the city.

At the end of the day, this comes down to what kind of city we want to be. Do we want to be a place defined by warehouses and truck traffic, or a place that puts residents first? I strongly urge you to reject this DEIR and protect the people who call Lake Forest home. Let's keep our city family-friendly and livable for generations to come.

Sincerely,

Alex Wang

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Target
Lake Forest Bankruptcy
Lake Forest Bankruptcy
241
Rancho Business Center
Staybridge Suites Irvine East/Lake Forest, an IHG
Top rated
Bliss Animal Hospital
Veterinary in Lake Forest
Our homes
Clava Sports Facility
Lake Forest Dr
Pump It Up Lake Forest
Kids Birthday and More
1
2
3

ALEX WANG

Letter Code: I-100
Date: September 15, 2025

Response to Comment I-100-1

This comment requests the City address their comments by rejecting the proposed Project. This comment also expresses general concerns related to visual impacts, noise, air pollution, traffic, bicyclist and pedestrian safety, health risks, property values, reduction of tax revenue, and the combined impact of the Western Realco Enterprise Way Industrial Project (Projects 1 and 2).

As detailed in Section 4.1.6, Project Impacts, starting on page 4.1-16 of Section 4.1, Aesthetics, of the Draft EIR, the proposed Project includes landscaping throughout the site in compliance with all applicable zoning and land use regulations governing scenic quality. This landscaping is designed to screen views of the Project from nearby residences, thereby reducing potential visual impacts. In addition, refer to Master Response 12 regarding the potential for light impacts from the proposed Project, Master Response 11 regarding noise impacts associated with the proposed Project, Master Response 9 regarding potential health risk impacts associated with the proposed Project, Master Response 8 regarding traffic and safety impacts for bicyclist and pedestrians, Response to Comment O-1-12 regarding impacts to property values associated with the proposed Project, and Master Response 6 regarding the adequacy of the cumulative impacts analysis presented in the Draft EIR. These responses thoroughly address the topics raised in this comment.

Regarding concerns related to potential for reduction of tax revenue, *State CEQA Guidelines* Section 21082.2(c) limits evaluation of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment. Therefore, the analysis and conclusions of the Draft EIR regarding evaluation of individual impacts remain valid, and no further response is required.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: Bob Huang [redacted]
Sent: Monday, September 15, 2025 1:50 PM
To: EnterpriseProjects
Subject: Objection to the IPT Enterprise Business Center Project

Lake Forest City Council Members and Planning Commissioners:

I'm a resident at the Meadows community in Lake Forest. I'm writing to you to express my objection to the IPT Enterprise Business Center Project. I have read the Draft Environmental Impact Report. The very reason I moved to the Meadows community was to raise my children in a quiet and safe community.
I-101-1 Such a huge warehouse and industrial facility next door would be a huge risk and hazard to my family. It is unacceptable that the City is considering this project.

Regards
Bob Huang
[redacted]
Lake Forest, CA 92630

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BOB HUANG

Letter Code: I-101
Date: September 15, 2025

Response to Comment I-101-1

This comment expresses opposition to the proposed Project, stating the opinion that it will be a risk and hazard.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. No further response is required.

Weiss, Jennifer

From: Nelson Chu [redacted]
Sent: Monday, September 15, 2025 2:18 PM
To: EnterpriseProjects
Subject: Urgent Request for Reconsideration of IPT Enterprise Business Center Project (SCH No. 2024030755)

Dear Planning Commission Members,

My name is Perng Nian Chu, and I write to you not only as a homeowner but as a father, neighbor, and a citizen who cherishes the promise of Lake Forest. My family and I moved to the Meadows community in 2024, investing nearly all of our life savings in what we believed would be our "forever home." We chose Lake Forest because of its natural beauty, its safe neighborhoods, and because we were assured—by the developer, Toll Brothers—that the surrounding business environment would remain stable, and that a school would rise to serve our children. We were promised a community, not an industrial corridor.

Today, that promise feels gravely endangered. The proposed IPT Enterprise LLC and Western Realco projects threaten to transform our neighborhood with the construction of enormous, 24/7 operating warehouses. The plan would demolish existing office buildings—including the well-known Panasonic Aviation site—and replace them with facilities designed for heavy trucking, right at our doorstep.

I-102-1 The consequences are profound and irreversible.

- Air and Health Risks: The demolition raises fears of asbestos exposure—an issue that belongs to the tragedies of the 1960s, not to a modern city like Lake Forest. Once built, the diesel emissions from hundreds of trucks per day will further elevate cancer risk in a community already facing levels far above safe thresholds. Our children's lungs should not be collateral damage to industrial convenience.
- Noise, Traffic, and Safety: The Draft Environmental Impact Report acknowledges 269 truck trips per day from the IPT project alone. Combined with Western Realco, the burden rises to nearly 650 trucks—plus up to 1,200 commuter vehicles—routed through Enterprise Way and Dimension Drive, roads that were never designed for such traffic. The result will be constant noise, sleep disruption for our children, unsafe crossings for pedestrians, and congestion that erodes quality of life for every Lake Forest resident.
- Community and Environmental Impact: Lake Forest is defined by its natural assets—Whiting Ranch Wilderness Park, Serrano Creek Trail, and the eucalyptus groves that breathe life into our city. Families walk, jog, and meet along these trails; children spot birds and wildlife that make this place more than just a residential zone. To place 48 truck docks against our neighborhood boundary is not just poor planning—it is an act that erases the character of our community.

Commissioners, I know you weigh many considerations. But I implore you: visit our neighborhood before you decide. Two of the board members have come my house, and all of my neighbors are willing to welcome your visit. Walk the Serrano Creek Trail. Stand at the edge of the Meadows and imagine diesel trucks idling through the night. Meet the children who will breathe this air, and the seniors whose health is already fragile. Numbers in a report cannot capture the lived experience of families who trusted that Lake Forest would safeguard their future.

The California Attorney General's Office and the South Coast Air Quality Management District have already raised concerns about deficiencies in the Draft EIR. These warnings, combined with the lived testimony of your residents, should compel pause and reconsideration.

I-102-1 cont.

We are not opposing progress—we are opposing a project that places industry over people, pollution over health, and short-term profit over long-term sustainability.

For the sake of our children, our elders, and the legacy of Lake Forest as a city of balance between community and nature, I respectfully urge you to reject or fundamentally revise the IPT Enterprise project.

Thank you for your time, your public service, and your commitment to making decisions that will resonate for generations.

Respectfully,

Perng Nian Chu

Resident, The Meadows Community

Lake Forest, CA

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PERNG NIAN CHU

Letter Code: I-102
Date: September 15, 2025

Response to Comment I-102-1

This comment opposes the Project and expresses general concerns related to asbestos exposure, health risks, noise, traffic, safety, recreation, biological resources, and community character. The comment requests that members of the Planning Commission visit the Forest Lake community, take the California Attorney General's NOP comment letter (*IPT Enterprise Business Center LLC, SCH #2024030755*, April 5, 2024; located in Appendix A of the Draft EIR) and SCAQMD letter into consideration, and address their comments by rejecting the proposed Project and the Western Realco Enterprise Way Industrial Project (Projects 1 and 2).

Refer to Master Response 9 regarding potential health risk impacts associated with the proposed Project, Master Response 13 regarding the potential for asbestos to be present on the Project site, Master Response 11 regarding noise impacts associated with the proposed Project, Master Response 8 regarding traffic and safety impacts associated with the proposed Project, Response to Comment O-1-16 regarding the recreation analysis presented In the Draft EIR, Response to Comment O-1-5 regarding impacts to biological resources, and Master Response 7 regarding the compatibility of the propose Project with surrounding land uses. Additionally, refer to Response to Comment S-2 regarding consideration of the SCAQMD letter. These responses thoroughly address the topics raised in this comment.

The City acknowledges the California Attorney General's NOP comment letter and considered the issues presented in the letter during preparation of the Draft EIR.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: Ge Shi [redacted]
Sent: Monday, September 15, 2025 3:59 PM
To: Stonich, Amy; EnterpriseProjects
Cc: Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Public Comments on DEIR of IPT Enterprise Business Center Project

Dear Ms. Stonich, Planning Commission, and City Council Members,

I am a resident living less than 100 feet from the proposed IPT Enterprise Business Center site, and I am submitting these formal comments on the Draft Environmental Impact Report (DEIR). Please confirm receipt of this email.

1. Inadequate Cumulative Impact Analysis

The DEIR fails to adequately assess the combined impacts of the IPT Project with the adjacent Western Realco Projects 1 and 2. Together, these projects would introduce **over 48 dock doors** and **649 truck trips per day**, in addition to **800–1,200 new daily commuter vehicles**. CEQA requires a complete cumulative impact analysis (§15130), yet the DEIR evaluates projects in isolation, understating impacts on traffic, air quality, and noise.

Requested Action: Recirculate the DEIR with a dedicated cumulative section covering air pollution, traffic, noise, and health risks from *all three* warehouse projects.

I-103-1

2. Air Quality & Public Health Risks

Independent review shows emissions of **NOx and PM-10 exceed ambient air quality standards**, posing significant cancer risk from diesel particulate matter to nearby homes. The Meadows community, including the **Meadows Senior Apartments with 100+ elderly residents**, will bear disproportionate exposure. Current mitigation (Tier 4 engines) is inadequate given 24/7 operations and undetermined tenants.

Requested Action: Require updated modeling that accounts for cumulative truck emissions and mandate stronger mitigations such as:

- 100% zero-emission truck fleets,
- Mandatory buffer zones,
- Truck route restrictions away from residential streets, and
- Air filtration/monitoring support for nearby homes.

3. Noise, Traffic, and Quality of Life Impacts

Truck ingress/egress is within **100 feet of residential homes**. The DEIR ignores cumulative noise from three projects, late-night idling, and constant warehouse activity. Local streets not designed for

WB40/WB67 trucks will suffer severe congestion and damage. This directly conflicts with the **Lake Forest 2040 General Plan**, which promises to protect the quiet and safe character of neighborhoods.

Requested Action: Recalculate noise/traffic impacts for concurrent operation of all projects, impose nighttime truck restrictions, and require enforceable setbacks and sound barriers.

4. Environmental Justice Concerns

The DEIR does not address environmental justice, ignoring the **frontline burden placed on children, seniors, and families** in nearby communities. This omission violates CEQA equity principles and contradicts Lake Forest's stated vision for a healthy, safe, and inclusive community.

Requested Action: Include an Environmental Justice section that evaluates disproportionate impacts on vulnerable populations and provides enforceable protections.

5. Infeasible and Limited Alternatives

I-103-1 cont.

The DEIR considers only one reduced-intensity alternative, which still places industrial activity within 100 feet of homes. CEQA requires meaningful alternatives. Viable options include reorienting buildings, relocating projects to non-residential zones, or pursuing **clean-technology or mixed-use developments** aligned with the City's 2040 Vision.

Requested Action: Evaluate feasible alternatives such as a low-impact commercial project, ZEV-only facility, or mixed-use residential/commercial campus.

Conclusion

The IPT Enterprise Business Center and Western Realco projects present unacceptable health, safety, and quality-of-life risks to surrounding residents. The DEIR, as currently drafted, does not meet CEQA requirements. I respectfully urge the Planning Commission and City Council to **reject these proposals unless a recirculated DEIR fully addresses cumulative impacts, public health protections, and feasible alternatives.**

Please confirm receipt of this email.

Sincerely,
Ge Shi
Resident, Lake Forest

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GE SHI

Letter Code: I-103
Date: September 15, 2025

Response to Comment I-103-1

This comment requests the City address their comments by rejecting the proposed Project. This comment also expresses general concerns related to cumulative impacts, air quality and health risks, noise, traffic, quality of life, land use incompatibility, environmental justice, and alternatives. The comment requests the Draft EIR be revised and recirculated to address their comments regarding the provision of a dedicated cumulative section for air pollution, traffic, noise, and health risks from all cumulative industrial warehouse projects, updated modeling and stricter mitigation for air quality, recalculations for noise and traffic modeling, an environmental justice section, and an expanded alternatives section.

Refer to Master Response 6 regarding the adequacy of the cumulative impacts analysis presented in the Draft EIR, Response to Comment O-1-4 and Master Response 9 regarding potential air quality and health risk impacts associated with the proposed Project, Master Response 14 regarding disproportionate environmental burdens and the requirements for an analysis of environmental justice impacts, Master Response 11 regarding noise impacts associated with the proposed Project, Master Response 8 regarding traffic and traffic safety impacts associated with the proposed Project, Master Response 4 regarding the requirements for mitigation under CEQA, Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses and the Project's effect on the quality of life, and Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: Yongzhen Lu [redacted]
Sent: Monday, September 15, 2025 4:06 PM
To: Stonich, Amy; EnterpriseProjects
Cc: Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Public Comments on DEIR of IPT Enterprise Business Center Project

Dear Ms. Stonich, Members of the Planning Commission, and City Council,

I am a Lake Forest resident living with my family next to the proposed IPT Enterprise Business Center site. Our home is less than 100 feet away from the truck ingress and loading areas. I am submitting the following formal comments on the Draft Environmental Impact Report (DEIR). Please confirm receipt of this email.

1. Cumulative Impacts Ignored

The DEIR treats the IPT project as if it exists in isolation, but in reality, it is combined with Western Realco Projects 1 and 2. Together, these projects introduce nearly 50 loading docks and hundreds of heavy truck trips every day, in addition to more than 800 daily commuter vehicles. Failing to analyze these combined impacts under CEQA makes the DEIR incomplete and misleading.

Requested Action: Recirculate the DEIR with a full cumulative analysis covering air quality, noise, traffic, and public health risks from *all three projects together*.

2. Air Quality and Health Risks

I-104-1 Diesel truck traffic operating around the clock will expose families, children, and especially the seniors in the Meadows Senior Apartments to dangerous levels of particulate matter and nitrogen oxides. Independent review has already shown exceedances of air quality standards. Tier 4 trucks are not enough to protect our community, especially with undetermined tenants and unlimited truck operations.

Requested Action: Require stricter mitigation such as 100% zero-emission trucks, enforceable buffer zones, filtration support for nearby homes, and routing restrictions that prevent trucks from cutting through residential areas.

3. Noise and Traffic Impacts

The DEIR fails to account for the constant truck idling, loading, and night operations from multiple warehouses. Noise impacts within 100 feet of homes will be severe. Traffic congestion will increase dramatically on roads that were not designed for heavy truck volumes, which is inconsistent with the City's General Plan goals to maintain safe and quiet neighborhoods.

Requested Action: Recalculate noise and traffic models with all three projects in operation. Impose nighttime operating limits, setbacks, and enforceable noise barriers.

4. Environmental Justice

The report does not include any analysis of environmental justice. Families, seniors, and children in this community will disproportionately bear the burden of pollution, noise, and traffic risks while others benefit economically. CEQA requires this be studied and addressed, yet the DEIR ignores it entirely.

Requested Action: Include an Environmental Justice section evaluating demographic vulnerability and exposure, and propose enforceable protections for impacted residents.

5. Feasible Alternatives Overlooked

The DEIR only considered a smaller warehouse alternative, but that still places industrial activity right against homes. The City should explore alternatives that better align with community health and the General Plan, such as a mixed-use development, low-impact commercial uses, or a clean-technology campus.

Requested Action: Expand the alternatives section to include designs and land uses that reduce or eliminate heavy trucking next to homes.

I-104-1 cont.

Conclusion

This project, as proposed, is incompatible with the surrounding residential neighborhoods. The DEIR does not satisfy CEQA because it ignores cumulative impacts, health and safety risks, and feasible alternatives.

I respectfully urge the City to reject the IPT project unless a new DEIR fully addresses these concerns and prioritizes the health, safety, and quality of life of Lake Forest residents.

Please confirm receipt of this comment.

Yongzhen Lu

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YONGZHEN LU

Letter Code: I-104
Date: September 15, 2025

Response to Comment I-104-1

This comment requests the City address their comments by rejecting the proposed Project. This comment also expresses general concerns related to cumulative impacts, air quality and health risks, noise, traffic, land use incompatibility, environmental justice, and alternatives. The comment requests the Draft EIR be revised and recirculated to address their comments regarding stricter mitigation, recalculations for noise and traffic modeling, the provision of an environmental justice section, and an expanded alternatives section.

Refer to Master Response 6 regarding the adequacy of the cumulative impacts analysis presented in the Draft EIR, Response to Comment O-1-4 and Master Response 9 regarding potential air quality and health risk impacts associated with the proposed Project, Master Response 14 regarding disproportionate environmental burdens and the requirements for an analysis of environmental justice impacts, Master Response 11 regarding noise impacts associated with the proposed Project, Master Response 8 regarding traffic and traffic safety impacts associated with the proposed Project, Master Response 4 regarding the requirements for mitigation under CEQA, Master Response 7 regarding compatibility of the proposed Project with surrounding land uses and Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: Grace Shi [redacted]
Sent: Monday, September 15, 2025 4:14 PM
To: Stonich, Amy; EnterpriseProjects
Cc: Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Public Comments on DEIR of IPT Enterprise Business Center Project

I live right next to the proposed IPT warehouse — less than 100 feet away. This project is outrageous and completely unacceptable.

The DEIR ignores the reality: three massive warehouses side by side, nonstop trucks, noise, pollution, and traffic flooding streets never built for this. Seniors and families here will be forced to breathe diesel fumes, lose sleep, and watch property values collapse. The so-called "mitigations" are a joke — unenforceable and meaningless.

I-105-1 This is not compatible with Lake Forest neighborhoods or the City's own General Plan. If you approve this, you are putting industry profits ahead of residents' health and safety.

I strongly urge you to reject the IPT project. We will not stay quiet while our community is poisoned and destroyed.

Please confirm receipt.

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GRACE SHI

Letter Code: I-105
Date: September 15, 2025

Response to Comment I-105-1

This comment expresses opposition to and concern regarding cumulative impacts, traffic, noise, pollution, air pollution, health risks, property values, and land use compatibility associated with the proposed Project. The comments urges the City to reject the proposed Project.

Refer to Master Response 6 regarding the cumulative impacts analysis prepared for the proposed Project that included consideration of the Western Realco Enterprise Way Industrial Project (Projects 1 and 2), Master Response 8 regarding traffic impacts associated with the proposed Project, Master Response 11 regarding noise impacts associated with the proposed Project, Master Response 9 regarding the proposed Project's contribution to pollution and health risk impacts on sensitive receptors, Response to Comment O-1-12 regarding impacts to property values, and Master Response 7 regarding compatibility of the proposed Project with surrounding land uses. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: Jiayi Zhu [redacted]
Sent: Monday, September 15, 2025 4:16 PM
To: Stonich, Amy; EnterpriseProjects
Cc: Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Tettemer, Mark; Cirbo, Doug; Yu, Benjamin; Smith, Amy
Subject: Public Comments on DEIR of IPT Enterprise Business Center Project

Dear City Council Members,

My name is Jiayi Zhu, and I am a resident of The Meadows and a parent of a toddler who attends daycare at Bella Montessori near the proposed warehouse development site. I am writing to express my strong opposition to the warehouse project currently under consideration near our residential community and the daycare center.

I-106-1 As a parent and neighbor, I am deeply concerned about the potential impacts this project will have on the safety, health, and well-being of our children and families. The proximity of this project to residences and daycare center is especially troubling in my opinion. Families like us chose this area for its quiet, community-oriented environment, and I'm worried that a large industrial facility would cause disruption on our peaceful neighbourhood. The days that I could bike my son to school may come to an end.

I urge the council to reconsider the location of this project and explore alternative sites that are better suited for industrial use — away from homes, senior apartments, and childcare centers.

Thank you for your time and attention to this matter.

--

Jiayi Zhu

[redacted] | [redacted]

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JIAYI ZHU

Letter Code: I-106
Date: September 15, 2025

Response to Comment I-106-1

This comment expresses opposition to the proposed Project and concerns regarding safety, health, and well-being, and requests the City address their comments by exploring alternatives for the proposed Project.

Refer to Master Response 8 regarding traffic safety associated with the proposed Project, Master Response 9 regarding health risk impacts associated with the proposed Project, Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses and the Project's effect on the well-being of adjacent residents, and Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From:	June [redacted]
Sent:	Monday, September 15, 2025 4:29 PM
To:	Stonich, Amy; EnterpriseProjects
Cc:	Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy; EJ@doj.ca.gov; Rose, Debra
Subject:	Subject: Comments on the DEIR for the Lake Forest IPT Project — Request for Site Visit and Broader Community/Citywide Impact Review
Attachments:	IPT DEIR commnets letter 9-14-2025 JuneSB.pdf

Dear Lake Forest Review Team,

I-107-1 I submit the following comments on the Draft Environmental Impact Report (DEIR) for the Lake Forest IPT Project. In addition to the technical issues raised in my prior letters, this comment focuses on the broader, long-term implications for Lake Forest's residents, businesses, and city identity. Because three related warehouse/logistics projects by the same proponent are moving through the DEIR process concurrently—together proposing 48+ truck dock stations with potential 24/7 operations and unknown tenants/possible manufacturing—these decisions will shape the future of Lake Forest for decades.

Citywide Vision, Community Identity, and General Plan Consistency

1.1 The clustering of three large logistics/warehouse projects next to a newly built residential community will define perceptions of Lake Forest's livability, economic direction, and brand. The DEIR should evaluate consistency with the General Plan's vision for neighborhood quality, economic diversification,
I-107-2 and public health.

1.2 Please assess whether intensive around-the-clock truck operations are compatible with adjacent residential land uses, parks, trails, schools, and senior housing, and whether approvals would set a citywide precedent for similar projects near homes.

1.3 If inconsistencies exist, CEQA requires disclosure and consideration of alternatives or policy actions (e.g., rezoning) to achieve compatibility.

Economic Development and Small Business Climate

2.1 The DEIR should discuss potential secondary effects on local businesses, including:

I-107-3 a) Customer access and parking impacts from increased truck volumes and congestion.

b) Potential shifts in the business mix (e.g., reticence from retail, dining, and professional services to locate near heavy logistics).

c) Worker attraction/retention challenges tied to air quality, noise, and traffic conditions.

I-107-3 cont.

2.2 While CEQA focuses on physical impacts, it can analyze the physical drivers of economic disruption (e.g., circulation changes, air/noise levels) that influence business viability.

Emergency Response, Safety, and Evacuation Readiness

I-107-4

3.1 Evaluate emergency vehicle access, response times, and evacuation performance under peak truck activity and roadway queuing. Include wildfire evacuation scenarios and incident detours, given regional wildfire history.

3.2 Provide a Truck Incident Management Plan: on-site spill containment, alternate routing during closures, and real-time coordination with City/County emergency services.

Parks, Trails, and Active Transportation

I-107-5

4.1 Analyze effects on nearby parks, trails, and active transportation corridors: exposure to elevated diesel particulate matter (DPM), increased noise levels, freight conflicts at crossings, and diminished recreational quality.

4.2 Identify mitigation: separated trail segments, enhanced buffers/landscaping, barriers from truck drive aisles, and air/noise screening adjacent to public open spaces.

Environmental Justice and Sensitive Receptors

I-107-6

5.1 Expand the environmental justice analysis to include seniors in The Meadows (including senior apartments), nearby childcare, schools, parks, and trail users. Use CalEnviroScreen to identify any overburdened populations affected by cumulative air/noise/traffic.

5.2 Incorporate and respond to the California Attorney General's April 2024 letter on the IPT NOP; explain how the DEIR was revised to address those concerns.

Combined/Programmatic Review of All Three Projects

I-107-7

6.1 Analyze the three related projects together for cumulative impacts on traffic/VMT and safety, air quality/health risk, noise/vibration, stormwater/water quality, biological resources, and visual character (CEQA Guidelines §15130; consider a programmatic/tiered EIR per §§15168/15152).

6.2 Use a consistent horizon year, network, and modeling assumptions for all three projects. If combined analysis shows new or more severe impacts, recirculate the DEIR and extend the comment period (Guidelines §15088.5).

I-107-8

Unknown Tenants, 24/7 Operations, and Potential Manufacturing

7.1 Provide a conservative, worst-case operations envelope across the three projects: unknown tenants, potential manufacturing/processing, hazardous materials handling, and 24/7 dock use (48+ docks).

I-107-8 cont.

7.2 If the City intends to avoid worst-case outcomes, adopt enforceable conditions: limits on hours/dock operations near residences, prohibited uses without further discretionary review and CEQA, caps on truck trips, and WAIRE/zero-emission timelines with on-site charging installed at occupancy.

Land-Use Compatibility and Long-Term Policy Direction

8.1 The Meadows area was rezoned from agriculture to residential, reflecting a policy commitment to neighborhood livability. In contrast, locating intensive logistics next to homes presents a direct land-use conflict that may not be fully mitigable.

I-107-9

8.2 In line with the AG's guidance and CARB's Land Use Handbook (500-foot or greater buffers where feasible), the City should evaluate alternatives, redesigns, or rezoning to ensure long-term compatibility and protect sensitive receptors.

Public Process: Site Visit, Field Verification, and Community Engagement

9.1 I respectfully invite City officials—including Planning Commissioners and City Council Members—along with City staff and the consultant team, to conduct a site visit of:

a) The three project sites and proposed truck access points/routes.

b) The Meadows community (including streets closest to the truck route), nearby senior apartments, childcare, schools, parks, and trails.

9.2 Purpose: to obtain first-hand understanding of proximity, topography, wind patterns, and how noise and truck movements will interact with homes and public spaces—especially at night and early morning.

I-107-10

9.3 Requests for field-based verification and engagement:

a) Host at least one community workshop and one site walk before certification of any EIR.

b) Conduct a truck-route "drive-along" simulation of peak operations and queueing; share video and queue length analysis.

c) Provide a nighttime noise demonstration or comparable modeling presentation for backup alarms, loading, and pass-bys at corrected receptor distances.

d) Install temporary monitoring (noise, PM2.5, black carbon) to establish pre-project baseline conditions in the Meadows and along the truck routes.

e) Commission independent third-party peer review of the air quality/health risk, noise, and traffic studies; publish responses to peer review in the Final EIR.

f) Form a Community-Technical Advisory Group (CTAG) with residents, small businesses, school/health representatives, and City staff to shape mitigation and monitoring.

I-107-10 cont.

g) If significant unavoidable impacts remain, consider a temporary moratorium on approvals pending a citywide programmatic EIR on warehouse siting and buffers.

Specific Design and Operations Improvements to Consider

10.1 Increase buffers/setbacks and relocate docks/drive aisles farther from homes; enclose docks nearest residences.

10.2 Require ZE/NZE truck adoption schedules, on-site DC fast charging sized to commitments, strict anti-idling enforcement with geofencing, and third-party monitoring.

10.3 Limit nighttime outdoor loading near residences; require broadband "white noise" backup alarms and quiet pavement on internal truck routes.

I-107-11

10.4 Install solid sound/air-dispersion walls and deep vegetative barriers; upgrade filtration (MERV 16 onsite; offer MERV 13–16 for nearest homes/senior apartments).

10.5 Adopt designated truck routes that avoid residential streets; prohibit residential cut-through; provide on-site staging to prevent street queueing.

Requested Actions

A. Schedule a joint site visit and community walk with Planning Commissioners, City Council Members, City staff, and consultants before the close of the public review or prior to any hearings.

B. Hold at least one public workshop to present corrected maps (showing ~100-foot proximities), cumulative findings for all three projects, and proposed mitigation/alternatives; accept written questions and provide written responses.

C. Expand the DEIR to include:

A citywide vision/General Plan consistency discussion

I-107-12

(Section 1).Business access and small-business viability analysis tied to physical impacts (Section 2).Emergency response and evacuation analysis under peak truck conditions (Section 3).Parks/trails and active transportation impact analysis with protections (Section 4).Environmental justice analysis and full response to the AG's April 2024 letter (Section 5).A combined/programmatic cumulative analysis of all three projects (Section 6).A conservative operations envelope for unknown tenants/24-7/potential manufacturing, with enforceable limits

Land-use compatibility and rezoning/alternative pathways

D. Recirculate the DEIR if corrected proximity, combined operations (48+ docks, 24/7), or new analyses show new or more severe impacts; extend the public comment period accordingly.

I-107-12 cont.

E. Commit to the design and operational improvements in Section 10, with enforceable conditions and a robust Mitigation Monitoring and Reporting Program (Guidelines §15097).

F. Establish a Community-Technical Advisory Group and commission independent peer review of air/health risk, noise, and traffic.

These projects will set the trajectory for Lake Forest's livability, economy, and reputation. A careful, transparent, field-informed process is essential to protect residents, support local businesses, and make decisions aligned with the City's long-term goals.

I-107-13

Thank you for your consideration. Please add me to the notification list for all future hearings and documents related to these projects. I will follow up to help coordinate the requested site visit and community walk at dates convenient for the reviewing team.

Sincerely,,

June Bian

Lake Forest Resident

CAUTION: Think Security! This email is not from someone at the City of Lake Forest. **Do not click any links or open any attachments you are not expecting.**

Subject: Comments on the DEIR for the Lake Forest IPT Project — Request for Site Visit and Broader Community/Citywide Impact Review

Dear Lake Forest Review Team,

I submit the following comments on the Draft Environmental Impact Report (DEIR) for the Lake Forest IPT Project. In addition to the technical issues raised in my prior letters, this comment focuses on the broader, long-term implications for Lake Forest's residents, businesses, and city identity. Because three related warehouse/logistics projects by the same proponent are moving through the DEIR process concurrently—together proposing 48+ truck dock stations with potential 24/7 operations and unknown tenants/possible manufacturing—these decisions will shape the future of Lake Forest for decades.

Citywide Vision, Community Identity, and General Plan Consistency

1.1 The clustering of three large logistics/warehouse projects next to a newly built residential community will define perceptions of Lake Forest's livability, economic direction, and brand. The DEIR should evaluate consistency with the General Plan's vision for neighborhood quality, economic diversification, and public health.

1.2 Please assess whether intensive around-the-clock truck operations are compatible with adjacent residential land uses, parks, trails, schools, and senior housing, and whether approvals would set a citywide precedent for similar projects near homes.

1.3 If inconsistencies exist, CEQA requires disclosure and consideration of alternatives or policy actions (e.g., rezoning) to achieve compatibility.

Economic Development and Small Business Climate

2.1 The DEIR should discuss potential secondary effects on local businesses, including:

a) Customer access and parking impacts from increased truck volumes and congestion.

b) Potential shifts in the business mix (e.g., reticence from retail, dining, and professional services to locate near heavy logistics).

c) Worker attraction/retention challenges tied to air quality, noise, and traffic conditions.

2.2 While CEQA focuses on physical impacts, it can analyze the physical drivers of economic disruption (e.g., circulation changes, air/noise levels) that influence business viability.

Emergency Response, Safety, and Evacuation Readiness

3.1 Evaluate emergency vehicle access, response times, and evacuation performance under peak truck activity and roadway queuing. Include wildfire evacuation scenarios and incident detours, given regional wildfire history.

3.2 Provide a Truck Incident Management Plan: on-site spill containment, alternate routing during closures, and real-time coordination with City/County emergency services.

Parks, Trails, and Active Transportation

4.1 Analyze effects on nearby parks, trails, and active transportation corridors: exposure to elevated diesel particulate matter (DPM), increased noise levels, freight conflicts at crossings, and diminished recreational quality.

4.2 Identify mitigation: separated trail segments, enhanced buffers/landscaping, barriers from truck drive aisles, and air/noise screening adjacent to public open spaces.

Environmental Justice and Sensitive Receptors

5.1 Expand the environmental justice analysis to include seniors in The Meadows (including senior apartments), nearby childcare, schools, parks, and trail users. Use CalEnviroScreen to identify any overburdened populations affected by cumulative air/noise/traffic.

5.2 Incorporate and respond to the California Attorney General's April 2024 letter on the IPT NOP; explain how the DEIR was revised to address those concerns.

Combined/Programmatic Review of All Three Projects

6.1 Analyze the three related projects together for cumulative impacts on traffic/VMT and safety, air quality/health risk, noise/vibration, stormwater/water quality, biological resources, and visual character (CEQA Guidelines §15130; consider a programmatic/tiered EIR per §§15168/15152).

6.2 Use a consistent horizon year, network, and modeling assumptions for all three projects. If combined analysis shows new or more severe impacts, recirculate the DEIR and extend the comment period (Guidelines §15088.5).

Unknown Tenants, 24/7 Operations, and Potential Manufacturing

7.1 Provide a conservative, worst-case operations envelope across the three projects: unknown tenants, potential manufacturing/processing, hazardous materials handling, and 24/7 dock use (48+ docks).

7.2 If the City intends to avoid worst-case outcomes, adopt enforceable conditions: limits on hours/dock operations near residences, prohibited uses without further discretionary review and CEQA, caps on truck trips, and WAIRE/zero-emission timelines with on-site charging installed at occupancy.

Land-Use Compatibility and Long-Term Policy Direction

8.1 The Meadows area was rezoned from agriculture to residential, reflecting a policy commitment to neighborhood livability. In contrast, locating intensive logistics next to homes presents a direct land-use conflict that may not be fully mitigable.

8.2 In line with the AG's guidance and CARB's Land Use Handbook (500-foot or greater buffers where feasible), the City should evaluate alternatives, redesigns, or rezoning to ensure long-term compatibility and protect sensitive receptors.

Public Process: Site Visit, Field Verification, and Community Engagement

9.1 I respectfully invite City officials—including Planning Commissioners and City Council Members—along with City staff and the consultant team, to conduct a site visit of:

a) The three project sites and proposed truck access points/routes.

b) The Meadows community (including streets closest to the truck route), nearby senior apartments, childcare, schools, parks, and trails.

9.2 Purpose: to obtain first-hand understanding of proximity, topography, wind patterns, and how noise and truck movements will interact with homes and public spaces—especially at night and early morning.

9.3 Requests for field-based verification and engagement:

a) Host at least one community workshop and one site walk before certification of any EIR.

b) Conduct a truck-route "drive-along" simulation of peak operations and queueing; share video and queue length analysis.

c) Provide a nighttime noise demonstration or comparable modeling presentation for backup alarms, loading, and pass-bys at corrected receptor distances.

d) Install temporary monitoring (noise, PM2.5, black carbon) to establish pre-project baseline conditions in the Meadows and along the truck routes.

e) Commission independent third-party peer review of the air quality/health risk, noise, and traffic studies; publish responses to peer review in the Final EIR.

f) Form a Community-Technical Advisory Group (CTAG) with residents, small businesses, school/health representatives, and City staff to shape mitigation and monitoring.

g) If significant unavoidable impacts remain, consider a temporary moratorium on approvals pending a citywide programmatic EIR on warehouse siting and buffers.

Specific Design and Operations Improvements to Consider

10.1 Increase buffers/setbacks and relocate docks/drive aisles farther from homes; enclose docks nearest residences.

10.2 Require ZE/NZE truck adoption schedules, on-site DC fast charging sized to commitments, strict anti-idling enforcement with geofencing, and third-party monitoring.

10.3 Limit nighttime outdoor loading near residences; require broadband "white noise" backup alarms and quiet pavement on internal truck routes.

10.4 Install solid sound/air-dispersion walls and deep vegetative barriers; upgrade filtration (MERV 16 onsite; offer MERV 13–16 for nearest homes/senior apartments).

10.5 Adopt designated truck routes that avoid residential streets; prohibit residential cut-through; provide on-site staging to prevent street queueing.

Requested Actions

A. Schedule a joint site visit and community walk with Planning Commissioners, City Council Members, City staff, and consultants before the close of the public review or prior to any hearings.

B. Hold at least one public workshop to present corrected maps (showing ~100-foot proximities), cumulative findings for all three projects, and proposed mitigation/alternatives; accept written questions and provide written responses.

C. Expand the DEIR to include:

A citywide vision/General Plan consistency discussion

(Section 1).Business access and small-business viability analysis tied to physical impacts (Section 2).Emergency response and evacuation analysis under peak truck conditions (Section 3).Parks/trails and active transportation impact analysis with protections (Section 4).Environmental justice analysis and full response to the AG's April 2024 letter (Section 5).A combined/programmatic cumulative analysis of all three projects (Section 6).A conservative operations envelope for unknown tenants/24-7/potential manufacturing, with enforceable limits

Land-use compatibility and rezoning/alternative pathways

D. Recirculate the DEIR if corrected proximity, combined operations (48+ docks, 24/7), or new analyses show new or more severe impacts; extend the public comment period accordingly.

E. Commit to the design and operational improvements in Section 10, with enforceable conditions and a robust Mitigation Monitoring and Reporting Program (Guidelines §15097).

F. Establish a Community-Technical Advisory Group and commission independent peer review of air/health risk, noise, and traffic.

These projects will set the trajectory for Lake Forest's livability, economy, and reputation. A careful, transparent, field-informed process is essential to protect residents, support local businesses, and make decisions aligned with the City's long-term goals.

Thank you for your consideration. Please add me to the notification list for all future hearings and documents related to these projects. I will follow up to help coordinate the requested site visit and community walk at dates convenient for the reviewing team.

Sincerely,,

June Bian

Lake Forest Resident

JUNE BIAN

Letter Code: I-107
Date: September 15, 2025

Response to Comment I-107-1

This comment is introductory and expresses concern regarding the potential for long-term implications of the proposed Project and adjacent warehouse projects for nearby residents.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-107-2

This comment expresses concern regarding community character and general plan consistency, stating the opinion that the proposed Project in combination with the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) would define the City's character, and requests that the Draft EIR address their comments by evaluating consistency with the General Plan, assessing compatibility of 24/7 operations with nearby residential, recreational, and educational land uses, and requiring disclosure or consideration of alternatives if inconsistencies are identified.

Refer to Master Response 7 regarding the compatibility of the proposed Project on surrounding land uses and consistency with the City's General Plan, and Response to Comment O-6-4 regarding 24/7 operations associated with the proposed Project. In addition, refer to Master Response 6 regarding the adequacy of the cumulative impacts analysis presented in the Draft EIR, and Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-107-3

This comment expresses concern regarding the potential for secondary effects on local businesses and requests the Draft EIR be revised to address their comments by discussing customer access and parking impacts, potential shifts in business mix, worker attraction/retention challenges related to the environmental impacts, and economic disruption for local businesses.

Impacts related to economic development, economic disruption, and potential shifts in business are not required to be analyzed under CEQA, as *State CEQA Guidelines* Section 21082.2(c) limits evaluation of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment.

The Draft EIR discusses access and parking for the proposed Project in Section 3.5, Circulation, Access, and Parking, starting on page 3-17 of Chapter 3.0, Project Description. As described therein, vehicular access to the Project site would be provided via two existing driveways on Enterprise Way and an existing shared drive aisle on the north corner of the site. Additionally, this section describes that the proposed Project would include a total of 262 parking spaces, consistent with Chapter 9.168, Off-Street Parking, of the City's Zoning Code, which establishes parking requirements for industrial uses. A detailed description of the types of parking spaces provided is included in Section 3.5.3 (page 3-17), Parking, of the Draft EIR.

This comment does not specify the nexus between specific environmental impacts associated with the proposed Project and worker attraction/retention challenges. Therefore, concerns regarding worker attraction/retention challenges are speculative and are not required to be analyzed under CEQA. This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-107-4

This comment requests the Draft EIR be revised to address their comments regarding evaluation of emergency vehicle access, response times, and evacuation performance, wildfire scenarios, and the provision of a Truck Incident Management Plan.

Refer to Master Response 13 regarding emergency access and evacuation associated with the proposed Project, Master Response 8 regarding response times and impacts related to truck safety associated with the proposed Project, Response to Comment O-1-10 regarding potential wildfire associated with the proposed Project. These responses thoroughly address the topics raised in this comment

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-107-5

This comment requests the Draft EIR be revised to address their comments regarding analysis of effects on nearby parks, trails, and active transportation corridors from DPM, noise, and freight conflicts at crossings and the provision of mitigation for recreational quality.

Refer to Master Response 9 regarding health risk impacts associated with the proposed Project on adjacent land uses, Master Response 11 regarding noise impacts associated with the proposed Project, Master Response 8 regarding potential conflicts related to traffic resulting from the proposed Project, and Response to Comment O-1-16 regarding the adequacy of the Draft EIR's recreation analysis. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-107-6

This comment requests the Draft EIR be revised to address their comments by expanding the environmental justice analysis and incorporating and responding to the California Attorney General's NOP comment letter (*IPT Enterprise Business Center LLC, SCH #2024030755*, April 5, 2024; located in Appendix A of the Draft EIR).

Refer to Master Response 14 regarding the disproportionate environmental burdens and the requirements for an analysis of environmental justice impacts. This Master Response thoroughly addresses the topics raised in this comment

The City acknowledges the California Attorney General's NOP comment letter and considered the issues presented in the letter during preparation of the Draft EIR.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-107-7

This comment requests the Draft EIR be revised to address their comments regarding the analysis of all cumulative industrial warehouse projects for combined impacts to traffic/VMT, safety, air quality, health risk, noise/vibration, stormwater/water quality, biological resources, and visual character, and use of consistent modeling assumptions for each cumulative project.

Refer to Master Response 6 regarding the adequacy of the cumulative impacts analysis presented in the Draft EIR. This Master Responses thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-107-8

This comment requests the Draft EIR be revised to address their comments regarding the provision of a conservative-worst case scenario on future tenancy for the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) including manufacturing/processing, hazardous materials, and dock use. This comment also requests that the City address their comments by adopting enforceable conditions to prohibit worst-case scenarios.

Refer to Response to Comment O-1-17 regarding the Draft EIR's evaluation of worst-case scenarios and Response to Comment O-1-10 regarding tenant uncertainty associated with the proposed Project. Additionally, Refer to Master Response 6 regarding the adequacy of the cumulative impacts analysis presented in the Draft EIR, and Master Response 13, Hazards and Hazardous Waste, regarding hazardous material use associated with the proposed Project. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-107-9

This comment expresses concern regarding land use incompatibility and requests the City address their comments by evaluating alternatives, redesigns or rezoning to ensure long-term compatibility and protection of sensitive receptors.

Refer to Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses, Master Response 9 regarding potential health risk impacts to sensitive receptors associated with the proposed Project, and Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-107-10

This comment requests the City conduct a site visit of the Meadows community and the Western Realco Enterprise Way Industrial Project (Projects 1 and 2) to obtain first-hand understanding of the existing environmental setting and conduct community engagement with nearby residents. This comment provides a detailed list of requests related to field-based verification and engagement.

The requests in this comment have been shared with and reviewed by the City. City staff have visited the Project site and the Meadows community. The Project Applicant has also conducted some community outreach. The comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. No further response is required.

Response to Comment I-107-11

This comment provides recommendations for design and operation, including increased buffers/ setbacks, relocation of docks/drive aisles, ZE/NZE emission truck schedules, limiting nighttime loading, installing sound/air dispersion walls, and adoption of designated truck routes.

The recommendations of this comment have been considered by the City. Refer to Master Response 4 regarding adequacy of the mitigation provided in the Draft EIR. This Master Response thoroughly addresses the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-107-12

This comment requests the City schedule the aforementioned site visits, hold at least one public workshop, and expand the Draft EIR to include a General Plan consistency discussion, economic impacts, emergency response and evacuation analysis for peak traffic scenarios, parks/trails and active transportation impacts, environmental justice analysis, and revised cumulative analysis. This comment also requests the City address their comments by recirculating the Draft EIR with revisions, committing to design and operation improvements with a robust MMRP, establishing a community Technical Advisory Group, and conducting peer reviews of the air, health, noise, and traffic studies.

Refer to Master Response 7 regarding the proposed Project's consistency with the City's General Plan and surrounding land uses, Master Responses 8 and 13 regarding emergency access, evacuation, and response times associated with the proposed Project, and Master Response 14 regarding disproportionate environmental burdens and the requirements for an analysis of environmental justice impacts. Additionally, Refer to Master Response 6 regarding the adequacy of the cumulative impacts analysis provided in the Draft EIR and Master Response 4 regarding the adequacy of the mitigation under CEQA proposed for the Project. Response to Comment I-49-12 discusses the independent peer-reviewed data that supports the conclusions reached in the Draft EIR.

Economic impacts are not required to be analyzed under CEQA, as *State CEQA Guidelines* Section 21082.2(c) limits evaluation of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment.

As discussed in Master Response 1 all comments received during the public review period that raise substantive environmental issues are responded to thoroughly in this Final EIR, consistent with *State CEQA Guidelines* Section 15088. Additionally, residents who have requested to be added to the Project notification list will be notified of future public hearing(s) for the proposed Project, at which time verbal comments can be made by members of the public.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Response to Comment I-107-13

This comment concludes the letter and requests notification of future Project-related activities.

Residents who have requested to be added to the Project notification list will be notified of future public hearing(s) for the proposed Project, at which time verbal comments can be made by members of the public.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses above. No further response is required.

Weiss, Jennifer

From: Mindy Li [redacted]
Sent: Monday, September 15, 2025 4:46 PM
To: Stonich, Amy; EnterpriseProjects
Cc: Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Questions Regarding Fire Safety and Liability of Proposed Warehouses

Dear Ms Stonich, City Planning Commission and City Council,

I live in the Meadows/ Redwood community near the proposed warehouse project. I have some serious concerns regarding the safety of our neighborhood:

1. How quickly can fire trucks realistically arrive at the proposed warehouse site in the event of a fire, especially during peak traffic hours?
2. What types of materials or goods will be stored in these warehouses? Will any hazardous, flammable, or chemical substances be involved?

I-108-1

3. In case of a fire or explosion, who will be responsible for protecting the safety of nearby residents and compensating for any property loss or damage? Will there be insurance coverage specifically addressing risks to surrounding neighborhoods?

We kindly ask for clear answers to these questions, as they directly affect the safety and wellbeing of the residents.

Thank you for your attention.

Sincerely,

Mindy Li

[redacted]

Lake Forest CA 92630

Please confirm that you have received this email.

发自我的 iPhone

CAUTION: Think Security! This email is not from someone at the City of Lake Forest. **Do not click any links or open any attachments you are not expecting.**

MINDY LI

Letter Code: I-108
Date: September 15, 2025

Response to Comment I-108-1

This comment expresses concerns regarding emergency access, hazardous materials, and nearby resident safety and inquires about fire response time, future use of hazardous materials on-site, and emergency plans.

Refer to Master Response 8 and Master Response 13 regarding impacts to emergency access, including fire response times as well as hazardous materials and safety pertaining to the future use of materials on-site. These Master Responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: Donghai Xu [redacted]
Sent: Monday, September 15, 2025 4:55 PM
To: EnterpriseProjects
Subject: Public Comments on DEIR – IPT Enterprise Business Center Project

Dear Amy,

I am writing to submit my public comments regarding the DEIR for the IPT Enterprise Business Center Project. To be honest, DEIR is too bulky and lengthy for ordinary people to review. It is more like a process for the applicant to push it through. I assure you that there are way more residents than you think who are strongly opposing this project.

I would like to raise the following points for consideration among many others. A lot of statements and conclusions are subjective and groundless, against common sense.

1. Bake Parkway and existing routes are busy and crowded enough and are suitable for more truck traffic. The narrowness of two lanes with up-and-downs has put some risks on daily commute. It should not be further undermined by more truck traffic. With an unidentified tenant, how can the truck traffic be accurately analyzed? The mitigation measure of bike lanes is ridiculous. How can they make sure people ride bikes instead? Do people want to ride bikes along with huge trucks?
2. Residents have kept requesting all-round accumulative analysis on all 3 warehouse projects. The DEIR is actually accumulative. I-109-1
3. It is not convincing at all to reach such a conclusion that households within 100 feet from the warehouse are not significantly impacted. Similar subjective statements can be found all over the report.
4. All sorts of pollution (light, air, hazardous material, etc.) related to the destruction, construction and operation of the facility are not fully analyzed.

All in all, the City should not approve such a project, which is against common sense to put massive manufacturing and warehouse in less than 100 feet from hundreds of households. It is contradictory to people's common warfare and the city's future development goals.

Thank you for your attention to this matter. Please let me know if you require any further information or clarification regarding my comments.

Sincerely,
Donghai Xu

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DONGHAI XU

Letter Code: I-109
Date: September 15, 2025

Response to Comment I-109-1

This comment expresses opposition to the proposed Project and raises concerns regarding traffic congestion, tenant uncertainty, adequacy of mitigation measures, less than significant environmental impact conclusions, light and air pollution, hazardous materials, and the cumulative impact analysis.

Refer to Master Response 8 regarding traffic congestion associated with the proposed Project, Response to Comment O-1-10 regarding tenant uncertainty, Master Response 4 regarding the adequacy of the mitigation measures proposed for the Project, Master Response 2 regarding the adequacy of the Draft EIR and its impacts conclusions, Master Response 12 regarding light pollution associated with the proposed Project, Master Response 9 regarding potential health risks associated with the proposed Project, Master Response 13 regarding impacts related to hazardous materials associated with the proposed Project, and Master Response 6 regarding the adequacy of the cumulative impacts analysis presented in the Draft EIR. These responses thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

Weiss, Jennifer

From: Vivian Zhao [redacted]
Sent: Monday, September 15, 2025 4:55 PM
To: Stonich, Amy; EnterpriseProjects
Cc: Ackerman, Gayle; Barajas, Francisco; Ludden, Thomas; Grable, Tom; Stannard, Michael; Villwock, Jordan; Voigts, Scott; Pequeno, Robert; Cirbo, Doug; Tettemer, Mark; Yu, Benjamin; Smith, Amy
Subject: Public Comment and Request for Acknowledgment of Receipt – Draft EIR (SCH No. 2024030755), IPT Enterprise Business Center LLC Project

Dear Amy, Planning Commissioners, and City Council Members,

I am a Lake Forest resident writing to comment on the Draft Environmental Impact Report (DEIR) for the IPT Enterprise Business Center Project. After reviewing the DEIR and discussing its implications with the attorney, I firmly oppose the warehouse proposal. Please confirm receipt of this email and include it in the administrative CEQA record.

Executive Summary

- **The DEIR fails to fully disclose, analyze, and mitigate significant impacts on air quality, health risk, noise/vibration, truck traffic and queuing, and neighborhood compatibility—especially at residential edges and sensitive receptors (playgrounds and an affordable senior community).**
- **Feasible, environmentally superior alternatives exist that meet project objectives with fewer impacts; CEQA requires their adoption or a lawful, evidence-based explanation for rejecting them.**
- **As drafted, the DEIR does not support approval findings; CEQA prohibits reliance on a deficient document.**

Key Findings Informed by Counsel's Review

- **Disclosure & Mitigation: The DEIR understates or omits peak-hour and cumulative impacts, lacks enforceable mitigation with measurable performance standards, and improperly defers future study without clear triggers, timelines, or remedies.**
- **Alternatives: The alternatives analysis is unreasonably narrow. Practical options—reduced-intensity footprints, limited (non-24/7) operations, and non-industrial mixed-use/office/clean-tech uses—were not adequately evaluated despite their feasibility and lower impacts.**
- **Legal Standard: Without substantial-evidence support for significance determinations and binding mitigation, the City cannot lawfully adopt findings or a Statement of Overriding Considerations.**

I-110-1

Community Impacts and Equity Concerns

Homes directly abutting the site would face round-the-clock truck movements, diesel exhaust, backup alarms, lighting glare, and traffic conflicts on neighborhood streets—separated from families, playgrounds, and a senior facility by only a block wall. Advancing the project without a legally adequate DEIR and meaningful, feasible protections would trade community health and safety for short-term industrial gain, contrary to the City's 2040 General Plan vision.

Requested Actions

To comply with CEQA and protect public health, I respectfully ask the City to:

1. **Reject and recirculate the DEIR, correcting deficiencies and providing enforceable mitigation and monitoring plans.**
2. **Require an independent Health Risk Assessment using conservative near-source exposure assumptions for residences, playgrounds, and the senior facility, and evaluate non-24/7 operating scenarios.**

3. **Expand the alternatives analysis to include lower-intensity and non-industrial options compatible with adjacent neighborhoods.**
4. **Adopt binding operating conditions (caps on truck trips and hours, off-street queuing, designated truck routes, zero-idling enforcement, fully shielded lighting, verified filtration for nearby receptors, and third-party compliance audits).**
5. **Convene a community workshop before recirculation so residents can review methodologies and enforcement/monitoring mechanisms.**

I-110-1

I support responsible, compatible development that advances Lake Forest's long-term well-being. I cannot support a project that, under a deficient DEIR, imposes disproportionate burdens on children, seniors, and nearby families. I urge the City and Applicant to pursue lawful, protective alternatives that safeguard health, respect neighborhood character, and deliver sustainable economic benefits.

Thank you for your consideration and public service. Please confirm receipt and inclusion of this comment in the administrative record. I am available to meet with staff and consultants at your convenience.

Sincerely,

Vivian Zhao
Resident, City of Lake Forest

On Sep 14, 2025, at 11:55 AM, Vivian Zhao [redacted] wrote:

Dear City Staff, Planning Commissioners, and Councilmembers,

Thank you for the significant effort that went into preparing the Draft Environmental Impact Report (DEIR) for the IPT Enterprise Business Center. As a nearby resident, I appreciate the City's commitment to a transparent CEQA process and to protecting community health, safety, and quality of life.

I respectfully submit the attached document containing chapter-by-chapter questions on the DEIR. These questions summarize and expand on the concerns I shared in my oral comment: the project's proximity to homes, children's playgrounds, and an affordable senior community; the potential for 24/7 truck operations to affect noise, vibration, and air quality; traffic circulation concerns given the single primary access in a residential area; and the DEIR's own finding of significant and unavoidable impacts related to VMT and greenhouse gas emissions.

The questions are organized to facilitate review, following the DEIR's structure (Sections 4.1–4.20). They are intended to be constructive and specific so that the City and its consultants can provide clear, written responses in accordance with CEQA. My goal is to help ensure the final environmental analysis fully addresses neighborhood conditions and sensitive receptors adjacent to the site.

I would also welcome a meeting or call with City staff and the consultant team to walk through these questions, compare assumptions, and clarify data sources.

If additional information or site-specific monitoring would be helpful, I am happy to assist in coordinating access and logistics.

Kindly confirm receipt of this email and attachments at your earliest convenience so I know my comments have been entered into the public record. Please also keep me informed of future hearings, notices, and any supplemental analyses related to this DEIR.

Thank you again for your time and for all you do for Lake Forest residents. I appreciate your thoughtful consideration of these comments.

Sincerely,

Vivian Zhao

Lake Forest Resident

<IPT_DEIR_Questions.docx>

Sent from my iPhone

CAUTION: Think Security! This email is not from someone at the City of Lake Forest. **Do not click any links or open any attachments you are not expecting.**

VIVIAN ZHAO

Letter Code: I-110
Date: September 15, 2025

Response to Comment I-110-1

This comment expresses opposition to the proposed Project, stating the opinion that the Draft EIR does not fully disclose, analyze, and mitigate significant impacts on air quality, health risk, noise/vibration, truck traffic and queuing, and neighborhood compatibility, that the Draft EIR does not support approval findings, that the analysis of alternatives is inadequate as environmentally superior alternatives exist, and expresses concern regarding community impacts and equity concerns. This comment also requests the City address their comments by rejecting and recirculating the Draft EIR, requiring an independent HRA, expanding the alternatives analysis, adopting binding operating conditions, and convening a community workshop.

Refer to Response to Comment O-1-4 regarding the air quality analysis conducted for the proposed Project, Master Response 9 regarding the Draft EIR's analysis health risk impacts, Master Response 11 regarding the Draft EIR's noise and vibration analysis, Master Response 8 regarding impacts to traffic and queuing associated with the proposed Project, Master Response 7 regarding the compatibility of the proposed Project with surrounding land uses and effect on quality of life, and Master Response 14 regarding disproportionate environmental burdens and the requirements for an analysis of environmental justice impacts. In addition, refer to Master Response 2 regarding the adequacy of the Draft EIR, and Master Response 5 regarding the adequacy of the range of alternatives considered for the proposed Project.

As discussed in Master Response 1 all comments received during the public review period that raise substantive environmental issues are responded to thoroughly in this Final EIR, consistent with *State CEQA Guidelines* Section 15088. Additionally, residents who have requested to be added to the Project notification list will be notified of future public hearing(s) for the proposed Project, at which time verbal comments can be made by members of the public.

The responses noted above thoroughly address the topics raised in this comment.

This comment does not provide evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the Draft EIR, or that impacts would be substantially more severe than those identified in the Draft EIR. No revisions are necessary, and no further response is required.

I-111

Outlook

Comments on the Draft Environmental Impact Report (DEIR) for IPT Enterprise Business Center (SCH No. 2024030755)

From Connie Ding <connieding1@gmail.com>
Date Mon 9/15/2025 6:20 PM
To Stonich, Amy <AStonich@lakeforestca.gov>; EnterpriseProjects <EnterpriseProjects@lakeforestca.gov>
Cc Ackerman, Gayle <GAckerman@lakeforestca.gov>; Barajas, Francisco <fbarajas@lakeforestca.gov>; Ludden, Thomas <tludden@lakeforestca.gov>; Grable, Tom <tgrable@lakeforestca.gov>; Stannard, Michael <mstannard@lakeforestca.gov>; Villwock, Jordan <jvillwock@lakeforestca.gov>; Voigts, Scott <svoigts@lakeforestca.gov>; Pequeno, Robert <rpequeno@lakeforestca.gov>; Cirbo, Doug <dcirbo@lakeforestca.gov>; Tettemer, Mark <MTettemer@lakeforestca.gov>; Yu, Benjamin <byu@lakeforestca.gov>; Smith, Amy <asmith@lakeforestca.gov>

Dear Planning Commission and City Staff,

I-111-1 As residents of Lake Forest, we strongly object to the Draft EIR for the IPT Enterprise Business Center. The project poses serious cumulative risks to public health, environmental safety, emergency response, and geotechnical stability, which are inadequately addressed in the DEIR. Many residents remain unaware of this project despite its direct impact on Bake Parkway, Lake Forest Drive, Dimension Drive, and Commercentre Drive, which are heavily used daily by residents, schools, and families.

Key Concerns

1. Air Quality and Health Risks

I-111-2
- Lake Forest already exhibits high cancer risk (>360 per million), largely due to diesel particulate matter (DPM).
- Sensitive populations include Meadows low-income senior apartments and Panasonic building, which contains asbestos.
- Draft EIR estimates 269 truck trips/day for IPT, excluding two Western Realco warehouse projects, which will further increase DPM exposure.

I-111-2 cont.

- DEIR does not fully use AQMD CEQA Air Quality Handbook and CalEEMod modeling or provide all inputs/outputs.

2. Industrial Contamination & Legal Violations

I-111-3

- Site history as Panasonic Avionics (1999–2020) involved:
  - Hexavalent chromium (Cr VI) from electroplating (exceeds CalEPA REL 0.02 µg/L; DTSC 2019 remediation).
  - TCE from metal degreasing (estimated 12× EPA MCL).
  - PFAS from firefighting foam, not addressed.
- DEIR fails to disclose these hazards, violating HS Code §§25358, 25359.7, §25160.

3. Traffic and Emergency Response

I-111-4

- Truck volumes underestimated; narrow roads will face severe congestion.
- Emergency response claims (<7 min) contradict 911 data (average 8 min 44 sec).
- Dimension Drive passes near schools and parks with heavy bicycle use.

4. Fire Protection

I-111-5

- Draft EIR specifies 800 GPM for fire hydrants; OCFA standard §507.5.1 requires 1500 GPM.
- Fire suppression capacity is insufficient, endangering facility and community.

5. Serrano Creek & Environmental Risks

I-111-6

- Heavy truck traffic and runoff may impact Serrano Creek.

I-111-6 cont.

- Extreme event risks: flooding during northeast-side Very High Fire Hazard Severity Zones (VHFHSZ) fire could carry warehouse chemicals into the creek, violating Clean Water Act §402.
- Need clarification on which water agency (IRWD or other) will review and recommend mitigation.

6. Geotechnical, Water Resources, and Natural Resource Concerns

- Project will permanently cover 8.4 acres of high-quality sand layer (CGS estimated 1.2 million tons, value ~$210 million) and cut off Serrano Creek groundwater recharge.

I-111-7

- Planned excavation 6 feet through sand layers with 0.5–2 cm dry cracks, per geotechnical report (Southern California Geotechnical 2021b, Appendix E), could compromise aquifers.
- OCTA report (2025) highlights county-wide sand scarcity; Santa Ana watershed is one of the last extractable areas.
- DEIR fails to analyze combined wildfire, flooding, and hazardous chemical release risk.

7. Public Notification

I-111-8

- Residents along impacted roads were not adequately notified. All Lake Forest residents deserve full disclosure.

8. Mitigation Measures (per AQMD and Best Practices)

I-111-9

- Zero or near-zero emission trucks with phased adoption.
- Limit daily truck trips; CEQA reevaluation if exceeded.
- Clearly marked truck routes away from schools/residences.
- Site layout: entry/exit, parking away from sensitive receptors.
- Buildings: solar, reflective surfaces, low VOC, energy-efficient.

- Compliance with AQMD Rule 2305 (WAIRE Program).
- MERV 13+ filters insufficient; priority must be source control.

Questions / Requests for Clarification

1. Total daily truck volume combining IPT and Western Realco projects?
2. Emergency response: how will fire, ambulance, and police respond effectively given congestion and 911 data? Independent Fire Dept. analysis?
3. Will AQMD/health agencies review cumulative health risks, including high cancer rates, asbestos, sensitive populations?
4. Could truck emissions/runoff contaminate Serrano Creek? Which water agency will review?
5. Why were residents along Bake Parkway, Lake Forest Drive, Dimension Drive, and Commercentre Drive not notified? Will all Lake Forest residents be informed?

I-111-10

6. Insurance: have companies been consulted on increased risks/premiums along truck routes?
7. Fire protection: why only 800 GPM when OCFA §507.5.1 requires 1500 GPM?
8. Why does DEIR fail to disclose hexavalent chromium, TCE, PFAS contamination and remediation orders?
9. How will City ensure compliance with HS Code §§25358, 25359.7, §25160?
10. Will independent soil, groundwater, vapor intrusion testing occur before approval?
11. How will project excavation and coverage of sand layers (aquifer recharge) be mitigated to avoid permanent aquifer and resource depletion?
12. Has the DEIR evaluated wildfire-flood-chemical release cascade risk, including extreme rainfall carrying hazardous materials into Serrano Creek?

Thank you for your consideration.

Sincerely,

Connie Ding
9/15/2025

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CONNIE DING

Letter Code: I-111
Date: September 15, 2025 (late)

Response to Comment I-111-1

This comment is introductory and describes the following comments to be addressed in response to the Draft EIR, expressing concerns regarding the environmental impacts analysis and cumulative impacts.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

Response to Comment I-111-2

This comment summarizes the commenter's concerns regarding the air quality and health risk analysis presented in the Draft EIR, including cancer risk and impacts to sensitive populations.

Refer to Master Response 6 regarding the cumulative analysis; Response to Comment O-1-4 regarding the air quality analysis; Master Response 9 regarding the health risk assessment prepared for the proposed Project; Response to Comment I-10-4 for more information related to potential cancer risk associated with the proposed Project; and Master Response 14 regarding disproportionate environmental burdens and the requirements for an analysis of environmental justice impacts. These responses thoroughly address the topics raised in this comment.

Response to Comment I-111-3

This comment summarizes the commenter's concerns related to the historical site use at the Project site.

Refer to Master Response 13 regarding the discussion of hazardous materials included in the Draft EIR. This Master Responses thoroughly addresses the topic raised in this comment.

Response to Comment I-111-4

This comment summarizes the commenter's concerns related to the estimation of truck volumes related to the proposed project, emergency response times, and impacts to nearby schools and parks that have heavy bicycle use.

Refer to Master Response 8 regarding traffic and safety impacts for bicyclists and pedestrians; and Master Response 13 and Response to Comment O-1-10 regarding the adequacy of emergency access provided under the proposed Project. These responses thoroughly address the topics raised in this comment.

Response to Comment I-111-5

This comment summarizes the commenter's concerns related to fire protection.

Refer to Master Response 13 regarding emergency preparedness related to the Project site. This Master Responses thoroughly addresses the topic raised in this comment.

Response to Comment I-111-6

This comment summarizes the commenter's concerns related to the potential for environmental impacts to Serrano Creek including runoff from heavy trucks, warehouse chemicals, and requests clarification on the agency that will be responsible for reviewing and recommending mitigation.

Refer to Response to Comment I-49-6 regarding the evaluation of impacts to the Serrano Creek watershed and connected ecosystems. As stated on page 4.19-14 of the Draft EIR, proposed connections to the existing wastewater lines would be reviewed and approved by the City's Public Works Department and IRWD, as applicable, to ensure consistency with system capacity and operations. As discussed in Response to Comment I-93-3, IRWD reviewed the Draft EIR and prescribed mitigation measures and commented on the proposed Project in Comment Letter O-4. This response thoroughly addresses the topic raised in this comment.

Response to Comment I-111-7

This comment summarizes the commenter's concerns related to the groundwater recharge of Serrano Creek, potential for aquifers to be compromised, and the opinion that the combined impacts related to wildfire, flooding, and hazardous chemical releases were not analyzed.

Refer to Response to Comment I-57-1 regarding groundwater recharge; Response to Comment I-55-4 regarding potential impacts to aquifers; and Master Response 6 regarding the adequacy of the cumulative impacts analysis presented in the Draft EIR. These responses thoroughly address the topics raised in this comment.

Response to Comment I-111-8

This comment summarizes the commenter's concerns related to public notification of the proposed Project.

Refer to Response to Comment I-93-1 regarding public noticing for the proposed Project. This response thoroughly addresses the topic raised in this comment.

Response to Comment I-111-9

This comment provides a list of mitigation measures per the Air Quality Management District and Best Practices.

The recommendations in this comment have been considered by the City. Refer to Master Response 4 regarding adequacy of the mitigation provided in the Draft EIR. This Master Response thoroughly addresses the topics raised in this comment.

Response to Comment I-111-10

This comment provides a list of questions/requests for clarifications which have been included in the commenters previous comment letters and are responded to throughout this RTC document.

Refer to Master Response 6 regarding the adequacy of the cumulative impact analysis prepared for the proposed Project; Master Response 13 regarding the proposed Project's potential impacts on emergency evacuation and emergency access, impacts related to hazardous wastes and materials, and requirements under the California Health and Safety Code; Master Response 9 regarding Project-related and cumulative health risks; Response to Comment I-49-6 regarding the evaluation of impacts to the Serrano Creek watershed and connected ecosystems; Response to Comment I-93-1 regarding public noticing for the proposed Project; Response to Comment O-1-15 regarding fire protection; Response to Comment I-57-1 regarding groundwater recharge; and Response to Comment I-55-4 regarding potential impacts to aquifers. In addition, California Public Resource Code Section 21082.2(c) limits evaluation of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment, including increased insurance premiums. These responses to comments thoroughly address the topics raised in this comment.

3.0 ERRATA

3.1 TEXT CHANGES TO DRAFT ENVIRONMENTAL IMPACT REPORT

This section of the Final Environmental Impact Report (EIR) provides text changes to the Draft EIR that have been made to clarify, amplify, or make minor edits to the Draft EIR text for the proposed IPT Enterprise Business Center LLC Project (proposed project). The changes described in this section are generally minor changes that do not constitute significant new information, change the conclusions of the environmental analysis, or require recirculation of the document (*State of California, California Environmental Quality Act [CEQA] Guidelines* Section 15088.5).

Such changes to the Draft EIR are indicated in this section under the appropriate Draft EIR section. Deletions are shown with ~~strikethrough~~ and additions are shown with double underline.

These changes were made for clarification only and have no effect on the analysis or conclusions contained in the Draft EIR.

1. **Chapter 1.0, Executive Summary**

   Revisions have been made to Table 1.A, Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance After Mitigation, of the Draft EIR to include the thresholds identified in the City of Lake Forest CEQA Significance Thresholds Guide (2025) and to reflect revisions made to regulatory compliance and mitigation measures consistent with the revisions made to Section 4.1, Aesthetics; Section 4.3, Air Quality; Section 4.10, Hydrology and Water Quality; Section 4.11, Land Use and Planning; Section 4.13, Noise; and Section 4.17, Transportation and Traffic, as discussed below and provided in Appendices B through G of this document. These changes have no effect on the analysis or conclusions contained within the Draft EIR. Please refer to Appendix A for a copy of revised Chapter 1 with deletions shown with ~~strikethrough~~ and additions shown with double underline.

2. **Chapter 3.0, Project Description**

   Table 3.A on page 3-21 of Chapter 3.0, Project Description, in the Draft EIR has been revised to clarify that if stationary or portable equipment would be used by the future tenant, permits would be required pursuant to SCAQMD Rules 201 and 203. This revision was made for clarification and has no effect on the analysis or conclusions contained in the Draft EIR.

Table 3.A: Probable Future Actions by Responsible Agencies

Responsible Agency	Action
Orange County Fire Authority (OCFA)	Approval of Secured Fire Protection Agreement and Fire Master Plan.
State Water Resources Control Board (SWRCB)	Applicant/Developer must submit Permit Registration Documents, including a Notice of Intent, to comply with the National Pollutant Discharge Elimination System (NPDES) North Orange County Permit (Order No. R8-2009-030 as amended by Order No. R8-2010-0062).
South Coast Air Quality Management District (SCAQMD)	The requirements of SCAQMD Rule 2305 would be applicable to the proposed project. The Applicant/Developer must submit a Warehouse Operations Notification to the SCAQMD, disclosing building and tenant information, and must submit annual documentation to SCAQMD demonstrating ongoing compliance with Rule 2305. If stationary or portable equipment would be used by the future tenant, the tenant would be required to obtain permits to construct and operate under SCAQMD Rules 201 and 203.

Source: Compiled by LSA (2025).

3. **Chapter 4.0, Environmental Impact Analysis**

The following text has been revised under Section 4.3, Thresholds of Significance, in Chapter 4.0 of the Draft EIR to provide clarification that the *City of Lake Forest CEQA Significance Thresholds Guide* (2025) was used in addition to the *State CEQA Guidelines* Appendix G thresholds to evaluate the significance of project impacts for the following six key topical issues: aesthetics, air quality, land use, noise, circulation/transportation, and water resources. This change has no effect on the conclusions contained within the Draft EIR and does not represent a new or impact of greater severity for the project.

Page 4-4, Section 4.3, Thresholds of Significance:

The threshold questions used in this EIR are consistent with Appendix G of the *State CEQA Guidelines* (20245) and the *City of Lake Forest CEQA Significance Thresholds Guide* (2025). The *City of Lake Forest CEQA Significance Thresholds Guide* provides guidance in evaluating the significance of project impacts for the following six key topical issues: aesthetics, air quality, land use, noise, circulation/transportation, and water resources. In instances where the City's thresholds expand upon the thresholds outlined in Appendix G of the *State CEQA Guidelines*, a discussion of both Appendix G of the State CEQA Guidelines and City's thresholds has been provided.

4. **Section 4.1, Aesthetics**

Revisions have been made to Section 4.1, Aesthetics, of the Draft EIR to provide clarification that the *City of Lake Forest CEQA Significance Thresholds Guide* (2025) was used in addition to the *State CEQA Guidelines* Appendix G thresholds to evaluate the significance of project impacts related to aesthetics. Additionally, references to the City of Lake Forest Municipal Code Section 7.08.095 in Section 4.1, Aesthetics, have been removed because Section 7.08.095 is not applicable to the proposed project because the proposed project does not involve a subdivision. These changes have no effect on the analysis or conclusions contained

within the Draft EIR. Please refer to Appendix B for a copy of revised Section 4.1 with deletions shown with ~~strikethrough~~ and additions shown with double underline.

5. Section 4.3, Air Quality

Revisions have been made to Section 4.3, Air Quality, of the Draft EIR to provide clarification that the *City of Lake Forest CEQA Significance Thresholds Guide* (2025) was used in addition to the *State CEQA Guidelines* Appendix G thresholds to evaluate the significance of project impacts related to air quality. These changes have no effect on the analysis or conclusions contained within the Draft EIR. Please refer to Appendix C for a copy of revised Section 4.3 with deletions shown with ~~strikethrough~~ and additions shown with double underline.

6. Section 4.8, Greenhouse Gas Emissions

Mitigation Measure GHG-1 on page 4.8-22 in Section 4.8, Greenhouse Gas Emissions, in the Draft EIR has been revised to clarify the timing of installation of on-site electric truck charging stations. These revisions were made for clarification and have no effect on the analysis or conclusions contained in the Draft EIR.

MM GHG-1: **Electric Vehicle Charging.** Provisions shall be made at the project site for emerging electric truck technology. Prior to the issuance of a shell building permit, the ~~City shall verify that the site plan identifies an on-site location for future electric truck charging stations, with space available for a minimum of four (4) trucks to simultaneously charge when charging stations are installed in the future. The conduit trenching shall be installed to that location for future conduit pull as a requirement of the shell building permit. In conjunction with the approval of tenant improvement plans and permits, the applicant shall install electric truck charging stations on the site for a minimum of four (4) electric truck to simultaneously charge.~~ construction plan set shall:

a) Provide for installation of all necessary infrastructure, including conduit, wiring, and sufficient electrical capacity, to support the future installation of on-site electric truck charging stations; and

b) Designate sufficient space to accommodate a minimum of four electric trucks charging simultaneously.

Prior to issuance of tenant improvement permits for the building, the tenant improvement plans shall include installation of a minimum of four electric truck charging stations at the predesignated locations. The charging stations shall be installed and operational prior to tenant occupancy of the building.

7. Section 4.10, Hydrology and Water Quality

Revisions have been made to Section 4.10, Hydrology and Water Quality, of the Draft EIR to provide clarification that the *City of Lake Forest CEQA Significance Thresholds Guide* (2025) was used in addition to the *State CEQA Guidelines* Appendix G thresholds to evaluate the

significance of project impacts related to hydrology and water quality. These changes have no effect on the analysis or conclusions contained within the Draft EIR. Please refer to Appendix D for a copy of revised Section 4.10 with deletions shown with ~~strikethrough~~ and additions shown with double underline.

8. Section 4.11, Land Use and Planning

Revisions have been made to Section 4.11, Land Use and Planning, of the Draft EIR to provide clarification that the *City of Lake Forest CEQA Significance Thresholds Guide* (2025) was used in addition to the *State CEQA Guidelines* Appendix G thresholds to evaluate the significance of project impacts related to land use and planning. These changes have no effect on the analysis or conclusions contained within the Draft EIR. Please refer to Appendix E for a copy of revised Section 4.11 with deletions shown with ~~strikethrough~~ and additions shown with double underline.

9. Section 4.13, Noise

Revisions have been made to Section 4.13, Noise, of the Draft EIR to provide clarification that the *City of Lake Forest CEQA Significance Thresholds Guide* (2025) was used in addition to the *State CEQA Guidelines* Appendix G thresholds to evaluate the significance of project impacts related to noise. These changes have no effect on the analysis or conclusions contained within the Draft EIR. Please refer to Appendix F for a copy of revised Section 4.13 with deletions shown with ~~strikethrough~~ and additions shown with double underline.

10. Section 4.17, Transportation and Traffic

Revisions have been made to Section 4.17, Transportation and Traffic, of the Draft EIR to provide clarification that the *City of Lake Forest CEQA Significance Thresholds Guide* (2025) was used in addition to the *State CEQA Guidelines* Appendix G thresholds to evaluate the significance of project impacts related to transportation and traffic. Additionally, Regulatory Compliance Measure (RCM) TRA-1 has been added to Section 4.17.9.1, Regulatory Compliance Measures, in the Draft EIR to acknowledge the development standards that are applicable to the proposed project pursuant to Section 9.160.040 of the City's Municipal Code. Because the proposed project was already required to comply with Section 9.160.040 of the City's Municipal Code and the requirements specified in RCM TRA-1 are a matter of regulatory control applicable to all development projects, the addition of this RCM in the Draft EIR has no effect on the analysis or conclusions contained within the Draft EIR. RCM TRA-1 does not address new or more severe significant impacts of the project and was added only to clarify applicable regulations with which the project Applicant must comply as a matter of law. Furthermore, Mitigation Measure (MM) TRA-2 has been added to Section 4.17.9.2, Mitigation Measures, in the Draft EIR consistent with measure T-18 in the 2024 CAPCOA Handbook to further encourage the use of transit and displace the use of vehicles for travel to and from the project site. MM TRA-2 does not address new or more severe significant impacts of the project. The provision of pedestrian-scale transit access lighting serves as a critical enhancement to T-18 (Provide Pedestrian Network Improvement) within the CAPCOA framework and it is an essential supportive and qualitative feature that improves the safety, comfort, and visibility of the walking environment. Because T-18 (Provide Pedestrian Network Improvement) primarily quantifies VMT reduction through the

physical expansion of sidewalk coverage (calculated as a ratio of existing vs. new sidewalk miles), the VMT reduction of the provision of pedestrian-scale transit access lighting is not quantifiable. The addition of this mitigation measure in the Draft EIR has no effect on the analysis or conclusions contained within the Draft EIR. As noted in the Draft EIR, even with implementation of the TDM measures (MM TRA-1 and MM TRA-2), the proposed project would result in a significant and unavoidable impact related to VMT.

The changes to Section 4.17 have no effect on the analysis or conclusions contained within the Draft EIR. Please refer to Appendix G for a copy of revised Section 4.17 with deletions shown with ~~strikethrough~~ and additions shown with double underline.

11. Section 4.20, Wildfire

A reference to the 2007 Santiago Fire and the 2020 Silverado Fire has been added to Section 4.20.3.4, Fire History, in Section 4.20, Wildfire, in the Draft EIR to acknowledge that these fires were included in the fire history review conducted for the proposed project. Neither the 2007 Santiago Fire nor the 2020 Silverado Fire reached the immediate Project site vicinity or burned onto the Project site; therefore, this change has no effect on the analysis or conclusions contained within the Draft EIR.

Page 4.20-3, fourth sentence of the second paragraph under Section 4.20.3.4:

These data suggest that Lake Forest has consistently experienced wildfires from 1970 to 2020 (including the 2007 Santiago Fire and the 2020 Silverado Fire), although there have been no recorded fires that have burned onto any portion of the project site. The FRAP map indicates that the project site is within an area historically prone to wildland fires (CAL FIRE 2022).

12. Chapter 7, Mitigation Monitoring and Reporting Program

Revisions have been made to Table 7.A, Mitigation and Monitoring Reporting Program, of the Draft EIR to reflect revisions made to regulatory compliance and mitigation measures consistent with the revisions made to Section 4.1, Aesthetics; Section 4.3, Air Quality; Section 4.10, Hydrology and Water Quality; Section 4.11, Land Use and Planning; Section 4.13, Noise; and Section 4.17, Transportation and Traffic, as discussed above and provided in Appendices B through G of this document. These changes have no effect on the analysis or conclusions contained within the Draft EIR. Please refer to Appendix H for a copy of revised Chapter 7 with deletions shown with ~~strikethrough~~ and additions shown with double underline.

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APPENDIX A

REVISED CHAPTER 1.0: EXECUTIVE SUMMARY

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1.0 EXECUTIVE SUMMARY

1.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that local government agencies, before taking action on projects over which they have discretionary approval authority, consider the environmental consequences of such projects. An Environmental Impact Report (EIR) is a document designed to provide to the public and to local and State governmental agency decision-makers an analysis of potential environmental consequences of a project to support informed decision-making.

This EIR has been prepared by the City of Lake Forest (City) to evaluate environmental impacts associated with the proposed IPT Enterprise Business Center LLC Project (project); to discuss alternatives; and to propose mitigation measures that will minimize, offset, or otherwise reduce or avoid the identified potentially significant environmental impacts.

This EIR has been prepared pursuant to the requirements of CEQA and the *State CEQA Guidelines*. The City is the Lead Agency, and as such, has reviewed all submitted drafts, technical studies, and reports for consistency with applicable City regulations and policies and has commissioned the preparation of this EIR to reflect its own independent judgment.

Data for this EIR were obtained from on-site field observations; discussion with affected agencies; review of adopted plans and policies; review of available studies, reports, and data; and specialized environmental assessments prepared for the project (i.e., Air Quality, Greenhouse Gas, and Energy Impact Report; Health Risk Assessment; Cultural Resources Assessment; Biological Resources Report; Geotechnical Investigation; Infiltration Report; Water Quality Management Plan; Hydrologic and Hydraulic Drainage Report; Phase I Environmental Site Assessment; Noise and Vibration Impact Analysis; and Traffic Impact Analysis).

The Executive Summary is intended to highlight the major areas of importance in the environmental analysis for the proposed project as required by *State CEQA Guidelines* Section 15123. The Executive Summary includes a brief description of the proposed project, areas of controversy known to the City, including issues raised by agencies and the public, a summary of the significant unavoidable impacts of the proposed project, and a summary of alternatives evaluated in the EIR. This Executive Summary also provides a table summarizing (1) the potential environmental impacts that would occur as a result of project implementation and operation; (2) the level of significance prior to implementation of mitigation measures; (3) regulatory compliance measures and mitigation measures that avoid or reduce the significant impacts of the proposed project; and (4) the level of significance after mitigation measures are implemented.

1.2 SUMMARY OF PROJECT DESCRIPTION

The proposed project at 26200 Enterprise Way (project site) is located in the north-central portion of Lake Forest in Orange County, California. The project site is bordered to the north, south, and west by existing industrial buildings that include a mix of permitted uses, including office, manufacturing, and warehouse uses. The recently constructed Meadows Residential Development

(formerly the Nakase Nursery site) is to the northeast/east of the project site. Regional access to the project site is provided by State Route 241 (SR-241), which is located approximately 0.7 mile north of the project site, and Interstate 5 (I-5), which is located approximately 3.75 miles southwest of the project site.

The proposed project involves the demolition of the existing 144,906-square-foot (sq ft), two-story office/industrial building and redevelopment, construction and operation of a 35-foot (ft) tall, 165,803 sq ft tilt-up concrete industrial building. The project includes a gated truck loading area, truck and auto parking spaces, and new landscaping throughout the site. Although the tenant has not been determined yet, the proposed project includes a mix of office, manufacturing, and warehouse space. Additionally, the project includes off-site improvements at five intersections within the City to enhance public safety and address concerns related to large truck turning movements.

1.3 AREAS OF CONTROVERSY

Pursuant to *State CEQA Guidelines* Section 15123, this EIR acknowledges the areas of controversy and issues to be resolved that are known to the City or were raised during the scoping process. The City held public scoping meetings at Lake Forest City Hall on Wednesday, April 3, 2024, and Wednesday April 24, 2024, to present the proposed project and to solicit input from interested parties regarding environmental issues that should be addressed in this EIR. The material environmental issues and concerns raised in response to the Notice of Preparation (NOP) or at the scoping meeting included:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Greenhouse Gases
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Transportation
- Tribal Cultural Resources
- Wildfire

Please note that this is not an exhaustive list of areas of controversy but rather key issues that were raised during the scoping process. This EIR addresses each of these areas of concern or controversy in detail, examines project-related and cumulative environmental impacts, identifies significant adverse environmental impacts, and proposes mitigation measures and/or alternatives designed to reduce or eliminate potentially significant impacts. Appendix A to this EIR includes the NOP, copies of written comments received in response to the NOP, and comments received at the Public Scoping Meeting, as well as written comment cards received in response to the public scoping meeting. Appendix A also includes a comment summary.

1.4 SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(b) of the *State CEQA Guidelines* requires that an EIR describe significant environmental impacts that cannot be avoided, including those effects that can be mitigated but not reduced to a less than significant level. The following is a summary of the impacts that are

considered significant adverse and unavoidable after all mitigation is applied. These impacts are also described in detail in Chapter 4.0, Existing Environmental Setting, Environmental Analysis, Impacts, and Mitigation Measures.

1.4.1 Transportation and Traffic

As discussed in Section 4.17, Transportation and Traffic, of this EIR, the proposed project's vehicle miles traveled (VMT) rate would exceed the City of Lake Forest's (City) VMT threshold (Target VMT Rate) by 20 percent. In accordance with the Lake Forest Municipal Code, the proposed project is required to implement feasible Traffic Demand Management (TDM) measures that would reduce project VMT, as stipulated by **Mitigation Measure (MM) TRA-1**. Providing bike lanes and an enhanced bikeway network, as required by **MM TRA-1**, can increase access to and from transit hubs. This encourages a mode shift from vehicles to bicycles and displaces VMT. According to the California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (December 2021) (CAPCOA Handbook), the addition of bike lanes (T-20 Expand Bikeway Network) can provide a maximum VMT reduction of 0.5 percent. Assuming this TDM measure could achieve the maximum 0.5 percent VMT reduction, the reduction achieved would not reduce the project's VMT to below the City's VMT threshold. Therefore, even with implementation of **MM TRA-1** (addition of bike lanes), the proposed project would result in a significant and unavoidable impact related to VMT.

1.4.2 Greenhouse Gas Emissions

As discussed in Section 4.8, Greenhouse Gas Emissions, of this Draft EIR, the proposed project would not result in any significant impacts related to mass emissions of GHG, and no mitigation is required. However, the proposed project would conflict with the goals of the 2022 Scoping Plan related to VMT. As described directly above under Section 1.4.1 and in Section 4.17, Transportation and Traffic, the proposed project would be required to implement TDM measures as specified in MM TRA-1 to promote alternative transportation with the intent of reducing VMT. While implementation of this TDM measure could reduce VMT, the proposed project would still result in a significant and unavoidable impact related to VMT. As such, the proposed project would not contribute to its "fair share" of emission reductions required to support SB 743 and the goals of the 2022 Scoping Plan related to VMT. Because the proposed project would conflict with the plans and policies adopted for the purpose of reducing the emissions of GHGs, including the 2022 Scoping Plan, the proposed project would result in a significant and unavoidable cumulatively considerable impact related to GHG emissions.

1.5 ALTERNATIVES

1.5.1 Alternatives Evaluated in this EIR

Public Resources Code (PRC) Section 21100 and *State CEQA Guidelines* Section 15126 require an EIR to identify and discuss a No Project Alternative and a reasonable range of alternatives to the proposed project that would feasibly attain most of the basic objectives of the project and would avoid or substantially lessen any of the significant environmental impacts. The following three alternatives have been determined to represent a reasonable range of alternatives that have the

potential to feasibly attain most of the basic objectives of the proposed project but that may avoid or substantially lessen any of the significant impacts of the proposed project. Therefore, the alternatives considered in this EIR include the following:

- **Alternative 1 – No Project Alternative:** CEQA requires analysis of a "No Project" Alternative. The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. According to *State CEQA Guidelines* Section 15126.6(e)(3)(C), the lead agency should proceed to analyze the impacts of the No Project Alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. Under Alternative 1, the No Project Alternative, the project site would remain in its current condition. No development of a new building, site improvements, or ground disturbance would occur. Under Alternative 1, the No Project Alternative, the existing underutilized office/ industrial building would remain in place and would remain vacant, consistent with existing conditions.

- **Alternative 2 – Previous Use and Associated Site Development Permit Alternative.** Under Alternative 2, the existing office/industrial building would be occupied by office uses consistent with the existing Site Development Permit. No modifications would be made to the exterior of the building, parking, or landscaping. The existing office/industrial building would remain in place and no construction (aside from interior tenant improvements), or ground-disturbing activities would occur.

- **Alternative 3 – Reduced Project Alternative.** Under Alternative 3, the square footage of the proposed project would be reduced by 25 percent. All building uses (e.g., office, manufacturing, and warehouse) would be proportionally reduced. The existing office/industrial building would be demolished and a new 35 ft tall 124,352.25 sq ft tilt-up concrete industrial building would be constructed. The building would include 7,500 sq ft of office space, 48,750 sq ft of manufacturing space, and 68,102.25 sq ft of warehouse space. The additional available square footage at the project site that would result from the decreased building square footage would be designated for vehicle and truck parking. Consistent with the proposed project, Alternative 3 would include a gated truck loading area, truck and auto parking spaces, and new landscaping throughout the site.

1.5.2 Identification of the Environmentally Superior Alternative

CEQA requires the identification of an Environmentally Superior Alternative among the alternatives evaluated in an EIR. *State CEQA Guidelines* Section 15126.6(e)(2) provides that, if the No Project/No Build Alternative is the Environmentally Superior Alternative, then the EIR shall also identify an Environmentally Superior Alternative among the other alternatives. With the exception of Alternative 1, the environmentally superior alternative would be Alternative 3, the Reduced Intensity Alternative. Alternative 3 would result in similar or reduced environmental impacts compared to the proposed project because the project site would be developed at a reduced density, thereby reducing most of the proposed project's environmental impacts. However,

Alternative 3 would not reduce the significant impacts related to VMT or cumulatively considerable significant impacts related to GHG emissions to a less than significant level, and these impacts would remain significant and unavoidable. Although Alternative 3 would achieve all of the project objectives, it would not achieve those objectives to the same degree as the proposed project. Accordingly, it is determined that Alternative 3 is the Environmentally Superior Alternative because it would meet all of the project objectives and result in reduced environmental impacts as compared to the proposed project.

1.6 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Table 1.A identifies the potential project environmental impacts, proposed mitigation measures, and level of significance after mitigation is incorporated into the project. Environmental topics addressed in this EIR include: Aesthetics, Agricultural Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils and Paleontological Resources, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation and Traffic, Tribal Cultural Resources, Utilities, and Wildfire.

1.6.1 Secondary Effects of Mitigation Measures

In accordance with *State CEQA Guidelines* Section 15126.4(a)(1)(D), if any mitigation measure would cause one or more significant effects in addition to those that would be caused by the proposed project, the effects of the mitigation measure shall be discussed. The mitigation measures proposed (as listed on Table 1.A) require the Applicant to provide the City with construction plans or provide evidence that the project would adhere to existing programs, regulations, or recommendations in technical reports. The regulations and policies listed in the mitigation measures have been evaluated during their respective adoptions or approval processes. No secondary effects related to the proposed mitigation measures are expected to occur.

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Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance After Mitigation

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
4.1: Aesthetics			
Threshold 4.1.1: The proposed project would not have a substantial adverse effect on a scenic vista (Appendix G); and The proposed project would not substantially damage scenic resources, including scenic vistas from public parks and views from designated scenic highways or arterial roadways. (City of Lake Forest CEQA Significance Threshold)	No Impact	No mitigation is required.	No Impact
Threshold 4.1.2: The proposed project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.	No Impact	No mitigation is required.	No Impact
Threshold 4.1.3: The proposed project would not conflict with applicable zoning and other regulations governing scenic quality (Appendix G); and The proposed project would not substantially degrade the existing visual character or quality of the site and its surroundings where: • The project exceeds the allowed height or bulk regulations or exceeds the prevailing height and bulk of existing structures; • The project is proposed to have an architectural style or to use building materials that would be in vivid contrast to an adjacent development where that development had been constructed adhering to a common architectural style or theme; • The project is located on a visually prominent site and, due to its height, bulk, architecture or signage, would be in vivid contrast to the surrounding development or environment degrading the visual unity of the area; • The project would include unscreened outdoor uses or materials; and • The project would result in the introduction of an architectural feature or building mass that conflicts with the character of the surrounding development. (City of Lake Forest CEQA Significance Threshold)	No Impact	No mitigation is required.	No Impact
Threshold 4.1.4: The proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area (Appendix G); and The proposed project would not create a new source of substantial night lighting that would result in "sky glow" (i.e. illumination of the night sky in urban areas) or "spill light" (i.e. light that falls outside of the area intended to be lighted) onto adjacent sensitive land uses. (City of Lake Forest CEQA Significance Threshold)	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Cumulative Impact related to Aesthetics: The proposed project would adhere to City and State regulations designed to reduce and/or avoid impacts related to aesthetics and therefore would not result in cumulative impacts to aesthetics.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
4.2: Agricultural and Forestry Resources			
Threshold 4.2.1: The proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.	No Impact	No mitigation is required.	No Impact
Threshold 4.2.2: The proposed project would not conflict with existing	No Impact	No mitigation is required.	No Impact

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance After Mitigation

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
zoning or agricultural use, or a Williamson Act contract.			
Threshold 4.2.3: The proposed project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).	No Impact	No mitigation is required.	No Impact
Threshold 4.2.4: The proposed project would not result in the loss of forest land or conversion of forest land to non-forest use.	No Impact	No mitigation is required.	No Impact
Threshold 4.2.5: The proposed project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.	No Impact	No mitigation is required.	No Impact
Cumulative Impact related to Agricultural Resources: The proposed project is not located on or nearby existing agricultural or forest land and would not result in cumulative impacts related to agriculture and forestry.	No Impact	No mitigation is required.	No Impact
4.3: Air Quality			
Threshold 4.3.1: The proposed project would not conflict with or obstruct implementation of the applicable air quality plan.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.3.2: The proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non- attainment under an applicable federal or state ambient air quality standard (Appendix G); The proposed project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. The SCAQMD construction and operational emission thresholds are used for this assessment (City of Lake Forest CEQA Significance Threshold); and The proposed project would not result in a cumulatively considerable net increase of any criteria pollutants for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors) where the incremental effect of the project emissions, considered together with past, present, and reasonably anticipated further project emissions, increase the level of any criteria pollutant above the existing ambient level. (City of Lake Forest CEQA Significance Threshold)	Potentially Significant Impact	**Mitigation Measure AQ-1: Tier 4 Interim Construction Equipment.** Prior to issuance of a building permit, the project Applicant shall submit construction plans to the City of Lake Forest verifying that all construction equipment used during construction of the project shall be equipped with Tier 4 Interim engines or the most effective Verified Diesel Emission Control Strategies (VDECS) available for the engine type (Tier 4 engines automatically meet this requirement) as certified by the California Air Resources Board (CARB). [1] During construction activities, the equipment shall be properly maintained and tuned in accordance with manufacturer specifications.	Less than Significant with Mitigation Incorporated
Threshold 4.3.3: The proposed project would not expose sensitive receptors to substantial pollutant concentrations.	Potentially Significant Impact	Refer to Mitigation Measure AQ-1.	Less than Significant with Mitigation Incorporated
Threshold 4.3.4: The proposed project would not result in other emissions (such as those leading to odors adversely affecting a substantial number of people).	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Cumulative Impacts related to Air Quality: The proposed project's construction-related regional daily emissions would exceed SCAQMD significance thresholds for VOCs if constructed at the same time as the two Western Realco Projects. Therefore, the proposed project's cumulative air quality impacts would be potentially significant.	Potentially Significant Impact	**Mitigation Measure AQ-2: Volatile Organic Compounds.** Prior to issuance of a grading permit, the Project Applicant shall submit construction plans to the City of Lake Forest that state that the project shall utilize "Super-Compliant" low volatile organic compounds (VOC) paints for nonresidential interior and exterior surfaces and low VOC paint for parking lot surfaces. Super-Compliant low VOC paints have been reformulated to exceed the regulatory VOC limits put forth by SCAQMD Rule 1113. Super-Compliant low VOC paints shall be no more than 10 grams per liter (g/L) of VOC.	Less than Significant with Mitigation Incorporated

[1] CARB. 2015. Verified Diesel Emission Control Strategy (VDECS). Website: https://ww2.arb.ca.gov/sites/default/files/classic/msprog/ordiesel/faq/vdecsfaq.pdf (accessed June 2025)

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance After Mitigation

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
		Mitigation Measure AQ-3: Tier 4 Final Construction Equipment. Prior to issuance of a building permit, the project Applicant shall consult with the City on the status of Western Realco Projects 1 and 2. If in this consultation, the City identifies that the construction schedule of Western Realco Projects 1 and 2, and the IPT Enterprise Business Center LLC Project (proposed project) will be under construction at the same time, the proposed project shall equip all construction equipment during the overlapping period with Tier 4 Final engines or the most effective Verified Diesel Emission Control Strategies (VDECS) available for the engine type (Tier 4 engines automatically meet this requirement) as certified by the California Air Resources Board. The equipment shall be properly maintained and tuned in accordance with manufacturer specifications. The project Applicant shall submit construction plans to the City of Lake Forest denoting the projected equipment Tier rating that will be used during the construction period.	
4.4: Biological Resources			
Threshold 4.4.1: The proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	Less than Significant Impact	**Regulatory Compliance Measure BIO-1: Nesting Bird Clearance Survey.** If construction/ground disturbing activities, including demolition, occurs between February 1 and August 31, a Qualified Biologist shall conduct a pre-construction clearance survey for nesting birds within 3 days of the start of any construction, vegetation clearing, or grading activities (including disking and demolition) to ensure that no nesting birds are disturbed during construction. The Qualified Biologist shall be retained by the Construction Contractor. The Qualified Biologist conducting the clearance survey shall document a negative survey with a brief letter report indicating that no impacts to active avian nests would occur. If an active avian nest is discovered during the pre-construction clearance survey, construction activities shall stay outside of a no-disturbance buffer. In general, the no-disturbance buffer shall be a minimum of 50 feet for passerines and 250 feet for raptors. However, a species' sensitivity to disturbance can vary among species, the level of noise or construction disturbance, and the line of sight between the nest and the disturbance. Limits of construction to avoid an active nest shall be established in the field with flagging, fencing, or other appropriate barriers; and construction personnel shall be instructed on the sensitivity of nest areas. A biological monitor, with experience in monitoring active nests, shall be present to delineate the boundaries of the buffer area and to monitor daily all active nests to observe the efficacy of the no-disturbance buffers and to document any new nesting occurrences to ensure that nesting behavior is not adversely affected by the construction activity. Adversely affected nesting behavior, as determined by the biological monitor, includes, but is not limited to, disrupting reproductive behavior, nest abandonment, and/or prolonged absences of parents while incubating eggs. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, construction, vegetation clearing, or grading activities (including disking and demolition) within the buffer area can occur. Field memorandums shall be prepared by the biological monitor within 24 hours of each day of monitoring and shall be submitted to the City of Lake Forest to document compliance with the applicable resource protection measures.	Less than Significant Impact
Threshold 4.4.2: The proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	No Impact	No mitigation is required.	No Impact
Threshold 4.4.3: The proposed project would not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	No Impact	No mitigation is required.	No Impact
Threshold 4.4.4: The proposed project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	Less than Significant Impact	Refer to **Regulatory Compliance Measure BIO-1**: Nesting Bird Clearance Survey.	Less than Significant Impact
Threshold 4.4.5: The proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	No Impact	No mitigation is required.	No Impact
Threshold 4.4.6: The proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.	No Impact	No mitigation is required.	No Impact

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance After Mitigation

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
Cumulative Impacts related to Biological Resources: The proposed project would not contribute to a cumulatively significant impact related to biological resources.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
4.5: Cultural Resources			
Threshold 4.5.1: The proposed project would not cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.5.2: The proposed project would potentially cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.	Less than Significant Impact	**Regulatory Compliance Measure CUL-1: Unknown Archaeological Resources.** In the event that archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the Orange County List of Qualified Archaeologists has evaluated the find in accordance with federal, State, and local guidelines to determine whether the find constitutes a "unique archaeological resource," as defined in Section 21083.2(g) of the California Public Resources Code (PRC). Personnel of the proposed project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded beyond 100 feet from the find on other portions of the project site. The found deposits shall be treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. Prior to issuance of a grading permit, the Director of Community Development, or designee, shall ensure that this regulatory compliance measure is documented on the grading plans.	Less than Significant Impact
Threshold 4.5.3: The proposed project would potentially disturb human remains, including those interred outside of formal cemeteries.	Less than Significant Impact	**Regulatory Compliance Measure CUL-2: Human Remains.** If human remains are encountered, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to State PRC Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be Native American, the County Coroner would notify the Native American Heritage Commission (NAHC), which would determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The MLD recommendations may include scientific removal and nondestructive analysis of human remains and items associated with Native American burials, preservation of Native American human remains and associated grave goods in place, relinquishment of Native American human remains and associated items to the descendants for treatment, or any other culturally appropriate treatment. Prior to issuance of a grading permit, the Director of Community Development, or designee, shall ensure that this regulatory measure is documented on the grading plans.	Less than Significant Impact
Cumulative Impacts related to Cultural Resources: Potential impacts of the proposed project to unknown cultural resources, when combined with the impacts of past, present, and reasonably foreseeable projects in the City of Lake Forest, would not contribute to a cumulatively significant impact to cultural resources with compliance with existing regulatory measures.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
4.6: Energy			
Threshold 4.6.1: The proposed project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance After Mitigation

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
Threshold 4.6.2: The proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Cumulative Impacts related to Energy: There are sufficient planned energy supplies to serve the proposed project and related projects. The proposed project's contribution to impacts related to the inefficient, wasteful, and unnecessary consumption of energy would not be cumulatively considerable.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
4.7: Geology and Soils			
Threshold 4.7.1(i): The proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault.	No Impact	No mitigation is required.	No Impact
Threshold 4.7.1(ii): The proposed project could directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.	Potentially Significant Impact	**Mitigation Measure GEO-1**: **Compliance with Applicable California Building Code and Project-Specific Geotechnical Specifications**. Prior to the final grading permit and the issuance of building permits, the project Applicant shall provide final project plans to applicable City of Lake Forest (City) staff for review and approval showing that the project, including site preparation and construction of proposed buildings, has been designed and will be constructed in conformance with applicable provisions of the most current California Building Code at the time of City review, the City's Building Code, and the specifications cited in the Geotechnical Investigation, prepared by Southern California Geotechnical, dated November 2021. During grading, an on-site inspection shall be conducted by the Applicant-hired Project Geotechnical Consultant and the City of Lake Forest Director of Public Works/ City Engineer, or designee, to ensure compliance with geotechnical specifications as incorporated into project plans. Prior to the final grading permit, the Project Geotechnical Consultant shall submit a Final Testing and Observation Geotechnical Report for Rough Grading to the City of Lake Forest Director of Public Works/City Engineer, or designee. Prior to the issuance of a Certificate of Occupancy for the new building, the Project Geotechnical Consultant shall provide a letter regarding contractor compliance with project plans and required geotechnical. The letter shall be submitted to the City of Lake Forest Building Division for review and approval.	Less than Significant Impact
Threshold 4.7.1(iii): The proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.	No Impact	No mitigation is required.	No Impact
Threshold 4.7.1(iv): The proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.	No Impact	No mitigation is required.	No Impact
Threshold 4.7.2: The proposed project would not result in substantial soil erosion or the loss of topsoil.	Less than Significant Impact	Refer to **Regulatory Compliance Measures WQ-1 through WQ-4**.	Less than Significant Impact
Threshold 4.7.3: The proposed project would be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.	Potentially Significant Impact	**Mitigation Measure GEO-2**: **Corrosive Soils.** Prior to issuance of building permits, the project Applicant/Developer shall retain the services of a licensed corrosion engineer to conduct additional site testing and final design evaluation regarding the possible on-site presence of significant volumes of corrosive soils. At a minimum, the corrosion engineer shall (1) verify the soluble sulfate concentrations of the soils that are present at pad grade within the building areas at the completion of rough grading; (2) provide detailed corrosion protection measures for cast iron and/or ductile iron pipes, as necessary; (3) confirm that soluble sulfates and chloride levels in the on-site soils do not warrant specialized concrete mix design; and (4) confirm that nitrates present in the on-site soil do not warrant protection for copper materials. During grading, on-site inspection shall be conducted by the Project Geotechnical Consultant and City of Lake Forest Director of Public Works/City Engineer, or designee, to ensure compliance with the corrosion protection measures of the corrosion engineer, as incorporated into the project plans. Prior to issuance of a building permit, the Director of the City of Lake Forest Public Works Department, or designee, shall verify that the project plans incorporate the corrosion protection measures of the corrosion engineer.	Less than Significant Impact

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance After Mitigation

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
Threshold 4.7.4: The proposed project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.7.5: The proposed project would not have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water	No Impact	No mitigation is required.	No Impact
Threshold 4.7.6: The proposed project would potentially directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	Potentially Significant Impact	**Mitigation Measure GEO-3**: **Paleontological Resources Impact Mitigation Program**. Prior to the final grading permit and the issuance of building permits, the project Applicant/Developer shall provide a letter to the Director of Community Development Department, or designee, stating that they have retained a qualified paleontologist (defined as a practicing paleontologist who is recognized in the paleontological community and proficient in vertebrate paleontology) who is listed on the County of Orange list of certified paleontologists. Prior to the final grading permit and the issuance of building permits, the qualified paleontologist shall submit to the City, a Paleontological Resources Impact Mitigation Program (PRIMP) for this project. The PRIMP shall include the methods that will be used to protect paleontological resources that may exist within the project site, as well as procedures for monitoring, fossil preparation and identification, curation into a repository, and preparation of a report at the conclusion of grading. The PRIMP shall be consistent with the guidelines of the Society of Vertebrate Paleontology. The City shall not issue a grading permit for the project until the letter and PRIMP, both referenced above, have been received. During construction, excavation and grading activities in deposits with high paleontological sensitivity shall be monitored by a paleontological monitor as defined by the PRIMP. No monitoring is required for excavations in deposits with no or low paleontological sensitivity (i.e., engineered fill soils). If paleontological resources are encountered during the course of ground disturbance, the paleontological monitor shall have the authority to temporarily redirect construction away from the area of the find in order to assess its significance. In the event that paleontological resources are encountered when a paleontological monitor is not present, work in the immediate area of the find shall be redirected, and a paleontologist shall be contacted to assess the find for significance. Collected resources shall be prepared to the point of identification, identified to the lowest taxonomic level possible, cataloged, and curated into the permanent collections of a scientific institution prepared by the Applicant-hired qualified paleontologist. Prior to the issuance of building permits, a report of findings shall be prepared to document the results of the monitoring program prepared by the Applicant-hired qualified paleontologist. The report shall be provided to the Director of Community Development, or designee.	Less than Significant Impact
Cumulative Impacts related to Geology and Soils: Potential impacts of the proposed project to unknown paleontological resources and unique geologic features, when combined with the impacts of past, present, and reasonably foreseeable projects in the City of Lake Forest, could contribute to a cumulatively significant impact due to the overall loss of paleontological remains unique to the region. However, when resources are assessed and/or protected as they are discovered, impacts to these resources are less than significant. The proposed project could contribute to regional seismic issues; however, compliance with applicable codes and design standards would reduce cumulatively considerable impacts to a less than significant level.	Potentially Significant Impact	Refer to Mitigation Measure GEO-3.	Less than Significant Impact
4.8: Greenhouse Gas Emissions			
Threshold 4.8.1: The proposed project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance After Mitigation

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
Threshold 4.8.2: The proposed project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	Potentially Significant Impact	**Mitigation Measure GHG-1: Electric Vehicle Charging.** Provisions shall be made at the project site for emerging electric truck technology. Prior to the issuance of a shell building permit, the ~~City shall verify that the site plan identifies an on-site location for future electric truck charging stations, with space available for a minimum of four (4) trucks to simultaneously charge when charging stations are installed in the future. The conduit trenching shall be installed to that location for future conduit pull as a requirement of the shell building permit. In conjunction with the approval of tenant improvement plans and permits, the applicant shall install electric truck charging stations on the site for a minimum of four (4) electric truck to simultaneously charge.~~ construction plan set shall: a) Provide for installation of all necessary infrastructure, including conduit, wiring, and sufficient electrical capacity, to support the future installation of on-site electric truck charging stations; and b) Designate sufficient space to accommodate a minimum of four electric trucks charging simultaneously. Prior to issuance of tenant improvement permits for the building, the tenant improvement plans shall include installation of a minimum of four electric truck charging stations at the predesignated locations. The charging stations shall be installed and operational prior to tenant occupancy of the building.	Significant and Unavoidable Impact
Cumulative Impacts related to Greenhouse Gas Emissions: The proposed project would conflict with the goals and policies of the 2022 Scoping Plan related to VMT and therefore would result in a significant cumulatively considerable impact related to GHG emissions when combined with the Western Realco Projects. Impacts would significant and unavoidable.	Significant and Unavoidable Impact	Refer to Mitigation Measure GHG-1.	Significant and Unavoidable Impact
4.9: Hazards and Hazardous Materials			
Threshold 4.9.1: The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.9.2: The proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.9.3: The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.9.4: The proposed project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, it would not create a significant hazard to the public or the environment.	No Impact	No mitigation is required.	No Impact
Threshold 4.9.5: The proposed project is not located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, and would not result in a safety hazard or excessive noise for people residing or working in the project area	No Impact	No mitigation is required.	No Impact
Threshold 4.9.6: The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.9.7: The proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.	No Impact	No mitigation is required.	No Impact
Cumulative Impacts related to Hazards and Hazardous Materials: The proposed project would not contribute to a cumulatively significant impact related to hazards or hazardous materials.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance After Mitigation

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
4.10: Hydrology and Water Quality			
Threshold 4.10.1: The proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality (Appendix G); The proposed project would not cause a significant alteration of receiving water quality during or following construction (City of Lake Forest CEQA Significance Threshold); The proposed project would not substantially degrade water quality by discharge which affects the beneficial uses (i.e. swimming, fishing, etc.) of the receiving or downstream waters (City of Lake Forest CEQA Significance Threshold); and The proposed project would not increase in any pollutant for which the receiving water body is already impaired as listed on the Clean Water Act Section 303(d) list. (City of Lake Forest CEQA Significance Threshold)	Less than Significant Impact	**Regulatory Compliance Measure WQ-1: Construction General Permit.** Prior to the issuance of a grading permit, the Construction Contractor shall obtain coverage under the State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2022-0057-DWQ, NPDES No. CAS000002) (Construction General Permit). This shall include submission of Permit Registration Documents (PRDs), including a Notice of Intent for coverage under the permit to the SWRCB via the Stormwater Multiple Application and Report Tracking System (SMARTs). The Construction Contractor shall provide the Waste Discharge Identification Number (WDID) to the Lake Forest Public Works Director, or designee, to demonstrate proof of coverage under the Construction General Permit. Project construction shall not be initiated until a WDID is received from the SWRCB and is provided to the City, or designee. A Storm Water Pollution Prevention Plan (SWPPP) shall be prepared by a Qualified SWPPP Developer in accordance with the requirements of the Construction General Permit and submitted via SMARTs. These include: Best Management Practices (BMPs) for erosion and sediment control, site management/housekeeping/waste management, management of non-storm water discharges, run-on and runoff controls, and BMP inspection/maintenance/repair activities. BMP implementation shall be consistent with the BMP requirements in the most recent version of the California Stormwater Quality Association's Stormwater Best Management Handbook: Construction. The SWPPP shall include a construction site monitoring program that identifies requirements for dry weather visual observations of pollutants at all discharge locations, and as appropriate (depending on the Risk Level), sampling of the site effluent and receiving waters. A Qualified SWPPP Practitioner shall be responsible for implementing the BMPs at the site and performing all required monitoring and inspection/maintenance/repair activities. Upon completion of construction and stabilization of the site, a Notice of Termination shall be submitted via SMARTs. **Regulatory Compliance Measure WQ-2: City of Lake Forest Municipal Code.** Prior to the issuance of a grading permit, the Project Applicant shall submit and obtain approval of an Erosion Control Plan in compliance with Article XIII of Chapter 8.30 of the City of Lake Forest Municipal Code from the Lake Forest Public Works Director, or designee. The Erosion Control Plan shall be submitted to the City of Lake Forest Building Official for approval by September 15 each year for projects under a grading permit. All grading shall be undertaken in accordance with the BMPs for pollution prevention adopted by the City, the City's NPDES Permit regulating discharges into and from its Municipal Separate Storm Sewer System (MS4), the Drainage Area Management Plan (DAMP), and any other conditions, requirements and water quality management plans adopted by the City. Additionally, the project Applicant shall adhere to the erosion and sediment control and water quality system maintenance requirements listed in Section 8.30.154 of the Lake Forest Municipal Code. **Regulatory Compliance Measure WQ-3: Final Water Quality Management Plan.** Prior to issuance of a grading permit, the project Applicant shall submit and obtain approval of a Final Water Quality Management Plan (WQMP) to the Lake Forest Public Works Director, or designee. The project shall implement project design features identified in the Final WQMP. The Final WQMP shall demonstrate that any proposed on-site development plan includes BMPs for source control, pollution prevention, site design, low impact development (LID) implementation, and structural treatment control. BMPs shall be designed and implemented to address 303(d) listed pollutants and retain the project site's minimum design capture volume and hydromodification volume to ensure that post-development storm water runoff volume or time of concentration does not exceed pre-development storm water runoff by more than 10 percent of the 2-year peak flow in accordance with the Santa Ana Regional Water Quality Control Board Order Number R8-2009-0030, NPDES Permit No. CAS618030, as amended by Order No. R8-2010-0062, also known as the North Orange County MS4 permit. The proposed LID BMPs specified in the Final WQMP shall be incorporated into the grading and development plans submitted to the City of Lake Forest for review and approval. Periodic maintenance of any required BMPs and landscaped areas during project occupancy and operation shall be in accordance with the schedule outlined in the Final WQMP. **Regulatory Compliance Measure WQ-4: Final Hydrology and Hydraulic Analyses.** Prior to issuance of grading permits, the project Applicant shall submit and obtain approval of the Final Hydrology and Hydraulic Analyses to the Lake Forest Director of Public Works, or designee, and the Orange County Flood Control District (OCFCD). The Final Hydrology and Hydraulic Analyses shall be prepared consistent with the requirements of the Orange County Hydrology Manual (Orange County Environment Agency 1986) and Orange County Hydrology Manual Addendum No. 1 (Orange County Environment Agency	Less than Significant Impact

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance After Mitigation

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
		1996), or subsequent guidance manuals. The Final Hydrology and Hydraulic Analyses shall confirm that the on-site storm drains, on-site detention basins, and any other drainage structures are appropriately sized to accommodate stormwater runoff from the design storm so that the peak flow of stormwater discharge from the project site is less than existing conditions. The Final Hydrology and Hydraulic Analyses shall also demonstrate that the detention facilities meet the hydromodification requirements of the Waste Discharge Requirements for the County of Orange, Orange County Flood Control District and the Incorporated Cities of Orange County within the Santa Ana Region Areawide Urban Storm Water Runoff Orange County (North Orange County MS4 Permit), Order R8-2009-0030, NPDES No. CAS618030 (as amended by Order No. R8-2010-0062). In compliance with the hydromodification requirements, the post-project runoff discharge volume for the 2-year storm shall not exceed that of the predevelopment condition by more than 5 percent, and the time of concentration of post-development runoff for the 2 year storm event shall not be greater than 5 percent less than that of the predevelopment condition. The Director of the City of Lake Forest Public Works Department, or designee, shall ensure that the drainage facilities specified in the Final Hydrology and Hydraulic Analyses are incorporated into the final project design.	
Threshold 4.10.2: The proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin (Appendix G); The proposed project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted) (City of Lake Forest CEQA Significance Threshold); and The proposed project would not adversely change the rate, direction or flow of groundwater. (City of Lake Forest CEQA Significance Threshold)	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.10.3(i): The proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site (Appendix G); and The proposed project would not deposit sediment and debris materials within existing channels obstructing flows. (City of Lake Forest CEQA Significance Threshold)	Less than Significant Impact	Refer to **Regulatory Compliance Measures WQ-1 through WQ-4**.	Less than Significant Impact
Threshold 4.10.3(ii): The proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite (Appendix G); and The proposed project would not exceed the capacity of a channel and cause overflow during design storm conditions. (City of Lake Forest CEQA Significance Threshold)	Less than Significant Impact	Refer to **Regulatory Compliance Measures WQ-3 and WQ-4**.	Less than Significant Impact
Threshold 4.10.3(iii): The proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.	Less than Significant Impact	Refer to **Regulatory Compliance Measures WQ-1 through WQ-4.**	Less than Significant Impact

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance After Mitigation

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
Threshold 4.10.3(iv): The proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows (Appendix G); The proposed project would not place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map (City of Lake Forest CEQA Significance Threshold); and The proposed project would not place within a 100-year flood hazard area structures which would impede or redirect flood flows. (City of Lake Forest CEQA Significance Threshold)	No Impact	No mitigation is required.	No Impact
Threshold 4.10.4: The proposed project would not be in a flood hazard, tsunami, or seiche zone, risking the release of pollutants due to project inundation (Appendix G); The proposed project would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam (City of Lake Forest CEQA Significance Threshold); and The proposed project would not cause inundation by seiche, tsunami, or mudflow. (City of Lake Forest CEQA Significance Threshold)	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.10.5: The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan (Appendix G); and The proposed project would not have an impact on groundwater that is inconsistent with a groundwater management plan prepared by the water agencies with the responsibility for groundwater management. (City of Lake Forest CEQA Significance Threshold)	Less than Significant Impact	Refer to **Regulatory Compliance Measures WQ-1 through WQ-4.**	Less than Significant Impact
Cumulative Impacts related to Hydrology and Water Quality: The proposed project and other related projects would comply with applicable NPDES and City requirements; therefore, cumulative hydrology and water quality impacts would be less than significant. Therefore, the proposed project would not contribute to a cumulatively significant impact related to hydrology and water quality.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
4.11: Land Use & Planning			
Threshold 4.11.~~2~~1: The proposed project would not physically divide an established community.	No Impact	No mitigation is required.	No Impact
Threshold 4.11.~~3~~2: The proposed project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect (Appendix G); and The proposed project would not substantially conflict with existing on-site or adjacent land use due to project-related significant unavoidable indirect effects (e.g., noise, aesthetics, etc,) that precludes use of the land as it was intended by the General Plan (City of Lake Forest CEQA Significance Threshold); and The proposed project would not conflict with the Central and Coastal	No Impact	No mitigation is required.	No Impact

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance After Mitigation

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
Natural Communities Conservation Program/Habitat Conservation Plan (NCCP/HCP) of which the City of Lake Forest is a participant. (City of Lake Forest CEQA Significance Threshold)			
Cumulative Impacts related to Land Use & Planning: The proposed project would not contribute to a cumulatively significant impact related to land use and planning.	No Impact	No mitigation is required.	No Impact
4.12: Mineral Resources			
Threshold 4.12.1: The proposed project would not result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state.	No Impact	No mitigation is required.	No Impact
Threshold 4.12.2: The proposed project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.	No Impact	No mitigation is required.	No Impact
Cumulative Impacts related to Mineral Resources: The proposed project would have no impact on mineral resources and therefore would not contribute to a cumulatively significant impact related to mineral resources.	No Impact	No mitigation is required.	No Impact
4.13: Noise			
Threshold 4.13.1: The proposed project would not result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies (Appendix G); The proposed project would not result in a 3 dBA CNEL increase in noise when existing noise levels are between 60 dBA and 65 dBA CNEL (City of Lake Forest CEQA Significance Threshold); The proposed project would not result in a 1.5 dBA CNEL increase in noise when existing noise levels exceed 65 dBA CNEL (City of Lake Forest CEQA Significance Threshold); The proposed project would not exceed the stationary source noise criteria for the City of Lake Forest as specified by the exterior noise standards set forth in the Noise Control Chapter (11.16) of the Lake Forest Municipal Code (City of Lake Forest CEQA Significance Threshold); and During construction, the proposed project would not exceed 80 dBA Leq (1-hour) between the hours of 7:00 a.m. and 8:00 p.m., Monday through Saturday. (City of Lake Forest CEQA Significance Threshold)	Less than Significant Impact	**Regulatory Compliance Measure NOI-1: City of Lake Forest Municipal Code, Section 11.16.060(D)**. During construction, construction activities shall be limited to between the hours of 7:00 a.m. and 8:00 p.m. Mondays through Saturdays. No construction shall be permitted outside of these hours or on Sundays or legal City of Lake Forest holidays, without a specific exemption issued by the City of Lake Forest.	Less than Significant Impact
Threshold 4.13.2: The proposed project could result in the generation of excessive groundborne vibration or groundborne noise levels (Appendix G); and The proposed project would not exceed the applicable standards from the Federal Transit Administration (FTA) or Caltrans vibration limits. (City of Lake Forest CEQA Significance Threshold)	Less than Significant Impact	**Regulatory Compliance Measure NOI-2: Pre-Construction Vibration Assessment.** After a specific project equipment list has been determined and prior to the issuance of a building permit, the following actions shall be implemented: 1) A qualified structural engineer, as approved by the Director of Community Development, or designee shall identify all structures that are located within the distances established in Table 2 of Section 11.16.090 of the City's Municipal Code and that have the potential to be affected by ground-borne vibration originating from the construction; and 2) A qualified acoustical engineer shall compile a list of proposed construction equipment and compare to the City's accepted vibration criteria. If it is determined that the proposed equipment would generate vibration levels below the City's standard of 0.3 inches per second (in/sec) peak particle velocity (PPV), no further vibration assessment is necessary. However, if vibration levels would potentially exceed the City's standard of 0.3 in/sec PPV, the Project Applicant shall develop a Vibration Monitoring and Construction Contingency Plan for approval by the Director of Community Development, or designee, to ensure that vibration levels would not exceed the City's accepted vibration damage criteria of 0.3 in/sec PPV. If a Vibration	Less than Significant Impact

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance After Mitigation

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
		Monitoring and Construction Contingency Plan is deemed necessary, monitoring of vibration during initial construction activities shall be required. Monitoring results may indicate the need for more or less intensive measurements. The Vibration Monitoring and Construction Contingency Plan, at the discretion of the Director of Community Development or designee, shall include the following items as necessary: ● Identification of structures where monitoring would be conducted; ● A vibration monitoring schedule; ● Defined structure-specific vibration limits; ● Photographic, elevation, and crack surveys to document before and after construction conditions; and ● Identification of construction contingencies for when vibration levels approach the limits. When vibration levels approach the limits specified in Section 11.16.090 of the City's Municipal Code, construction shall be suspended and contingencies identified in the approved Vibration Monitoring and Construction Contingency Plan shall be implemented as necessary to lower vibration levels, which could include shielding or protecting the affected building from potential vibration impacts as a possible alternative to changing construction methods	
Threshold 4.13.3: The proposed project would not be located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, and would not expose people residing or working in the project area to excessive noise levels.	~~Less than Significant~~ No Impact	No mitigation is required.	~~Less than Significant~~ No Impact
Cumulative Impacts related to Noise and Vibration: The proposed project would not contribute to a cumulatively significant impact related to noise and vibration.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
4.14: Population and Housing			
Threshold 4.14.1: The proposed project would not induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.14.2: The proposed project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.	No Impact	No mitigation is required.	No Impact
Cumulative Impacts related to Population and Housing: The proposed project would not contribute to a cumulatively significant impact related to population and housing.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
4.15: Public Services			
Threshold 4.15.1(i): The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.15.1(ii): The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.15.1(iii): The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or	Less than Significant Impact	No mitigation is required.	Less than Significant Impact

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance After Mitigation

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools.			
Threshold 4.15.1(iv): The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.15.1(v): The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Cumulative Impacts related to Public Services: The proposed project would not contribute to a cumulatively significant impact to fire services, police protection, school services, public libraries, or public transportation.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
4.16: Recreation			
Threshold 4.16.1: The proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.16.2: The proposed project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.	No Impact	No mitigation is required.	No Impact
Cumulative Impacts related to Recreational Resources: The proposed project would not contribute to a cumulatively significant impact related to recreation.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
4.17: Transportation and Traffic			
Threshold 4.17.1: The proposed project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.17.2: The proposed project would conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b) (Appendix G); and The proposed project would not meet any of the screening criteria described in the City of Lake Forest Transportation Analysis Guidelines (City of Lake Forest CEQA Significance Threshold); and The proposed project would exceed the vehicle miles traveled (VMT) thresholds described in the City of Lake Forest Transportation Analysis Guidelines. (City of Lake Forest CEQA Significance Threshold)	Potentially Significant Impact	**Regulatory Compliance Measure TRA-1: Development Standards Pursuant to Section 9.160.040 of the City's Municipal Code.** The provisions of Zoning Code Chapter 9.160.040 (Facility Design Regulations) shall be implemented as follows: • Prior to the issuance of the building permits for the construction of the primary building, the site plan and/or floor plans in the construction drawings shall clearly show the location of the required carpool parking stalls, vanpool parking stalls, ride share vehicle loading area, bicycle parking, shower facilities, locker facilities, and commuter information area, in accordance with the regulations in Zoning Code Section 9.160.040. • Prior to issuance of building permits for the construction of the primary building, the applicant shall retain a licensed Civil Engineer by the State of California to prepare Civil Street Improvement Plans for the installation of a bus shelter with solar-powered lights, a bus bench, and a trash receptacle for the existing bus stop located on the northwest corner of the intersection of Dimension Drive at Commercentre Drive/Enterprise Way, in accordance with the regulations in Zoning Code Section 9.16.040 and Orange County Transportation Authority Guidelines. The bus stop improvements shall be designed in accordance to the standards provided in the Orange County	Significant and Unavoidable Impact

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance After Mitigation

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
		Transportation Authority (OCTA) Transit-Supportive Design Guidelines (June 30, 2021 or latest edition). As appropriate, the existing sidewalk shall be widened within the existing right-of-way (ROW) to a minimum eight feet wide to accommodate wheelchair bus boardings. If that is not feasible due to ROW constraints, then the sidewalk shall be widened to greatest extent practical. The project Applicant shall submit these Civil Street Improvement Plans to the City's Engineering Division and obtain a Public Works Encroachment Permit to construct the improvements to the existing bus stop. • Prior to issuance of Certificate of Occupancy of the building, all provisions of Chapter 9.160 shall be implemented, as approved on the construction drawings and civil street improvement plans, including but not limited to, the required carpool parking stalls, vanpool parking stalls, ride share vehicle loading area, bicycle parking, shower facilities, locker facilities, commuter information area, and improvements to the existing bus stop located on the northwest corner of the intersection of Dimension Drive at Commercentre Drive/Enterprise Way. **Mitigation Measure TRA-1 Bike Lanes.** Prior to issuance of a certificate of occupancy for the proposed industrial building, the project Applicant shall retain a licensed Civil Engineer by the State of California to prepare Civil Street Improvements and Signing & Striping Plans (collectively Construction Plans) for the implementation of bike lanes in both directions on Commercentre Drive between Alton Parkway and Dimension Drive. These bike lanes on Commercentre Drive would connect the proposed project site on Enterprise Way to the existing bike lanes on Alton Parkway, which eventually connects to the Irvine Transportation Center, a multi-model transit hub including Metrolink and Amtrak commuter train services and OCTA bus services. Based on a preliminary design assessment, the Construction Plans shall include an asphalt slurry seal of Commercentre Drive to modify the existing lane striping for the addition of standard striped bike lanes and green bike markings. The project Applicant shall use these Construction Plans to obtain a Public Works Encroachment Permit to construct said improvements for bike lanes on Commercentre Drive. The construction of said improvements shall be completed per the plans and to the satisfaction of the Public Works Department. The project Applicant shall use these Construction Plans to obtain a Public Works Encroachment Permit to construct said improvements for bike lanes on Commercentre Drive. **Mitigation Measure TRA-2: Pedestrian-Scale Transit Access Lighting.** To reduce vehicle miles traveled (VMT) and improve first-/last-mile access to transit, the applicant/developer shall install pedestrian-scale lighting along the on-site pedestrian pathway between the primary building entrance and the public right-of-way, leading to the existing bus stops. Lighting shall provide adequate nighttime visibility for pedestrians (generally achieving a maintained average of 1.0 foot-candle), avoid glare, and limit spillover to adjacent properties in accordance with Lake Forest Municipal Code section 9.72.085(3). Fixtures shall include automatic dusk-to-dawn controls. Prior to issuance of building permits, a lighting plan depicting fixture types, locations, heights, and illumination levels shall be submitted by the Applicant to the City for review and approval. Prior to issuance of a certificate of occupancy, all required lighting shall be installed and operational and shall be maintained by the property owner for the life of the project.	
Threshold 4.17.3: The proposed project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) (Appendix G); and The proposed project would not include design features or uses that may cause traffic hazards such as sharp curves, tight turning radii from streets, limited roadway visibility, short merging lanes, uneven road grades, or any other conditions determined by the City traffic engineer to be a hazard. (City of Lake Forest CEQA Significance Threshold)	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.17.4: The proposed project would not result in inadequate emergency access.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Cumulative Impacts related to Transportation and Traffic: The	Potentially Significant Impact	Refer to **Mitigation Measure TRA-1**.	Significant and Unavoidable Impact

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance After Mitigation

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
proposed project would result in a significant and unavoidable impact related to VMT which would contribute to significant and unavoidable cumulative transportation and traffic impacts.			
4.18: Tribal Cultural Resources			
Threshold 4.18.1: The proposed project would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).	Potentially Significant Impact	**Mitigation Measure TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities**. A. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe. D. On-site tribal monitoring shall conclude upon the later of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) prior to approval of final building permit, a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs. **Mitigation Measure TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funeral/Non-Ceremonial).** A. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes. **Mitigation Measure TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects.** A. Native American human remains are defined in California Public Resources Code (PRC) 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. B. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed. C. Human remains and grave/burial goods shall be treated alike per California PRC Section 5097.98(d)(1) and (2). D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.	Less than Significant Impact

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance After Mitigation

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
Threshold 4.18.2: The proposed project would cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.	Potentially Significant Impact	Refer to **Mitigation Measures TCR-1, TCR-2, and TCR-3**.	Less than Significant Impact
Cumulative Impacts related to Tribal Cultural Resources: The proposed project would not contribute to a cumulatively significant impact on tribal cultural resources.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
4.19: Utilities and Service Systems			
Threshold 4.19.1: The proposed project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.19.2: The proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.19.3: The proposed project would result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.19.4: The proposed project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.19.5: The proposed project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Cumulative Impacts related to Utilities and Service Systems: The proposed project would not contribute to a cumulatively significant impact on wastewater, portable water, solid waste, electricity, natural gas, or telecommunications services.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
4.20: Wildfire			
Threshold 4.20.1: The proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.20.2: The proposed project would not, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and therefore would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Threshold 4.20.3: The proposed project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact

Table 1.A: Summary of Project Impacts, Regulatory Compliance Measures, Mitigation Measures, and Level of Significance After Mitigation

Environmental Impact	Level of Significance Prior to Mitigation	Regulatory Compliance Measures and Mitigation Measures	Level of Significance After Mitigation
Threshold 4.20.4: The proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff post-fire slope instability, or drainage changes.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact
Cumulative Impacts related to Wildfire: The proposed project and all related projects are required to adhere to City, State, and federal regulations designed to reduce and/or avoid impacts related to wildfire. With compliance with these regulations, the proposed project would not contribute to a cumulatively significant impact related to wildfire.	Less than Significant Impact	No mitigation is required.	Less than Significant Impact

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APPENDIX B

REVISED SECTION 4.1: AESTHETICS

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4.1 AESTHETICS

This section evaluates the potential impacts to visual and aesthetic resources from implementation of the proposed project. This section is based in part on the following:

- Visual simulations prepared for the proposed project;
- *City of Lake Forest Citywide Design Guidelines* (City of Lake Forest n.d.);
- *City of Lake Forest General Plan Land Use Element* (City of Lake Forest 2020); and
- *City of Lake Forest General Plan Recreation and Resources Element* (City of Lake Forest 2020); and
- *City of Lake Forest CEQA Significance Thresholds Guide (City of Lake Forest 2025)*.

4.1.1 Scoping Process

The Notice of Preparation (NOP) for the proposed project was published in March 2024, and public Scoping Meetings were held on April 3, 2024, and April 24, 2024. The City of Lake Forest (City) received 120 comment letters during the public review period of the NOP. For a copy of the NOP comment letters received, refer to Appendix A of this Draft Environmental Impact Report (EIR). Eleven comment letters included comments related to aesthetics. These comments raised concerns about the project's compatibility with surrounding land uses and community character, alterations to the existing visual landscape, and the potential for increased nighttime lighting to be generated from the proposed project.

4.1.2 Methodology

The proposed project's potential aesthetic impacts are based on the nature and degree of visible change brought about by the project along with how viewers are likely to respond to those changes and is based on several factors, including: the scale of the development; the mass of the development; the context of the development (i.e., its consistency with and proportion to surrounding land uses); changes in vistas and viewsheds; potential conflicts with applicable zoning and other regulations governing scenic quality; changes to scenic resources along designated scenic roads, and the introduction of new sources of light and glare. The viewers' response to project-related aesthetic changes is assessed from three different vantage points or "viewing zones" as defined below. The comparison between the existing visual setting and the proposed condition ~~nature and degree of visual change~~ is accomplished through the use of visual simulations, which are provided in Figure 4.1-1.

The viewshed impact analysis evaluates project-related impacts from three viewing distance zones, as explained below.

- **Foreground Views:** These views include elements that are seen at a close distance and that dominate the entire view. These vantage points are generally 500 feet or less from the project site, surrounding topography, and other prominent physical features in the project vicinity.
- **Middle-Ground Views:** These views include elements that are seen at a moderate distance and that partially dominate the view. These vantage points are generally located between 500 feet and 1 mile from the project site.

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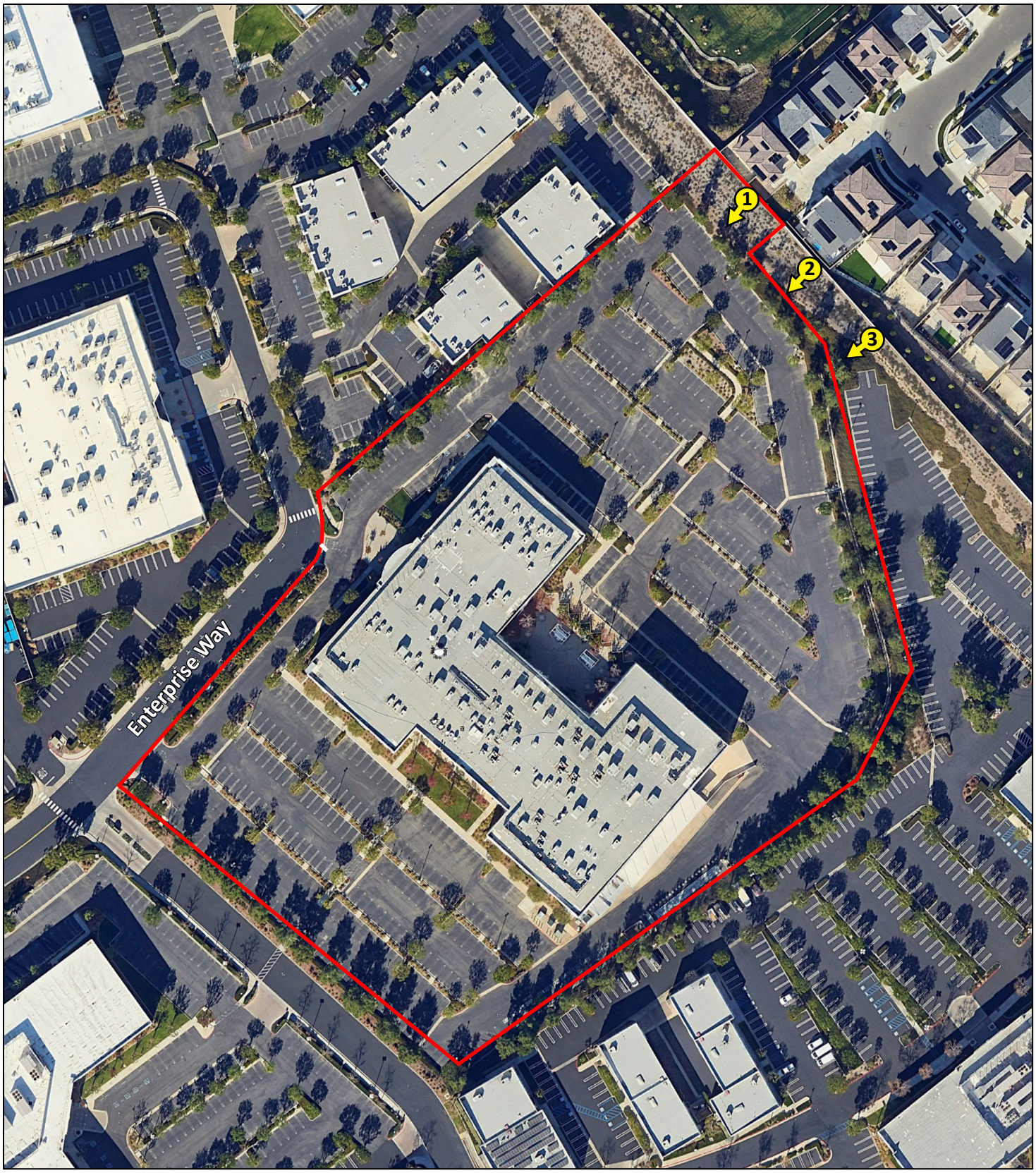

LSA

LEGEND

Project Site Boundary

View Simulation Photo Viewpoint

FIGURE 4.1-1
Page 1 of 4

0 110 220
FEET

SOURCE: Google Earth 2023

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IPT Enterprise Business Center LLC Project
Visual Simulation Viewpoints

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View 1 - Existing View



View 1 - Simulated View

LSA

FIGURE 4.1-1

IPT Enterprise Business Center LLC Project

Comparison Between Existing Visual Setting and the Nature and Degree of Visual Change
View Simulation - View 1

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View 2 - Existing View



View 2 - Simulated View

LSA

FIGURE 4.1-1

IPT Enterprise Business Center LLC Project

Comparison Between Existing Visual Setting and the Nature and Degree of Visual Change
View Simulation - View 2

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View 3 - Existing View



View 3 - Simulated View

LSA

FIGURE 4.1-1

IPT Enterprise Business Center LLC Project

Comparison Between Existing Visual Setting and the Nature and Degree of Visual Change
View Simulation - View 3

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- **Background Views:** These views include elements that are seen at a long distance and typically comprise horizon-line views that are part of the overall visual composition of the area. These vantage points are generally farther than 1 mile from the project site.

The analysis of light and glare identifies the location of light-sensitive land uses and describes the existing ambient conditions on and in the vicinity of the project site. The analysis describes the proposed project's light and glare sources and the extent to which project lighting would spill off the project site onto adjacent light-sensitive areas. The analysis also considers the potential for sunlight to reflect off of windows and building surfaces (glare) and the extent to which such glare would interfere with the operation of motor vehicles, aviation, or other activities. Glare can also be produced during evening and nighttime hours by artificial light sources, such as illuminated signage and vehicle headlights. Glare-sensitive uses generally include residences and transportation corridors (i.e., roadways).

The concepts and terminology used in this analysis are described below.

- **Scenic Resources:** Scenic resources are defined as natural or man-made elements that contribute to an area's scenic value and are generally regarded as visually pleasing. Scenic resources include landforms, vegetation, water, or adjacent scenery and may include a cultural modification to the natural environment.

- **Scenic Vista:** A scenic vista is a viewpoint that provides expansive views of a highly valued landscape for the public's benefit. It is usually viewed from some distance away. Aesthetic components of a scenic vista include (1) scenic quality, (2) sensitivity level, and (3) view access. A scenic vista can be impacted in two ways: a development project can have visual impacts by either directly diminishing the scenic quality of the vista or by blocking the view corridors or "vista" of the scenic resource. Important factors in determining whether a proposed project would block scenic vistas include the project's proposed height, mass, and location relative to surrounding land uses and travel corridors.

- **Scenic Corridors:** Scenic corridors are channels that facilitate movement (primarily by automobile, transit, bicycle, or foot) from one location to another with expansive views of natural landscapes and/or visually attractive man-made development. Scenic corridors analyzed under the California Environmental Quality Act (CEQA) typically include State-designated Scenic Highways and locally designated scenic routes.

- **Scenic Quality:** The scenic quality of a streetscape, building, group of buildings, or other man-made or natural feature creates an overall impression of an area. For example, a scenic vista along the boundary of a community, a pleasing streetscape with trees, and well-kept residences and yards are scenic resources that create a pleasing impression of an area. In general, concepts of scenic quality can be organized around four basic elements: (1) site utilization, (2) buildings and structures, (3) landscaping, and (4) signage. Adverse scenic quality effects can include the loss of aesthetic features or the introduction of contrasting features that could contribute to a decline in overall scenic quality.

- **Glare:** Glare is identified as a continuous or periodic intense light that may cause eye discomfort or be temporarily blinding to humans.

- **Light Source:** A device that produces illumination, including incandescent bulbs, fluorescent and neon tubes, halogen and other vapor lamps, and reflecting surfaces or refractors incorporated into a lighting fixture, are considered to be light sources. Any translucent enclosure of a light source is considered to be part of the light source.

4.1.3 Existing Environmental Setting

4.1.3.1 Local Context

The project site is located at 26200 Enterprise Way in the north-central portion of Lake Forest in Orange County, California. The areas surrounding the project site consist of a mix of land uses, including industrial and residential. Local access to the project site is provided by Enterprise Way, which is accessed from Dimension Drive. Circulation in the surrounding area is provided by one- to four-lane roadways.

According to the United States Census Bureau, Lake Forest is located within the Mission Viejo-Lake Forest-San Clemente, CA Urbanized Area,[1] which also includes the cities of Aliso Viejo, Dana Point, Laguna Beach, Laguna Hills, Laguna Niguel, Laguna Woods, Mission Viejo, Rancho Santa Margarita, San Clemente, and San Juan Capistrano, and the unincorporated communities of Coto de Caza, Ladera Ranch, and Las Flores. As described in the *State CEQA Guidelines* Section 15387 and defined by the United States Census Bureau, an "urbanized area" is a central city or a group of contiguous cities with a population of 50,000 or more people, together with adjacent densely populated areas having a population density of at least 1,000 people per square mile (United States Census Bureau 2022).[2] Because Lake Forest is located in an urbanized area, the project site is also located within an urbanized area.

4.1.3.2 Existing Visual Character of the Project Site

The 8.83-acre site is developed with an existing 144,906-square-foot (sq ft), two-story tilt-up office/industrial building (previously occupied by Panasonic Avionics) and associated parking (refer to Figure 3-3 in Chapter 3.0 of this Draft EIR). The project site is generally flat; however, the eastern and southern boundaries of the site have north- and west-facing slopes. These slopes ascend 10 to 15 feet from the project site to the adjacent property. A concrete-lined drainage swale is near the midpoint of the slope on the eastern side of the property. Ornamental, non-native vegetation covers the remaining areas of these slopes. The site also includes ornamental landscaping along the site perimeters, within the parking medians, and around the building.

[1] United States Census Bureau. n.d. Mission Viejo-Lake Forest-San Clemente, CA Urbanized Area No. 57709. Website: https://www2.census.gov/geo/maps/dc10map/UAUC_RefMap/ua/ua57709_mission_viejo--lake_forest--san_clemente_ca/DC10UA57709.pdf (accessed April 24, 2024).

[2] United States Census Bureau. 2022. 2020 Census Urban Areas FAQs. December 2022. Website: https://www2.census.gov/geo/pdfs/reference/ua/Census_UA_2020FAQs.pdf (accessed April 24, 2024).

Existing sources of light and glare on the project site and in the project vicinity are typical of industrial areas and include vehicle headlights on nearby roadways, streetlights in the nearby vicinity, building façade and interior lighting, and pole-mounted lighting in the parking areas within the project site and adjacent developments. Lighting from existing distant development within Lake Forest also contributes to the background lighting in the project vicinity.

The project site currently has a Lake Forest General Plan land use designation of Light Industrial. The Light Industrial designation is intended to provide for a variety of light industrial uses. The project site is located within the Pacific Commercentre Planned Community and has a zoning designation of LI – Light Industrial. Permitted uses include a variety of office, manufacturing, and warehouse uses. Pursuant to the zoning designation, the proposed industrial building is permitted subject to a Site Development Permit.

4.1.3.3 Visual Character of the Surrounding Area

The project area is characterized by relatively dense urban development with some open space and landscaping in the nearby vicinity. The project site is bordered to the north, south, and west by existing one- to two-story industrial buildings that include a mix of permitted uses, including office, manufacturing, and warehouse uses. The recently constructed Meadows Residential Development (formerly the Nakase Nursery site) is to the northeast/east of the project site, which consists of two-story single family residences. Light-sensitive uses near the project site include the residential uses to the northeast/east.

According to the California Scenic Highway Mapping System, there are no California Department of Transportation (Caltrans) designated scenic highways in proximity to the project site.[3]

While Lake Forest contains numerous areas and viewsheds with relatively high scenic value, there are no officially designated scenic vista points in the City. Significant visual resources in Lake Forest include several prominent creeks, including Aliso Creek, Serrano Creek, San Diego Creek, and the Borrego Canyon Wash, and the Eucalyptus groves that surround portions of these creeks. Other prominent visual features throughout the planning area include views of ridgelines, hillsides, and canyons. Additionally, the Recreation and Resources Element of the City's General Plan notes that natural resources and open space contribute to the visual quality of the City (City of Lake Forest 2020).

There are no significant visual resources present on the project site. The project site is located approximately 10 miles northeast of the Pacific Ocean, although the ocean cannot be seen from the project site due to the intervening San Joaquin Hills to the southwest of the City. The Santa Ana Mountains, which are the highest and most prominent mountains in Orange County, are visible in the east from the project site and surrounding area. The City's Nature Park (26215 Dimension Drive) is

[3] California Department of Transportation (Caltrans). n.d. California Scenic Highway Mapping System. Website: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa (accessed April 24, 2024).

located approximately 400 feet southeast of the project site, and Serrano Creek is located approximately 600 feet southeast of the project site.

4.1.4 Regulatory Setting

Federal, State, and local regulations and programs related to aesthetics that are applicable to the proposed project are described below.

4.1.4.1 Federal Regulations

There are no federal regulations that apply to the proposed project with respect to aesthetics.

4.1.4.2 State Regulations

Caltrans Scenic Highway Program. The California Department of Transportation (Caltrans) Scenic Highway Program protects the natural scenic beauty of the State's highways and corridors through its designated Scenic Highways throughout the State. Caltrans defines a Scenic Highway as any freeway, highway, road, or other public right-of-way that traverses an area of exceptional scenic quality. Other considerations given to a Scenic Highway designation include how much of the natural landscape a traveler may see and the extent to which visual intrusions degrade the scenic corridor.

As described further below (Threshold 4.1.1), there are no officially designated Scenic Highways located in the vicinity of the project site.

4.1.4.3 Regional Regulations

There are no regional regulations that apply to the proposed project with respect to aesthetics.

4.1.4.4 Local Regulations

City of Lake Forest General Plan 2040. The City of Lake Forest General Plan is intended to guide future growth and development within the City and is comprised of several elements. Goals and policies related to aesthetics are intended to enhance the City's image and identity and create a sense of community. The Land Use Element of the City's General Plan contains goals and policies related to aesthetics.

The following goals and policies applicable to the proposed project and related to aesthetics and scenic quality are presented in the Land Use Element:

> **Goal LU-2 Compatible Development**: A community where new development blends harmoniously into the existing neighborhood fabric.
>
> > **Policy LU-2.1 Physical Characteristic Compatibility**: Ensure that new development fits within the existing community setting and is compatible with surrounding land uses and public infrastructure availability.
> >
> > **Policy LU-2.4 Scale and Character**: Ensure that the scale and character of new development is appropriate to the setting and intended use.

Policy LU-2.5 Visual Compatibility: Require new development projects achieve visual compatibility with surrounding development through building, site, or design techniques, such as landscaping and architectural design, to achieve visual compatibility.

Policy LU-2.7 Interface with Residential Areas: Promote compatibility of adjacent land uses along the interface of different residential density and non-residential intensity categories by paying special attention to buffers and transitional areas.

Action LU-2a: As part of the City's development review process, ensure that commercial projects are designed to be compatible with residential uses, including appropriate\e building massing and scale and minimization of impacts related to the operation of the use. Review of employment-generating projects should ensure that the following design concepts are addressed in projects that abut residential areas:

- Appropriate building scale and/or siting;
- Site design and noise-attenuating features to avoid exposure to excessive noise due to long hours of operation or inappropriate location of accessory structures;
- Site and structure design to avoid excessive glare or excessive impacts from light sources onto adjacent properties; and
- Site design to avoid unnecessary loss of community and environmental resources (archaeological, historical, ecological, recreational, etc.).

Action LU-2b: As part of the City's development review process, ensure that new developments are designed to minimize glare and light impacts onto adjacent properties.

Goal LU-3 Placemaking: A distinct community image and identity that promotes Lake Forest as a desirable place to live and do business.

Policy LU-3.4 High-Quality Design: Promote high-quality design for all public and private development projects, including building form, site design, landscaping, lighting, signage, and other components which impact the visual quality of a project.

Policy LU-3.6 Architectural Styles: Promote architectural styles that emphasize the established community identity while allowing for the introduction of other appealing architectural design strategies that are compatible with their surroundings.

Goal LU-4 Streetscapes: A community with streetscapes that enhance the economic vitality and overall visual quality of the City, support the circulation network, and encourage pedestrian-scale streets and patterns of activity.

Policy LU-4.3 Building Massing: Reduce the bulk and perceived size of large buildings by dividing their mass into smaller parts, stepping down to adjacent structures, recessing openings for doors/windows, and using pedestrian-scale features; single-plane massing is discouraged.

Policy LU-4.4 Building Footprint: Require and enforce appropriate residential and nonresidential development standards, including adequate building setbacks, to ensure that a building's footprint does not negatively affect adjacent uses or the visual quality of the area.

City of Lake Forest Municipal Code. The Lake Forest Municipal Code includes regulations related to zoning and lighting that are applicable to the proposed project and related to aesthetics and scenic quality.

~~**Section 7.08.095 Street lighting.** The Lake Forest Municipal Code requires that street lighting along local streets be provided at illumination levels specified in plans that have been approved by the City Engineer.~~

Section 9.72.085 Non-residential site development standards. The Lake Forest Municipal Code requires that all lights shall be designed and installed so that lighting is confined to the site and adjacent properties are protected from glare.

Citywide Design Guidelines. The *Citywide Design Guidelines* are intended to supplement the goals and policies set forth in the City's General Plan Land Use Element and the development standards in the City's Municipal Code. The design guidelines are intended to guide proposed development so that it is aesthetically pleasing, high quality, and reflective of the character of the surrounding community. The *Citywide Design Guidelines* are general in nature and provide examples of the expected level of design of development within the City. For example, the design guidelines provide direction on issues not typically covered by the development standards (e.g., building orientation, architectural styles, and building materials). Individual design guidelines should be viewed as qualitative rather than mandatory development standards, provided the project design meets or exceeds the intent of the guidelines.

4.1.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines* and the *City of Lake Forest CEQA Significance Thresholds Guide* (2025). A number of the City of Lake Forest CEQA Significance Thresholds are fundamentally the same as those detailed in Appendix G of the State CEQQ Guidelines. However, some of the City of Lake Forest CEQA Significance Thresholds expand upon the State CEQA Guidelines Appendix G thresholds. In instances where the City of Lake Forest CEQA Significance Thresholds expand upon the *State CEQA Guidelines* Appendix G thresholds, the detailed threshold is provided below and is analyzed under Section 4.1.6, Project Impacts. Based on these thresholds, implementation of the proposed project would have a significant adverse impact with respect to aesthetics if it would:

Appendix G of the *State CEQA Guidelines*:

Threshold 4.1.1: Have a substantial adverse effect on a scenic vista;

Threshold 4.1.2: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;

Threshold 4.1.3: In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality; or

Threshold 4.1.4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

City of Lake Forest CEQA Significance Thresholds:

- Substantially damage scenic resources, including scenic vistas from public parks and views from designated scenic highways or arterial roadways.
- Create a new source of substantial night lighting that would result in "sky glow" (i.e. illumination of the night sky in urban areas) or "spill light" (i.e. light that falls outside of the area intended to be lighted) onto adjacent sensitive land uses.
- Substantially degrade the existing visual character or quality of the site and its surroundings where:
    - The project exceeds the allowed height or bulk regulations or exceeds the prevailing height and bulk of existing structures;
    - The project is proposed to have an architectural style or to use building materials that would be in vivid contrast to an adjacent development where that development had been constructed adhering to a common architectural style or theme;
    - The project is located on a visually prominent site and, due to its height, bulk, architecture or signage, would be in vivid contrast to the surrounding development or environment degrading the visual unity of the area;
    - The project would include unscreened outdoor uses or materials; and
    - The project would result in the introduction of an architectural feature or building mass that conflicts with the character of the surrounding development.

4.1.6 Project Impacts

Threshold 4.1.1: **Would the project have a substantial adverse effect on a scenic vista (Appendix G); and**

Would the project substantially damage scenic resources, including scenic vistas from public parks and views from designated scenic highways or arterial roadways? (City of Lake Forest CEQA Significance Threshold)

No Impact. Development projects have the potential to impact scenic vistas in two ways: (1) a development could physically alter a designated scenic resource (e.g., disturb or develop upon a ridgeline, hillside, or other designated scenic resource), or (2) could block a view corridor or "vista" of

the scenic resource from public view. Important factors in determining whether a project would block scenic vistas include the project's proposed height, mass, and location relative to surrounding land uses and travel corridors. Under CEQA, a private residence would not be considered a viewing location from which to determine whether a proposed project would impact scenic views since views of scenic resources from a private location are not available to the public. California courts have ruled that the obstruction of private views in a project's immediate vicinity is not generally regarded as a significant environmental impact (*Banker's Hill, Hillcrest, Park West Community Preservation Group v. City of San Diego*).[4]

As discussed previously in Section 4.1.2.3, Visual Character of the Surrounding Area, the Lake Forest General Plan does not officially designate any scenic vista points in the City. However, significant visual resources in Lake Forest include several prominent creeks, including Aliso Creek, Serrano Creek, San Diego Creek, and the Borrego Canyon Wash, and the Eucalyptus groves that surround portions of these creeks. Other prominent visual features throughout the planning area include views of ridgelines, hillsides, and canyons. Additionally, the General Plan Recreation and Resources Element notes that natural resources and open space contribute to the visual quality of the City.

The project site is located in a fully developed area in the northern portion of Lake Forest in Orange County, California. The Santa Ana Mountains, which are the highest and most prominent mountains in Orange County, are visible in background views to the east from the project site and surrounding area. However, views are intermittently obstructed by existing development and trees and are not of high quality. Therefore, the existing views are not considered to be of such high quality that they constitute a significant scenic vista. The City's Nature Park (26215 Dimension Drive) is located approximately 400 feet southeast of the project site, and Serrano Creek is located approximately 600 feet southeast of the project site. However, Nature Park and Serrano Creek are at a lower elevation than the project site and views of these visual resources are largely obstructed by existing development and trees. Due to distance, topography, and intervening development, no portion of Nature Park or Serrano Creek are visible from the project site. Similarly, the project site cannot be seen from Nature Park or Serrano Creek. No other significant visual resources are visible from the project site or surrounding areas. Furthermore, there are no officially listed or eligible State Scenic Highways in the vicinity of the proposed project.[5]

The proposed project would result in the demolition of the existing 144,906 sq ft two-story office/ industrial building with a height of approximately 35 feet (based on City records) and the replacement of this structure with a new 35-foot-tall, 165,803 sq ft tilt-up concrete industrial building. The proposed project includes a gated truck loading area, truck and auto parking spaces, and new landscaping throughout the site, and various off-site improvements at five intersections within the City to enhance public safety and address concerns over pre-existing and future large truck turning movements. The height and mass of the proposed structure would be similar to the existing structure

[4] *Banker's Hill, Hillcrest, Park West Community Preservation Group v. City of San Diego*, 139 Cal. App. 4th 249, 279 (2006).

[5] California Department of Transportation (Caltrans). n.d. California Scenic Highway Mapping System. Website: https://www.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa (accessed February 12, 2026).

and similar to the surrounding development (refer to Figure 4.1-1). Therefore, views of the project site from Dimension Drive (a divided local roadway) and Enterprise Way (a local private roadway) would be consistent with existing views of the industrial park development. There are no views of the project site from arterial roadways. Given that the proposed project is replacing an existing project of similar bulk and scale and there is existing development on all sides of the project site, which already obstructs views of the surrounding hillsides, park, and creek, the proposed project would not alter the foreground, middle ground, or background views of the project site or of nearby areas. Furthermore, as noted above, existing views from the project site are not considered to be of such high quality as to constitute a scenic vista. Therefore, the proposed project would not result in a substantial adverse effect on views of scenic vistas, including views from public parks and designated scenic highways or arterial roadways. No impact would occur, and no mitigation is required.

Threshold 4.1.2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. There are no officially listed or eligible State Scenic Highways in the vicinity of the project site.[6] The only officially designated State Scenic Highway in Orange County is a portion of State Route 91 (SR-91) that is located approximately 14 miles north of the project site. The nearest State highways that are eligible for official designation as a State Scenic Highway include a portion of State Route 74 (SR-74) that is located approximately 10 miles southeast of the project site, and a portion of Pacific Coast Highway (PCH or State Route 1 [SR-1]) that is located approximately 10 miles southwest of the project site. Due to distance, topography, and intervening development, no portion of the project site or surrounding area is visible from the officially designated portion of SR-91 or the eligible portion of SR-74 or PCH (SR-1). Therefore, the proposed project would not substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State Scenic Highway. No impact would occur, and no mitigation is required.

Threshold 4.1.3: In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from publicly accessible vantage point)? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality (Appendix G); and

Would the project substantially degrade the existing visual character or quality of the site and its surroundings where:

- **The project exceeds the allowed height or bulk regulations or exceeds the prevailing height and bulk of existing structures;**
- **The project is proposed to have an architectural style or to use building materials that would be in vivid contrast to an adjacent development where**

[6] California Department of Transportation (Caltrans). n.d. California Scenic Highway Mapping System. Website: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa (accessed April 24, 2024).

that development had been constructed adhering to a common architectural style or theme;

- **The project is located on a visually prominent site and, due to its height, bulk, architecture or signage, would be in vivid contrast to the surrounding development or environment degrading the visual unity of the area;**
- **The project would include unscreened outdoor uses or materials; and**
- **The project would result in the introduction of an architectural feature or building mass that conflicts with the character of the surrounding development? (City of Lake Forest CEQA Significance Threshold)**

No Impact. As stated previously, the United States Census Bureau designates the project site as part of an urbanized area because the entire City is within the Mission Viejo-Lake Forest-San Clemente, CA Urbanized Area. The project site is zoned Light Industrial (LI) within the Pacific Commercentre Planned Community. The project site's General Plan land use designation is Light Industrial.

Zoning Code. Title 9, Planning and Zoning, of the Lake Forest Municipal Code includes provisions and regulations for planned development projects within the City. The LI Zoning District is intended to provide for a broad range of industrial uses as specified in City's Municipal Code Section 9.72.090 (Non-Residential Land Use Matrix), column "I." Permitted uses include a variety of office, retail, manufacturing, and retail uses. The proposed project would be compliant with all the development standards for the LI zoning, including but not limited to setbacks, building height, landscaping, and parking, as shown in Table 4.1.A. Table 4.1.A below provides a consistency analysis of the Site Development Standards governing scenic quality from the LI zoning district in the Pacific Commercentre Planned Community that are applicable to the proposed project. As stated in Table 4.1.A, the proposed project would be consistent with all of the applicable development standards.

Table 4.1.A: Pacific Commercentre Planned Community Site Development Standards - Aesthetics Consistency Analysis

Applicable Site Development Standards	Consistency Analysis
Building Height Limit: No maximum except that building heights shall comply with the provisions of Section 9.144.050 (Height Limits) of the Lake Forest Municipal Code. Within the High Technology and Light Industrial Planning Areas, prior to the issuance of any building permit for any structure or buildings which are proposed to be greater than 35 feet above the proposed grade elevation, applicant shall obtain approval of a Use Permit.	**Consistent.** The proposed building would be a maximum height of 35 feet and would comply with the provisions of Section 9.144.050 (Height Limits) of the Lake Forest Municipal Code. The proposed project would not conflict with this development standard.
Building Setbacks: All setbacks shall be measured from the ultimate right-of-way line and interior property lines. • **Adjacent to Local Street:** Along any local street, buildings shall be set back a minimum of 15 feet	**Consistent.** The proposed building would be greater than 15 feet from the right-of-way lines for adjacent local streets, including Enterprise Way and Enterprise Court. The proposed project would not conflict with this development standard.

Table 4.1.A: Pacific Commercentre Planned Community Site Development Standards - Aesthetics Consistency Analysis

Applicable Site Development Standards	Consistency Analysis
from the ultimate right-of-way line, except that unsupported roofs or architectural elements may project 6 feet into the required setback area • **Adjacent to a Non-Residential Parcel:** Along property lines that separate business park and non-residential uses there shall be no required minimum setback.	
Loading: All loading shall be performed on the site. Loading platforms and areas shall be screened from view from adjacent streets and highways.	**Consistent**. The proposed project includes a gated truck loading area. Loading docks would be located on the southwest side of the proposed building and screened from the adjacent streets. The proposed project would not conflict with this development standard.
Trash and Storage Areas: All storage, including cartons, containers, materials, products or trash, shall be shielded from view within a building or area enclosed by a solid masonry wall not less than 6 feet in height.	**Consistent.** The proposed project would include two trash enclosures to shield trash storage. The trash enclosures would be composed of a painted concrete tilt-up wall panel and would be approximately 11.13 feet high with a roof that extends to 13.13 feet. The proposed project would not conflict with this development standard.
Streets and Intersections: Screening (including walls and fences) along all streets and boundaries shall have a height of not less than 36 inches nor more than 42 inches within 20 feet of the point of intersection of: • A vehicular accessway or driveway and a street; • A vehicular accessway or driveway and a sidewalk and • Two or more vehicular accessways, driveways or streets.	**Consistent**. The proposed project includes perimeter landscaping that would serve as a screen along all streets and boundaries. Vegetation within 20 feet of driveway and street intersections would be between 36 inches and 42 inches high. The proposed project would not conflict with this development standard.
Mechanical Equipment: Mechanical equipment placed on any roof such as, but not limited to, air conditioning, heating, ventilating ducts, and exhaust shall be screened from view from any abutting street or highway.	**Consistent.** Equipment located on the roof of the proposed building would be screened by the building parapet and would be out of the line of sight from the property line. The proposed project would not conflict with this development standard.
Landscaping: Landscaping, consisting of evergreen or deciduous trees, shrubs, ground cover, or hardscape shall be installed and maintained subject to the following standards: • Boundary landscaping along public streets, other than arterial highways, is required to an average depth of 10 feet and a minimum depth of 5 feet. • **Separation:** Any landscaped area shall be separated from an adjacent vehicular area by a wall or curb at least 6 inches higher than the adjacent vehicular area or in some manner be protected from vehicular damage.	**Consistent.** The proposed project includes boundary landscaping that would be an average depth of 10 feet and a minimum depth of 5 feet along public streets. Landscaped areas would be separated by a curb at least 6 inches or higher from adjacent vehicular areas. Landscaped areas would be watered using permanent automatic watering facilities and would be maintained in a neat, clean, and healthy condition. The proposed project would not conflict with this development standard.

Table 4.1.A: Pacific Commercentre Planned Community Site Development Standards - Aesthetics Consistency Analysis

Applicable Site Development Standards	Consistency Analysis
• **Watering:** Permanent automatic watering facilities shall be provided for all landscaped areas. Site development plans shall incorporate provisions for a dual water system utilizing reclaimed wastewater for irrigation purposes, consistent with the requirements of the Irvine Ranch Water District. • **Maintenance:** All landscaping shall be maintained in a neat, clean and healthy condition. This shall include proper pruning, mowing of lawns, weeding, removal of litter, fertilizing, replacement of plants when necessary, and the regular watering of all plantings.	

General Plan. The City of Lake Forest General Plan is intended to guide future growth and development within the City. The General Plan Land Use Element and Recreation and Resources Element contain specific goals and policies related to aesthetics and scenic quality. As shown in Table 4.1.B, below, and discussed above, the proposed project would be consistent with applicable General Plan goals and policies related to aesthetics and scenic quality. Therefore, the proposed project would be consistent with the City's General Plan as it relates to aesthetics and scenic quality and would not cause project-related significant unavoidable direct or indirect impacts that would preclude the use of on-site or adjacent land as intended by the City's General Plan.

Table 4.1.B: General Plan Aesthetics Consistency Analysis

General Plan Goals, Policies, and Actions	General Plan Consistency Analysis
Goal LU-2 Compatible Development: A community where new development blends harmoniously into the existing neighborhood fabric.	
Policy LU-2.1 Physical Characteristic Compatibility: Ensure that new development fits within the existing community setting and is compatible with surrounding land uses and public infrastructure availability.	**Consistent.** The proposed industrial building is located within the Pacific Commercentre Planned Community. The Pacific Commercentre Planned Community was developed as a master planned industrial business park with local streets providing internal circulation. The buildings in the Planned Community include a mix of warehouse, distribution, manufacturing, research and development and offices. The proposed industrial building is consistent with the type, scale, and intensity of the existing industrial development in the Pacific Commercentre Planned Community. The proposed project includes the replacement of an existing 2-story concrete tilt-up industrial building with a new 2-story concrete tilt-up industrial building. The subject site is adjacent to the Meadows Residential Community to the northeast/east. The project site is not connected to the Meadows Residential Community by any streets or walkways. Furthermore, a landscape buffer separates the Meadows Residential Community and the industrial area. The proposed project includes the installation of additional landscaping and mature trees along the northeastern corner of the project site, adjacent to the Meadows Community. This new landscaping will further reduce the visibility of the industrial site as viewed from the Meadows Community. Furthermore, the building was designed so that the truck dock and loading area of the proposed building is oriented to the southeast (not facing the residential properties), is located over 200 feet away from the nearest residential property line, and would not be readily visible from the residences. As such, the new proposed building is compatible with the surrounding land uses. As detailed in Sections 4.13 Noise, 4.1 Aesthetics, and 4.3 Air Quality, the proposed project would not result in excessive noise, smoke, dust, light or glare that would impact the nearby residences.
Policy LU-2.4 Scale and Character: Ensure that the scale and character of new development is appropriate to the setting and intended use.	
Policy LU-2.5 Visual Compatibility: Require new development projects achieve visual compatibility with surrounding development through building, site, or design techniques, such as landscaping and architectural design, to achieve visual compatibility.	
Policy LU-2.7 Interface with Residential Areas: Promote compatibility of adjacent land uses along the interface of different residential density and non-residential intensity categories by paying special attention to buffers and transitional areas.	
Action LU-2a: As part of the City's development review process, ensure that commercial projects are designed to be compatible with residential uses, including appropriate building massing and scale and minimization of impacts related to the operation of the use. Review of employment-generating projects should ensure that the following design concepts are addressed in projects that abut residential areas: • Appropriate building scale and/or siting; • Site design and noise-attenuating features to avoid exposure to excessive noise due to long hours of operation or inappropriate location of accessory structures; • Site and structure design to avoid excessive glare or excessive impacts from light sources onto adjacent properties; and • Site design to avoid unnecessary loss of community and environmental resources (archaeological, historical, ecological, recreational, etc.).	
Action LU-2b: As part of the City's development review process, ensure that new developments are designed to minimize glare and light impacts onto adjacent properties.	

Table 4.1.B: General Plan Aesthetics Consistency Analysis

General Plan Goals, Policies, and Actions	General Plan Consistency Analysis
	The overall building treatment and façade is compatible with the existing architecture of the industrial buildings in the Pacific Commercentre Planned Community. The proposed building would be constructed of architecturally enhanced tilt-up concrete panels and would be painted different shades of gray with a blue accent. The building architecture utilizes scoring, color transitions, and windows to provide articulation to the facades of the building. The truck doors, which would be painted to match the building, would be located on the south elevation of the building, and would not be visible from the surrounding streets or residential properties. All lighting associated with the proposed project would be hooded or shielded to focus the light downward and prevent light spillage onto adjacent properties. The Applicant has provided a photometric plan that shows low illumination at the property lines adjacent to the light industrial areas and no illumination at the property line adjacent to the residential property. The building materials (e.g., concrete, glass, metal) and proposed uses are typical of those found in the surrounding areas and would not create unusual or isolated glare effects that would affect daytime visibility or views in the project vicinity. Consistent with the requirements of California's Building Energy Efficiency Standards (Energy Code), the proposed project would include a rooftop solar photovoltaic system. The rooftop of the proposed building would be flat and therefore, the photovoltaic panels are not anticipated to generate significant amounts of glare onto adjacent properties. As detailed in Table 4.1.A, the proposed project would be consistent with the permitted uses and development standards of the City's Zoning Code and the Pacific Commercentre Planned Community. Additionally, as detailed in the Biological Resources, Cultural Resources, Recreation, and Tribal Cultural Resources sections of this EIR, the proposed project would not result in an unnecessary loss of community and environmental resources (archaeological, historical, ecological, recreational, etc.). The proposed project would not conflict with these General Plan Policies or actions.

Table 4.1.B: General Plan Aesthetics Consistency Analysis

General Plan Goals, Policies, and Actions	General Plan Consistency Analysis
Goal LU-3 Placemaking: A distinct community image and identity that promotes Lake Forest as a desirable place to live and do business.	
Policy LU-3.4 High-Quality Design: Promote high-quality design for all public and private development projects, including building form, site design, landscaping, lighting, signage, and other components which impact the visual quality of a project. **Policy LU-3.6 Architectural Styles:** Promote architectural styles that emphasize the established community identity while allowing for the introduction of other appealing architectural design strategies that are compatible with their surroundings.	**Consistent.** The proposed building would be similar in design, scale, and character to existing surrounding industrial uses. The proposed building would be constructed of architecturally enhanced tilt-up concrete panels and would be painted different shades of gray with a blue accent. The building architecture utilizes scoring, color transitions, and windows to provide articulation to long facades of the building. The truck doors, which would be painted to match the building, would be located on the south elevation of the building, and would not be visible from the surrounding streets, nor residential properties. The overall building treatment and façade will be compatible and consistent with the remainder of the existing, surrounding industrial park. The proposed project would not impact any existing parks, trails, or scenic vistas and would enhance streetscapes by providing a variety of trees, shrubs and ground cover and maintaining the existing landscaping around the perimeter of the project site. The proposed project would result in the redevelopment of an older and underutilized site with a new industrial building with improved quality and enhanced site and building design. The proposed project would not conflict with these General Plan Policies.
Goal LU-4 Streetscapes: A community with streetscapes that enhance the economic vitality and overall visual quality of the City, support the circulation network, and encourage pedestrian-scale streets and patterns of activity.	
Policy LU-4.3 Building Massing: Reduce the bulk and perceived size of large buildings by dividing their mass into smaller parts, stepping down to adjacent structures, recessing openings for doors/windows, and using pedestrian-scale features; single-plane massing is discouraged. **Policy LU-4.4 Building Footprint:** Require and enforce appropriate residential and nonresidential development standards, including adequate building setbacks, to ensure that a building's footprint does not negatively affect adjacent uses or the visual quality of the area.	**Consistent.** The proposed project would enhance streetscapes by providing a variety of trees, shrubs and ground cover and maintaining the existing landscaping around the perimeter of the project site. The proposed project would include an on-site accessible path of travel through the parking lot that would lead to a paved walkway along the north side of the building and would connect to an existing striped crosswalk across Enterprise Way. The proposed building would be constructed of architecturally enhanced tilt-up concrete panels and would be painted different shades of gray with a blue accent. The building's main entrances would be emphasized with vertical and horizontal bands, windows, and decorative light sconces. The building architecture utilizes scoring, color transitions, and windows to provide articulation to long facades of the building. The proposed building would be consistent

Table 4.1.B: General Plan Aesthetics Consistency Analysis

General Plan Goals, Policies, and Actions	General Plan Consistency Analysis
	with allowable building setbacks and, as detailed in Table 4.11.C, the proposed project would be consistent with the City's Zoning Code and permitted uses and developed standards of the Pacific Commercentre Planned Community. Additionally, the proposed project includes the installation of landscaping and mature trees along the northeastern corner of the proposed building and project site to reduce the visibility of the project site from adjacent residential uses and to improve the overall visual quality of the site. The proposed project would not conflict with these General Plan Policies.

Citywide Design Guidelines. The visual character and quality of the project site and surrounding area would be preserved and enhanced through the application of the Citywide Design Guidelines (Design Guidelines). In accordance with Section 9.184.040.E.1.g of the Design Guidelines, a project must demonstrate consistency with the Design Guidelines before the City can approve project-related discretionary permits. The Citywide Design Guidelines contribute to the City's Vision by ensuring that new and renovated projects in the City are developed in context with the surrounding areas and designed in a high-quality manner which promotes a positive City Image. The proposed project has been designed in compliance with the Citywide Design Guidelines and would implement the following design elements~~, including but not limited to the following guidelines~~ related to aesthetics (refer to Figure 4.1-1):

- The building would be located over 150 feet from the closest property line to a single-family residence, and a 60-foot-wide (minimum) landscaped slope would buffer the industrial project from the adjacent single-family residential community (as required by the Transitions in Land Use section of the Design Guidelines).

- The building architecture would utilize scoring, color transitions, and windows to provide articulation to long facades of the building to create visual interest (as required by the Architecture and Building Design section of the Design Guidelines).

- The building architecture features low, medium, and high elevation elements (as required by the Architecture and Building Design section of the Design Guidelines).

- The main building entrance, which faces Enterprise Way street frontage, would be emphasized with vertical and horizontal bands, windows, and decorative light sconces. Building articulation would be provided at the entrance by changes in the façade planes and height variation in roof line. These architectural features make the main entrance easily identifiable and the architectural focal point of the building (as required by the Architecture and Building Design section of the Design Guidelines).

- The building has been designed with a built-in roof top well to screen the roof-top mechanical equipment (as required by the Architecture and Building Design section of the Design Guidelines).

- The vehicular entrances to the site would be flanked by landscaping that includes, trees, hedges and landscaped berms (as required by the Vehicular Access/Circulation/Parking section of the Design Guidelines).

- The project would maintain and/or enhance the existing perimeter landscaping around the entire site, which screens the parking areas (as required by the Parking Lot Landscaping section of the Design Guidelines).

The proposed project would require a Site Development Permit, which would provide the opportunity for the City to review the physical improvements to the project site, including the overall building scale, height, massing (bulk), and design, including architectural style and building materials to ensure compatibility and compliance with City requirements governing scenic quality. With the approval of a Site Development Permit, the proposed project would be consistent with the General Plan and zoning designations, and no General Plan Amendment, Specific Plan Amendment, or zone change would be required as part of project approval.

The visual character and quality of the project site and surrounding area would be preserved through the application of the architectural and landscape design guidelines outlined in the Citywide Design Guidelines. Furthermore, the proposed project would be consistent with other regulations governing scenic quality, including those outlined in the City of Lake Forest General Plan and the City's Municipal Code. The project site is not visually prominent, and the project design would be consistent with existing development, both on- and off-site. The proposed project would not include unscreened outdoor uses or materials. Therefore, the proposed project would neither substantially degrade the visual character of the project site nor conflict with applicable zoning and other regulations governing scenic quality and would not cause project-related significant unavoidable direct or indirect impacts that would preclude the use of on-site or adjacent land as intended by the City's General Plan. The proposed project would have no impact related to conflicts with applicable zoning and other regulations governing scenic quality, and no mitigation is required.

Threshold 4.1.4: Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area (Appendix G); and

Would the project create a new source of substantial night lighting that would result in "sky glow" (i.e. illumination of the night sky in urban areas) or "spill light" (i.e. light that falls outside of the area intended to be lighted) onto adjacent sensitive land uses? (City of Lake Forest CEQA Significance Threshold)

Less Than Significant Impact.

Construction. Construction activities would occur only between the hours of 7:00 a.m. and 8:00 p.m. Any construction-related illumination during evening and nighttime hours would be used for safety and security purposes only, would be downlit to minimize light spillage onto adjacent properties, and

would occur only for the duration required for the temporary construction process. Because any necessary night lighting resulting from construction activities would be minimal, would not spill onto adjacent properties, and would be temporary, it would not substantially impact sensitive uses, substantially alter the character of surrounding uses, or interfere with the performance of off-site activities. In addition, construction activities are not anticipated to result in flat, shiny surfaces that would reflect sunlight or cause other natural glare. Minor glare from sunlight on construction equipment and vehicle windshields is not anticipated to impact visibility in the area because (1) relatively few construction vehicles and pieces of construction equipment would be used on the project site, and (2) the construction site would be fenced and shielded from pedestrian and vehicular views. In addition, construction vehicles would not be operating at night and thus would not create nighttime sources of light or glare. Therefore, construction of the proposed project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area, and light and glare impacts associated with construction would be less than significant. No mitigation is required.

Operation. The proposed project would provide parking lot lights consistent with the City's requirements for parking lot safety and accent lighting on the building. The type and location of these light sources would be similar to those that currently exist on site. All project lighting would be hooded or shielded to focus the light downward and prevent light spillage onto adjacent properties. All new lighting would comply with applicable regulations of the 2019 State Building Energy Efficiency Standards (Title 24). Additionally, new lighting would be required to comply with Section~~s 7.08.095 and~~ 9.72.085 of the City of Lake Forest Municipal Code, which require~~s~~ that lighting be confined to the project site and that adjacent properties are protected from glare.

As noted in Chapter 3.0, Project Description, the existing building is currently vacant. Although the existing building is currently vacant, existing sources of light and glare on the project site includes building façade lighting, security lighting, and pole-mounted lighting in the parking area. Existing sources of light and glare on the project site and in the project vicinity are typical of industrial areas and include vehicle headlights on nearby roadways, streetlights in the nearby vicinity, building façade and interior lighting, and pole-mounted lighting in the parking areas ~~within the project site~~ and adjacent developments. Lighting from existing surrounding ~~distant~~ development within Lake Forest (including commercial and residential land uses) also contributes to the background lighting in the project vicinity. Therefore, sources of light and glare associated with the proposed project would be consistent with existing and surrounding development and would not contribute to a substantial increase in the existing surrounding uses during both daytime and nighttime hours.

A photometric plan has been prepared for the proposed project to evaluate the illumination levels of the proposed project at each of the project boundaries, which is included in Appendix B. As shown in the photometric plan, the proposed project would result in low illumination at the property lines adjacent to the light industrial areas and no illumination at the property line adjacent to the residential property. Furthermore, the proposed building materials (e.g., concrete, glass, metal) and uses of these materials are typical of those found in the surrounding areas and are not anticipated to create unusual or isolated glare effects that would affect daytime visibility or views in the project vicinity.

Consistent with the requirements of California's Building Energy Efficiency Standards (Energy Code), the proposed project would include a rooftop solar photovoltaic system. The rooftop of the proposed building would be flat and therefore, the photovoltaic panels are not anticipated to generate significant amounts of glare onto adjacent properties.

Based on the above ~~Overall~~, sources of light and glare associated with the proposed project would be consistent with the existing surrounding uses during both the daytime and nighttime hours. Furthermore, compliance with the applicable lighting standards set forth in Section~~s 7.08.095 and~~ 9.72.085 of the City Municipal Code and General Plan and adherence to Title 24 requirements would ensure that the proposed project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area or result in "sky glow" or "spill light" on adjacent sensitive land uses. Impacts would be less than significant, and no mitigation is required.

4.1.7 Cumulative Impacts

As defined in Section 15355 of the *State CEQA Guidelines*, cumulative impacts refer to the incremental effects of an individual project when viewed in connection with the effects of past projects, current projects, and probable future projects. The cumulative study area for aesthetics is described in Chapter 4.0; the cumulative project list is provided in Chapter 4.0, Table 4.A, and a map of the cumulative project locations is provided in Chapter 4.0, Figure 4-1.

Cumulative impacts are addressed only for those thresholds that would result in a project-related impact, whether it would be significant, less than significant or less than significant with mitigation. If the project would result in no impact with respect to a particular threshold, by definition, it would not contribute to a cumulative impact. Therefore, no analysis would be required.

As detailed in this section, the proposed project would have no impact on scenic vistas, no impact on scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway, and no impact related to conflicts with applicable zoning and other regulations governing scenic quality. Because the proposed project would have no impact on scenic vistas or scenic resources within a State Scenic Highway and would not conflict with applicable zoning and other regulations governing scenic quality, it would not contribute to a cumulatively considerable impact to scenic vistas, scenic resources within a State Scenic Highway, or conflicts with applicable zoning and other regulations governing scenic quality, and no mitigation is required.

As detailed in this section, construction and operation of the proposed project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Construction activities would be limited to daytime hours, construction-related illumination would be downlit, and construction activities would be temporary, ensuring that construction-related light and glare impacts would be less than significant. Once operational, all project lighting would be hooded or shielded and compliance with Title 24 and Section~~s 7.08.095 and~~ 9.72.085 of the City of Lake Forest Municipal Code would ensure that project-related light and glare impacts would be less than significant. Development within the cumulative study area would also be required to comply with existing regulatory requirements related to light and glare including Title 24 and the City's Municipal Code to reduce potential impacts associated with light and glare and if significant light and glare impacts are anticipated, appropriate mitigation measures would be implemented as part of the CEQA

environmental review process. Therefore, the proposed project would not result in cumulatively considerable impacts related to light and glare. Cumulative impacts would be less than significant, and no mitigation is required.

4.1.8 Level of Significance Prior to Mitigation

The proposed project would result in less than significant impacts related to aesthetics.

4.1.9 Regulatory Compliance Measures and Mitigation Measures

4.1.9.1 Regulatory Compliance Measures

There are no regulatory compliance measures applicable to the proposed project pertaining to aesthetics.

4.1.9.2 Mitigation Measures

The proposed project would not result in significant impacts related to aesthetics, and no mitigation is required.

4.1.10 Level of Significance after Mitigation

The proposed project would result in less than significant impacts related to aesthetics.

APPENDIX C

REVISED SECTION 4.3: AIR QUALITY

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4.3 AIR QUALITY

This section evaluates the potential impacts to air quality conditions from implementation of the proposed project. This section is based in part on the following:

- *Air Quality, Greenhouse Gas, and Energy Impact Report* (Air Quality/GHG/Energy Analysis) (LSA 2025a) (provided in Appendix C); and

- *Health Risk Assessment* (LSA 2025b) (provided in Appendix C), both prepared for the proposed project and included in this Draft Environmental Impact Report (EIR).

4.3.1 Scoping Process

The Notice of Preparation (NOP) was published in March 2024 for the proposed project, and public Scoping Meetings were held on April 3, 2024, and April 24, 2024. The City of Lake Forest (City) received 120 comment letters during the public review period of the NOP. For a copy of the NOP comment letters received, refer to Appendix A of this Draft EIR. Eighty-one (81) comment letters included comments related to air quality. These comments raised concerns about additional air pollution from the proposed project specifically related to increased truck activity and traffic, potential air quality impacts to sensitive populations, and the need for additional air quality analysis, mitigation measures, emission reduction strategies, and pollution hotspot identification.

4.3.2 Methodology

The Air Quality/GHG/Energy Analysis used the California Emissions Estimator Model (CalEEMod), Version 2022.1, to quantify criteria pollutant emissions for both construction and operation of the proposed project.

CalEEMod provides a platform to calculate both construction emissions and operational emissions from a project. It calculates both the daily maximum and annual average for criteria pollutants as well as total or annual greenhouse gas (GHG) emissions. The model also provides default values for water and energy use. Specifically, the model performs the following calculations.

- Short-term construction emissions associated with demolition, site preparation, grading, building, architectural coating (painting), and paving from off-road construction equipment; on-road mobile equipment associated with workers, vendors, delivery, and hauling; fugitive dust associated with grading, demolition, truck loading, and roads; and volatile emissions of volatile organic compounds (VOCs) from architectural coating and paving.

- Operational emissions, such as on-road mobile vehicle traffic generated by the land uses, fugitive dust associated with roads, volatile emissions of reactive organic gases (ROGs) from architectural coatings, off-road emissions from landscaping equipment, volatile emissions of ROGs from consumer products and cleaning supplies, natural gas usage in the buildings, electricity usage in the buildings, water usage by the land uses, and solid waste disposal by the land uses.

In addition, CalEEMod contains default values and existing regulation methodologies to use in each specific local air quality district region. Appropriate statewide default values can be utilized if regional default values are not defined. This analysis utilized project-specific inputs and relevant model default factors for the Orange County area, which is within the South Coast Air Quality Management District (SCAQMD) jurisdiction for the emissions inventory, consistent with SCAQMD requirements.

The *Health Risk Assessment* (HRA) used a dispersion model to translate an emission rate from the source location to a concentration at the receptor location of interest (i.e., a nearby residence and worksites). Dispersion modeling varies from a simpler, more conservative screening-level analysis to a more complex and refined detailed analysis. This refined assessment was conducted using the California Air Resources Board (CARB) exposure methodology with the air dispersion modeling performed using the United States Environmental Protection Agency (USEPA) dispersion model AERMOD. The model provides a detailed estimate of exhaust concentrations based on site and source geometry, source emissions strength, distance from the source to the receptor, and meteorological data.

4.3.3 Existing Environmental Setting

The City is part of the South Coast Air Basin (Basin) and is under the jurisdiction of SCAQMD. Background information about air pollutants and health effects, climate, meteorological conditions, and regional air quality conditions in the Basin and local air quality conditions in the vicinity of the City are provided below.

4.3.3.1 Air Pollutants and Health Effects

Both State and federal governments have established health-based ambient air quality standards (California Ambient Air Quality Standards [CAAQS] and National Ambient Air Quality Standards [NAAQS], respectively) for six criteria air pollutants:[1] carbon monoxide (CO), ozone (O_3), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), lead (Pb), and suspended particulate matter (PM). In addition, the State has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety. Long-term exposure to elevated levels of criteria pollutants may result in adverse health effects. However, emission thresholds established by an air district are used to manage total regional emissions within an air basin based on the air basin's attainment status for criteria pollutants. These emission thresholds were established for individual projects that would contribute to regional emissions and pollutant concentrations and could adversely affect or delay the projected attainment target year for certain criteria pollutants.

Because of the conservative nature of the thresholds and the basin-wide context of individual project emissions, there is no known direct correlation between a single project and localized air quality-related health effects. One individual project that generates emissions exceeding a threshold

[1] Criteria pollutants are defined as those pollutants for which the federal and State governments have established ambient air quality standards, or criteria, for outdoor concentrations in order to protect public health.

does not necessarily result in adverse health effects for residents in the project vicinity. This condition is especially true when the criteria pollutants exceeding thresholds are those with regional effects, such as ozone precursors like nitrogen oxides (NO_X) and VOCs.

Occupants of facilities such as schools, daycare centers, parks and playgrounds, hospitals, and nursing and convalescent homes are considered to be more sensitive than the general public to air pollutants because these population groups have increased susceptibility to respiratory disease. Persons engaged in strenuous outdoor work or exercise also have increased sensitivity to poor air quality. Residential areas are considered more sensitive to air quality conditions, compared to commercial and industrial areas, because people generally spend longer periods of time at their residences, with greater associated exposure to ambient air quality conditions. Recreational uses are also considered sensitive compared to commercial and industrial uses due to greater exposure to ambient air quality conditions associated with exercise.

Ozone. Rather than being directly emitted, ozone (or smog) is formed by photochemical reactions between NO_X and VOCs. Ozone is a pungent, colorless gas. Elevated ozone concentrations result in reduced lung function, particularly during vigorous physical activity. This health problem is particularly acute in sensitive receptors such as the sick, the elderly, and young children. Ozone levels peak during the summer and early fall months.

Carbon Monoxide. CO is formed by the incomplete combustion of fossil fuels, almost entirely from automobiles. It is a colorless, odorless gas that can cause dizziness, fatigue, and impairments to central nervous system functions. CO passes through the lungs into the bloodstream, where it interferes with the transfer of oxygen to body tissues.

Particulate Matter. PM is the term used for a mixture of solid particles and liquid droplets found in the air. Coarse particles are those that are 10 microns or less in diameter (PM_{10}). Fine, suspended particulate matter with an aerodynamic diameter of 2.5 microns or less ($PM_{2.5}$), is not readily filtered out by the lungs. Nitrates, sulfates, dust, and combustion particulates are major components of PM_{10} and $PM_{2.5}$. These small particles can be directly emitted into the atmosphere as byproducts of fuel combustion, through abrasion (e.g., tire or brake lining wear), or through fugitive dust (e.g., wind or mechanical erosion of soil). They can also be formed in the atmosphere through chemical reactions. Particulates may transport carcinogens and other toxic compounds that adhere to the particle surfaces and can enter the human body through the lungs.

Nitrogen Dioxide. NO_2 is a reddish-brown gas that is a byproduct of combustion processes. Automobiles and industrial operations are the main sources of NO_2. Aside from its contribution to ozone formation, NO_2 also contributes to other pollution problems, including a high concentration of fine particulate matter, poor visibility, and acid deposition. NO_2 may be visible as a coloring component on high pollution days, especially in conjunction with high ozone levels. NO_2 decreases lung function and may reduce resistance to infection.

Sulfur Dioxide. SO_2 is a colorless, irritating gas formed primarily from incomplete combustion of fuels containing sulfur. Industrial facilities also contribute to gaseous SO_2 levels in the region. SO_2

irritates the respiratory tract, can injure lung tissue when combined with fine particulate matter, and reduces visibility and the level of sunlight.

Lead. Leaded gasoline (phased out in the United States beginning in 1973), paint (on older houses and cars), smelters (metal refineries), and the manufacture of lead storage batteries have been the primary sources of lead released into the atmosphere. Lead has multiple adverse neurotoxic health effects, and children are at special risk. Some lead-containing chemicals cause cancer in animals. Lead levels in the air have decreased substantially since leaded gasoline was eliminated. Ambient lead concentrations are only monitored on an as-warranted, site-specific basis in California. On October 15, 2008, the USEPA strengthened the NAAQS for lead by lowering it from 1.5 to 0.15 micrograms per cubic meter ($\mu g/m^3$). The USEPA revised the monitoring requirements for lead in December 2010. These requirements focus on airports and large urban areas, resulting in an increase in 76 monitors nationally.

Volatile Organic Compounds. VOCs (also known as ROGs and reactive organic compounds [ROCs]) are formed from the combustion of fuels and the evaporation of organic solvents. VOCs are not defined as criteria pollutants; however, because VOCs accumulate in the atmosphere more quickly during the winter, when sunlight is limited and photochemical reactions are slower, they are a prime component of the photochemical smog reaction. There are no attainment designations for VOCs.

Toxic Air Contaminants. In addition to the criteria pollutants discussed above, toxic air contaminants (TACs) are another group of pollutants of concern. TACs are injurious in small quantities and are regulated by the USEPA and the CARB. Some examples of TACs include benzene, butadiene, formaldehyde, and hydrogen sulfide. The identification, regulation, and monitoring of TACs is relatively recent compared to that for criteria pollutants.

TACs do not have ambient air quality standards, but are regulated by the USEPA, CARB, and the SCAQMD. In 1998, the CARB identified particulate matter from diesel-fueled engines as a TAC. The CARB has completed a risk management process that identified potential cancer risks for a range of activities using diesel-fueled engines.[2] High-volume freeways, stationary diesel engines, and facilities attracting heavy and constant diesel vehicle traffic (e.g., distribution centers and truck stops) were identified as posing the highest risk to adjacent receptors. Other facilities associated with increased risk include warehouse distribution centers, large retail or industrial facilities, high-volume transit centers, and schools with a high volume of bus traffic. Health risks from TACs are a function of both concentration and duration of exposure.

Unlike TACs emitted from industrial and other stationary sources noted above, most diesel particulate matter is emitted from mobile sources—primarily "off-road" sources such as construction and mining equipment, agricultural equipment, and truck-mounted refrigeration units, as well as "on-road" sources such as trucks and buses traveling on freeways and local roadways.

[2] California Air Resources Board (CARB). 2000. Stationary Source Division and Mobile Source Control Division. *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles.* October.

Although not specifically monitored, recent studies indicate that exposure to diesel particulate matter may contribute significantly to a cancer risk (a risk of approximately 500 to 700 in 1,000,000) that is greater than all other measured TACs combined.[3] The technology for reducing diesel particulate matter emissions from heavy-duty trucks is well established, and both State and federal agencies are moving aggressively to regulate engines and emission control systems to reduce and remediate diesel emissions. The CARB anticipated that by 2020, average statewide diesel particulate matter concentrations will decrease by 85 percent from levels in 2000 with full implementation of the CARB's Diesel Risk Reduction Plan,[4] meaning that the statewide health risk from diesel particulate matter is expected to decrease from 540 cancer cases in 1,000,000 to 21.5 cancer cases in 1,000,000. The CARB 2000 Diesel Risk Reduction Plan is still the most recent version and has not been updated.

Table 4.3.A summarizes the sources and health effects of air pollutants discussed in this section.

Table 4.3.A: Sources and Health Effects of Air Pollutants

Pollutants	Sources	Primary Effects
Carbon Monoxide (CO)	● Incomplete combustion of fuels and other carbon-containing substances, such as motor exhaust ● Natural events, such as decomposition of organic matter	● Reduced tolerance for exercise ● Impairment of mental function ● Impairment of fetal development ● Death at high levels of exposure ● Aggravation of some heart diseases (angina)
Nitrogen Dioxide (NO_2)	● Motor vehicle exhaust ● High temperature stationary combustion ● Atmospheric reactions	● Aggravation of respiratory illness ● Reduced visibility ● Reduced plant growth ● Formation of acid rain
Ozone (O_3)	● Atmospheric reaction of organic gases with nitrogen oxides in sunlight	● Aggravation of respiratory and cardiovascular diseases ● Irritation of eyes ● Impairment of cardiopulmonary function ● Plant leaf injury
Lead (Pb)	● Contaminated soil	● Impairment of blood functions and nerve construction ● Behavioral and hearing problems in children
Suspended Particulate Matter ($PM_{2.5}$ and PM_{10})	● Stationary combustion of solid fuels ● Construction activities ● Industrial processes ● Atmospheric chemical reactions	● Reduced lung function ● Aggravation of the effects of gaseous pollutants ● Aggravation of respiratory and cardiorespiratory diseases ● Increased cough and chest discomfort ● Soiling ● Reduced visibility
Sulfur Dioxide (SO_2)	● Combustion of sulfur-containing fossil fuels ● Smelting of sulfur-bearing metal ores Industrial processes	● Aggravation of respiratory diseases (asthma, emphysema) ● Reduced lung function ● Irritation of eyes ● Reduced visibility ● Plant injury ● Deterioration of metals, textiles, leather, finishes, coatings, etc.

Source: California Air Resources Board (2015).

[3] CARB. 2000. Stationary Source Division and Mobile Source Control Division. *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles.* October.

[4] Ibid.

4.3.3.2 National and State Ambient Air Quality Standards

Both State and federal governments have established health-based ambient air quality standards for criteria air pollutants. Criteria pollutants are defined as those pollutants for which the federal and State governments have established ambient air quality standards, or criteria, for outdoor concentrations in order to protect public health.

Both the USEPA and the CARB have established ambient air quality standards for the following common pollutants: CO, O_3, NO_2, SO_2, Pb, and suspended particulate matter. In addition, the State has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety. These ambient air quality standards are levels of contaminants that avoid specific adverse health effects associated with each pollutant.

Federal standards include both primary and secondary standards. Primary standards establish limits to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly. Secondary standards set limits to protect public welfare, including protection against decreased visibility, and damage to animals, crops, vegetation, and buildings.[5] State and federal standards for the criteria air pollutants are listed in Table 4.3.B.

4.3.3.3 Existing Climate and Air Quality

The following provides a discussion of the climate, regional, and local air quality in Lake Forest.

Climate and Meteorology. Air quality in the planning area is not only affected by various emission sources (e.g., mobile and industry), but also by atmospheric conditions (e.g., wind speed, wind direction, temperature, and rainfall). The combination of topography, low mixing height, abundant sunshine, and emissions from the second-largest urban area in the United States gives the Basin some of the worst air pollution in the nation.

The annual average temperature varies little throughout the Basin, ranging from the low to middle 60 degrees Fahrenheit (°F). With a more pronounced oceanic influence, coastal areas show less variability in annual minimum and maximum temperatures than inland areas. Based on data provided by the Western Regional Climate Center, there are no climatological stations located in Lake Forest. Other nearby stations are located in Laguna Beach, Newport Beach, Tustin, and Santa Ana. Based on the nearby stations, the climatological station closest to the site is the Laguna Beach Station.[6] The monthly average maximum temperature recorded at this station ranged from 65.1°F in January to 78.1°F in August, with an annual average maximum of 71.2°F. The monthly average minimum temperature recorded at this station ranged from 43.0°F in January to 59.6°F in August, with an annual average minimum of 51.0°F. These levels are representative of the project area.

[5] United States Environmental Protection Agency (USEPA). 2017. Criteria Air Pollutants. October. Website: www.epa.gov/criteria-air-pollutants (accessed June 2025).

[6] Western Regional Climate Center. n.d. Recent Climate in the West. Website: http://www.wrcc.dri.edu, (accessed June 2025).

Table 4.3.B: Federal and State Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[a]		Federal Standards[b]		
		Concentration[c]	Method[d]	Primary[c,e]	Secondary[c,f]	Method[g]
Ozone (O_3)[h]	1-Hour	0.09 ppm (180 µg/m³)	Ultraviolet Photometry	–	Same as Primary Standard	Ultraviolet Photometry
	8-Hour	0.07 ppm (137 µg/m³)		0.070 ppm (137 µg/m³)		
Respirable Particulate Matter (PM_{10})[i]	24-Hour	50 µg/m³	Gravimetric or Beta Attenuation	150 µg/m³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m³		–		
Fine Particulate Matter ($PM_{2.5}$)[i]	24-Hour	-		35 µg/m³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m³	Gravimetric or Beta Attenuation	9.0 µg/m³	15.0 µg/m3	
Carbon Monoxide (CO)	8-Hour	9.0 ppm (10 mg/m³)	Non-Dispersive Infrared Photometry (NDIR)	9 ppm (10 mg/m³)	–	Non-Dispersive Infrared Photometry (NDIR)
	1-Hour	20 ppm (23 mg/m³)		35 ppm (40 mg/m³)		
	8-Hour (Lake Tahoe)	6 ppm (7 mg/m³)		–	–	
Nitrogen Dioxide (NO_2)[j]	Annual Arithmetic Mean	0.03 ppm (57 µg/m³)	Gas Phase Chemi-luminescence	53 ppb (100 µg/m³)	Same as Primary Standard	Gas Phase Chemi-luminescence
	1-Hour	0.18 ppm (339 µg/m³)		100 ppb (188 µg/m³)	-	
Lead (Pb)[l,m]	30-Day Average	1.5 µg/m³	Atomic Absorption	–	–	High-Volume Sampler and Atomic Absorption
	Calendar Quarter	–		1.5 µg/m³ (for certain areas)[l]	Same as Primary Standard	
	Rolling 3-Month Average[i]	–		0.15 µg/m³		
Sulfur Dioxide (SO_2)[k]	24-Hour	0.04 ppm (105 µg/m³)	Ultraviolet Fluorescence	0.14 ppm (for certain areas)	–	Ultraviolet Fluorescence; Spectro-photometry (Pararosaniline Method)
	3-Hour	–		–	0.5 ppm (1300 µg/m³)	
	1-Hour	0.25 ppm (655 µg/m³)		75 ppb (196 µg/m³)[k]	–	
	Annual Arithmetic Mean	–		0.030 ppm (for certain areas)[k]	–	
Visibility-Reducing Particles[l]	8-Hour	See footnote n	Beta Attenuation and Transmittance through Filter Tape.	No Federal Standards		
Sulfates	24-Hour	25 µg/m³	Ion Chromatography			
Hydrogen Sulfide	1-Hour	0.03 ppm (42 µg/m³)	Ultraviolet Fluorescence			
Vinyl Chloride[j]	24-Hour	0.01 ppm (26 µg/m³)	Gas Chromatography			

Source: California Air Resources Board (2024) (Website: https://www.arb.ca.gov/research/aaqs/aaqs2.pdf).

Table notes are provided on the following page.

[a] California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1- and 24-hour), nitrogen dioxide, and particulate matter (PM_{10}, $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California Ambient Air Quality Standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

[b] National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m^3 is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact USEPA for further clarification and current national policies.

[c] Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

[d] Any equivalent measurement method which can be shown to the satisfaction of the CARB to give equivalent results at or near the level of the air quality standard may be used.

[e] National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

[f] National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[g] Reference method as described by the USEPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the USEPA.

[h] On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

[i] On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 µg/m^3 to 12.0 µg/m^3. In February 2024, the national annual $PM_{2.5}$ primary standard was lowered from 12 µg/m^3 to 9.0 µg/m^3; the secondary annual standard remained at 15 µg/m^3.The existing national 24- hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 µg/m^3, as was the annual secondary standard of 15 µg/m^3. The existing 24-hour PM_{10} standards (primary and secondary) of 150 µg/m^3 also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

[j] To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

[k] On June 2, 2010, a new 1-hour SO_2 standard was established, and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

[l] The CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

[m] The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard (1.5 µg/m^3 as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

[n] In 1989, the CARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

°C = degrees Celsius
µg/m^3 = micrograms per cubic meter
CARB = California Air Resources Board
mg/m^3 = milligrams per cubic meter
ppb = parts per billion
ppm = parts per million
USEPA = United States Environmental Protection Agency

The majority of annual rainfall in the Basin occurs between November and March. Summer rainfall is minimal and is generally limited to scattered thundershowers in coastal regions and slightly heavier showers in the eastern portion of the Basin and along the coastal side of the mountains. Average monthly rainfall at the Laguna Beach Station varies from 0.03 inch in July to 2.77 inches in February, with an annual total of 12.52 inches. Patterns in monthly and yearly rainfall totals are unpredictable due to fluctuations in the weather.

The Basin experiences a persistent temperature inversion (increasing temperature with increasing altitude) as a result of the Pacific high. This inversion limits the vertical dispersion of air contaminants, holding them relatively near the ground. As the sun warms the ground and the lower air layer, the temperature of the lower air layer approaches the temperature of the base of the inversion (upper) layer until the inversion layer finally breaks, allowing vertical mixing with the lower layer. This phenomenon is observed in mid-afternoon to late afternoon on hot summer days when the air appears to clear up suddenly. Winter inversions frequently break by midmorning.

Winds in the project area blow predominantly from the south-southwest, with relatively low velocities. Wind speeds in the project area average about 5 miles per hour (mph). Summer wind speeds average slightly higher than winter wind speeds. Low average wind speeds, together with a persistent temperature inversion, limit the vertical dispersion of air pollutants throughout the Basin. Strong, dry, north or northeasterly winds, known as Santa Ana winds, occur during the fall and winter months, dispersing air contaminants. The Santa Ana conditions tend to last for several days at a time.

The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. On days of no inversion or high wind speeds, ambient air pollutant concentrations are the lowest. During periods of low inversions and low wind speeds, air pollutants generated in urbanized areas are transported predominantly on shore into Riverside and San Bernardino Counties. In the winter, the greatest pollution problems are CO and NO_X because of extremely low inversions and air stagnation during the night and early morning hours. In the summer, the longer daylight hours and brighter sunshine combine to cause a reaction between hydrocarbons and NO_x to form photochemical smog. Smog is a general term for naturally occurring fog that has become mixed with smoke or pollution. In this context it is better described as a form of air pollution produced by the photochemical reaction of sunlight with pollutants that have been released into the atmosphere, especially by automotive emissions.

Attainment Status. The CARB is required to designate areas of the State as attainment, nonattainment, or unclassified for all State standards. An *attainment* designation for an area signifies that pollutant concentrations did not violate the standard for that pollutant in that area. A *nonattainment* designation indicates that a pollutant concentration violated the standard at least once, excluding those occasions when a violation was caused by an exceptional event, as defined in the criteria. An *unclassified* designation signifies that data do not support either an attainment or nonattainment status. The California Clean Air Act (CCAA) divides districts into moderate, serious, and severe air pollution categories, with increasingly stringent control requirements mandated for each category.

The USEPA designates areas for O_3, CO, and NO_2 as they do not meet the primary standards, cannot be classified, or better than national standards. For SO_2, areas are designated as does not meet the primary standards, does not meet the secondary standards, cannot be classified, or better than national standards. In February 2024, the USEPA issued a final revised standard for $PM_{2.5}$ to lower the primary standard from 12 µg/m^3 to 9 µg/m^3. The USEPA will issue final area designations in February 2026.

Table 4.3.C provides a summary of the attainment status for the Basin with respect to NAAQS and CAAQS.

Table 4.3.C: Attainment Status of Criteria Pollutants in the South Coast Air Basin

Pollutant	State	Federal
O_3 1-hour	Nonattainment	Extreme Nonattainment
O_3 8-hour	Nonattainment	Extreme Nonattainment
PM_{10}	Nonattainment	Attainment/Maintenance
$PM_{2.5}$	Nonattainment	Serious Nonattainment
CO	Attainment	Attainment/Maintenance
NO_2	Attainment	Attainment/Maintenance
SO_2	N/A	Attainment/Unclassified
Lead	Attainment	Attainment[1]
All others	Attainment/Unclassified	Attainment/Unclassified

Source: SCAQMD (2018).
[1] Except in Los Angeles County.
CO = carbon monoxide
N/A = not applicable
NO_2 = nitrogen dioxide
O_3 = ozone
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
SCAQMD = South Coast Air Quality Management District
SO_2 = sulfur dioxide

Air Quality Monitoring Results. Air quality monitoring stations are located throughout the nation and are maintained by the local air pollution control district and State air quality regulating agencies. The SCAQMD, together with the CARB, maintains ambient air quality monitoring stations in the Basin. The air quality monitoring stations closest to the project site are located at 26081 Via Pera in Mission Viejo and 1630 West Pampas Lane in Anaheim.

Pollutant monitoring results for years 2021 to 2023 at the Mission Viejo and Anaheim ambient air quality monitoring stations, shown in Table 4.3.D, indicate that air quality in the area has generally been good. As indicated in the monitoring results, the federal PM_{10} standard had no exceedances in the 3-year period. The State PM_{10} standard had no exceedances in 2021 and 2022 and an unknown number of exceedances in 2023. Similarly, the $PM_{2.5}$ federal standard had no exceedances in 2021 and 2022 and an unknown number of exceedances in 2023. The 1-hour ozone State standard was exceeded two times in 2021, one time in 2022, and an unknown number of times in 2023. The 8-hour ozone State standard was exceeded eight times in 2021, six times in 2022, and an unknown number of times in 2023. The 8-hour ozone federal standard was exceeded eight times in 2021, five times in 2022, and two times in 2023. In addition, the CO and NO_2 standards were not exceeded in this area during the 3-year period. SO_2 is not monitored in the project area.

Table 4.3.D: Ambient Air Quality at the Nearby Monitoring Stations

Pollutant	Standard	2021	2022	2023
Carbon Monoxide (CO)[1]				
Maximum 1-hour concentration (ppm)		1.0	1.2	2.5
Number of days exceeded:	State: > 20 ppm	0	0	0
	Federal: > 35 ppm	0	0	0
Maximum 8-hour concentration (ppm)		0.8	1.0	1.6
Number of days exceeded:	State: > 9 ppm	0	0	0
	Federal: > 9 ppm	0	0	0
Ozone (O_3)[1]				
Maximum 1-hour concentration (ppm)		0.105	0.110	0.089
Number of days exceeded:	State: > 0.09 ppm	2	1	ND
Maximum 8-hour concentration (ppm)		0.081	0.088	0.076
Number of days exceeded:	State: > 0.07 ppm	8	6	ND
	Federal: > 0.07 ppm	8	5	2
Coarse Particulates (PM_{10})[1]				
Maximum 24-hour concentration (µg/m^3)		35.2	31.0	146.0
Number of days exceeded:	State: > 50 µg/m^3	0	0	ND
	Federal: > 150 µg/m^3	0	0	0
Annual arithmetic average concentration (µg/m^3)		16.2	12.7	ND
Exceeded for the year:	State: > 20 µg/m^3	No	No	ND
	Federal: > 50 µg/m^3	No	No	ND
Fine Particulates ($PM_{2.5}$)[1]				
Maximum 24-hour concentration (µg/m^3)		32.6	22.6	50.7
Number of days exceeded:	Federal: > 35 µg/m^3	0	0	ND
Annual arithmetic average concentration (µg/m^3)		9.3	ND	9.5
Exceeded for the year:	State: > 12 µg/m^3	No	ND	No
	Federal: > 15 µg/m^3	No	ND	No
Nitrogen Dioxide (NO_2)[2]				
Maximum 1-hour concentration (ppm)		0.067	0.053	0.051
Number of days exceeded:	State: > 0.250 ppm	0	0	ND
Annual arithmetic average concentration (ppm)		0.012	0.011	0.010
Exceeded for the year:	Federal: > 0.053 ppm	No	No	No
Sulfur Dioxide (SO_2)				
Maximum 1-hour concentration (ppm)		ND	ND	ND
Number of days exceeded:	State: > 0.25 ppm	ND	ND	ND
Maximum 24-hour concentration (ppm)		ND	ND	ND
Number of days exceeded:	State: > 0.04 ppm	ND	ND	ND
	Federal: > 0.14 ppm	ND	ND	ND
Annual arithmetic average concentration (ppm)		ND	ND	ND
Exceeded for the year:	Federal: > 0.030 ppm	ND	ND	ND

Sources: CARB (2024) and USEPA (2024).

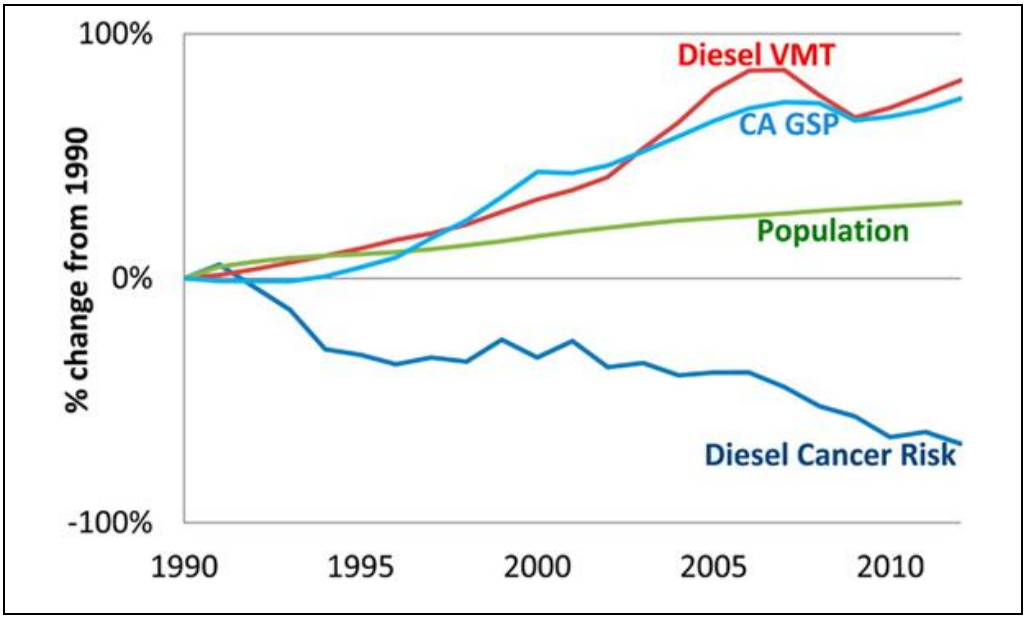
[1] Data from 2021–2022 was taken from the Mission Viejo Monitoring Station and data from 2023 was taken from the Anaheim Monitoring Station.

[2] Data was taken from the Anaheim Monitoring Station.

µg/m^3 = micrograms per cubic meter
CARB = California Air Resources Board
ND = No data. There were insufficient (or no) data to determine the value.
ppm = parts per million
USEPA = United States Environmental Protection Agency

Toxic Air Contaminant Trends. In 1984, the CARB adopted regulations to reduce TAC emissions from mobile and stationary sources, as well as consumer products. A CARB study showed that ambient concentrations and emissions of the seven TACs responsible for the most cancer risk from airborne exposure declined by 76 percent between 1990 and 2012.[7] Concentrations of diesel particulate matter, a key TAC, declined by 68 percent between 1990 and 2012, despite a 31 percent increase in State population and an 81 percent increase in diesel vehicle miles traveled (VMT), as shown on Figure 4.3-1, below. The study also found that the significant reductions in cancer risk to California residents from the implementation of air toxics controls are likely to continue.

Figure 4.3-1: California Population, Gross State Product (GSP), Diesel Cancer Risk, and Diesel Vehicle Miles Traveled (VMT) Regulatory Context



Source: Ambient and Emission Trends of Toxic Air Contaminants in California (Propper, Ralph, et al. 2015).

The USEPA and the CARB regulate direct emissions from motor vehicles. The SCAQMD is the regional agency primarily responsible for regulating air pollution emissions from stationary sources (e.g., factories) and indirect sources (e.g., traffic associated with new development), as well as monitoring ambient pollutant concentrations.

4.3.4 Regulatory Setting

Federal, State, and local regulations and programs related to air quality that are applicable to the proposed project are described below.

[7] Propper, Ralph, Patrick Wong, Son Bui, Jeff Austin, William Vance, Álvaro Alvarado, Bart Croes, and Dongmin Luo. 2015. Ambient and Emission Trends of Toxic Air Contaminants in California. *American Chemical Society: Environmental Science & Technology*. Website: https://pubs.acs.org/doi/full/10.1021/acs.est.5b02766 (accessed June 2025).

4.3.4.1 Federal Regulations

Federal Clean Air Act. The 1970 Federal Clean Air Act (CAA) authorized the establishment of national health-based air quality standards and also set deadlines for their attainment. The Federal Clean Air Act Amendments of 1990 changed deadlines for attaining national standards as well as the remedial actions required of areas of the nation that exceed the standards. Under the CAA, State and local agencies in areas that exceed the national standards are required to develop State Implementation Plans to demonstrate how they will achieve the national standards by specified dates.

4.3.4.2 State Regulations

California Clean Air Act. In 1988, the California Clean Air Act (CCAA) required that all air quality districts in the State endeavor to achieve and maintain California Ambient Air Quality Standards (CAAQS) for carbon monoxide (CO), ozone (O_3), sulfur dioxide (SO_2), and nitrogen dioxide (NO_2) by the earliest practical date. The California Clean Air Act provides districts with authority to regulate indirect sources and mandates that air quality districts focus particular attention on reducing emissions from transportation and area-wide emission sources. Each nonattainment district is required to adopt a plan to achieve a 5 percent annual reduction, averaged over consecutive 3-year periods, in district-wide emissions of each nonattainment pollutant or its precursors. A Clean Air Plan shows how a district would reduce emissions to achieve air quality standards. Generally, the State standards for these pollutants are more stringent than the national standards.

California Air Resources Board. The California Air Resources Board (CARB) is the State's "clean air agency." The CARB's goals are to attain and maintain healthy air quality, protect the public from exposure to toxic air contaminants, and oversee compliance with air pollution rules and regulations.

Assembly Bill 2588 Air Toxics "Hot Spots" Information and Assessment Act. Under Assembly Bill (AB) 2588, stationary sources of air pollutants are required to report the types and quantities of certain substances that their facilities routinely released into the air. The goals of the Air Toxics "Hot Spots" Act are to collect emission data, identify facilities having localized impacts, determine health risks, and notify nearby residents of significant risks.

4.3.4.3 Regional Regulations

South Coast Air Quality Management District. The South Coast Air Quality Management District (SCAQMD) has jurisdiction over most air quality matters in the South Coast Air Basin (Basin). This area includes all of Orange County, Los Angeles County except for the Antelope Valley, the non-desert portion of western San Bernardino County, and the western and Coachella Valley portions of Riverside County. The SCAQMD is the agency principally responsible for comprehensive air pollution control in the Basin and is tasked with implementing certain programs and regulations required by the CAA and the CCAA. The SCAQMD prepares plans to attain CAAQS and National Ambient Air Quality Standards (NAAQS). The SCAQMD is directly responsible for reducing emissions from stationary (area and point) sources. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces such measures though educational programs or fines, when necessary.

The proposed project would be subject to the following SCAQMD rules and regulations:

- **Regulation IV – Prohibitions:** This regulation sets forth the restrictions for visible emissions, odor nuisance, fugitive dust, various air pollutant emissions, fuel contaminants, start-up/ shutdown exemptions, and breakdown events.
    - **Rule 402 – Nuisance:** This rule restricts the discharge of any contaminant in quantities that cause or have a natural ability to cause injury, damage, nuisance, or annoyance to businesses, property, or the public.
    - **Rule 403 – Fugitive Dust:** This rule requires the prevention, reduction, or mitigation of fugitive dust emissions from a project site. Rule 403 restricts visible fugitive dust to a project property line, restricts the net PM_{10} emissions to less than 50 micrograms per cubic meter ($\mu g/m^3$) and restricts the tracking out of bulk materials onto public roads. Additionally, Rule 403 requires an Applicant to utilize one or more of the best available control measures (identified in the tables within the rule). Control measures may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers, and/or ceasing all activities. Finally, Rule 403 requires that a contingency plan be prepared if so determined by the United States Environmental Protection Agency (USEPA). In addition, SCAQMD Rule 403(e), Additional Requirements for Large Operations, includes requirements to provide Large Operation Notification Form 403 N, appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control training class in the South Coast Air Basin.
- **Regulation XI – Source Specific Standards:** Regulation XI sets emissions standards for different sources.
    - **Rule 1113 – Architectural Coatings:** This rule limits the amount of VOCs from architectural coatings and solvents, which lowers the emissions of odorous compounds.
- **Rule 2305 – Warehouse Indirect Source Rule (ISR):** The purpose of this rule is to reduce local and regional emissions of nitrogen oxides and particulate matter, and to facilitate local and regional emission reductions associated with warehouses and the mobile sources attracted to warehouses in order to assist in meeting State and federal air quality standards for ozone and fine particulate matter. This rule applies to owners and operators of warehouses with at least 100,000 square feet (sq ft) of indoor floor space in a single building. The warehouse rule is a menu-based points system requiring warehouse operators to annually earn a specified number of points. These points can be earned by completing actions from a menu that can include acquiring and using natural gas, Near-Zero Emissions and/or Zero- Emissions on-road trucks, zero-emission cargo handling equipment, solar panels or zero-emission charging and fueling infrastructure, or other options. The SCAQMD expects this rule to reduce emissions from warehouse uses by 10–15 percent. On September 11, 2024, the USEPA approved Rule 2305 to reduce pollution from warehouses, as a State implementation plan (SIP) revision.

The SCAQMD is responsible for demonstrating regional compliance with ambient air quality standards but has limited indirect involvement in reducing emissions from fugitive, mobile, and natural sources. To that end, the SCAQMD works cooperatively with the CARB, the Southern California Association of Governments (SCAG), county transportation commissions, local governments, and other federal and State government agencies. It has responded to this requirement by preparing a series of Air Quality Management Plans (AQMPs) to meet CAAQS and NAAQS. SCAQMD and the SCAG are responsible for formulating and implementing the AQMP for the Basin. The main purpose of an AQMP is to bring the area into compliance with federal and State air quality standards. Every 3 years, SCAQMD prepares a new AQMP, updating the previous plan and 20-year horizon.[8]

The Final 2022 AQMP is the currently adopted AQMP. Key elements of the Final 2022 AQMP include the following:

- Calculating and taking credit for co-benefits from other planning efforts (e.g., climate, energy, and transportation);
- A strategy with fair-share emission reductions at the federal, State, and local levels;
- Investment in strategies and technologies meeting multiple air quality objectives;
- Seeking new partnerships and significant funding for incentives to accelerate deployment of zero-emission and near-zero emission technologies;
- Enhanced socioeconomic assessment, including an expanded environmental justice analysis;
- Attainment of the 24-hour $PM_{2.5}$ standard in 2019 with no additional measures;
- Attainment of the annual $PM_{2.5}$ standard by 2025 with implementation of a portion of the O_3 strategy; and
- Attainment of the 1-hour O_3 standard by 2022 with no reliance on "black box" future technology (CAA Section 182(e)(5) measures).

The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NO_x technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 8-hour ozone standard, which is the most current ozone standard.

Southern California Association of Governments. SCAG is a council of governments for Los Angeles, Orange, Riverside, San Bernardino, Imperial, and Ventura Counties. It is a regional planning agency and serves as a forum for regional issues relating to transportation, the economy and community

[8] SCAQMD. 2022. *Final 2022 Air Quality Management Plan*. December 2.

development, and the environment. SCAG is the federally designated Metropolitan Planning Organization (MPO) for the majority of the southern California region and is the largest MPO in the nation. With regard to air quality planning, SCAG prepares the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP), which address regional development and growth forecasts and form the basis for the land use and transportation control portions of the AQMP and are utilized in the preparation of the air quality forecasts and consistency analysis included in the AQMP. The RTP, RTIP, and AQMP are based on projections originating within local jurisdictions.

Although SCAG is not an air quality management agency, it is responsible for developing transportation, land use, and energy conservation measures that affect air quality. SCAG's Regional Comprehensive Plan (RCP) provides growth forecasts that are used in the development of air quality-related land use and transportation control strategies by the SCAQMD. The RCP is a framework for decision-making for local governments, assisting them in meeting federal and State mandates for growth management, mobility, and environmental standards, while maintaining consistency with regional goals regarding growth and changes. Policies within the RCP include consideration of air quality, land use, transportation, and economic relationships by all levels of government.

SCAG adopted the 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (Connect SoCal) on April 4, 2024. However, the CARB has not officially approved the 2024–2050 RTP/SCS. Therefore, the 2020–2045 RTP/SCS[9] is the approved version by the CARB. The 2024–2050 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The 2024–2050 RTP/SCS is an important planning document for the region, allowing project sponsors to qualify for federal funding and takes into account operations and maintenance costs, to ensure reliability, longevity, and cost effectiveness. The forecasted development pattern, when integrated with the financially constrained transportation investments identified in the 2024–2050 RTP/SCS, would reach the regional target of reducing GHG emissions from autos and light-duty trucks by 19 percent by 2035 (compared to 2005 levels).

4.3.4.4 Local Regulations

City of Lake Forest General Plan. The City of Lake Forest addresses air quality in the Recreation and Resources Element of its General Plan.[10] The Recreation and Resources Element includes goals and policies that work to create a community with optimal air quality for its residents. The following policies from the Recreation and Resources Element are applicable to the proposed project:

[9] *Southern California Association of Governments (SCAG). 2024–2050 Regional Transportation Plan/ Sustainable Communities Strategy, RTP/SCS Demographics and Growth Forecast Technical Report.* Adopted April 4, 2024. Website: https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecast-final-040424.pdf?1712261839 (accessed February 2025).

[10] City of Lake Forest. 2020. *General Plan, Lake Forest 2040*. June. Website: https://www.lakeforestca.gov/sites/default/files/lake-forest/departments/Lake%20Forest%20General%20Plan%20(excluding %20Housing %20Element)_20211005121255885 2.pdf (accessed June 2025).

Goal RR-4 Air Quality and Greenhouse Gas Emissions: A community with optimal air quality for its residents.

Policy RR-4.7 Mitigation: Require the implementation of relevant mitigation measures for all future development upon identification of potential air quality impacts.

Action RR-4a: Review all new industrial and commercial development projects for potential air quality impacts to residences and other sensitive receptors. Ensure that mitigation measures and best management practices are implemented to reduce significant emissions of criteria pollutants.

Action RR-4b: Review development, infrastructure, and planning projects for consistency with SCAQMD requirements during the CEQA review process. Require project applicants to prepare air quality analyses to address SCAQMD and General Plan requirements, which include analysis and identification of:

1. Air pollutant emissions associated with the project during construction, project operation, and cumulative conditions.

2. Potential exposure of sensitive receptors to toxic air contaminants.

3. Significant air quality impacts associated with the project for construction, project operation, and cumulative conditions.

4. Mitigation measures to reduce significant impacts to less than significant or the maximum extent feasible where impacts cannot be mitigated to less than significant.

Action RR-4n: Future development projects implemented under the General Plan will be required to demonstrate consistency with SCAQMD construction emission thresholds. Where emissions from individual projects exceed SCAQMD thresholds, the following actions shall be incorporated as necessary to minimize impacts. These measures do not exclude the use of other, equally effective mitigation measures.

1. Require all off-road diesel equipment greater than 50 horsepower (hp) used for this Project to meet USEPA Tier 4 final off-road emission standards or equivalent. Such equipment shall be outfitted with Best Available Control Technology (BACT) devices including a California Air Resources Board Certified Level 3 Diesel Particulate Filter (DPF) or equivalent. This DPF will reduce diesel particulate matter and NOx emissions during construction activities.

2. Require a minimum of 50 percent of construction debris be diverted for recycling.

3. Require building materials to contain a minimum 10 percent recycled content.

4. Require materials such as paints, primers, sealants, coatings, and glues to have a low volatile organic compound concentration compared to conventional products. If low VOC materials are not available, architectural coating phasing should be extended sufficiently to reduce the daily emissions of VOCs.

Action RR-4o: Future development projects implemented under the General Plan will be required to demonstrate consistency with SCAQMD's operational emission thresholds. For projects where operational emissions exceed regulatory thresholds, the following measures may be used to reduce impacts. Note the following measures are not all inclusive and developers have the option to add or substitute measures that are equally or more appropriate for the scope of their project.

1. Develop a project-specific TDM program for residents and/or employees that provides opportunities for carpool/vanpools.

2. Provide onsite solar/renewable energy in excess of regulatory requirements.

3. Require that owners/tenants of non-residential or multi-family residential developments use architectural coatings that are 10 grams per liter or less when repainting/repairing properties.

4. Require dripless irrigation and irrigation sensor units that prevent watering during rain storms.

5. Ensure all parking areas are wired for capability of future EV charging and include EV charging stations that exceed regulatory requirements.

4.3.5 Thresholds of Significance

4.3.5.1 CEQA Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines* and the *City of Lake Forest CEQA Significance Thresholds Guide* (2025). A number of the City of Lake Forest CEQA Significance Thresholds are fundamentally the same as those detailed in Appendix G of the State CEQQ Guidelines. However, some of the City of Lake Forest CEQA Significance Thresholds expand upon the State CEQA Guidelines Appendix G thresholds. In instances where the City of Lake Forest CEQA Significance Thresholds expand upon the *State CEQA Guidelines* Appendix G thresholds, the detailed threshold is provided below and is analyzed under Section 4.3.6, Project Impacts. Based

on these thresholds, implementation of the proposed project would have a significant adverse impact with respect to air quality if it would:

Appendix G of the *State CEQA Guidelines*:

Threshold 4.3.1: Conflict with or obstruct implementation of the applicable air quality plan;

Threshold 4.3.2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non- attainment under an applicable federal or state ambient air quality standard;

Threshold 4.3.3: Expose sensitive receptors to substantial pollutant concentrations; or

Threshold 4.3.4: Result in other emissions (such as those leading to odors adversely affecting a substantial number of people).

City of Lake Forest CEQA Significance Thresholds:

- Violate any air quality standard or contribute substantially to an existing or projected air quality violation. The SCAQMD construction and operational emission thresholds are used for this assessment (see Table 4.3.E, below).

- Be considered to result in a cumulatively considerable net increase of any criteria pollutants for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors) where the incremental effect of the project emissions, considered together with past, present, and reasonably anticipated further project emissions, increase the level of any criteria pollutant above the existing ambient level.

4.3.5.2 Regional Emissions Thresholds

SCAQMD has established daily emissions thresholds for construction and operation of a proposed project in the South Coast Air Basin. The emissions thresholds were established based on the attainment status of the Basin with regard to air quality standards for specific criteria pollutants. Because the concentration standards were set at a level that protects public health with an adequate margin of safety, these emissions thresholds are regarded as conservative and would overstate an individual project's contribution to health risks.

Table 4.3.E lists the CEQA significance thresholds for construction and operational emissions established for the Basin. Projects in the Basin with construction- or operation-related emissions that exceed any of their respective emission thresholds would be considered significant under SCAQMD guidelines. These thresholds, which SCAQMD developed and that apply throughout the Basin, apply as both project and cumulative thresholds. If a project exceeds these standards, it is considered to have a project-specific and cumulative impact.

Table 4.3.E: Regional Thresholds for Construction and Operational Emissions

Emissions Source	Pollutant Emissions Threshold (lbs/day)					
	VOCs	NO_x	CO	PM_{10}	$PM_{2.5}$	SO_x
Construction	75	100	550	150	55	150
Operations	55	55	550	150	55	150

Source: SCAQMD. Air Quality Significance Thresholds. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf (accessed August 2024).

CO = carbon monoxide
lbs/day = pounds per day
NO_x = nitrogen oxides
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOCs = volatile organic compounds

4.3.5.3 Localized Impacts

The SCAQMD published its *Final Localized Significance Threshold Methodology* in July 2008, recommending that all air quality analyses include an assessment of air quality impacts to nearby sensitive receptors.[11] This guidance was used to analyze potential localized air quality impacts associated with construction of the proposed project. Localized significance thresholds (LSTs) are developed based on the size or total area of the emission source, the ambient air quality in the source receptor area, and the distance to the project. Sensitive receptors include residences, schools, hospitals, and similar uses that are sensitive to adverse air quality.

LSTs are based on the ambient concentrations of that pollutant within the project Source Receptor Area (SRA) and the distance to the nearest sensitive receptor. For the proposed project, the appropriate SRA for the LST is the nearby Saddleback Valley (SRA 19). SCAQMD provides LST screening tables for 25-, 50-, 100-, 200-, and 500-meter source-receptor distances for projects that are 5 acres in size or less. If the project exceeds the 5-acre LST threshold, then additional dispersion modeling analysis would be required. The closest sensitive receptors to the project site are residential uses including single-family homes, which are located adjacent to the east property line at approximately 82 feet from the project site's eastern boundary. Based on the anticipated construction equipment and based on the grading and ground-disturbing activities assumed in CalEEMod, it is assumed that the maximum daily disturbed acreage during construction of the proposed project would be 4.0 acres.[12] For the operational threshold, the maximum daily LST, which

[11] SCAQMD. 2008a. *Final Localized Significance Threshold Methodology.* July.

[12] SCAQMD. n.d. *Fact Sheet for Applying CalEEMod to Localized Significance Thresholds*. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf (accessed June 2025).

is based on a 5-acre project site, would be used. Table 4.3.F lists the emissions thresholds that apply during project construction and operation.

Table 4.3.F: South Coast Air Quality Management District Localized Significance Thresholds

Emissions Source	Pollutant Emissions Threshold (lbs/day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Construction	175.0	1,534.0	10.0	6.7
Operations	197.0	1,801.0	3.0	2.0

Source: SCAQMD (2008).
CO = carbon monoxide
lbs/day = pounds per day
NO_x = nitrogen oxides
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
SCAQMD = South Coast Air Quality Management District

4.3.5.4 Local Microscale Concentration Standards

The significance of localized project impacts under CEQA depends on whether ambient CO levels in the vicinity of the project site are above or below State and federal CO standards. Because ambient CO levels are below the standards throughout the Basin, a project would be considered to have a significant CO impact if project emissions result in an exceedance of one or more of the 1-hour or 8-hour standards. The following are applicable local emission concentration standards for CO:

- California State 1-hour CO standard of 20 parts per million (ppm)
- California State 8-hour CO standard of 9 ppm

4.3.5.5 Health Risk Thresholds

Both the State and federal governments have established health-based ambient air quality standards for seven air pollutants. For other air pollutants without defined significance standards, the definition of substantial pollutant concentrations varies. For TACs, "substantial" is taken to mean that the individual health risk exceeds a threshold considered to be a prudent risk management level.

The following limits for maximum individual cancer risk (MICR) and noncancer acute and chronic Hazard Index (HI) from project emissions of TACs are considered appropriate for use in determining the health risk for projects in the Basin:

- **MICR:** MICR is the estimated probability of a maximally exposed individual (MEI) contracting cancer as a result of exposure to TACs over a period of 30 years for adults and 9 years for children in residential locations and over a period of 25 years for workers. The MICR calculations include multipathway consideration, when applicable.

  The cumulative increase in MICR that is the sum of the calculated MICR values for all TACs would be considered significant if it would result in an increased MICR greater than 10 in 1 million (1×10^{-5}) at any receptor location.

- **Chronic HI:** Chronic HI is the ratio of the estimated long-term level of exposure to a TAC for a potential MEI to its chronic reference exposure level. The chronic HI calculations include multipathway consideration, when applicable.

  The proposed project would be considered significant if the cumulative increase in total chronic HI for any target organ system would exceed 1.0 at any receptor location.

- **Acute HI:** Acute HI is the ratio of the estimated maximum 1-hour concentration of a TAC for a potential MEI to its acute reference exposure level.

  The proposed project would be considered significant if the cumulative increase in total acute HI for any target organ system would exceed 1.0 at any receptor location.

The SCAQMD *CEQA Air Quality Handbook*[13] states that emissions of TACs are considered significant if an HRA shows an increased risk of greater than 10 in 1 million. Based on guidance from SCAQMD in the document *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis,*[14] for the purposes of this analysis, the threshold of 10 in 1 million was used as the cancer risk threshold for the proposed project.

4.3.6 Project Impacts

Please refer to Section 4.3.9 for a full text description of the regulatory compliance and/or mitigation measures referenced in the analysis below.

Threshold 4.3.1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. An AQMP consistency determination plays an essential role in local agency project review by linking local planning and unique individual projects to the information provided in air quality management plans. A consistency determination fulfills the CEQA goal of fully informing local agency decision-makers of the environmental costs of a project under consideration at a stage early enough to ensure that air quality concerns are addressed. Because air quality management plans are based on development projections from land use designations depicted and described in local General Plans, only new or amended General Plan elements, Specific Plans, and significantly unique projects need to undergo a consistency review.

The SCAQMD's 2022 AQMP is based on regional growth projections developed by SCAG. The proposed project would include 165,803 sq ft of industrial uses. The proposed project would not house more than 1,000 persons, occupy more than 40 acres of land, or encompass more than 650,000 sq ft of floor area. Thus, the proposed project would not be defined as a regionally

[13] SCAQMD. 1993. *CEQA Air Quality Handbook.* Website: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993) (accessed June 2025).

[14] SCAQMD. 2003. *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*. August.

significant project under CEQA, and therefore, it does not meet SCAG's Intergovernmental Review criteria.

The City's General Plan is consistent with the SCAG Regional Comprehensive Plan Guidelines and the SCAQMD 2022 AQMP. Pursuant to the methodology provided in the SCAQMD *CEQA Air Quality Handbook*, consistency with the 2022 AQMP is affirmed when a project (1) would not increase the frequency or severity of an air quality standard violation or cause a new violation, and (2) is consistent with the growth assumptions in the 2022 AQMP. The proposed project's consistency review is presented as follows:

1. The proposed project would result in short-term construction and long-term operational pollutant emissions. However, as demonstrated in threshold 4.3.2 in Table 4.3.J and Table 4.3.K, the proposed project would not exceed the significance criteria for daily VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$ emissions. Therefore, construction and operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard. Therefore, the proposed project would not result in an increase in the frequency or severity of an air quality standards violation or cause a new air quality standards violation.

2. The SCAQMD *CEQA Air Quality Handbook* indicates that consistency with AQMP growth assumptions must be analyzed for new or amended General Plan elements, Specific Plans, and significant projects. Significant projects include airports, electrical generating facilities, petroleum and gas refineries, designation of oil drilling districts, water ports, solid waste disposal sites, and offshore drilling facilities; therefore, the proposed project is not defined as a significant project pursuant to the SCAQMD *CEQA Air Quality Handbook*. In addition, the proposed project would not require a change to the General Plan land use designation or the current zoning and would be consistent with the City's General Plan and Zoning Ordinance.

   The projections in the AQMP for achieving air quality goals are based, in part, on assumptions in SCAG's RTP/SCS regarding population, housing, and growth trends, as well as assumptions and projections of local planning agencies to determine control strategies for regional compliance status. According to SCAG's 2020–2045 RTP/SCS, the City's household and employment are forecasted to increase by approximately 3,100 households and 6,400 jobs, respectively, between 2016 and 2045[15]. Moreover, according to SCAG's 2024–2050 RTP/SCS, the City's households and employment are forecasted to increase by approximately 2,600 households and 1,200 jobs, respectively, between 2019 and 2050.[16] The City's General Plan does not specify or anticipate when complete buildout would occur because long-range demographic and economic trends are speculative. The designation within the General Plan of a site for a certain use does

[15] Southern California Association of Governments (SCAG). 2020. 2020–2045 Regional Transportation Plan/ Sustainable Communities Strategy. Demographics and Growth Forecast, Technical Report, Table 14. Adopted September 3, 2020.

[16] Southern California Association of Governments (SCAG). 2024. 2024–2050 Regional Transportation Plan/ Sustainable Communities Strategy. Demographics and Growth Forecast, Technical Report, Table 13. Adopted April 4, 2024.

not necessarily mean that the site would be developed with that use during the planning period because most development depends on property owner initiative.

Once operational, the proposed project would not result in direct population growth because the proposed project is not a residential use or does not include a residential component; and therefore, would not add new residents at the project site. The proposed 165,803 sq ft industrial building would generate approximately 187 new jobs in Lake Forest. Based on the SCAG 2020–2045 RTP/SCS Demographics and Growth Forecast Technical Report data in Table 13 and Table 14, this represents approximately 3 percent[17] of the job growth anticipated in Lake Forest by 2045 and less than 1 percent[18] of the job growth anticipated in Orange County for 2045. Similarly, according to the SCAG 2024–2050 RTP/SCS Growth Forecast Technical Report data summarized in Table 4.14.A and Table 4.14.B, this represents approximately 17 percent[19] of the job growth anticipated in Lake Forest by 2035 and less than 1 percent[20] of the job growth anticipated in Orange County by 2035. Given that approximately 1,800 and 64,100 people are currently unemployed[21] in Lake Forest and Orange County, respectively, it is logical to assume that the majority of these positions would be filled by existing City or County residents. Therefore, growth projections of the proposed project would be within the parameters of expected overall growth in the City. Therefore, the proposed project would not result in growth in the area or in Lake Forest beyond that which was planned for by SCAG.

Based on the consistency analysis presented above, the proposed project would not conflict with or obstruct implementation of the applicable air quality plan. Impacts associated with conflicts with the applicable air quality plan would be less than significant, and no mitigation is required.

Threshold 4.3.2: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard <u>(Appendix G);</u>

<u>Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation. The SCAQMD construction and</u>

[17] The anticipated change in employment in Lake Forest from 2016 to 2045 is 6,400 jobs (48,900-42,500 = 6,400). The proposed project would generate approximately 187 jobs, which accounts for 17 percent of the anticipated job growth (187/6,400 = 0.029 x 100 = 2.9 percent, round up to 3 percent).

[18] The anticipated change in employment in Orange County from 2016 to 2045 is 270,000 jobs (1,980,000-1,710,000 = 270,000). The proposed project would generate approximately 187 jobs, which accounts for 0.069 percent of the anticipated job growth (187/270,000 = 0.00069 x 100 = 0.069 percent).

[19] The anticipated change in employment in Lake Forest from 2019 to 2035 is 1,100 jobs (45,800-44,700 = 1,100). The proposed project would generate approximately 187 jobs, which accounts for 17 percent of the anticipated job growth (187/1,100 = 0.17 x 100 = 17 percent).

[20] The anticipated change in employment in Orange County from 2019 to 2035 is 137,000 jobs (1,942,000-1,805,000 = 137,000). The proposed project would generate approximately 187 jobs, which accounts for 0.14 percent of the anticipated job growth (187/137,000 = 0.0014 x 100 = 0.14 percent).

[21] Civilians over the age of 16 who are not working but are able, available, and actively looking for work according to the California Employment Development Department (EDD).

operational emission thresholds are used for this assessment (see Table 4.3.E, above) (City of Lake Forest CEQA Significance Threshold); and

Would the project be considered to result in a cumulatively considerable net increase of any criteria pollutants for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors) where the incremental effect of the project emissions, considered together with past, present, and reasonably anticipated further project emissions, increase the level of any criteria pollutant above the existing ambient level? (City of Lake Forest CEQA Significance Threshold)

Less Than Significant with Mitigation Incorporated. The Basin is currently designated as nonattainment for the federal and State standards for O_3 and $PM_{2.5}$. In addition, the Basin is in nonattainment for the federal PM_{10} standard. The Basin's nonattainment status is attributed to the region's development history. Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant.

In developing thresholds of significance for air pollutants, the SCAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. Therefore, additional analysis to assess cumulative impacts is not necessary. The following analysis assesses the potential project-level air quality impacts associated with construction and operation of the proposed project.

Construction Emissions. During construction, short-term degradation of air quality may occur due to the release of particulate emissions generated by grading, paving, building, and other activities. Emissions from construction equipment are also anticipated and would include CO, NO_x, ROG, directly emitted particulate matter ($PM_{2.5}$ and PM_{10}), and TACs such as diesel exhaust particulate matter.

Project construction activities would include demolition, grading, site preparation, building construction, paving, and architectural coating activities. Construction-related effects on air quality from the proposed project would be greatest during the site preparation phase due to the disturbance of soils. If not properly controlled, these activities would temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soils at the construction site. Unless properly controlled, vehicles leaving the site would deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries. PM_{10} emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM_{10} emissions would depend on soil moisture, silt content of soil, wind speed, and the

amount of operating equipment. Larger dust particles would settle near the source, while fine particles would be dispersed over greater distances from the construction site.

Water or other soil stabilizers can be used to control dust, resulting in emission reductions of 50 percent or more. The SCAQMD has established Rule 403: Fugitive Dust, which would require the Applicant to implement measures that would reduce the amount of particulate matter generated during the construction period.

In addition to dust-related PM_{10} emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, SO_2, NO_x, VOCs and some soot particulate ($PM_{2.5}$ and PM_{10}) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles idle in traffic. These emissions would be temporary in nature and limited to the immediate area surrounding the construction site.

Construction emissions were estimated for the project using CalEEMod. As discussed in Chapter 3.0, Project Description, construction of the proposed project would tentatively commence in January 2026 and is expected to be completed in approximately 13 months, which was included in CalEEMod. Construction of the proposed project would require the net export of approximately 900 cy of material, which was included in CalEEMod. The proposed project would require the use of concrete industrial saws, excavators, impactors, stackers, jaw crushers, bull dozers, tractors, loaders, backhoes, graders, scrapers, forklifts, cranes, generator sets, welders, concrete ride on trowel machine, cement and mortar mixers, paving equipment, and air compressors, which was also included in CalEEMod. Equipment tier engine and number of equipment pieces was provided by the project Applicant, which was included in CalEEMod. In addition, this analysis assumes that the proposed project would comply with SCAQMD Rule 403 measures. Number of worker trips, vendor, and hauling trips during construction were also provided by the project applicant and were included in CalEEMod. All other construction details are not yet known; therefore, default assumptions (e.g., off-road emission factors and construction trip lengths) from CalEEMod were used.

Table 4.3.G lists the tentative project construction schedule based on a 13-month construction duration. Table 4.3.H lists the potential construction equipment to be used during project construction under each phase of construction. Construction-related emissions are presented in Table 4.3.I. CalEEMod output sheets are included as an appendix to the Air Quality/GHG/Energy Analysis.[22]

[22] LSA. 2025a. *Air Quality, Greenhouse Gas, and Energy Impact Report*.

Table 4.3.G: Tentative Project Construction Schedule

Phase Number	Phase Name	Phase Start Date	Phase End Date	Number of Days/Week	Number of Days
1	Demolition	1/5/2026	2/19/2026	5	34
2	Site Preparation	2/9/2026	3/6/2026	5	20
3	Grading	2/23/2026	6/24/2026	5	88
4	Building Construction	3/9/2026	12/7/2026	5	196
5	Paving	11/2/2026	12/15/2026	5	32
6	Architectural Coating	12/7/2026	1/21/2027	5	34

Source: Compiled by LSA, based on information provided by the Applicant (June 2025).

Table 4.3.H: Diesel Construction Equipment Utilized by Construction Phase

Construction Phase	Off-Road Equipment Type	Off-Road Equipment Unit Amount	Hours Used per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	1	8	33	0.73
	Excavators	3	8	36	0.38
	Other Construction Equipment	3	8	367	0.4
Site Preparation	Rubber Tired Dozers	1	8	325	0.4
	Tractors/Loaders/Backhoes	4	8	84	0.37
Grading	Excavators	4	8	175	0.38
	Graders	1	8	185	0.41
	Rubber Tired Dozers	2	8	367	0.4
	Tractors/Loaders/Backhoes	3	8	125	0.37
	Scrapers	3	8	500	0.48
Building Construction	Cranes	1	7	367	0.29
	Forklifts	3	8	367	0.2
	Generator Sets	1	8	82	0.74
	Tractors/Loaders/Backhoes	3	7	84	0.37
	Welders	1	8	14	0.45
	Other Construction Equipment	5	10	88	0.42
Paving	Pavers	1	8	81	0.42
	Paving Equipment	2	6	86	0.36
	Rollers	2	6	36	0.38
	Tractors/Loaders/Backhoes	1	8	84	0.37
	Cement and Mortar Mixers	2	6	10	0.56
Architectural Coating	Air Compressors	2	6	37	0.48
	Tractors/Loaders/Backhoes	3	7	84	0.37

Source: Compiled by LSA, based on information provided by the Applicant (June 2025).
CalEEMod = California Emissions Estimator Model

Table 4.3.I: Project Construction Emissions

Project Construction	Maximum Pollutant Emissions (lbs/day)					
	VOCs	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Demolition	0.7	8.3	26.2	<0.1	4.5	1.0
Site Preparation	1.1	24.1	28.2	<0.1	3.4	2.0
Grading	3.6	84.5	102.6	0.1	9.4	5.2
Building Construction	1.3	34.2	40.9	0.1	1.6	1.1
Paving	0.7	11.3	9.8	<0.1	0.8	0.5
Architectural Coating	24.0	9.6	7.8	<0.1	0.7	0.5
Maximum (lbs/day)	**26.0**	**118.7**	**143.6**	**0.2**	**12.8**	**7.2**
SCAQMD Thresholds	75.0	100.0	550.0	150.0	150.0	55.0
Exceeds?	**No**	**Yes**	**No**	**No**	**No**	**No**

Source: Compiled by LSA (June 2025).
Note: Maximum emissions of VOC occurred during the overlapping building construction, paving, and architectural coating phases. The maximum emissions of CO and NO_X occurred during the overlapping of grading and building construction phases. Maximum emissions of PM_{10} and $PM_{2.5}$ occurred during the overlapping of site preparation and grading phases.
Note: The South Coast Air Basin is classified as non-attainment for ozone under both the State and federal standards. Ozone is not directly emitted by any one source but rather forms in the atmosphere through reactions with other pollutants including NOx and VOCs.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOCs = volatile organic compounds

As shown in Table 4.3.I, construction emissions associated with the project would not exceed the SCAQMD thresholds for VOCs, CO, sulfur oxides (SO_X), $PM_{2.5}$, or PM_{10} emissions. However, maximum daily NO_X emissions during the overlapping of grading and building construction phases would exceed the significance criteria. Therefore, the proposed project would result in a potentially significant impact for criteria pollutants during construction. As such, implementation of mitigation that would require Tier 4 Interim equipment or the most effective Verified Diesel Emission Control Strategies (VDECS) available for the engine type (Tier 4 engines automatically meet this requirement) as certified by the CARB would reduce NOx emissions by resulting in fewer emissions during the construction process. VDECS are an effective emissions control strategy verified by CARB (pursuant to the verification procedure laid out in Title 13, California Code of Regulations, sections 2700-2710) to reduce emissions from either PM or NOx, or both. If Tier 4 engines are not available, construction equipment will need to be equipped with the highest VDECS to mitigate emissions. Therefore, **Mitigation Measure (MM) AQ-1** would be required to reduce NO_X emissions to a less than significant level.

Table 4.3.J identifies the results of the analysis with implementation of **MM AQ-1**.

As shown in Table 4.3.J, with implementation of **MM AQ-1**, NO_X emissions associated with the proposed project would be below the SCAQMD significance thresholds. Therefore, with implementation of **MM AQ-1**, construction of the proposed project would not result in emissions that would result in a cumulatively considerable net increase of any criteria pollutant for which the project is in nonattainment under an applicable federal or State ambient air quality standard. Furthermore, the project would not be anticipated to increase ambient pollutant concentrations because the SCAQMD mass-based significance thresholds are designed to limit project-level emissions such that development does not contribute to exceedances of State or federal ambient air

quality standards. Because construction emissions are below SCAQMD significance thresholds, the project would not violate any air quality standard, contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase of any criteria pollutant. Therefore, ~~i~~impacts would be less than significant with implementation of **MM AQ-1**.

Table 4.3.J: Mitigated Project Construction Emissions

Project Construction	Maximum Pollutant Emissions (lbs/day)					
	VOCs	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Demolition	0.6	16.2	26.2	0.1	4.3	0.9
Site Preparation	0.4	7.8	14.7	<0.1	2.8	1.4
Grading	1.7	36.3	72.0	0.1	7.1	3.1
Building Construction	1.0	21.6	40.9	0.1	0.7	0.3
Paving	0.5	6.1	9.8	<0.1	0.3	0.1
Architectural Coating	23.3	5.5	7.8	<0.1	0.2	0.1
Maximum (lbs/day)	**24.8**	**57.9**	**112.6**	**0.2**	**9.9**	**4.5**
SCAQMD Thresholds	75.0	100.0	550.0	150.0	150.0	55.0
Exceeds?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Compiled by LSA (June 2025).
Note: Maximum emissions of VOC occurred during the overlapping building construction, paving, and architectural coating phases. The maximum emissions of CO and NO_X occurred during the overlapping of grading and building construction phases. Maximum emissions of PM_{10} and $PM_{2.5}$ occurred during the overlapping of site preparation and grading phases.
Note: The South Coast Air Basin is classified as non-attainment for Ozone under both the State and federal standards. Ozone is not directly emitted by any one source but rather forms in the atmosphere through reactions with other pollutants including NOx and VOCs.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOCs = volatile organic compounds

Operational Air Quality Impacts. Long-term air pollutant emission impacts are those typically associated with mobile sources (e.g., vehicle trips and truck trips), energy sources (e.g., electricity), area sources (e.g., architectural coatings and the use of landscape maintenance equipment), and stationary sources (e.g., use of fire pump).

Mobile source emissions include VOC and NO_X emissions that contribute to the formation of ozone. Additionally, PM_{10} emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways.

Energy source emissions result from activities in buildings for which natural gas is used. However, the proposed building would be all electric and no natural gas use would be associated with the operation of the proposed building.

Typically, area source emissions consist of direct sources of air emissions located at the project site, including architectural coatings and the use of landscape maintenance equipment. Stationary source emissions are associated with the use of the fire pump.

Consistent with the SCAQMD guidance for estimating emissions associated with land use development projects, CalEEMod was used to calculate the long-term operational emissions

associated with the project. The proposed project would construct a 165,803 sq ft industrial building. Therefore, the proposed project analysis was conducted using land use codes *Unrefrigerated Warehouse- No Rail*, *Other Asphalt Surfaces,* and *Parking Lot*. The *Other Asphalt Surfaces* land use was used to represent the off-site improvements for the proposed project. Trip generation rates used in CalEEMod for the project were based on the project's trip generation described in Section 4.17, Transportation and Traffic, which identifies that the proposed project would generate approximately 573 average daily trips, 458 passenger car trips, 368 two-axle truck trips, 21 three-axle truck trips, and 58 four-axle truck trips. As noted in Section 4.17, the trip generation rates are based trip generation rates are from the Institute of Transportation Engineers Trip Generation Manual, 11th Edition and the Warehouse Truck Trip Study Data Results and Usage from the SCAQMD. This analysis assumes that the four-axle truck trips would travel approximately 40 miles. To be conservative, separate CalEEMod analyses were prepared for the operational analysis for the proposed project – one CalEEMod run evaluated operational and vehicle trip emissions and another CalEEMod run evaluated four-axle truck (heavy heavy-duty trucks) trip emissions for the proposed project. Mobile source emissions from both model runs are summarized in Table 4.3.K below. Consistent with the project design plans, this CalEEMod analysis assumes no natural gas usage during construction and operation of the proposed project. The CalEEMod analysis includes the use of a 300 horsepower (hp) diesel fire pump, which is estimated to run for approximately 50 hours per year and the use of two 200 hp diesel powered cargo handling equipment units. In addition, the CalEEMod analysis assumes that the proposed project would be operational in 2027.

Table 4.3.K: Project Operational Emissions

Emission Type	Pollutant Emissions (lbs/day)					
	VOCs	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Mobile Sources – Vehicles and Light Duty Trucks	1.6	1.6	18.0	0.1	5.1	1.3
Mobile Sources – Heavy Heavy-Duty Trucks	0.1	8.7	3.5	0.1	2.3	0.7
Area Sources	5.2	0.1	7.2	<0.1	<0.1	<0.1
Energy Sources	0.0	0.0	0.0	0.0	0.0	0.0
Off-Road Sources	0.7	5.1	3.3	<0.1	0.2	0.2
Stationary Sources	0.5	1.4	1.3	<0.1	0.1	0.1
Total Proposed Project Emissions	**8.1**	**16.9**	**33.3**	**0.2**	**7.7**	**2.3**
SCAQMD Thresholds	**55.0**	**55.0**	**550.0**	**150.0**	**150.0**	**55.0**
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Compiled by LSA (June 2025).
CO = carbon monoxide
lbs/day = pounds per day
NO_x = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_x = sulfur oxides
VOCs = volatile organic compounds

Model results are shown in Table 4.3.K. CalEEMod output sheets are included as an appendix to the Air Quality/GHG/Energy Analysis.[23]

As shown in Table 4.3.K, emissions associated with the proposed project would not exceed the SCAQMD significance criteria for VOCs, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$ emissions; thus, the proposed project would not have a significant effect on regional air quality. Therefore, operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project is nonattainment under an applicable federal or State ambient air quality standard. Furthermore, the proposed project would not be anticipated to increase ambient pollutant concentrations because the SCAQMD mass-based significance thresholds are designed to limit project-level emissions such that development does not contribute to exceedances of State or federal ambient air quality standards. In addition, the SCAQMD thresholds are developed with consideration of expected atmospheric dispersion and mixing conditions in the South Coast Air Basin, where pollutants emitted from individual projects dilute rapidly with distance due to natural dispersion, vertical mixing within the atmospheric boundary layer, and prevailing wind patterns. Because operational emissions are below the SCAQMD significance thresholds, the project would not violate any air quality standard, contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase of criteria pollutants. As a result, the proposed project would not be expected to cause localized increases in pollutant concentrations that could lead to exceedances of ambient air quality standards. Therefore, iImpacts would be less than significant, and no mitigation is required.

Long-Term Microscale (CO Hot Spot) Analysis. Vehicular trips associated with the proposed project would contribute to congestion at intersections and along roadway segments in the project vicinity. Localized air quality impacts would occur when emissions from vehicular traffic increase as a result of the proposed project. The primary mobile-source pollutant of local concern is CO, a direct function of vehicle idling time and, thus, of traffic flow conditions. CO transport is extremely limited; under normal meteorological conditions, CO disperses rapidly with distance from the source. However, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels, affecting local sensitive receptors (e.g., residents, schoolchildren, the elderly, and hospital patients). Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service or with extremely high traffic volumes. In areas with high ambient background CO concentrations, modeling is recommended to determine a project's effect on local CO levels.

An assessment of project-related impacts on localized ambient air quality requires that future ambient air quality levels be projected. Existing CO concentrations in the immediate project vicinity are not available. Ambient CO levels monitored at the Mission Viejo Station, the closest monitoring station to the project site, showed a highest recorded 1-hour concentration of 2.5 ppm (the State standard is 20 ppm) and a highest 8-hour concentration of 1.6 ppm (the State standard is 9 ppm) during the past 3 years (Table F). The highest CO concentrations would normally occur during peak traffic hours; hence, CO impacts calculated under peak traffic conditions represent a worst-case analysis.

[23] LSA. 2025a. *Air Quality, Greenhouse Gas, and Energy Impact Report*.

As described in Section 4.17, Transportation and Traffic, the proposed project would generate 74 a.m. peak hour trips and 78 p.m. peak-hour trips. As the proposed project would not generate 100 or more a.m. or p.m. peak hour trips, the proposed project did not meet the criteria for an evaluation of study area intersection or roadway segment level of service (LOS). Therefore, it is assumed that the addition of the proposed project traffic would not create any significant adverse impacts to nearby intersections.

Therefore, given the extremely low level of CO concentrations in the project area, and lack of traffic impacts at any intersections, project-related vehicles are not expected to contribute significantly to result in the CO concentrations exceeding the State or federal CO standards. No CO hot spots would occur, and the project would not result in any project-related impacts on CO concentrations. Impacts would be less than significant, and no mitigation is required.

Threshold 4.3.3: Would the project expose sensitive receptors to substantial pollutant concentrations?

***Less Than Significant with Mitigation Incorporated*.** Construction of the project would require the use of diesel-fueled equipment, which could be a source of toxic air contaminants. Additionally, during project operation, diesel fueled trucks would operate on the project site.

The SCAQMD defines structures that house persons (e.g., children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise) or places where persons gather (i.e., residences, schools, playgrounds, child-care centers, convalescent centers, retirement homes, and athletic fields) as sensitive receptors. Sensitive receptors are defined as people who have an increased sensitivity to air pollution or environmental contaminants. Although not sensitive receptors, this discussion includes an analysis of health impacts to nearby worker receptors (i.e., employees in nearby businesses) to ensure that people working close to the proposed project would not be exposed to substantial pollutant concentrations. The closest sensitive receptors to the project site are residential uses, including single-family homes, which are located adjacent to the east property line at approximately 82 feet from the project site's eastern boundary limit to the residential building facade. The closest worker receptor to the project site is located approximately 25 feet immediately north of the project site.

Health Risk on Nearby Sensitive Receptors. The following sections describe the potential impacts on sensitive receptors from construction and operation of the proposed project, which is based on the results of an HRA prepared for the project and provided in Appendix C. The HRA analysis and results are presented below. Model inputs, detailed construction and operational data, and other details are also included in the *Health Risk Assessment*.[24]

Construction Health Risk Assessment. A construction HRA, which evaluates construction-period health risk to off-site receptors, was performed for the proposed project.

[24] LSA. 2025b. *Health Risk Assessment*.

For the purposes of an HRA, short-term emissions are of concern for analyzing acute health impacts, and long-term emissions are of concern for analyzing chronic and carcinogenic health impacts. A screening-level multi-pathway assessment has been conducted. This technique was chosen as recommended in the OEHHA *Air Toxic Hot Spots Program Risk Assessment Guidelines*[25] and guidance from the SCAQMD.

This HRA has been conducted using three models: (1) CARB's California Emissions Factor Model, Version 2021 (EMFAC2021) for on-road vehicle emissions factors and percentages of fuel type within the overall vehicle fleet; (2) the USEPA's AERMOD air dispersion model to determine how the TACs would move through the atmosphere after release from sources both on site and on surrounding roadways; and (3) CARB's HARP2 model to translate the pollutant concentrations from AERMOD into individual health risks at any sensitive receptor locations surrounding the project site.

The OEHHA has determined that long-term exposure to diesel exhaust particulates poses the highest cancer risk of any TAC it has evaluated. Exposure to diesel exhaust can also have immediate health effects. Diesel exhaust can irritate the eyes, nose, throat, and lungs, and it can cause coughs, headaches, lightheadedness, and nausea. In studies with human volunteers, diesel particular matter (DPM) made people with allergies more susceptible to the materials to which they were allergic, such as dust and pollen. Exposure to DPM also causes inflammation in the lungs, which may aggravate chronic respiratory symptoms and increase the frequency or intensity of asthma attacks. For risk assessment procedures, the OEHHA specifies that the surrogate for whole diesel exhaust is DPM. The HRA analysis used PM_{10} emissions to represent DPM emissions, consistent with OEHHA guidance.

The conservative nature of this analysis is due primarily to the following three factors:

- The CARB-adopted diesel exhaust unit risk factor (URF) of 300 in 1 million per $\mu g/m^3$ is based on the upper 95th percentile of estimated risk for each of the epidemiological studies used to develop the URF. Therefore, the risk factor is already representative of the conservative risk posed by DPM.

- The risk estimates assume sensitive receptors would be subject to DPM 24 hours per day, 350 days per year. As a conservative measure, SCAQMD does not recognize indoor adjustments for residents. However, typical people spend the majority of their time indoors versus remaining outdoors 24 hours per day, 350 days per year.

- The exposure to DPM is assumed to be constant for the given period analyzed (i.e., 70 years). However, emissions from DPM are expected to substantially decrease in the future with the implementation of standard regulatory requirements and technological advancement to reduce DPM.

[25] California Environmental Protection Agency Office of Environmental Health Hazard Assessment, 2015. *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*. March. Website: https://oehha.ca.gov/air/air-toxics-hot-spots (accessed June 2025).

To estimate the potential cancer risk associated with construction of the proposed project from equipment exhaust (including DPM), a dispersion model was used to translate an emission rate from the source location to a concentration at the receptor location of interest (i.e., a nearby residence and worksites). The HRA analyis used PM_{10} emissions to represent DPM emissions, consistent with OEHHA guidance.[26] Dispersion modeling varies from a simpler, more conservative screening-level analysis to a more complex and refined detailed analysis. This refined assessment was conducted using the CARB exposure methodology with the air dispersion modeling performed using the USEPA dispersion model AERMOD. The model provides a detailed estimate of exhaust concentrations based on site and source geometry, source emissions strength, distance from the source to the receptor, and meteorological data. Details of these inputs are included in as an Appendix to the *Health Risk Assessment*.[27]

CARB's HARP2 model is a tool that assists with the programmatic requirements of the Air Toxics "Hot Spots" Program (Assembly Bill 2588). HARP2 was used to translate the TAC concentrations from AERMOD into long-term carcinogenic and chronic, and short-term acute health risk levels following the guidance in the SCAQMD and OEHHA risk assessment guidelines. These guidelines specify a minimum set of TAC pathways and HARP2 modeling options for the carcinogenic assessment. To estimate chronic noncancer risks at residential receptors, the "RMP-Derived Method" risk-calculation option was used. Following the OEHHA guidance, an 8-hour chronic noncancer risk was calculated for residential receptors because the project would operate more than 8 hours per day and 5 days per week.

The dose-response relationship for a specific pollutant describes the association between exposure and the observed response (health effect). In other words, the relationship estimates how different levels of exposure to a pollutant change the likelihood and severity of health effects. The dose-response relationship (the response occurring with increasing doses) varies with each pollutant, individual sensitivity, and type of health effect. Combining the results of the emission characterization and dispersion modeling described above with the dose-response assessment gives an estimate of the increased health risk for an individual exposed to the maximum predicted long-term concentrations of TACs.

Discrete variants for daily breathing rates, exposure frequency, and exposure duration were default rates as presented in the OEHHA guidance document entitled *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*[28] and guidance from the SCAQMD.

Table 4.3.L, below, identifies the results of the analysis at the maximally exposed individual (MEI), who is a hypothetical individual who—because of realistically assumed proximity, activities, and

[26] California Environmental Protection Agency Office of Environmental Health Hazard Assessment, 2015. Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. March. Website: https://oehha.ca.gov/air/air-toxics-hot-spots (accessed June 2025).

[27] LSA. 2025b. *Health Risk Assessment*.

[28] California Environmental Protection Agency Office of Environmental Health Hazard Assessment, 2015. Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. March. Website: https://oehha.ca.gov/air/air-toxics-hot-spots (accessed June 2025).

living habits—would receive the highest exposure of a pollutant. Model snap shots of the sources are included in as an appendix to the *Health Risk Assessment*.[29]

Table 4.3.L: Health Risks from Project Construction to Off-Site Receptors

Location	Carcinogenic Inhalation Health Risk in 1 Million	Chronic Inhalation Hazard Index	Acute Inhalation Hazard Index
Residential MEI	41.14	0.054	0.000
Worker MEI	0.70	0.054	0.000
SCAQMD Significance Threshold	**10 in 1 million**	**1.0**	**1.0**
Significant?	**Yes**	**No**	**No**

Source: Compiled by LSA (June 2025).
MEI = maximally exposed individual
SCAQMD = South Coast Air Quality Management District

As shown in Table 4.3.L, the maximum cancer risk for the residential MEI would be 41.14 in 1 million, which would exceed the SCAQMD cancer risk threshold of 10 in 1 million. The worker MEI would be 0.70 in 1 million, which would not exceed the SCAQMD cancer risk threshold of 10 in 1 million. The total chronic HI would be 0.054 for the residential MEI and for the worker MEI, which is below the threshold of 1.0. In addition, the total acute HI would be nominal (0.000), which would also not exceed the threshold of 1.0. Because the residential MEI would exceed the SCAQMD cancer risk threshold, a mitigation measure to reduce toxic air contaminants would be required. Tier 4 Interim equipment or the most effective Verified Diesel Emission Control Strategies (VDECS) available for the engine type (Tier 4 engines automatically meet this requirement) as certified by the CARB would reduce construction PM_{10} emissions by resulting in fewer emissions during the construction process. Long term exposure to PM_{10} emissions is associated with an increased risk of lung cancer. Therefore, reducing PM_{10} emissions to the extent feasible would help lower the cancer risk associated with the construction emissions from the proposed project. Therefore, implementation of **MM AQ-1** would be required to reduce the cancer risks to off-site receptors from construction.

As shown in Table 4.3.M, with the implementation of **MM AQ-1** the maximum cancer risk for the residential receptor MEI would be reduced from 41.14 in 1 million to 5.12 in 1 million, which is below the SCAQMD cancer risk threshold of 10 in 1 million. Therefore, with implementation of **MM AQ-1**, construction of the proposed project would not cause an exceedance of the SCAQMD health risk thresholds and would not result in the exposure of nearby sensitive receptors to substantial pollutant concentrations. Impacts resulting from the exposure of sensitive receptors to substantial pollutant concentrations during construction would be less than significant with implementation of **MM AQ-1**.

Table 4.3.M: Mitigated Health Risks from Project Construction to Off-Site Receptors

Location	Carcinogenic	Chronic Inhalation	Acute Inhalation

[29] Ibid.

	Inhalation Health Risk in 1 Million	Hazard Index	Hazard Index
Residential MEI	5.12	0.007	0.000
Worker MEI	0.09	0.007	0.000
SCAQMD Significance Threshold	**10 in 1 million**	**1.0**	**1.0**
Significant?	**No**	**No**	**No**

Source: Compiled by LSA (June 2025).
MEI = maximally exposed individual
SCAQMD = South Coast Air Quality Management District

Operational Health Risk Assessment. An operational HRA was conducted to determine the potential health risk to people living and working near the project site associated from the exhaust of diesel-powered trucks and equipment during proposed project operation. The carcinogenic and chronic health risks from the proposed project are shown in Table 4.3.N. The residential risk conservatively incorporates both the risk for a child living in a nearby residence for 9 years (the standard period of time for child risk) and an adult living in a nearby residence for 30 years (considered a conservative period of time for an individual to live in any one residence). An exposure period of 25 years was assumed for worker receptors.

Table 4.3.N: Health Risks from Project Operation to Off-Site Receptors

Location	Carcinogenic Inhalation Health Risk in 1 Million	Chronic Inhalation Hazard Index	Acute Inhalation Hazard Index
Residential MEI	3.06	0.001	<0.001
Worker MEI	0.85	0.003	<0.001
SCAQMD Significance Threshold	**10.0 in 1 million**	**1.0**	**1.0**
Significant?	**No**	**No**	**No**

Source: Compiled by LSA (June 2025).
MEI = maximally exposed individual
SCAQMD = South Coast Air Quality Management District

As shown in Table 4.3.N, the maximum cancer risk for the residential MEI would be 3.06 in 1 million, which would not exceed the SCAQMD cancer risk threshold of 10 in 1 million. The worker MEI would be 0.85 in 1 million, which would also not exceed the threshold. The total chronic HI would be 0.001 for the residential MEI and 0.003 for the worker MEI, which is below the threshold of 1.0. In addition, the total acute HI would be less than 0.001, which would also not exceed the threshold of 1.0. As these results show, all health risk levels to nearby receptors from operation-related emissions of TACs would be well below the SCAQMD's health risk thresholds. Therefore, operation of the proposed project would not expose sensitive receptors to substantial pollutant concentrations during project operations. Impacts would be less than significant, and no mitigation is required.

Localized Significance Analysis. The SCAQMD's numeric regional mass daily emission thresholds are based in part on Section 180 I of the CAA. It should be noted that the numeric regional mass daily emission thresholds have not changed since their adoption as part of the *CEQA Air Quality Handbook* published by SCAQMD in 1993 (over 20 years ago). The numeric regional mass daily

emission thresholds are also intended to provide a means of consistency in significance determination within the environmental review process.

Notwithstanding, simply exceeding the SCAQMD's numeric regional mass daily emission thresholds does not constitute a particular health impact to an individual nearby. The reason for this is that the mass daily emission thresholds are in lbs/day emitted into the air, whereas health effects are determined based on the concentration of a pollutant in the air at a particular location (e.g., ppm by volume of air or $\mu g/m^3$ of air). CAAQS and NAAQS were developed to protect the most susceptible population groups from adverse health effects and were established in terms of ppm or $\mu g/m^3$ for the applicable emissions.

For this reason, the SCAQMD developed a methodology to assist lead agencies in analyzing localized air quality impacts from a proposed project as they relate to CO, NO_X, $PM_{2.5}$, and PM_{10}. This methodology is collectively referred to as the LST as described in Section 4.3.5.3. Localized Impacts. LSTs differ from the numeric regional mass daily emission thresholds in that LSTs are based on (1) the amount of emissions generated from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable NAAQS or CAAQS, and (2) the ambient concentrations of the pollutant and the relative distance to the nearest sensitive receptor (the SCAQMD performed air dispersion modeling to determine what amount of emissions generated a particular concentration at a particular distance).

This air quality analysis evaluated the proposed project localized impact to air quality for emissions of CO, NO_X, $PM_{2.5}$, and PM_{10} by estimating the proposed project's on-site emissions using CalEEMod and comparing the resulting pollutant concentrations at surrounding sensitive receptors to the CAAQS. As shown in Tables 4.3.O and 4.3.P, which are provided below, the proposed project emissions would not be expected to exceed the most stringent applicable NAAQS or CAAQS for CO, NO_X, $PM_{2.5}$, and PM_{10}. It should be noted that the AAQS are developed and represent levels at which the most susceptible persons (children and the elderly) are protected. In other words, the AAQS are purposefully set low to protect children, the elderly, and those with existing respiratory problems.

The SCAQMD has acknowledged that for criteria pollutants, it would be extremely difficult, if not impossible, to quantify health impacts for various reasons, including modeling limitations as well as where in the atmosphere air pollutants interact and form.

Known health effects related to ozone include worsening of bronchitis, asthma, and emphysema and a decrease in lung function. Health effects associated with particulate matter include premature death of people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, decreased lung function, and increased respiratory symptoms. Because of the relatively small amount of emissions from the proposed project relative to regional-wide emissions, it would be speculative to assess whether or the extent to which the proposed project would contribute to adverse health effects. Even though SCAQMD has among the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the State, SCAQMD has not provided methodology, and modeling does not currently exist, to assess the specific correlation between mass emissions generated, cumulative increases from individual projects, and the effect on health or even to determine how exceeding the regional thresholds by small amounts would affect the

number of days the region is in nonattainment. Similarly, CARB methodology has reported that a $PM_{2.5}$ methodology is not suited for small projects and may yield unreliable results. For these reasons, mass emissions are not correlated with concentrations of emissions or how many additional individuals in the air basin would be affected by the health effects cited above. In contrast, for extremely large regional projects (unlike the proposed project), the SCAQMD has only been able to correlate potential health outcomes for very large emissions sources. As part of its rulemaking activity, the SCAQMD determined that, specifically 6,620 lbs/day of NO_X and 89,180 lbs/day of VOCs were expected to result in approximately 20 premature deaths per year and 89,947 school absences due to O_3.

The proposed project does not generate anywhere near 6,620 lbs/day of NO_X or 89,190 lbs/day of VOC emissions. As shown in Table 4.3.K above, the proposed project would generate approximately 16.9 lbs/day of NO_X during operation (less than 1 percent of 6,620 lbs/day) and approximately 8.1 lbs/day of VOC emissions during operations (less than 1 percent of 89,190 lbs/day). Therefore, the proposed project's emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level.

Notwithstanding, as previously noted, this air quality analysis does include a site-specific localized impact analysis that correlates potential health impacts from the proposed project on a local level to immediately adjacent land uses. Current scientific, technological, and modeling limitations do not allow for the relation of expected adverse air quality impacts to likely specific health consequences.

Localized impact results from the proposed project are presented below.

Construction Localized Significance Analysis. Project construction and operation emissions were compared to the LST screening tables in SRA 19, based on an 82-foot (25-meter) source-receptor distance and a disturbed acreage of 4.0 acres for construction and 5.0 acres for operation.

Table 4.3.O indicates the estimated on-site construction emissions. As shown in Table 4.3.O, on-site construction emissions would not exceed the LST thresholds for the closest receptor. Therefore, construction of the proposed project would not result in a locally significant air quality impact.

Table 4.3.O: Project Localized Construction Emissions (lbs/day)

Source	NO_x	CO	PM_{10}	$PM_{2.5}$
Proposed Project On-Site Emissions	84.3	101.8	9.2	5.1
Localized Significance Threshold	175.0	1,534.0	10.0	6.7
Exceeds Threshold?	**No**	**No**	**Yes**	**No**

Source: Compiled by LSA (June 2025).
Note: Source Receptor Area 19, based on a 4.0-acre construction disturbance daily area, at a distance of 82 feet from the project boundary.
CO= carbon monoxide
lbs/day = pounds per day
NO_x= nitrogen oxides
$PM_{2.5}$= particulate matter less than 2.5 microns in size
PM_{10}= particulate matter less than 10 microns in size

Operational Localized Significance Analysis. The localized significance thresholds only apply to emissions from on-site sources to off-site receptors; however, the CalEEMod outputs do not separate the on-site emissions from stationary sources and the off-site emissions from mobile sources. For a worst-case scenario assessment, the emissions detailed in Table 4.3.P assume all area, off-road (two 200 hp diesel powered cargo handling equipment used on-site for operation), stationary, and energy source emissions would occur on site, and 5 percent of the project-related new mobile sources, which is an estimate of the amount of project-related on-site vehicle and truck travel, would occur on site. Considering the total trip length included in CalEEMod, the 5 percent assumption is conservative. Table 4.3.P shows that the localized operational emissions would not exceed the LSTs at the closest receptor. The results of the LST analysis show that the proposed project would not result in an exceedance of the SCAQMD LST thresholds during project operation. Therefore, the proposed operational activity would not result in a locally significant air quality impact. Impacts would be less than significant, and no mitigation is required.

Table 4.3.P: Project Localized Operational Emissions (lbs/day)

Source	NO_x	CO	PM_{10}	$PM_{2.5}$
Proposed Project On-Site Emissions	7.0	12.9	0.7	0.4
Localized Significance Threshold	197.0	1,801.0	3.0	2.0
Exceeds Threshold?	**No**	**No**	**No**	**No**

Source: Compiled by LSA (June 2025).
Note: Source Receptor Area 19, based on a 5.0-acre operational daily area, at a distance of 82 feet from the project boundary.
CO = carbon monoxide
lbs/day = pounds per day
NO_x = nitrogen oxides
$PM_{2.5}$= particulate matter less than 2.5 microns in size
PM_{10}= particulate matter less than 10 microns in size

Threshold 4.3.4: Would the project result in other emissions (such as those leading to odors adversely affecting a substantial number of people)?

Less Than Significant Impact. During project construction, some odors may be present due to diesel exhaust. However, these odors would be temporary and limited to the construction period. Additionally, noxious odors would be confined to the immediate vicinity of the construction equipment and are unlikely to be detected off-site or affect a substantial number of people. Nuisance odors from land uses in the Basin are regulated under SCAQMD Rule 402, Nuisance, which states:

> A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

Examples of odor-generating projects are wastewater treatment plants, compost facilities, landfills, solid-waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. The proposed project would include 165,803 sq ft of industrial uses. Compliance with SCAQMD Regulation XI and Rule 2305 would further limit doses and exposures, reducing potential odors related to gasoline vapors to a level that is not significant. In addition, the proposed project would be designed to ensure that the majority of the uses would be situated away from sensitive receptors and the public right of way. In addition, idling of trucks would be limited by the CARB's In-Use Off-Road Diesel Vehicles regulation, which limits idling to 5 minutes or less. Minimizing idling time reduces vehicle exhaust emissions and any resulting odors.[30] Any odors in general would be confined mainly to the project site and would readily dissipate. Therefore, the proposed uses are not anticipated to emit any objectionable odors. The proposed project would also include trash enclosures, which would reduce any potential for odors from project-related waste. Therefore, the proposed project would not result in other emissions (such as those leading to odors) affecting a substantial number of people. Impacts would be less than significant, and no mitigation is required.

4.3.7 Cumulative Impacts

As defined in Section 15355 of the *State CEQA Guidelines*, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area. The cumulative study area for air quality is described in Chapter 4.0; the cumulative project list is provided in Chapter 4.0, Table 4.A, and a map of the cumulative project locations is provided in Chapter 4.0, Figure 4-1. As stated previously, the SCAQMD air quality significance thresholds consider the emission levels for which a project's individual emissions would be cumulatively considerable. Therefore, if a project falls below the SCAQMD significance threshold, its contribution would also not be cumulatively considerable. Nevertheless, because the Western Realco Project 1 and Project 2 are reasonably foreseeable projects that would be located in the immediate vicinity of the project site and for the purposes of this analysis are assumed to have construction schedules that overlap with the proposed project, a quantitative evaluation of the combined air quality and health risk impacts of constructing and operating the proposed project and the Western Realco Projects has been prepared and is presented in this section. The Western Realco Projects 1 and 2 analysis is based on the project-specific *Air Quality, Greenhouse Gas, and Energy Impact Report: Western Realco Enterprise Way Industrial Project*, prepared by LSA on May 2025.[31]

4.3.7.1 Western Realco Projects

The Western Realco Projects are comprised of two projects (Western Realco Project 1 and Western Realco Project 2). Western Realco Project 1 (26110 Enterprise, 26140 Enterprise, and 26160 Enterprise Way) consists of an 8.42-acre project site located north of the IPT Enterprise Business

[30] CARB. 2025. *In-use off-Road Diesel Vehicle Regulation*. Website: https://ww2.arb.ca.gov/capp-resource-center/heavy-duty-diesel-vehicle-idling-information (accessed June 2025).

[31] LSA. 2025. *Air Quality, Greenhouse Gas, and Energy Impact Report for the Western Realco Enterprise Way Industrial Project*. June.

Center LLC Project site along Bake Parkway. Western Realco Project 1 includes the demolition of three existing office buildings (a total of 150,000 sq ft) and the reconstruction of two new industrial buildings with a total of 156,800 sq ft (one 54,000 sq ft building and one 102,800 sq ft building). The two buildings would have a total of 59,800 sq ft of warehouse use, 79,000 sq ft of manufacturing use, and 18,000 sq ft of office space. Western Realco Project 2 (26250 Enterprise Way) consists of a 4.54-acre project site located immediately west of the IPT Enterprise Business Center LLC Project site in the intersection between Enterprise Way and Dimension Drive. Western Realco Project 2 includes the demolition of a 76,978 sq ft two-story office building and construction of a 77,000 sq ft single-story building. The building would have 69,000 sq ft of warehouse use and 8,000 sq ft of office space.

Cumulative impacts associated with the proposed project along with the Western Realco Projects are further analyzed below.

Cumulative Construction Emissions. Two separate model runs were conducted to evaluate the potential cumulative impacts from implementation of the proposed project at the same time as the two separate Western Realco Projects. One model run evaluated impacts associated with the Western Realco Project 1, and the other evaluated the impacts associated with the Western Realco Project 2.

Construction activities under Western Realco Project 1 would consist of demolition, site preparation, grading, building construction, paving, architectural coating, and utility trenching activities. Western Realco Project 1 would require the demolition approximately 150,000 sq ft of existing buildings, which was included in CalEEMod. Construction of Western Realco Project 1 would tentatively commence in the first quarter of 2026 and is expected to be completed in about 1 year, which was included in CalEEMod. Construction phase durations and schedule were provided by the project Applicant and included in CalEEMod. Western Realco Project 1 would not require the export or import of soil, which was also included in CalEEMod. In addition, Western Realco Project 1 would require the use of concrete industrial saws, excavators, impactors, bull dozers, tractors, loaders, backhoes, graders, scrapers, forklifts, cranes, generator sets, welders, cement and mortar mixers, paving equipment, and air compressors, which was included in CalEEMod. The number of equipment pieces was provided by the project Applicant, which was included in CalEEMod. This analysis assumes that Western Realco Project 1 would comply with SCAQMD Rule 403 and Rule 1113 measures. All other construction details are not yet known; therefore, default assumptions (e.g., worker and construction trips, off-road emission factors and construction trip lengths) from CalEEMod were used.

Construction activities under Western Realco Project 2 would consist of demolition, site preparation, grading, building construction, paving, architectural coating, and utility trenching activities. Western Realco Project 2 would require the demolition of approximately 76,978 sq ft of existing building, which was included in CalEEMod. Construction of Western Realco Project 2 would tentatively commence in the third quarter of 2026 and is expected to be completed in about 9 months, which was included in CalEEMod. Western Realco Project 2 would require the net import of approximately 1,167 cubic yards of material, which was also included in CalEEMod. Based on information from the project Applicant, Western Realco Project 2 is anticipated to require the use of

concrete industrial saws, excavators, impactors, jaw crushers, bull dozers, tractors, loaders, backhoes, graders, scrapers, forklifts, cranes, generator sets, welders, cement and mortar mixers, paving equipment, and air compressors, which was included in CalEEMod. The number of equipment pieces was provided by the project Applicant, which was included in CalEEMod. This analysis assumes that Western Realco Project 2 would comply with SCAQMD Rule 403 and Rule 1113 measures. All other construction details are not yet known; therefore, default assumptions (e.g., worker and construction trips, off-road emission factors and construction trip lengths) from CalEEMod were used.

The total peak emissions from Western Realco Projects 1 and 2, along with the peak emissions from the proposed project were summed and compared to the SCAQMD regional thresholds. Cumulative construction emissions are summarized in Table 4.3.Q below. Table 4.3.Q identifies the estimated emissions with implementation of **MM AQ-1** for the proposed project along with the mitigated construction emissions for Western Realco Projects 1 and 2 as identified in the *Air Quality, Greenhouse Gas, and Energy Impact Report: Western Realco Enterprise Way Industrial Project.*[32] CalEEMod output sheets are included as an appendix to the Air Quality/GHG/Energy Analysis.[33]

Table 4.3.Q: Cumulative Construction Emissions

Construction Year	Total Regional Pollutant Emissions, lbs/day					
	VOC	NOx	CO	SOx	Total PM_{10}	Total $PM_{2.5}$
Western Realco Projects Estimated Emissions						
Project 1: 26110 Enterprise, 26140 Enterprise, and 26160 Enterprise Way with Tier 4 Final Mitigation						
2026	23.0	41.0	139.3	0.2	15.4	6.4
2027	23.0	40.9	111.8	0.2	2.2	0.8
Peak Daily Emissions	23.0	41.0	139.3	0.2	15.4	6.4
Project 2: 26250 Enterprise Way with Tier 4 Interim Mitigation						
2026	35.2	69.1	121.1	0.2	10.5	4.0
2027	13.6	78.6	98.0	0.2	3.1	1.8
Peak Daily Emissions	35.2	78.6	121.1	0.2	10.5	4.0
IPT Enterprise Business Center LLC Project - Proposed Project with MM AQ-1 (Tier 4 Interim)						
Peak Daily Emissions	24.4	57.9	112.6	0.1	9.8	4.5
Cumulative Peak Emissions (Western Realco Projects + proposed project)	**82.6**	**177.5**	**373.0**	**0.5**	**35.7**	**14.9**
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Emissions Exceed Threshold?	**Yes**	**Yes**	**No**	**No**	**No**	**No**

[32] LSA. 2025. *Air Quality, Greenhouse Gas, and Energy Impact Report for the Western Realco Enterprise Way Industrial Project*. June.

[33] LSA. 2025a. *Air Quality, Greenhouse Gas, and Energy Impact Report.*

Table 4.3.Q: Cumulative Construction Emissions

Source: Compiled by LSA (June 2025).
Note: The South Coast Air Basin is classified as non-attainment for Ozone under both the State and federal standards. Ozone is not directly emitted by any one source but rather forms in the atmosphere through reactions with other pollutants including NOx and VOCs.

CO = carbon monoxide
lbs/day = pounds per day
MM = mitigation measure
NOx = nitrogen oxides
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
ROG = reactive organic gas
SCAQMD = South Coast Air Quality Management District
SOx = sulfur oxides
VOC = volatile organic compounds

The results shown in Table 4.3.Q, indicate the cumulative emissions would not exceed the significance criteria for daily CO, SO_x, PM_{10} or $PM_{2.5}$. However, the maximum emissions for NO_x and VOC would exceed the significance criteria. VOCs are not defined as criteria pollutants; however, because VOCs are prime components of photochemical reactions that contribute to the formation of ozone, an exceedance in VOC emissions would result in the increase of ozone levels in the atmosphere. As such, implementation of the proposed project at the same time as Western Realco Projects 1 and 2 would be cumulatively considerable and a potentially significant impact associated with the net increase in criteria pollutants for which the project is in nonattainment under an applicable federal or State ambient air quality standard during construction.

The VOC emissions during construction are primarily a result of architectural coating emissions. All cumulative projects would be required to comply with SCAQMD Rule 1113, which requires that VOC emissions be reduced during painting by placing limits on the VOC content in various coating categories. Compliance with Rule 1113 architectural coatings would minimize VOC emissions during construction. Nevertheless, compliance with SCAQMD Rule 1113 would not reduce cumulative VOC emissions to below significance. Therefore, the proposed project is required to implement **MM AQ-2**, which requires the use of "Super-Compliant" low VOC paints for nonresidential interior and exterior surfaces and low VOC paint for parking lot surfaces. Super-Compliant low VOC paints have been reformulated to exceed the regulatory VOC limits put forth by SCAQMD Rule 1113 and would therefore further reduce VOC emissions to ensure that emissions are below construction emission thresholds.

In addition, as shown in Table 4.3.Q, cumulative NO_X emissions would exceed the significance criteria. As described above, this cumulative analysis provides an evaluation of the combined air quality impacts of constructing the proposed project and Western Realco Projects 1 and 2 at the same time. The likelihood of all three projects being constructed at the same time represents a conservative assumption. In the event that the construction phases of the proposed project and Western Realco Projects 1 and 2 overlap, the proposed project would be required to implement **MM AQ-3** which would require the use of Tier 4 Final engines to further reduce the cumulative NO_X emissions to the extent feasible.

Based on the project-specific *Air Quality, Greenhouse Gas, and Energy Impact Report: Western Realco Enterprise Way Industrial Project*,[34] the cumulative analysis for Western Realco Projects 1 and 2 along with the IPT Enterprise Business Center LLC Project would have the potential to result in impacts of criteria pollutant emissions of NO_x and VOC during construction. Therefore, Western Realco Projects 1 and 2 would also be required to implement mitigation requiring the use of super compliant low VOC paints with no more than 10 grams per liter of VOC content to reduce cumulative VOC emissions to the extent feasible. In addition, in the event that the construction of the proposed project and phases of Western Realco Projects 1 and 2 overlap, Western Realco Projects 1 and 2 would also be required to implement mitigation requiring all construction equipment be equipped with Tier 4 Final engines or the most effective Verified Diesel Emission Control Strategies (VDECS) available for the engine type as certified by the CARB to reduce cumulative NO_X emissions. With implementation of these mitigation measures, the cumulative NO_X and VOC emissions would be reduced to a less than significant impact for Western Realco Projects 1 and 2, as identified in the *Air Quality, Greenhouse Gas, and Energy Impact Report: Western Realco Enterprise Way Industrial Project*.[35]

Table 4.3.R identifies the estimated cumulative emissions with implementation of **MM AQ-2** and **MM AQ-3** for the proposed project, as identified above, and the mitigated emissions identified for Western Realco Projects 1 and 2 which require implementation of super compliant low VOC paints and Tier 4 Final Engines.

Table 4.3.R: Mitigated Cumulative Construction Emissions

Construction Year	Total Regional Pollutant Emissions, lbs/day					
	VOC	NOx	CO	SOx	Total PM_{10}	Total $PM_{2.5}$
Western Realco Projects Estimated Emissions						
Mitigated Project 1: 26110 Enterprise, 26140 Enterprise, and 26160 Enterprise Way						
2026	5.0	41.0	139.3	0.2	15.4	6.4
2027	5.0	40.9	111.8	0.2	2.2	0.8
Peak Daily Emissions	5.0	41.0	139.3	0.2	15.4	6.4
Mitigated Project 2: 26250 Enterprise Way						
2026	35.0	26.2	121.1	0.2	10.2	3.7
2027	13.3	35.6	98.0	0.2	1.7	0.6
Peak Daily Emissions	35.0	35.6	121.1	0.2	10.2	3.7
IPT Enterprise Business Center LCC Project - Proposed Project with MM AQ-1 and MM AQ-2						
Peak Daily Emissions	5.9	10.5	112.6	0.1	9.8	4.5
Cumulative Peak Emissions (Western Realco Projects + proposed project)	**45.9**	**87.1**	**373.0**	**0.5**	**35.4**	**14.6**
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**

[34] LSA. 2025. *Air Quality, Greenhouse Gas, and Energy Impact Report for the IPT Enterprise Business Center LLC Project*. March.

[35] LSA. 2025. *Air Quality, Greenhouse Gas, and Energy Impact Report for the IPT Enterprise Business Center LLC Project*. June .

Table 4.3.R: Mitigated Cumulative Construction Emissions

Emissions Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Compiled by LSA (June 2025).
Note: The South Coast Air Basin is classified as non-attainment for Ozone under both the State and federal standards. Ozone is not directly emitted by any one source but rather forms in the atmosphere through reactions with other pollutants including NOx and VOCs.

CO = carbon monoxide
lbs/day = pounds per day
MM = mitigation measure
NOx = nitrogen oxides
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
ROG = reactive organic gas
SCAQMD = South Coast Air Quality Management District
SOx = sulfur oxides
VOC = volatile organic compound

As shown in Table 4.3.R, with implementation of **MM AQ-2** and **MM AQ-3**, estimated cumulative NO_x and VOC emissions associated with the proposed project along with Western Realco Projects 1 and 2 (if constructed at the same time) would be below the SCAQMD significance threshold. Therefore, with implementation of **MM AQ-2** and **MM AQ-3**, cumulative construction emissions resulting from the implementation of the proposed project along with Western Realco Projects 1 and 2 would not result in a cumulatively considerable net increase of any criteria pollutant for which the project is in nonattainment under an applicable federal or State ambient air quality standard.

Cumulative Operational Emissions. Long-term air pollutant emissions associated with operation of Western Realco Projects 1 and 2 include emissions from area, energy, and mobile sources, and are discussed below. The quantity of emissions is the product of usage intensity (i.e., the amount of natural gas) and the emission factor of the fuel source. Emission estimates for Western Realco Projects 1 and 2 operations were calculated using CalEEMod.

Western Realco Project 1 would construct two industrial buildings totaling 156,800 sq ft, which would include a mix of office, manufacturing, and warehouse space. Therefore, the Western Realco Project 1 analysis was conducted using land use codes *Unrefrigerated Warehouse-No Rail*, *Manufacturing, General Office Building, Parking Lot,* and *Other Asphalt Surfaces*. Trip generation rates used in CalEEMod for Western Realco Project 1 were based on the project's Traffic Impact Analysis (TIA),[36] which identifies that Western Realco Project 1 would generate approximately 670 ADT, including 104 ADT for warehouse uses, 371 ADT for manufacturing uses, and 195 ADT for office uses. As noted in the TIA, the trip generation rates are from the Institute of Transportation Engineers Trip Generation Manual, 11th Edition, and the Warehouse Truck Trip Study Data Results and Usage from the SCAQMD. This analysis assumes that the four-axle truck trips associated with the warehouse and manufacturing uses would travel approximately 40 miles. To be conservative, separate CalEEMod analyses were prepared for the operational analysis for Western Realco Project 1. One CalEEMod run evaluated operational and vehicle trip emissions and another CalEEMod run evaluated four-axle truck trip emissions for Western Realco Project 1. In addition, consistent with the project design plans, this CalEEMod analysis incorporates selections to reflect no natural gas usage during construction and operation. In addition, this analysis assumes that Western Realco Project 1 would be operational in 2027, which is included in CalEEMod.

36 LSA. 2025a. *Traffic Impact Analysis for the Western Realco Enterprise Way Industrial Project.* April.

Western Realco Project 2 would construct a 77,000 sq ft industrial building. Therefore, the Western Realco Project 2 analysis was conducted using land use codes *Unrefrigerated Warehouse-No Rail* and *Parking Lot*. Trip generation rates used in CalEEMod for Western Realco Project 2 were based on the project's TIA,[37] which identifies that Western Realco Project 2 would generate approximately 204 ADT, including 87 ADT for office uses. As noted in the TIA, the trip generation rates are from the Institute of Transportation Engineers Trip Generation Manual, 11th Edition, and the Warehouse Truck Trip Study Data Results and Usage from the SCAQMD. This analysis assumes that the four-axle truck trips associated with the warehouse uses would travel approximately 40 miles. To be conservative, separate CalEEMod analyses were prepared for the operational analysis for Western Realco Project 2. One CalEEMod run evaluated operational and vehicle trip emissions and another CalEEMod run evaluated four-axle truck trip emissions for Western Realco Project 2. In addition, consistent with the project design plans, this CalEEMod analysis incorporates selections to reflect no natural gas usage during construction and operation of Western Realco Project 2. In addition, this analysis assumes that Western Realco Project 2 would be operational in 2027, which is included in CalEEMod. Detailed input assumptions are included in the CalEEMod output sheets attached to the Air Quality/GHG/Energy Analysis.[38]

Operational Cumulative emissions are shown in Table 4.3.S.

[37] Ibid.

[38] LSA. 2025a. *Air Quality, Greenhouse Gas, and Energy Impact Report*.

Table 4.3.S: Cumulative Long Term Operational Emissions

Source	Pollutant Emissions (lbs/day)					
	VOC	NOx	CO	SOx	PM_{10}	$PM_{2.5}$
Western Realco Projects						
Project 1: 26110 Enterprise, 26140 Enterprise, and 26160 Enterprise Way						
Mobile Sources – Vehicles and Light Duty Trucks	1.9	2.0	21.7	0.1	6.1	1.6
Mobile Sources – Heavy Heavy Duty Trucks	0.1	5.4	2.3	<0.1	1.3	0.4
Area Sources	4.9	0.1	6.8	<0.1	<0.1	<0.1
Energy Sources	0.0	0.0	0.0	0.0	0.0	0.0
Total Project 1 Emissions	**6.9**	**7.5**	**30.8**	**0.1**	**7.4**	**2.0**
Project 2: 26250 Enterprise Way						
Mobile Sources – Vehicles and Light Duty Trucks	0.6	0.5	6.5	<0.1	1.8	0.5
Mobile Sources – Heavy Heavy Duty Trucks	<0.1	3.2	1.3	<0.1	0.9	0.3
Area Sources	2.4	<0.1	3.3	<0.1	<0.1	<0.1
Energy Sources	0.0	0.0	0.0	0.0	0.0	0.0
Total Project 2 Emissions	**3.0**	**3.7**	**11.1**	**<0.1**	**2.7**	**0.8**
IPT Enterprise Business Center LLC Project - Proposed Project						
Total Proposed Project Emissions	**8.1**	**16.9**	**33.3**	**0.2**	**7.7**	**2.3**
Total Cumulative Emissions (Western Realco Projects + proposed project)	**18.0**	**28.1**	**75.2**	**0.3**	**17.8**	**5.1**
SCAQMD Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Emissions Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Compiled by LSA (June 2025).

CO = carbon monoxide
lbs/day = pounds per day
NOx = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
ROG = reactive organic gas
SCAQMD = South Coast Air Quality Management District
SOx = sulfur oxides
VOC = volatile organic compounds

The results shown in Table 4.3.S indicate the cumulative emissions associated with the proposed project and Western Realco Projects 1 and 2 would not exceed the project-level significance criteria for daily VOC, NO_x, PM_{10} or $PM_{2.5}$ emissions. Therefore, cumulative operational emissions would not result in a cumulatively considerable net increase of criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standards.

Moreover, future development under Western Realco Projects 1 and 2 may require further analysis in a project-specific environmental analysis consistent with environmental review requirements under CEQA, as applicable.

Health Risk on Nearby Sensitive Receptors. The following sections describe the potential cumulative impacts on sensitive and worker receptors resulting from construction and operational activities associated with the development of the proposed project combined with Western Realco Projects 1 and 2. As defined in the *State CEQA Guidelines*, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and

probable future projects within the cumulative impact area. The SCAQMD significance health risk thresholds consider the emission levels for which a project's individual emissions would be considerable. Each project's individual emissions would contribute to the total ambient air concentration. Therefore, if a project falls below the SCAQMD significance health risk thresholds, its contribution would not be cumulatively considerable.

Western Realco Projects 1 and 2 are a reasonably foreseeable projects that would be located in the immediate vicinity of the proposed project and for the purposes of this analysis are assumed to have construction schedules that overlap with the proposed project. Therefore, the City has requested a quantitative evaluation of the combined cumulative impacts associated with development of the proposed project and immediately adjacent proposed Western Realco Projects. The residential MEI for the cumulative analysis is an apartment building reserved for seniors located to the east of Project Site 1, within 125 feet from the project site's eastern boundary, as measured to the building façade. The nearest cumulative worker MEI is located immediately south of Western Realco Project Site 1.

The regional thresholds developed by the SCAQMD are based on individual projects. In the absence of cumulative thresholds and to be conservative, this analysis would compare the combined cumulative emissions (emissions from the proposed project and Western Realco Projects 1 and 2) against the project-based SCAQMD significance criteria to determine impacts. Cumulative impacts associated with the proposed project along with Western Realco Projects 1 and 2 are further analyzed below. ***Cumulative Construction Health Risk.*** A construction HRA was performed to estimate the potential cancer risk associated with construction of the proposed project along with Western Realco Projects 1 and 2 from equipment exhaust (including diesel particulate matter), a dispersion model was used to translate an emission rate from the source location to a concentration at the receptor location of interest (i.e., a nearby residence and worksites). This assessment was conducted using the AERMOD air dispersion model, which provides a detailed estimate of exhaust concentrations based on site and source geometry, source emissions strength, distance from the source to the receptor, and meteorological data from the Mission Viejo Station.

This analysis assumes buildout of the proposed project and Western Realco Projects 1 and 2. Therefore, a model run was conducted to evaluate the potential cumulative impacts of the buildout of the proposed project along with Western Realco Projects 1 and 2.

Table 4.3.T, below, identifies the results of the analysis at the MEI, and the risk level of proposed project combined with Western Realco Projects 1 and 2 at the cumulative MEI. Model snap shots of the sources are included as an appendix to the Health Risk Assessment.[39]

[39] LSA. 2025b. *Health Risk Assessment.*

Table 4.3.T: Cumulative Health Risks from Project Construction to Off-Site Receptors

Location	Carcinogenic Inhalation Health Risk in 1 Million	Chronic Inhalation Hazard Index	Acute Inhalation Hazard Index
Western Realco Projects			
Project 1: 26110 Enterprise, 26140 Enterprise, and 26160 Enterprise Way			
Residential MEI	71.62	0.094	0.000
Worker MEI	1.69	0.120	0.000
Project 2: 26250 Enterprise Way			
Residential MEI	2.73	0.002	0.000
Worker MEI	0.096	0.004	0.000
IPT Enterprise Business Center LLC Project – Proposed Project			
Residential MEI	4.33	0.006	0.000
Worker MEI	0.196	0.015	0.000
Total Cumulative Health Risk (Western Realco Projects and the Proposed Project)			
Residential MEI	**78.68**	**0.102**	**0.000**
Worker MEI	**1.98**	**0.139**	**0.000**
SCAQMD Significance Threshold	**10 in 1 million**	**1.0**	**1.0**
Significant?	**Yes**	**No**	**No**

Source: Compiled by LSA (June 2025).
MEI = maximally exposed individual
MM = mitigation measure
SCAQMD = South Coast Air Quality Management District

As shown in Table 4.3.T, the construction related maximum cumulative cancer risk for the residential MEI would be 78.6 in 1 million, which would exceed the SCAQMD cancer risk threshold of 10 in 1 million. The worker MEI would be 1.98 in 1 million, which would not exceed the SCAQMD cancer risk threshold of 10 in 1 million. The total chronic HI would be 0.102 for the residential MEI and 0.139 for the worker MEI, which is below the threshold of 1.0. In addition, the total acute HI would be nominal (0.000), which would also not exceed the threshold of 1.0. As compared to the project-level emission thresholds recommended by SCAQMD, cumulative construction emissions resulting from the implementation of the proposed project along with the emissions from Western Realco Projects 1 and 2, would exceed SCAQMD thresholds. Therefore, implementation of **MM AQ-1** would be required to reduce construction cancer risk.

Furthermore, as identified on the project-specific *Health Risk Assessment: Western Realco Enterprise Way Industrial Project*,[40] the cumulative analysis for Western Realco Projects 1 and 2 along with the proposed project would exceed the SCAQMD the cumulative cancer risk threshold of 10 in 1 million during construction. Therefore, Western Realco Projects 1 would be required to implement mitigation requiring all construction equipment be equipped with Tier 4 Final engines or the most effective Verified Diesel Emission Control Strategies (VDECS) available for the engine type as certified by the CARB to reduce cumulative cancer risks. Western Realco Project 2 would be required to implement mitigation requiring all construction equipment be equipped with Tier 4 Interim engines or the most effective VDECS available for the engine type as certified by the CARB to reduce

[40] LSA. 2025. *Health Risk Assessment for the IPT Enterprise Business Center LLC Project*. June.

cumulative cancer risks. With implementation of these mitigation measure, the cumulative cancer risk would be reduced a less than significant impact for Western Realco Projects 1 and 2, as identified in the *Health Risk Assessment: Western Realco Enterprise Way Industrial Project*.[41]

Table 4.3.U identifies the estimated cumulative health risks with implementation of **MM AQ-1** for the proposed project and the mitigated emissions identified for Western Realco Projects 1 and 2.

Table 4.3.U: Mitigated Cumulative Health Risks from Project Construction to Off-Site Receptors

Location	Carcinogenic Inhalation Health Risk in 1 Million	Chronic Inhalation Hazard Index	Acute Inhalation Hazard Index
Western Realco Projects			
Mitigated Project 1: 26110 Enterprise, 26140 Enterprise, and 26160 Enterprise Way			
Residential MEI	3.94	0.005	0.000
Worker MEI	1.692	0.001	0.000
Mitigated Project 2: 26250 Enterprise Way			
Residential MEI	0.99	<0.001	0.000
Worker MEI	0.03	0.002	0.000
IPT Enterprise Business Center LLC Project – Proposed Project with MM AQ-1			
Residential MEI	0.54	<0.001	0.000
Worker MEI	0.02	0.002	0.000
Total Cumulative Health Risk (Western Realco Projects and the Proposed Project with MM AQ-1)			
Residential MEI	**5.47**	**0.005**	**0.000**
Worker MEI	**1.742**	**0.005**	**0.000**
SCAQMD Significance Threshold	**10 in 1 million**	**1.0**	**1.0**
Significant?	**No**	**No**	**No**

Source: Compiled by LSA (June 2025).
MEI = maximally exposed individual
SCAQMD = South Coast Air Quality Management District

As shown in Table 4.3.U, with the project's implementation of **MM AQ-1**, the construction related maximum cumulative cancer risk for the residential MEI would be 5.47 in 1 million, which would not exceed the SCAQMD cancer risk threshold of 10 in 1 million. As compared to the project-level emission thresholds recommended by SCAQMD, cumulative construction emissions resulting from the implementation of the proposed project with **MM AQ-1** along with the emissions from Western Realco Projects 1 and 2, would not exceed SCAQMD thresholds. Therefore, no significant health risk would occur from cumulative construction emissions with the project's implementation of **MM AQ-1**.

Operational Health Risk. To determine the potential health risk associated with the exhaust of diesel-powered trucks and equipment to people living and working near the proposed project and Western Realco Projects 1 and 2, an operational HRA was conducted.

[41] LSA. 2025. *Health Risk Assessment for the IPT Enterprise Business Center LLC Project*. June.

Trip generation rates used for Western Realco Project 1 were based on the project's Traffic Impact Analysis (TIA),[42] which identifies that Western Realco Project 1 would generate approximately 670 ADT, including 104 ADT for warehouse uses, 371 ADT for manufacturing uses, and 195 ADT for office uses. Trip generation rates used in CalEEMod for Western Realco Project 2 were based on the project's TIA,[43] which identifies that Western Realco Project 2 would generate approximately 204 ADT, including 87 ADT for office uses. This cumulative HRA assumed vehicles traveling on site would maneuver slowly, averaging approximately 5–15 mph, and that vehicles traveling on roadways would average 5–55 mph. This analysis also assumes that on-site truck idling would occur for approximately 15 minutes. In addition, to be conservative, this analysis assumes the use of emissions factors for the operational year of 2027.

The cumulative carcinogenic and chronic health risks from the proposed project along with Western Realco Projects 1 and 2 are shown in Table 4.3.V. The residential risk conservatively incorporates both the risk for a child living in a nearby residence for 9 years (the standard period of time for child risk) and an adult living in a nearby residence for 30 years (considered a conservative period of time for an individual to live in any one residence). An exposure period of 25 years was assumed for worker receptors. HRA model output sheets are included as an appendix to the Health Risk Assessment.[44]

Table 4.3.V: Cumulative Health Risks from Project Operation to Off-Site Receptors

Location	Carcinogenic Inhalation Health Risk in 1 Million	Chronic Inhalation Hazard Index	Acute Inhalation Hazard Index
Residential MEI	4.43	0.002	<0.001
Worker MEI	2.16	0.007	<0.001
SCAQMD Significance Threshold	**10 in 1 million**	**1.0**	**1.0**
Significant?	**No**	**No**	**No**

Source: Compiled by LSA (June 2025).
MEI = maximally exposed individual
SCAQMD = South Coast Air Quality Management District

As shown in Table 4.3.V, the maximum cumulative cancer risk for the residential MEI would be 4.43 in 1 million, which would not exceed the SCAQMD cancer risk threshold of 10 in 1 million. The worker MEI would be 2.16 in 1 million, which would also not exceed the threshold. The total chronic hazard index would be 0.002 for the residential MEI and 0.007 for the worker MEI, which is below the threshold of 1.0. In addition, the total acute hazard index would be less than 0.001, which would also not exceed the threshold of 1.0. As these results show, all health risk levels to nearby receptors from cumulative operation-related emissions of TACs would be well below the SCAQMD's HRA thresholds. No significant health risk would occur from cumulative operational emissions and no mitigation is required.

42 LSA. 2025a. *Traffic Impact Analysis for the Western Realco Enterprise Way Industrial Project.* April.
43 Ibid.
44 LSA. 2025b. *Health Risk Assessment.*

4.3.8 Level of Significance Prior to Mitigation

Prior to mitigation, the proposed project would have potentially significant impacts related to NO_x during construction. When combined with Western Realco Projects 1 and 2, the proposed project would result in a potentially significant cumulative impact related to VOC during construction of the proposed project along with Western Realco Projects 1 and 2 (if constructed at the same time). Additionally, the proposed project would have potentially significant impacts to nearby sensitive receptors during construction prior to mitigation.

4.3.9 Regulatory Compliance Measures and Mitigation Measures

4.3.9.1 Regulatory Compliance Measures

There are no regulatory compliance measures applicable to the proposed project pertaining to air quality.

4.3.9.2 Mitigation Measures

The following mitigation measures are required to reduce potentially significant impacts related to air quality to a less than significant level:

MM AQ-1 **Tier 4 Interim Construction Equipment.** Prior to issuance of a building permit, the project Applicant shall submit construction plans to the City of Lake Forest verifying that all construction equipment used during construction of the project shall be equipped with Tier 4 Interim engines or the most effective Verified Diesel Emission Control Strategies (VDECS) available for the engine type (Tier 4 engines automatically meet this requirement) as certified by the California Air Resources Board (CARB). [45] During construction activities, the equipment shall be properly maintained and tuned in accordance with manufacturer specifications.

MM AQ-2 **Volatile Organic Compounds.** Prior to issuance of a grading permit, the Project Applicant shall submit construction plans to the City of Lake Forest that state that the project shall utilize "Super-Compliant" low volatile organic compounds (VOC) paints for nonresidential interior and exterior surfaces and low VOC paint for parking lot surfaces. Super-Compliant low VOC paints have been reformulated to exceed the regulatory VOC limits put forth by SCAQMD Rule 1113. Super-Compliant low VOC paints shall be no more than 10 grams per liter (g/L) of VOC.

MM AQ-3 **Tier 4 Final Construction Equipment.** Prior to issuance of a building permit, the project Applicant shall consult with the City on the status of Western Realco Projects 1 and 2. If in this consultation, the City identifies that the construction schedule of Western Realco Projects 1 and 2, and the IPT Enterprise Business

[45] CARB. 2015. Verified Diesel Emission Control Strategy (VDECS). Website: https://ww2.arb.ca.gov/sites/default/files/classic/msprog/ordiesel/faq/vdecsfaq.pdf (accessed June 2025)

Center LLC Project (proposed project) will be under construction at the same time, the proposed project shall equip all construction equipment during the overlapping period with Tier 4 Final engines or the most effective Verified Diesel Emission Control Strategies (VDECS) available for the engine type (Tier 4 engines automatically meet this requirement) as certified by the California Air Resources Board. The equipment shall be properly maintained and tuned in accordance with manufacturer specifications. The project Applicant shall submit construction plans to the City of Lake Forest denoting the projected equipment Tier rating that will be used during the construction period.

4.3.10 Level of Significance after Mitigation

Potentially significant impacts would be reduced to a less than significant level after mitigation. Therefore, with implementation of **MM AQ-1, MM AQ-2,** and **MM AQ-3**, the proposed project would not result in any significant impacts related to air quality.

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APPENDIX D

REVISED SECTION 4.10: HYDROLOGY AND WATER QUALITY

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4.10 HYDROLOGY AND WATER QUALITY

This section evaluates the potential impacts to hydrology and water quality conditions from implementation of the proposed project. This section is based in part on the following:

- *Preliminary Water Quality Management Plan* (Kier & Wright 2023b) (provided in Appendix G);
- *Preliminary Hydrologic & Hydraulic Drainage Report* (Kier & Wright 2023a) (provided in Appendix G);
- *Geotechnical Investigation* (Southern California Geotechnical 2021a) (provided in Appendix E); and
- *Infiltration Report* (Southern California Geotechnical 2021b) (provided in Appendix E).

4.10.1 Scoping Process

The Notice of Preparation (NOP) was published in March 2024 for the proposed project, and public Scoping Meetings were held on April 3, 2024, and April 24, 2024. The City of Lake Forest (City) received 120 comment letters during the public review period of the NOP. For a copy of the NOP comment letters received, refer to Appendix A of this Draft EIR. Seven comment letters included comments related to hydrology and water quality. These comments pertain to concerns that the proposed project would contaminate or pollute local water bodies, affect drainage, and increase runoff.

4.10.2 Methodology

The analysis of potential project-related impacts to on- and off-site hydrology and water quality are based on the *Preliminary Hydrologic & Hydraulic Drainage Report*, the *Preliminary Water Quality Management Plan*, the *Infiltration Report*, and the *Geotechnical Investigation* completed for the proposed project. There have been no changes to existing conditions since the reports were prepared and the information and conclusions provided in the reports remain valid for the following analysis. The on- and off-site hydrology and water quality impacts were evaluated based on the proposed project's adherence to local, regional, State, and federal standards, the changes in pre- and post-project stormwater flows, and proposed best management practices (BMPs) for control of surface runoff and reduction of pollutants in stormwater runoff.

4.10.3 Existing Environmental Setting

4.10.3.1 Surface Waters

The project site is located within the San Diego Creek Watershed, which is a subwatershed of the larger 154-square-mile Newport Bay Watershed (refer to Figure 4.10-1, Watersheds and Subwatersheds). The Newport Bay Watershed is defined by the foothills of the Santa Ana Mountains to the east (Loma Ridge), and the San Joaquin Hills to the west and southwest (USEPA 2017). The San Diego Creek Watershed is approximately 112 square miles in area and located in parts of Irvine, Aliso Viejo, Laguna Hills, Laguna Woods, Lake Forest, Orange, Santa Ana, and Tustin.

For regulatory purposes, the Santa Ana Regional Water Quality Control Board (RWQCB) designates watershed areas in Hydrologic Units (HUs), which are further divided into Hydrologic Areas (HAs) and Hydrologic Subareas (HSAs). As designated by the Santa Ana RWQCB, the project site is located within the Santa Ana River HU, Lower Santa Ana River HA, and East Coast Plain HSA (Santa Ana RWQCB 1995) (refer to Figure 4.10-2, Hydrologic Units, Areas, and Subareas).

Serrano Creek is located approximately 0.1 mile southeast of the project site. Serrano Creek is an approximately 7.5-mile long tributary of San Diego Creek. Serrano Creek originates in the Santa Ana Mountains in a canyon in Whiting Ranch Wilderness Park, near the boundary of the Cleveland National Forest. From the Santa Ana Mountains, Serrano Creek then flows southwest into the City of Lake Forest, then into San Diego Creek, Newport Bay, and the Pacific Ocean (refer to Figure 4.10-3, Surface Waters). Serrano Creek carries intermittent flows.

4.10.3.2 On-Site Drainage

Under existing conditions, stormwater runoff drains to various curb inlets throughout the existing surface parking lot where it is then routed out to the public storm drain system which outfalls to Serrano Creek southwest of the project site at the end of Prism Place.

4.10.3.3 Surface Water Quality

Receiving waters include Serrano Creek, which flows to San Diego Creek Reach 2 and San Diego Creek Reach 1, which extends to Upper Newport Bay. Further downstream is Lower Newport Bay, which flows to the Pacific Ocean (refer to Figure 4.10-3, Surface Waters). The receiving waters for stormwater runoff from the project site are listed as impaired on the 303(d) list for several constituents (SWRCB 2024). Serrano Creek is listed as impaired for ammonia (unionized), benthic community effects, indicator bacteria, pH, and toxicity. San Diego Creek (Reach 2 – above Jeffrey Road to the headwaters) is listed as impaired for benthic community effects, indicator bacteria, nutrients, sedimentation/siltation, and toxicity. San Diego Creek (Reach 1 – below Jeffrey Road) is listed as impaired for benthic community effects, dichlorodiphenyltrichloroethane (DDT), indicator bacteria, malathion, nutrients, sedimentation/siltation, selenium, toxaphene, toxicity, pyrethroids, bifenthrin, and nitrogen. Upper Newport Bay is listed as impaired for chlordane, copper, DDT, indicator bacteria, malathion, nutrients, polychlorinated biphenyls (PCBs), sedimentation/siltation, and toxicity. Lower Newport Bay is listed as impaired for chlordane, copper, DDT, indicator bacteria, nutrients, PCBs, dieldrin, and toxicity.

4.10.3.4 Groundwater

According to the California Department of Water Resources (DWR), the project site is located within the Coastal Plain of the Orange County Groundwater Basin. The basin has a surface area of approximately 224,000 acres (350 square miles) and is located in the northwestern portion of Orange County. The basin is bounded by the Puente and Chino Hills to the north, the Santa Ana Mountains to the east, the San Joaquin Hills to the south, the Pacific Ocean to the southwest, and by a low topographic divide approximated by the Orange County – Los Angeles County line to the northwest (refer to Figure 4.10-4, Groundwater Basins) (DWR 2004).

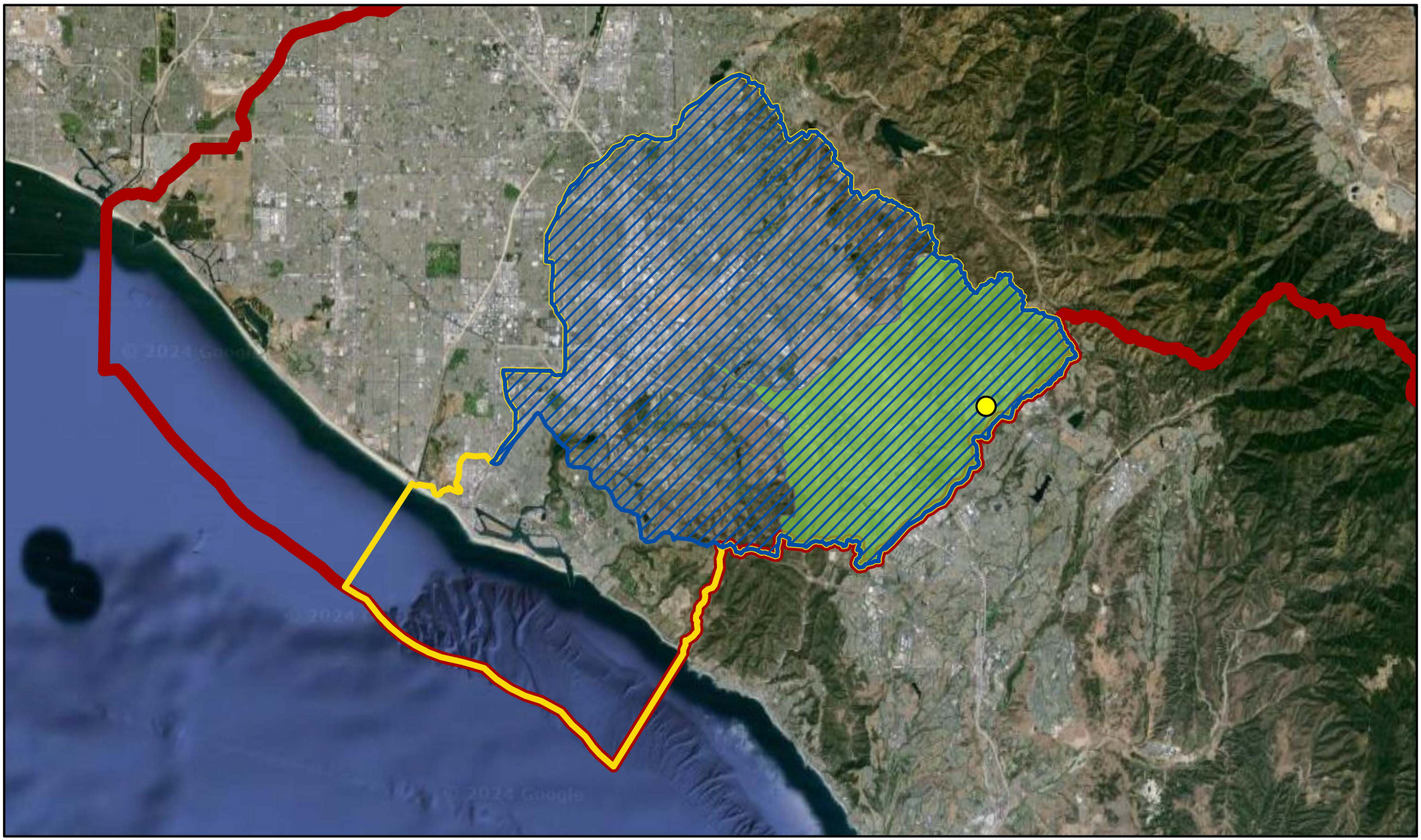

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FIGURE 4.10-1

SOURCE: Google Imagery (2023); CDFW (2024)

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IPT Enterprise Business Center LLC Project

Watersheds and Subwatersheds

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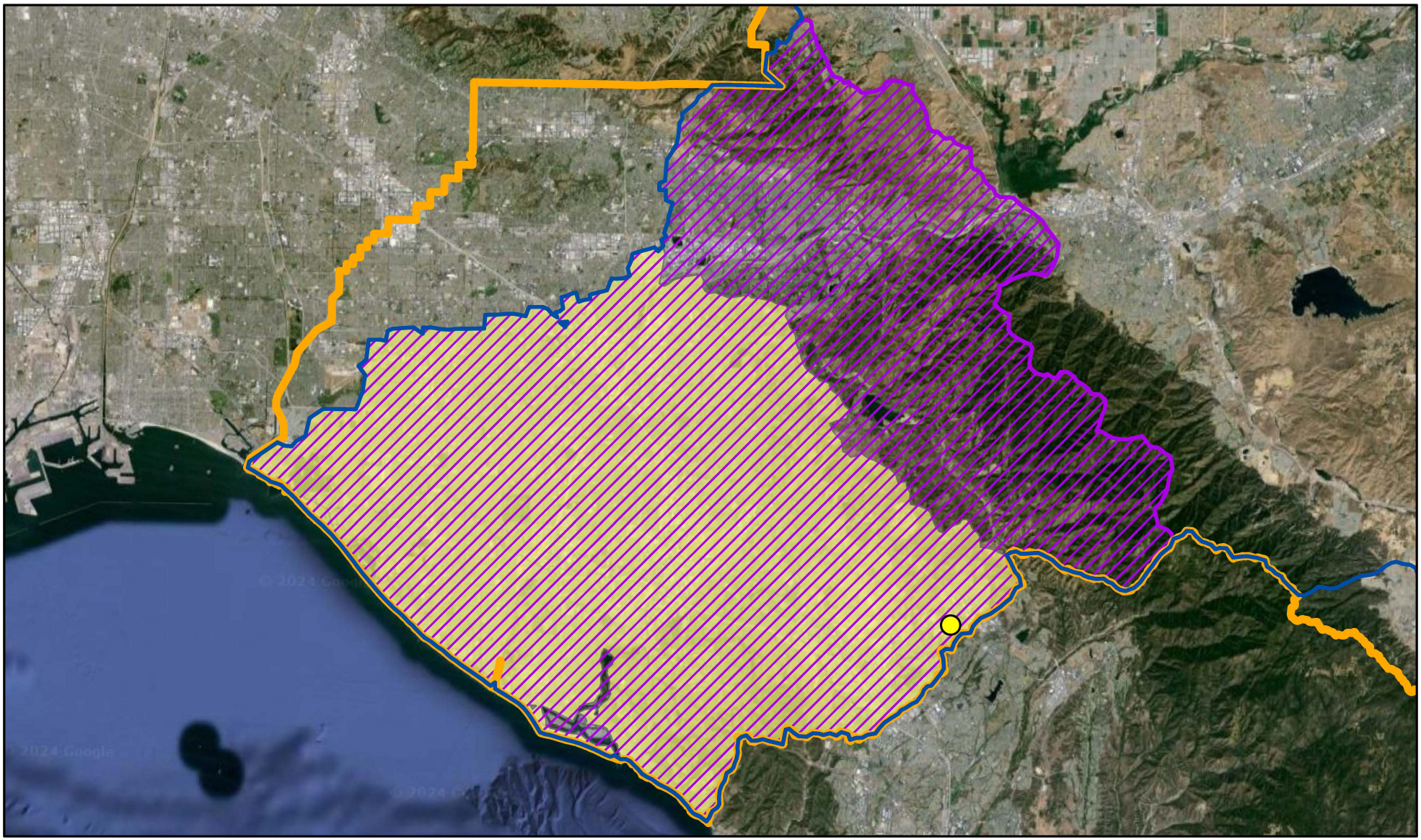

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FIGURE 4.10-2

IPT Enterprise Business Center LLC Project

Hydrologic Units, Areas, and Subareas

SOURCE: Google Imagery (2023); CDFW (2024)

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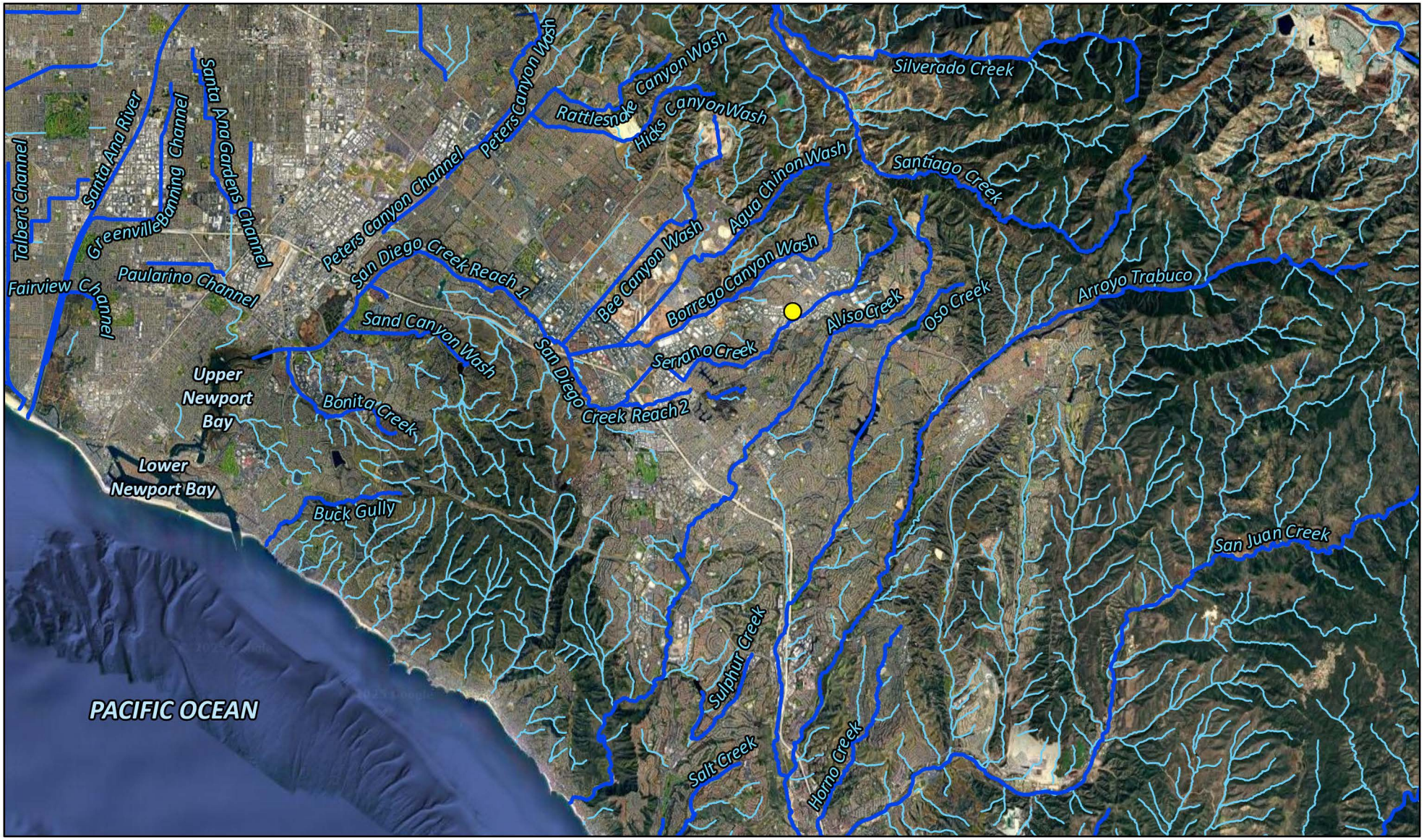

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FIGURE 4.10-3

SOURCE: Google Imagery (2023); CDFW (2024)

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IPT Enterprise Business Center

Surface Waters

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For regulatory purposes, the Santa Ana RWQCB divides the Coastal Plain of Orange County Groundwater Basin into three Groundwater Management Zones. The project site is within the Irvine Groundwater Management Zone (Santa Ana RWQCB 1995). The Irvine Groundwater Management Zone is bounded to the north by the Chino Hills, to the northeast by the Santa Ana Mountains, to the northwest by State Route 55 (SR-55), to the south by the San Joaquin Hills, and to the southwest by the Pacific Ocean.

Recharge to the basin is derived from percolation of Santa Ana River flow, infiltration of precipitation, and injection into wells. Groundwater levels are generally lower than the level in 1969, when the basin is considered to have been full. The level in the forebay has generally stabilized, whereas the southern coastal area has declined steadily through time. Average groundwater levels for the Orange County Groundwater Basin have risen about 15 feet since 1990, with average levels in the forebay area rising about 30 feet and average levels in the coastal area dropping a few feet. The total capacity of the Orange County Groundwater Basin is 38,000,000 acre-feet and, as of 1998, the total freshwater stored within the basin was approximately 37,700,000 acre-feet (DWR 2004).

According to the Geotechnical Investigation completed for the proposed project, groundwater was not encountered during explorations to depths of more than 30 feet below the existing grade. Therefore, the groundwater table is expected to exist at a depth in excess of 30 feet at the project site.

4.10.3.5 Groundwater Quality

Water in the Coastal Plain of the Orange County Groundwater Basin is primarily sodium-calcium bicarbonate based. Total dissolved solids range from 232 to 661 milligrams per liter (mg/L) and average 475 mg/L. Near the coast, groundwater is impaired from seawater intrusion. Groundwater is impaired by salinity, nitrate, and methyl tertiary-butyl ether (MTBE) (DWR 2004).

4.10.3.6 Floodplains

According to the Federal Emergency Management Agency (FEMA) Flood Hazard Map, the project site is located within Zone X (Area with Minimal Flood Hazard) (FEMA 2009). Zone X designates areas of minimal flood risk, and are the areas between the limits of the base flood and the 0.2 percent annual chance flood or 500-year flood.

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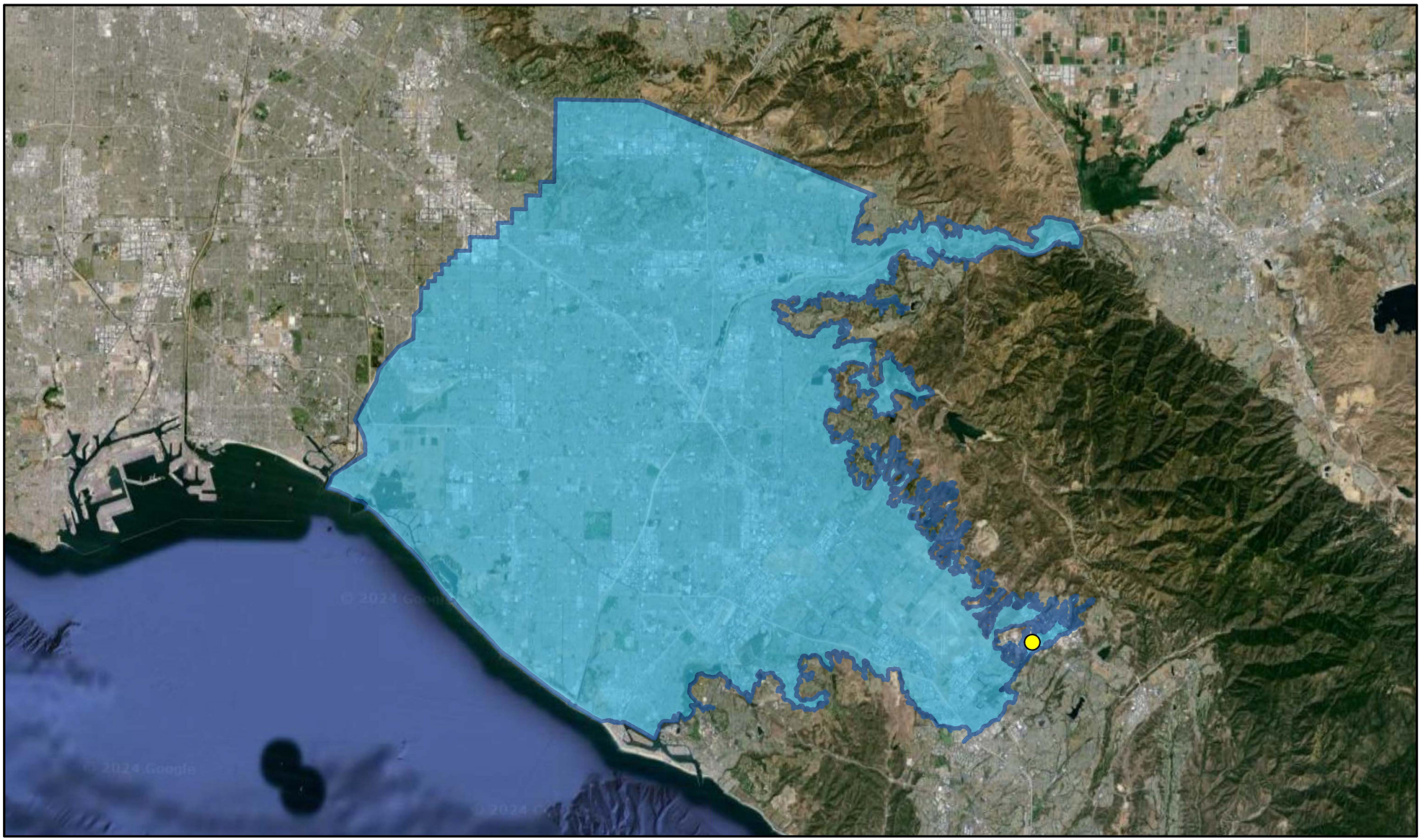

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FIGURE 4.10-4

IPT Enterprise Business Center

Groundwater Basins

SOURCE: Google Imagery (2023); CDFW (2024)

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4.10.4 Regulatory Setting

Federal, State, and local regulations and programs related to hydrology and water quality that are applicable to the proposed project are described below.

4.10.4.1 Federal Regulations

Clean Water Act. In 1972, Congress amended the Federal Water Pollution Control Act, making the addition of pollutants to the waters of the United States from any point source unlawful unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. Known today as the Clean Water Act (CWA), Congress has amended it several times. The objective of the CWA is "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." In the 1987 amendments, Congress directed dischargers of storm water from municipal and industrial/construction point sources to comply with the NPDES permit scheme. Important CWA sections are:

- Sections 303 and 304 require states to promulgate water quality standards, criteria, and guidelines and have those standards approved by the United States Environmental Protection Agency (USEPA).

  Water quality standards consist of designated beneficial uses for a particular water body (e.g., wildlife habitat, agricultural supply, fishing), along with water quality criteria necessary to support those uses. Water quality criteria are set concentrations or levels of constituents (e.g., lead, suspended sediment, and fecal coliform bacteria) or narrative statements that represent the quality of water that support a particular use. Because California had not established a complete list of acceptable water quality criteria for toxic pollutants, the USEPA Region IX established numeric water quality criteria for toxic constituents in the form of the California Toxics Rule (CTR).

  When designated beneficial uses of a particular water body are being compromised by water quality, Section 303(d) of the CWA requires identifying and listing that water body as impaired. Once a water body has been deemed impaired, a Total Maximum Daily Load (TMDL) must be developed for each impairing water quality constituent. A TMDL is an estimate of the total load of pollutants from point, nonpoint, and natural sources that a water body may receive without exceeding applicable water quality standards (often with a "factor of safety" included, which limits the total load of pollutants to a level well below that which could cause the standard to be exceeded). Once established, the TMDL is allocated among current and future dischargers into the water body.

  The State Water Resources Board (SWRCB), in compliance with Section 303(d) of the CWA, prepared the 2024 proposed list of impaired water bodies in California. The SWRCB approved the 2024 California Integrated Report (CWA Section 303(d) List/305(b) Report on February 6, 2024, and the USEPA partially approved the 2024 California Integrated Report on December 13, 2024. The 303(d) list includes a priority schedule for the development of TMDL implementation for each contaminant impacting the water body. The current list of impairments for the project site receiving waters are provided in Section 4.10.3.3.

- Section 401 Certification requires an applicant for a federal license or permit to conduct any activity that may result in a discharge to waters of the United States to obtain certification from the state that the discharge will comply with other provisions of the act. (This is most frequently required in tandem with a Section 404 permit request and is discussed further below.)

- Section 402 establishes the NPDES, a permitting system for the discharges (except for dredge or fill material) of any pollutant into waters of the United States. The USEPA delegated the implementation and administration of the NPDES program to the California State Water Resources Control Board (SWRCB). The SWRCB established nine Regional Water Quality Control Boards (RWQCBs). The SWRCB enacts and enforces the federal NPDES program and all water quality programs and regulations that cross regional boundaries. The nine RWQCBs enact, administer, and enforce all programs, including NPDES permitting, within their jurisdictional boundaries. Section 402(p) requires permits for discharges of stormwater from industrial, construction, and Municipal Separate Storm Sewer Systems (MS4s). To comply with the MS4 permits, storm water pollution controls must be implemented for construction and operational activities that discharge either directly to surface waters or indirectly through separate municipal storm drains. Pollution control is achieved by establishing engineering measures that have been designed, tested, and successfully implemented throughout the past decades, such as detention basins and sediment traps, during both the construction period and the operational phases of a project.

  Direct discharges of pollutants into waters of the United States are not allowed except in accordance with the NPDES program established in Section 402 of the CWA.

- Section 404 establishes a permit program for the discharge of dredge or fill material into waters of the United States. This permit program is administered by the United States Army Corps of Engineers (USACE).

  Pursuant to Section 404 of the CWA, the USACE regulates discharges of dredged or fill material into waters of the United States. These waters include wetlands and non-wetland bodies of water that meet specific criteria, including a direct or indirect connection to interstate commerce. The USACE regulatory jurisdiction pursuant to Section 404 of the CWA is founded on a connection, or nexus, between the water body in question and interstate commerce. This connection may be direct (through a tributary system linking a stream channel with traditional navigable waters used in interstate or foreign commerce) or may be indirect (through a nexus identified in the USACE regulations). The USACE typically regulates as non-wetland waters of the U.S. any body of water displaying an ordinary high water mark (OHWM). To be considered a jurisdictional wetland under Section 404, an area must possess three wetland characteristics: hydrophytic vegetation, hydric soils, and wetland hydrology. Each characteristic has a specific set of mandatory wetland criteria that must be satisfied in order for that particular wetland characteristic to be met. A project-specific discussion regarding Section 404 issues is provided in Section 4.4, Biological Resources, in this Draft EIR.

National Flood Insurance Act. Congress acted to reduce the costs of disaster relief by passing the National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973. The intent of these acts was to reduce the need for large, publicly funded flood control structures and disaster relief efforts by restricting development in floodplains. The Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program (NFIP), which provides flood insurance, floodplain management, and flood hazard mapping. Communities subject to flood hazards voluntarily participate in the NFIP by adopting and enforcing floodplain management ordinances to reduce the potential for flood damage. In turn, the NFIP offers federally funded flood insurance to homeowners, renters, and business owners in participating communities. Under this program, FEMA produces Flood Insurance Rate Maps (FIRMs) that identify properties and buildings in flood insurance risk areas. Flood hazards related to storm events are generally described in terms of 100- or 500-year floods. These are floods that, respectively, have 1 percent and 0.2 percent chance of occurring every year. The City of Lake Forest manages local storm drain facilities, and the Orange County Flood Control District (OCFCD) is responsible for regional flood control planning within Orange County.

4.10.4.2 State Regulations

Porter-Cologne Water Quality Control Act of 1970. The federal CWA places the primary responsibility for the control of water pollution and planning the development and use of water resources with the states, although it does establish certain guidelines for the states to follow in developing their programs.

California's primary statute governing water quality and water pollution is the Porter-Cologne Water Quality Control Act of 1970 (Porter-Cologne Act). The Porter-Cologne Act grants the SWRCB and the nine RWQCBs broad powers to protect water quality and is the primary vehicle for the implementation of California's responsibility under the federal CWA. The Porter-Cologne Act grants the SWRCB and RWQCBs the authority and responsibility to adopt plans and policies, to regulate discharges to surface water and groundwater, to regulate waste disposal sites, and to require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, oil, or petroleum product.

Each RWQCB must formulate and adopt a water quality plan for its region. The regional plans are to conform to the policies set forth in the Porter-Cologne Act and established by the SWRCB in its State water policy. The Porter-Cologne Act also provides that an RWQCB may include in its region a regional plan with water discharge prohibitions applicable to particular conditions, areas, or types of waste. The City, including the project site, is within the jurisdictional boundaries of the Santa Ana RWQCB (Region 8).

State Water Resources Control Board and Regional Water Quality Control Boards. The SWRCB adjudicates water rights, sets water pollution control policy, issues water board orders on matters of statewide application, and oversees water quality functions throughout the State by approving Basin Plans, TMDLs, and NPDES permits. RWQCBs are responsible for protecting beneficial uses of water resources within their regional jurisdiction using planning, permitting, and enforcement authorities to meet this responsibility.

National Pollutant Discharge Elimination System Program. Section 402(p) of the CWA requires the issuance of NPDES permits for five categories of stormwater dischargers, including MS4s. The USEPA defines an MS4 as "any conveyance or system of conveyances (roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, human-made channels, and storm drains) owned or operated by a state, city, town, county, or other public body having jurisdiction over stormwater, that are designed or used for collecting or conveying stormwater." The SWRCB or the RWQCB issues NPDES permits for 5 years, and permit requirements remain active until a new permit has been adopted.

Municipal Separate Storm Sewer System (MS4). The Municipal Stormwater Permitting Program regulates stormwater discharges from MS4s. The NPDES MS4 permits are issued in two phases by the SWRCB and RWQCBs. Phase I MS4 Permits are issued to medium municipalities (serving between 100,000 and 250,000 people) and large municipalities (serving more than 250,000 people). Most of these permits are issued to a group of co-permittees encompassing an entire metropolitan area. The Phase II MS4 Permits are issued to smaller municipalities (populations of less than 100,000 people). The Phase II Small MS4 Permit covers Phase II permittees statewide and became effective on July 1, 2013. The Phase I and Phase II MS4 Permits require the permittees to develop a stormwater management program and individual dischargers to develop and implement a Storm Water Management Plan.

California Toxics Rule (CTR). As stated previously, because California had not established a complete list of acceptable water quality criteria for toxic pollutants, USEPA Region IX established numeric water quality criteria for toxic constituents in the form of the CTR. The CTR provides water quality criteria for certain potentially toxic compounds for inland surface waters, enclosed bays, estuaries, and waters designated for human health or aquatic life uses. The CTR is often used by the RWQCBs when establishing water quality objectives and TMDLs. Although the CTR criteria do not apply directly to discharges of storm water runoff, they are utilized as benchmarks for toxics in urban runoff. The CTR is used as a benchmark to evaluate the potential ecological impacts of storm water runoff to receiving waters. The CTR establishes acute and chronic surface water quality standards for certain water bodies. Acute criteria provide benchmarks for the highest permissible concentration below which aquatic life can be exposed for short periods of time without negative effects. Chronic criteria provide benchmarks for an extended period of time (i.e., 4 days or more) without negative effects. The acute CTR criteria have a shorter relevant averaging period (less than 4 days) and provide a more appropriate benchmark for comparison for storm water flows.

CTR criteria apply to the receiving water body and are calculated based on the probable hardness values of the receiving waters. At higher hardness values for receiving waters, certain constituents (including copper, lead, and zinc) are more likely to be complexed (bound with) components in the water column. This in turn reduces the bioavailability and resulting potential toxicity of these metals.

General Construction Activity Storm Water Permit. The *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities,* Order No. 2022-0057-DWQ, NPDES No. CAS000002 (Construction General Permit), adopted by the SWRCB, regulates construction activity that includes clearing, grading, and excavation resulting in soil disturbance of at least 1 acre of total land area. The Construction General Permit authorizes the discharge of stormwater to surface waters from construction activities.

The Construction General Permit requires that all developers of land where construction activities will occur over more than 1 acre do the following:

- Complete a Risk Assessment to determine pollution prevention requirements pursuant to the three risk levels established in the General Permit;
- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the United States;
- Develop and implement a Stormwater Pollution Prevention Plan (SWPPP) that specifies BMPs that will reduce pollution in stormwater discharges to the Best Available Technology/Economically Achievable/Best Conventional Pollutant Control Technology standards;
- Perform inspections and maintenance of all BMPs; and
- Conduct stormwater sampling, if required based on risk level.

To obtain coverage under the Construction General Permit, a project applicant must electronically file all permit registration documents with the SWRCB prior to the start of construction. Permit registration documents must include a:

- Notice of Intent (NOI),
- Risk Assessment,
- Site map,
- SWPPP,
- Annual fee, and
- Signed certification statement.

Typical BMPs contained in SWPPPs are designed to minimize erosion during construction, stabilize construction areas, control sediment, and control pollutants from construction materials. The SWPPP must also include a discussion of the program to inspect and maintain all BMPs.

Groundwater Management Act (Assembly Bill 3030). The Groundwater Management Act (California Water Code, Sections 10750–10756) provides a systematic procedure for an existing local agency to develop a groundwater management plan. Assembly Bill (AB) 3030 allows a local agency whose service includes a groundwater basin that is not already subject to groundwater management pursuant to law or court order to adopt and implement a groundwater management plan and includes plans to mitigate overdraft conditions, control brackish water, and to monitor and replenish groundwater.

Sustainable Groundwater Management Act of 2014 (Senate Bills 1168 and 1319, Assembly Bill 1739). In March 2014, the Governor's Office released a draft framework soliciting input on actions that can be taken to ensure local groundwater managers have the tools and authority to manage groundwater sustainably. In response, Senate Bill (SB) 1168 and AB 1739 were introduced. These bills moved through the legislation process in nearly identical form while the authors and administration convened multiple stakeholder meetings and further developed the provisions of the bills. On August

22, 2014, both bills were amended to divide the provisions between the two bills. In tandem, SB 1168 and AB 1739 provide a comprehensive groundwater sustainability management program.[1] In September 2014, SB 1168 and SB 1319, and AB 1739 were enacted, amending and adding to the State's Government and Water Codes relative to the management of groundwater resources. The three bills comprise the Sustainable Groundwater Management Act of 2014 (SGMA). The SGMA provides for the formation of local groundwater sustainability agencies (GSAs), which are responsible for monitoring and sustainably managing groundwater basins.

Cobey-Alquist Flood Plain Management Act (Sections 8000–9651 of the California Water Code). The Cobey-Alquist Flood Management Act states that a large portion of land resources of the State of California is subject to recurrent flooding. The public interest necessitates sound development of land use, as land is a limited, valuable, and irreplaceable resource, and the floodplains of the State are a land resource to be developed in a manner that, in conjunction with economically justified structural measures for flood control, would result in prevention of loss of life and of economic loss caused by excessive flooding. The primary responsibility for planning, adoption, and enforcement of land use regulations to accomplish floodplain management rests with local levels of government. It is policy of the State of California to encourage local government to plan land use regulations to accomplish floodplain management and to provide State assistance and guidance. As part of its discretionary review process, the City must determine how the project will comply with this act and not create flooding impacts on new occupied land uses.

4.10.4.3 Regional Regulations

Water Quality Control Plans (Basin Plans). The Santa Ana RWQCB has adopted a Basin Plan for their region of responsibility that delineates water resource area boundaries based on hydrological features. For the purposes of achieving and maintaining water quality protection, specific beneficial uses have been identified for each of the surface waters and groundwater management zones described in the Basin Plan. Once beneficial uses are designated, appropriate water quality objectives can be established, and programs that maintain or enhance water quality can be implemented to ensure the protection of beneficial uses.

Beneficial uses of surface receiving waters for the project site are shown in Table 4.10.A. As shown in Table 4.10.A, beneficial uses of surface receiving waters for the project site include: groundwater recharge (GWR); navigation (NAV); water contact recreation (REC1); non-contact water recreation (REC2); commercial and sport fishing (COMM); warm freshwater habitat (WARM); preservation of biological habitats of special significance (BIOL); wildlife habitat (WILD); rare, threatened, or endangered species (RARE); spawning, reproduction and development (SPWN); marine habitat (MAR); shellfish harvesting (SHEL); and estuarine habitat (EST). The surface receiving waters are excepted from the municipal and domestic supply (MUN).

Beneficial uses of the Irvine Groundwater Management Zone include municipal and domestic supply (MUN), agricultural supply (AGR), industrial service supply (IND), and industrial process supply (PROC).

[1] Association of California Water Agencies. 2014. *Sustainable Groundwater Management Act of 2014.* Website: https://water.ca.gov/programs/groundwater-management/sgma-groundwater-management (accessed July 8, 2024).

Table 4.10.A: Beneficial Uses of Surface Receiving Waters

Receiving Water	Beneficial Use													
	MUN	GWR	NAV	REC1	REC2	COMM	WARM	BIOL	WILD	RARE	SPWN	MAR	SHEL	EST
Surface Waters														
Serrano Creek	❖	☐		☐	☐		☐		☐	●				
San Diego Creek Reach 2 (above Jeffrey Road to headwaters)	❖	☐		☐	☐		☐		☐	●				
San Diego Creek Reach 1 (below Jeffrey Road)	❖			●[1]	●		●		●	●				●
Upper Newport Bay	❖			●	●	●		●	●	●	●	●	●	●
Lower Newport Bay	❖		●	●	●	●			●	●	●	●	●	

Source: *Santa Ana River Water Quality Control Plan (Basin Plan) for the Santa Ana River Basin, Santa Ana Regional Water Quality Control Board* (RWQCB 1995, amended 2019).

Note: ● = Existing or Potential Beneficial Use
☐ = Intermittent Beneficial Use
❖ = Excepted from MUN

[1] Access prohibited in all or part per agency with jurisdiction.

BIOL = preservation of biological habitats of special significance
COMM = commercial and sport fishing
EST = estuarine habitat
GWR = groundwater recharge
MAR = marine habitat
MUN = municipal and domestic supply
NAV = navigation
RARE = rare, threatened, or endangered species
REC1 = water contact recreation
REC2 = non-contact water recreation
RWQCB = Regional Water Quality Control Board
SHEL = shellfish harvesting
SPWN = spawning, reproduction and development
WARM = warm freshwater habitat
WILD = wildlife habitat

Basin Plans also establish implementation programs to achieve water quality objectives to protect beneficial uses and require monitoring to evaluate the effectiveness of the programs. These objectives must comply with the State antidegradation policy (State Board Resolution No. 68-16), which is designed to maintain high-quality waters while allowing some flexibility if beneficial uses are not unreasonably affected.

Basin Plans have established narrative and numeric water quality objectives for inland surface streams and groundwater. If water quality objectives are exceeded, the RWQCBs can use their regulatory authority to require municipalities to reduce pollutant loads to the affected receiving waters. Relevant surface water quality objectives for all inland surface waters, bays and estuaries, and groundwater under the jurisdiction of the Santa Ana RWQCB that are applicable to the receiving waters for the project site are shown in Tables 4.10.B, 4.10.C, and 4.10.D, respectively.

Table 4.10.B: Surface Water Quality Objectives for Inland Surface Waters: Santa Ana RWQCB

<table>
<tr><th>Constituent Name</th><th>Narrative Objective</th></tr>
<tr><td>N/A</td><td>Inland surface water communities and populations, including vertebrate, invertebrate, and plant species, shall not be degraded as a result of the discharge of waste. Degradation is damage to an aquatic community or population with the result that balanced community no longer exists. A balanced community is one that (1) is diverse; (2) has the ability to sustain itself through cyclic seasonal changes; (3) includes necessary food chain species; and (4) is not dominated by pollution-tolerant species unless that domination is caused by physical habitat limitations. A balanced community also: (5) may include historically introduced nonnative species, but (6) does not include species present because best available technology has not been implemented, or (7) because site-specific objectives have been adopted, or (8) because of thermal discharges.</td></tr>
<tr><td>Algae</td><td>Waste discharges shall not contribute to excessive algal growth in inland surface receiving waters.</td></tr>
<tr><td>Ammonia, Un-ionized</td><td>Calculated numerical UIA-N objectives as well as corresponding total ammonia nitrogen concentration for various pH and temperature conditions are shown in Basin Plan Tables 4-2 and 4-3.</td></tr>
<tr><td>Boron</td><td>Boron concentrations shall not exceed 0.75 mg/L in inland surface waters of the region as a result of controllable water quality factors.</td></tr>
<tr><td>Chemical Oxygen Demand (COD)</td><td>Waste discharges shall not result in increases in COD levels in inland surface waters that exceed the values shown in Basin Plan Table 4-1 or that adversely affect beneficial uses.</td></tr>
<tr><td>Chloride</td><td>The chloride objectives listed in Basin Plan Table 4-1 shall not be exceeded as a result of controllable water quality factors.</td></tr>
<tr><td>Chlorine, Residual</td><td>To protect aquatic life, the chlorine residual in wastewater discharged to inland surface waters shall not exceed 0.1 micrograms per liter (mg/L).</td></tr>
<tr><td>Color</td><td>Waste discharges shall not result in coloration of the receiving waters that causes a nuisance or adversely affects beneficial uses. The natural color of fish, shellfish, or other inland surface water resources used for human consumption shall not be impaired.</td></tr>
<tr><td>Dissolved Solids, Total (Total Filtrable Residue)</td><td>The dissolved mineral content of the waters of the region, as measured by the total dissolved solids test (“Standard Methods for the Examination of Water and Wastewater, 16th Ed.,” 1985: 209B (180°C), p. 95), shall not exceed the specific objectives listed in Basin Plan Table 4-1 as a result of controllable water quality factors.</td></tr>
<tr><td>Filtrable Residue,Total</td><td>See Dissolved Solids, Total</td></tr>
<tr><td>Floatables</td><td>Waste discharges shall not contain floating materials, including solids, liquids, foam, or scum, that cause a nuisance or adversely affect beneficial uses.</td></tr>
<tr><td>Fluoride</td><td>Fluoride concentrations shall not exceed values specified below in inland surface waters designated MUN because of controllable water quality factors.
<table>
<tr><th colspan="2">Annual Average Maximum Optimum Fluoride</th></tr>
<tr><th>Daily Air Temperature (°C)</th><th>ntration (mg/L)</th></tr>
<tr><td>12.0 and below</td><td>1.2</td></tr>
<tr><td>12.1 to 14.6</td><td>1.1</td></tr>
<tr><td>14.7 to 17.6</td><td>1.0</td></tr>
<tr><td>17.7 to 21.4</td><td>0.9</td></tr>
<tr><td>21.5 to 26.2</td><td>0.8</td></tr>
<tr><td>26.3 to 32.5</td><td>0.7</td></tr>
</table></td></tr>
<tr><td>Hardness (as $CaCO_3$)</td><td>The objectives listed in Basin Plan Table 4-1 shall not be exceeded as a result of controllable water quality factors. If no hardness objective is listed in Basin Plan Table 4-1, the hardness of receiving waters used for MUN shall not be increased as a result of waste discharges to levels that adversely affect beneficial uses.</td></tr>
</table>

Table 4.10.B: Surface Water Quality Objectives for Inland Surface Waters: Santa Ana RWQCB

Constituent Name	Narrative Objective
Inorganic Nitrogen, Total	See Nitrogen, Total Inorganic
Methylene Blue- Activated Substances (MBAS)	MBAS concentrations shall not exceed 0.05 mg/L in inland waters designated MUN as a result of controllable water quality factors.
Nitrate	Nitrate-nitrogen concentrations shall not exceed 45 mg/L (as NO3) or 10 mg/L (as N) in inland surface waters designated MUN as a result of controllable water quality factors.
Nitrogen, Total Inorganic	The objectives listed in Basin Plan Table 4-1 shall not be exceeded as a result of controllable water quality factors.
Oil and Grease	Waste discharges shall not result in deposition of oil, grease, wax or other material in concentrations that result in a visible film or in coating objects in the water, or which cause a nuisance or adversely affect beneficial uses.
Oxygen, Dissolved	The dissolved oxygen content of surface waters shall not be depressed below 5 mg/L for waters designated WARM, or 6 mg/L for waters designated COLD, as a result of controllable water quality factors. In addition, waste discharges shall not cause the median dissolved oxygen concentration to fall below 85% of saturation or the 95th percentile concentration or fall below 75% of saturation within a 30-day period.
Pathogen Indicator Bacteria	Waste discharges shall not cause or contribute to excessive risk of illness from microorganisms pathogenic to human beings. Pathogen indicator concentrations shall not exceed the values listed in Basin Plan Table 4-pio as a result of controllable water quality factors unless it is demonstrated to the Regional Board's satisfaction that the elevated indicator concentrations do not result in excessive risk of illness among people recreating in or near the water. In all cases, the level of water quality necessary to protect existing uses must be maintained. Where existing water quality is better than necessary to protect the designated use, the existing high level of water quality must be maintained unless it is demonstrated that existing or potential beneficial uses would be protected and that water quality consistent with maximum benefit to the people of California would be maintained, as specified in the state antidegradation policy (SWRCB Resolution No. 68-16). The Regional Board may also require recycled water discharged to freshwaters designated REC-1 or REC-2 to comply with other limitations recommended by the California Department of Public Health (CDPH).
pH	The pH of inland surface waters shall not be raised above 8.5 pH or depressed below 6.5 pH as a result of controllable water quality factors.
Radioactivity	Radioactive materials shall not be present in the waters of the region in concentrations that are deleterious to human, plant, or animal life. Waters designated MUN shall meet the limits specified in the California Code of Regulations, Title 22, and listed here: **Combined Radium-226 and Radium-228:** 5 pCi/L **Gross Alpha Particle Activity:** 15 pCi/L **Tritium:** 20,000 pCi/L **Strontium-90:** 8 pCi/L **Gross Beta Particle:** 50 pCi/L **Uranium 20:** pCi/L
Sodium	The sodium objectives listed in Basin Plan Table 4-1 shall not be exceeded as a result of controllable water quality factors.
Solids, Suspended and Settleable	Inland surface waters shall not contain suspended or settleable solids in amounts that cause a nuisance or adversely affect beneficial uses as a result of controllable water quality factors.
Sulfate	The objectives listed in Basin Plan Table 4-1 shall not be exceeded as a result of controllable water quality factors.
Sulfides	The dissolved sulfide content of inland surface waters shall not be increased as a result of controllable water quality factors.

Table 4.10.B: Surface Water Quality Objectives for Inland Surface Waters: Santa Ana RWQCB

Constituent Name	Narrative Objective
Surfactants (surface- active agents)	Waste discharges shall not contain concentrations of surfactants that result in foam in the course of flow or use of the receiving water, or that adversely affect aquatic life.
Taste and Odor	The inland surface waters of the region shall not contain, as a result of controllable water quality factors, taste- or odor-producing substances at concentrations that cause a nuisance or adversely affect beneficial uses. The natural taste and odor of fish, shellfish, or other regional inland surface water resources used for human consumption shall not be impaired.
Temperature	The natural receiving water temperature of inland surface waters shall not be altered unless it can be demonstrated to the satisfaction of the Regional Board that such alteration in temperature does not adversely affect beneficial uses. The temperature of waters designated COLD shall not be increased by more than 5°F as a result of controllable water quality factors. The temperature of waters designated WARM shall not be raised above 90°F from June through October or above 78°F during the rest of the year as a result of controllable water quality factors. Lake temperatures shall not be raised more than 4°F above established normal values as a result of controllable water quality factors.
Total Dissolved Solids	See Dissolved Solids, Total
Total Filtrable Residue	See Dissolved Solids, Total
Total Inorganic Nitrogen	See Nitrogen, Total Inorganic
Toxic Substances	Toxic substances shall not be discharged at levels that will bioaccumulate in aquatic resources to levels that are harmful to human health. The concentrations of contaminants in waters that are existing or potential sources of drinking water shall not occur at levels that are harmful to human health. The concentrations of toxic pollutants in the water column, sediments or biota shall not adversely affect beneficial uses.
Turbidity	Increases in turbidity that result from controllable water quality factors shall comply with the following: **Natural Turbidity** / **Maximum Increase** 0–5 NTU / 20% 50–100 NTU / 10 NTU >100 NTU / 10% All inland surface waters of the region shall be free of changes in turbidity that adversely affect beneficial uses.

Source: *Santa Ana River Water Quality Control Plan (Basin Plan) for the Santa Ana River Basin, Santa Ana Regional Water Quality Control Board* (RWQCB 1995, amended 2019).

°C = degrees Celsius
°F = degrees Fahrenheit
$CaCO_3$ = calcium carbonate
COLD = cold freshwater habitat
MUN = municipal supply
NO_3 = nitrate
NTU = nephelometric turbidity unit
pCi/L = picocuries per liter of air
REC-1 = contact water recreation
REC-2 = non-contact water recreation
RWQCB = Regional Water Quality Control Board
SWRCB = State Water Resources Control Board
UIA-N = un-ionized ammonia nitrogen
WARM = warm freshwater habitat

Table 4.10.C: Surface Water Quality Objectives for Bays and Estuaries

Constituent	Concentration
Algae	Waste discharges shall not contribute to excessive algal growth.
Chlorine (residual)	Chlorine residual in wastewater discharged to enclosed bays and estuaries shall not exceed 0.1 mg/L.
Color	Waste discharges shall not result in coloration of the receiving waters that causes a nuisance or adversely affects beneficial uses. The natural color of fish, shellfish or other bay and estuarine water resources used for human consumption shall not be impaired.
Floatables	Waste discharges shall not contain floating materials, including solids, liquids, foam, or scum, that cause a nuisance or adversely affect beneficial uses.
Oil and Grease	Waste discharges shall not result in deposition of oil, grease, wax, or other materials in concentrations that result in a visible film or in coating objects in the water or which cause a nuisance or adversely affect beneficial uses.
Oxygen (dissolved)	Shall not be depressed to levels that adversely affect beneficial uses as a result of controllable water quality factors.
Pathogen Indicator Bacteria	Waters with REC1 Beneficial Use: Fecal coliform log mean less than 200 organisms/100 mL based on five or more samples/30-day period, and not more than 10% of the samples exceed 400 organisms/100 mL for any 30-day period. Water with SHEL Beneficial Use: Fecal coliform median concentration not more than 14 MPN/100 mL and not more than 10% of samples exceed 43 MPN/100 mL.
pH	Shall not be raised above 8.6 or depressed below 7.0 as a result of controllable water quality factors; ambient pH levels shall not be changed more than 0.2 units.
Radioactivity	Shall not be present in concentrations which are deleterious to human, plant, or animal life.
Solids (suspended and settleable)	Shall not cause nuisance or adversely affect beneficial uses as a result of water quality factors.
Sulfides	Shall not increase as a result of controllable water quality factors.
Surfactants	Waste discharges shall not contain concentrations of surfactants that result in foam in the course of flow or use of the receiving water or that adversely affect aquatic life.
Taste and Odor	Shall not contain taste- or odor-producing substances at concentrations that cause a nuisance or adversely affect beneficial uses. The natural taste and odor of fish, shellfish, or other enclosed bay and estuarine resources used for human consumption shall not be impaired.
Temperature	Shall meet the objective specified in the SWRCB's Water Quality Control Plan for Control of Temperature in the Coastal and Interstate Waters and Enclosed Bays and Estuaries of California (Thermal Plan).
Toxic Substances	Shall not be discharged at levels that will bioaccumulate in aquatic resources to levels that are harmful to human health. Concentrations of toxic pollutants in the water column, sediments, or biota shall not adversely affect beneficial uses.
Turbidity	Where natural turbidity is between 0 and 50 NTU, increases shall not exceed 20%. Where natural turbidity is between 50 and 100 NTU, increases shall not exceed 10 NTU. Where natural turbidity is greater than 100 NTU, increases shall not exceed 10%.

Source: *Santa Ana River Water Quality Control Plan (Basin Plan) for the Santa Ana River Basin, Santa Ana Regional Water Quality Control Board* (RWQCB 1995, amended 2019).
mg/L = milligrams per liter
mL = milliliter
MPN = most probable number
NTU = nephelometric turbidity units
pH = percentage of hydrogen
REC1 = water contact recreation
RWQCB = Regional Water Quality Control Board
SHEL = shellfish harvesting
WARM = Warm Freshwater Habitat

Table 4.10.D: Groundwater Quality Objectives

Constituent	Basin Plan Objectives
Arsenic	Arsenic concentrations shall not exceed 0.05 mg/L in groundwater designated MUN as a result of controllable water quality factors.
Bacteria, Coliform	Total coliform numbers shall not exceed 2.2 organisms/100 mL median over any 7-day period in groundwaters designated MUN as a result of controllable water quality factors.
Barium	Barium concentrations shall not exceed 1.0 mg/L in groundwaters designated MUN as a result of controllable water quality factors.
Boron	Boron concentrations shall not exceed 0.75 mg/L in groundwaters of the region as a result of controllable water quality factors.
Chloride	Chloride concentrations shall not exceed 500 mg/L in groundwaters of the region designated MUN as a result of controllable water quality factors.
Color	Waste discharges shall not result in coloration of the receiving waters that causes a nuisance or adversely affects beneficial uses.
Cyanide	Cyanide concentrations shall not exceed 0.2 mg/L in groundwaters designated MUN as a result of controllable water quality factors.
Dissolved Solids, Total (Total Filterable Residue)	The dissolved mineral content of the waters of the region, as measured by the total dissolved solids test ("Standard Methods for the Examination of Water and Wastewater, 20th Ed.," 1998: 2540C (180˚C), p.2-56), shall not exceed the specific objectives listed in Table 4-1 of the Santa Ana RWQCB Basin Plan as a result of controllable water quality factors. (See also discussion of management zone TDS and nitrate-nitrogen water quality objectives in the Santa Ana RWQCB Basin Plan.)
Filterable Residue, Total	See Dissolved Solids, Total.
Fluoride	Fluoride concentrations shall not exceed 1.0 mg/L in groundwaters designated MUN as a result of controllable water quality factors.
Hardness (as $CaCO_3$)	The hardness of receiving waters used for MUN shall not be increased as a result of waste discharges to levels that adversely affect beneficial uses.
Metals	Metal concentrations shall not exceed the values listed below in groundwaters designated MUN as a result of controllable water quality factors.
Methylene Blue-Activated Substances (MBAS)	MBAS concentrations shall not exceed 0.05 mg/L in groundwaters designated MUN as a result of controllable water quality factors.
Nitrogen (Nitrate, Nitrite)	Nitrate-nitrogen concentrations listed in Table 4-1 of the Santa Ana RWQCB Basin Plan shall not be exceeded as a result of controllable water quality factors. (See also discussion of management zone TDS and nitrate-nitrogen water quality objectives in the Santa Ana RWQCB Basin Plan.)
Oil and Grease	Waste discharges shall not result in deposition of oil, grease, wax, or other materials in concentrations that cause a nuisance or adversely affect beneficial uses.
pH	The pH of groundwater shall not be raised above 9 or depressed below 6 as a result of controllable water quality factors.

Metal (°C)	Concentration (mg/L)
Cadmium	0.01
Chromium	0.05
Cobalt	0.2
Copper	1.0
Iron	0.3
Lead	0.05
Manganese	0.05
Mercury	0.002
Selenium	0.01
Silver	0.05

Table 4.10.D: Groundwater Quality Objectives

Constituent	Basin Plan Objectives
Radioactivity	Radioactive materials shall not be present in the waters of the region in concentrations that are deleterious to human, plant, or animal life. Groundwaters designated MUN shall meet the limits specified in the California Code of Regulations, Title 22, and listed below: Combined Radium-226 and Radium-228 ..... 5 pCi/L Gross Alpha particle activity ..... 15 pCi/L Tritium ..... 20,000 pCi/L Strontium-90 ..... 8 pCi/L Gross Beta particle activity ..... 50 pCi/L Uranium ..... 20 pCi/L
Sodium	Groundwaters designated AGR shall not exceed a sodium absorption ration (SAR) of 9 as a result of controllable water quality factors.
Sulfate	Sulfate concentrations shall not exceed 500 mg/L in groundwaters of the region designated MUN as a result of controllable water quality factors.
Taste and Odor	The groundwaters of the region shall not contain, as a result of controllable water quality factors, taste- or odor-producing substances at concentrations that cause a nuisance or adversely affect beneficial uses.
Total Dissolved Solids	See Dissolved Solids, Total
Total Filtrable Residue	See Dissolved Solids, Total
Total Inorganic Nitrogen	See Nitrogen, Total Inorganic
Toxic Substances	All waters of the region shall be maintained free of substances in concentrations that are toxic or that produce detrimental physiological responses in human, plant, animal, or aquatic life.

Source: *Santa Ana River Water Quality Control Plan (Basin Plan) for the Santa Ana River Basin, Santa Ana Regional Water Quality Control Board* (RWQCB 1995, amended 2019).

°C = degrees Celsius
AGR = agricultural water supply
mg/L= milligrams per liter
mL= milliliters
MUN= Municipal Water Supply
pCi/L= picocuries per liter of air
RWQCB = Regional Water Quality Control Board
TDS = total dissolved solids

In addition to the water quality objectives applicable to all surface waters, bays and estuaries, and groundwater, the Santa Ana RWQCB has designated site-specific water quality objectives for waters. The site-specific water quality objectives for San Diego Creek Reach 2 (above Jeffrey Road to the headwaters) are:

- **Total Dissolved Solids:** 720 mg/L
- **Total Inorganic Nitrogen:** 5 mg/L

The site-specific water quality objectives for San Diego Creek Reach 1 (below Jeffrey Road) are:

- **Total Dissolved Solids:** 1,500 mg/L
- **Total Inorganic Nitrogen:** 13 mg/L
- **Chemical Oxygen Demand:** 90 mg/L

There are no site-specific water quality objectives for Serrano Creek, Upper Newport Bay, or Lower Newport Bay.

The site-specific water quality objectives for the Irvine Groundwater Management Zone are:

- **Total Dissolved Solids:** 910 mg/L
- **Nitrate as Nitrogen:** 5.9 mg/L

Orange County National Pollutant Discharge Elimination System Permit. The City is a Permittee of the *Waste Discharge Requirements for the County of Orange, Orange County Flood Control District and the Incorporated Cities of Orange County within the Santa Ana Region Areawide Urban Storm Water Runoff Orange County* (North Orange County MS4 Permit), Order R8-2009-0030, NPDES No. CAS618030, as amended by Order No. R8-2010-0062. The North Orange County MS4 Permit regulates discharges into the MS4 system in the cities and county areas within Orange County that are in the Santa Ana Region. As discussed further below, the North Orange County MS4 Permit requires preparation of a Water Quality Management Plan (WQMP) and implementation of post-construction BMPs for new development and significant redevelopment projects that qualify as Priority Projects.

The proposed project is considered a Priority Project under the following category specified in the North Orange County MS4 Permit:

- Significant redevelopment projects that include the addition or replacement of 5,000 square feet (sq ft) or more of impervious surface on a developed site.

Drainage Area Management Program. The Drainage Area Management Plan (DAMP) was created by the County of Orange, the OCFCD, and incorporated cities (permittees), and includes specific water pollutant requirements of the North Orange County Stormwater Program. The DAMP is the principal guidance and compliance document for the county-wide implementation of the Stormwater Program. It is the foundation for the permittees to implement model programs designed to prevent pollutants from entering receiving waters to the maximum extent practicable. Section 7 of the DAMP discusses issues relating to new developments and significant redevelopments.

Local Implementation Plan. The City Local Implementation Plan (LIP) is the principal guidance and compliance document specific to the City's jurisdiction for compliance with the requirements of the North Orange County MS4 Permit. The LIP provides the description and details of the City's water quality program implementation activities. The LIP is designed to work in conjunction with the Orange County DAMP. It should be noted that the Lake Forest LIP takes precedence over DAMP requirements.

Model Water Quality Management Plan. The *Model Water Quality Management Plan* (County of Orange 2011) was developed to aid Orange County, the OCFCD, the cities in Orange County (permittees), and developers in Orange County to address post-construction urban runoff and stormwater pollution from new development and significant redevelopment projects that qualify as Priority Projects. The proposed project is categorized as a significant redevelopment project and, thus, is considered a Priority Project.

Priority Projects are required to develop a Project WQMP to minimize adverse impacts of development to on-site hydrology, volume and rate of runoff, and pollutants of concern. Project WQMPs include project-specific BMPs to minimize these effects (e.g., Low Impact Development [LID],

site design measures, source control BMPs). The requirements identified in the Project WQMPs are subject to Section 7 of the DAMP.

Technical Guidance Document. The County of Orange developed the *Technical Guidance Document for the Preparation of Conceptual/Preliminary and/or Project Water Quality Management Plans (WQMPs)* (Technical Guidance Document) (County of Orange 2013) in cooperation with the incorporated cities of Orange County to aid agency staff and project proponents with addressing post-construction urban runoff and stormwater pollution from new development and significant redevelopment projects in Orange County. The Technical Guidance Document serves as a technical guidance to complete the Project WQMP.

Orange County Construction Runoff Guidance Manual. The *Construction Runoff Guidance Manual for Contractors, Project Owners, and Developers* (County of Orange 2012) presents the requirements related to construction from the DAMP. The goal of this Guidance Manual is to control pollutant discharges from construction sites. As such, it helps applicants with building and grading permits to understand the water quality requirements during the construction phase of development projects.

General Waste Discharge Requirements (WDR) Permit for Discharges to Surface Waters That Pose an Insignificant (de Minimus) Threat to Water Quality. The Santa Ana RWQCB requires a permit for discharges to surface waters that pose an insignificant threat to water quality (Order No. R8-2020-0006, NPDES No. CAG998001). Wastewater discharges associated with construction dewatering are regulated under this order. If dewatering occurs during construction of the project within the Santa Ana RWQCB Region, it must comply with this permit.

4.10.4.4 Local Regulations

City of Lake Forest General Plan 2040. The Public Facilities element includes policies and actions related to the City's water system and stormwater system. The following policies and actions from the Public Facilities Element would apply to the proposed project:

Goal PF-5 Storm Drain System: A community with an efficient, attractive, and environmentally sound storm drain system.

Policy PF-5.3 Stormwater Runoff: Encourage that stormwater be directed towards permeable surfaces to allow for more percolation of stormwater into the ground.

Policy PF-5.4 Stormwater Capture: Encourage the use of professionally designed stormwater capture methods to aid in the reuse of rain water for non-potable uses in compliance with applicable State regulations.

Policy PF-5.6: Stormwater Treatments: Promote Best Management Practices (BMPs) and Low Impact Development measures (LID) to treat stormwater before discharge from the site. The facilities shall be sized to meet regulatory requirements.

Action PF-5b: Project designs shall minimize drainage concentrations, minimize impervious coverage, utilize pervious paving materials, utilize low impact development

(LID) strategies, and utilize Best Management Practices (BMPs) to reduce stormwater runoff.

Action PF-5c: Promote the use of LID strategies in new development and redevelopment projects, including but not limited to the use of canopy trees and shrubs, vegetated swales, and permeable paving.

Action PF-5d: Require new development to mitigate increases in stormwater peak flows and/or volume. Mitigation measures, such as LID strategies, should take into consideration impacts on adjoining lands in the City.

City of Lake Forest Municipal Code Chapter 8.30. Chapter 8.30 of the City's Municipal Code regulates grading and excavation activities.

- **Section 8.30.150** specifies that grading activities be undertaken in compliance with NPDES and City requirements. Each grading project shall implement BMPs to ensure that discharges of pollutants are effectively prohibited and will not cause or contribute to an exceedance of water quality standards. Section 8.30.150 also specifies that, prior to the issuance by the City of a grading permit, the Department of Public Works and/or Development Services Department shall review the project plans.

- **Section 8.30.152** specifies that projects with a grading permit shall submit an erosion control plan to the Director of the City of Lake Forest Public Works Department, or designee, for approval by September 15th of each year.

- **Section 8.30.154** specifies required maintenance of erosion control and sediment control BMPs after rainstorms for projects with a grading permit.

City of Lake Forest Municipal Code Chapter 15.14. Chapter 15.14 of the City's Municipal Code regulates stormwater quality and prohibits discharges of pollutants into surface waters unless the discharge is authorized by an NPDES permit.

- **Section 15.14.040** requires that all new development and redevelopment projects comply with the requirements of the North Orange County MS4 Permit. Section 15.14.040 specifies that, prior to the issuance of a grading permit or building permit, the Department of Public Works and/or Development Services Department shall review the project plans.

- **Section 15.14.050** requires preparation of an erosion and sediment control plan as a condition of approval for issuance of a construction or grading permit. Section 15.14.050 also requires implementation of construction BMPs to ensure that the discharge of pollutants from the site will be effectively prohibited and will not cause or contribute to an exceedance of water quality standards. Section 15.14.050 specified that construction and grading activities be undertaken in compliance with NPDES and City requirements.

- **Section 15.14.060** requires implementation of operational BMPs on all sites that have the potential to discharge a pollutant to the City's MS4.

4.10.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines* and the *City of Lake Forest CEQA Significance Thresholds Guide* (2025). A number of the City of Lake Forest CEQA Significance Thresholds are fundamentally the same as those detailed in Appendix G of the State CEQQ Guidelines. However, some of the City of Lake Forest CEQA Significance Thresholds expand upon the State CEQA Guidelines Appendix G thresholds. In instances where the City of Lake Forest CEQA Significance Thresholds expand upon the State CEQA Guidelines Appendix G thresholds, the detailed threshold is provided below and is analyzed under Section 4.10.6, Project Impacts. Based on these thresholds, implementation of the proposed project would have a significant adverse impact with respect to hydrology and water quality if it would:

Appendix G of the *State CEQA Guidelines*:

Threshold 4.10.1: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality;

Threshold 4.10.2: Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;

Threshold 4.10.3: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

(i) Result in substantial erosion or siltation on- or off-site;

(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

(iii) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or

(iv) Impede or redirect flood flows;

Threshold 4.10.4: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; or

Threshold 4.10.5: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

City of Lake Forest CEQA Significance Thresholds:

Surface Water and Flooding.

- Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.
- Place within a 100-year flood hazard area structures which would impede or redirect flood flows.
- Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.
- Cause inundation by seiche, tsunami, or mudflow.
- Deposit sediment and debris materials within existing channels obstructing flows.
- Exceed the capacity of a channel and cause overflow during design storm conditions.

Groundwater.

- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).
- Adversely change the rate, direction or flow of groundwater.
- Have an impact on groundwater that is inconsistent with a groundwater management plan prepared by the water agencies with the responsibility for groundwater management.

Water Quality.

- Cause a significant alteration of receiving water quality during or following construction.
- Substantially degrade water quality by discharge which affects the beneficial uses (i.e. swimming, fishing, etc.) of the receiving or downstream waters.
- Increase in any pollutant for which the receiving water body is already impaired as listed on the Clean Water Act Section 303(d) list.

4.10.6 Project Impacts

Please refer to Section 4.10.9 for full text description of the regulatory compliance and/or mitigation measures referenced in the analysis below.

Threshold 4.10.1: Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality (Appendix G);

Would the project cause a significant alteration of receiving water quality during or following construction (City of Lake Forest CEQA Significance Threshold);

Would the project substantially degrade water quality by discharge which affects the beneficial uses (i.e. swimming, fishing, etc.) of the receiving or downstream waters (City of Lake Forest CEQA Significance Threshold); and

Would the project increase in any pollutant for which the receiving water body is already impaired as listed on the Clean Water Act Section 303(d) list? (City of Lake Forest CEQA Significance Threshold)

Less Than Significant Impact.

Construction. The proposed project involves the demolition of the existing 144,906 sq ft, two-story office/industrial building and the construction and operation of a 35-foot-tall, 165,803 sq ft, tilt-up concrete industrial building. The project includes a gated truck loading area, truck and auto parking spaces, and new landscaping throughout the site. The project Applicant also proposes to complete off-site improvements in order to enhance public safety and address concerns related to large truck turning movements at five intersections within Lake Forest. Construction activities would result in the disturbance of 8.4 acres of soil. Pollutants of concern during construction include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. During construction activities, excavated soil would be exposed, and there would be an increased potential for soil erosion and sedimentation compared to existing conditions. In addition, chemicals, liquid products, petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste may be spilled or leaked, and they have the potential to be transported via storm water runoff into receiving waters.

Because construction of the proposed project would disturb greater than 1 acre of soil, the project is subject to the requirements of the Construction General Permit (CGP), which requires preparation of an SWPPP and implementation of construction BMPs during construction activities, as specified in **Regulatory Compliance Measure (RCM) WQ-1**. Construction BMPs would include, but are not limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site as well as Good Housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters. In addition, the proposed project must comply with Article XIII of Chapter 8.30 of the City's Municipal Code, which requires the preparation and submission of an Erosion Control Plan and that all grading be undertaken in accordance with BMPs for pollution prevention adopted by the City as detailed in **RCM WQ-2**.

According to the Geotechnical Investigation completed for the proposed project, groundwater was not encountered during explorations to depths of more than 30 feet below the existing grade. Therefore, the groundwater table is expected to exist at a depth in excess of 30 feet at the project site. The proposed project would require excavation to a maximum depth of 6 feet below the existing grade. Therefore, it is not anticipated that groundwater dewatering would be required during construction of the proposed project.

Adherence with the CGP and the City of Lake Forest Municipal Code, including implementation of the required SWPPP, Construction BMPs, and the Erosion Control Plan, would ensure construction ~~impacts related to~~ would not violate surface water quality standards or~~,~~ waste discharge

requirements, and would not cause a significant alteration of receiving water quality during or following construction. Construction-related impacts to ~~and~~ surface water quality would be less than significant.

Operation. Pollutants of concern from long-term project operations include suspended solids/ sediment, nutrients, pathogens (bacteria/virus), pesticides, oil and grease, heavy metals, toxic organic compounds, and trash and debris. If these pollutants enter project receiving waters, they would exacerbate impairments for which the receiving water body is already impaired as listed on the Clean Water Act Section 303(d) list. Project receiving waters include Serrano Creek, San Diego Creek Reach 2 and 1, Upper and Lower Newport Bay and the Pacific Ocean. As detailed in Section 4.10.3.3 above, the receiving waters are listed as impaired on the 303(d) list for several constituents. Serrano Creek is listed as impaired for ammonia (unionized), benthic community effects, indicator bacteria, pH, and toxicity. San Diego Creek (Reach 2 – above Jeffrey Road to the headwaters) is listed as impaired for benthic community effects, indicator bacteria, nutrients, sedimentation/siltation, and toxicity. San Diego Creek (Reach 1 – below Jeffrey Road) is listed as impaired for benthic community effects, dichlorodiphenyltrichloroethane (DDT), indicator bacteria, malathion, nutrients, sedimentation/siltation, selenium, toxaphene, toxicity, pyrethroids, bifenthrin, and nitrogen. Upper Newport Bay is listed as impaired for chlordane, copper, DDT, indicator bacteria, malathion, nutrients, polychlorinated biphenyls (PCBs), sedimentation/siltation, and toxicity. Lower Newport Bay is listed as impaired for chlordane, copper, DDT, indicator bacteria, nutrients, PCBs, dieldrin, and toxicity. Chapter 15.14 of the City's Municipal Code regulates stormwater quality and prohibits discharges of pollutants into surface waters unless the discharge is authorized by an NPDES permit. RCM WQ-3 and RCM WQ-4 requires compliance with the North Orange County MS4 Permit (Order R8-2009-0030, NPDES No. CAS618030, as amended by Order No. R8-2010-0062), the implementation of LID techniques, and the incorporation of operational BMPs that are designed and implemented to address 303(d) listed pollutants. Compliance with the requirements of the City and the North Orange County MS4 Permit, as detailed in RCM WQ-3 and RCM WQ-4 would ensure that the project would not increase any pollutant for which the receiving water bodies are already impaired as listed on the Clean Water Act Section 303(d) list.

The proposed project would include three linear modular wetland systems and three underground detention systems to reduce site discharge during the 100-year, 24-hour peak runoff rate by 47 percent in accordance with City requirements to reduce flows and associated erosion potential in Serrano Creek. The proposed project would also be required to prepare a Final WQMP, as detailed in **RCM WQ-3**, consistent with the requirement of the City's MS4 permit, because the project consists of significant redevelopment that would replace 5,000 sq ft or more of impervious surface. The Final WQMP would specify the Site Design, Source Control, LID, and Treatment Control BMPs that would be implemented to capture, treat, and reduce pollutants of concern in storm water runoff. Additionally, as specified in **RCM WQ-4,** a Final Hydrology Study would be required to be prepared, which would demonstrate that the final design of the proposed project meets the hydromodification requirements and that, with implementation of detention facilities and linear modular wetland systems, the peak flow of stormwater runoff in the proposed condition would be less than existing conditions. As detailed in Section 4.10.4.3, the project receiving waters host a number of beneficial uses. ~~Therefore,~~ Compliance with the requirements

of the City and the North Orange County MS4 Permit, as detailed in **RCM WQ-3** and **RCM WQ-4** would ensure that the proposed project would not substantially degrade water quality by discharge which affects the beneficial uses of the receiving or downstream waters, would not increase any pollutant for which the receiving water bodies are already impaired as listed on the Clean Water Act Section 303(d) list, and would not result in other ~~operation~~ impacts to water quality during project operations. Water quality impacts would be less than significant.

Because the proposed project would be required to comply with existing regulations, including the CGP, the City of Lake Forest Municipal Code, and the North Orange County MS4 Permit, the proposed project would not violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or groundwater quality, or deposit sediment and debris material within existing channels obstructing flows. Furthermore, with compliance with the CGP, the City of Lake Forest Municipal Code, and the North Orange County MS4 Permit, the proposed project would not result in discharge which would affect the beneficial uses of Serrano Creek or result in an increase in any pollutant for which Serrano Creek is already impaired. Therefore, impacts would be less than significant, and no mitigation is required.

Threshold 4.10.2: Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin (Appendix G);

Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted) (City of Lake Forest CEQA Significance Threshold); and

Would the project adversely change the rate, direction or flow of groundwater? (City of Lake Forest CEQA Significance Threshold)

Less Than Significant Impact.

Construction. As discussed under Threshold 4.10.1 above, the Geotechnical Investigation completed for the proposed project indicates that groundwater was not encountered during explorations to depths of more than 30 feet below the existing grade. Therefore, the groundwater table is expected to exist at a depth in excess of 30 feet at the project site. The proposed project would require excavation to a maximum depth of 6 feet below the existing grade. Therefore, it is not anticipated that groundwater dewatering would be required during construction of the proposed project. Construction activities could result in soil compaction, which could reduce groundwater infiltration. But according to the Results of Infiltration Testing Report completed for the proposed project, on-site soils possess poor to marginal infiltration characteristics. Therefore, the project site is not a significant source of groundwater recharge, and the temporary increase in compacted soil during construction would not affect groundwater recharge. Furthermore, short-term demand for water during construction (e.g., soil watering for fugitive dust control, and

cleanup, masonry, painting, and other activities) would require minimal water and for only a temporary period of time. Therefore, water demand during construction would not have any adverse impacts on available water supplies. Therefore, ~~and~~ construction of the proposed project would not substantially decrease groundwater supplies~~.~~, interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level, impede sustainable groundwater management of the basin, or adversely change the rate, direction or flow of groundwater. Impacts would be less than significant for the proposed project, and no mitigation is required.

Operation. Water service for the proposed project would be provided by Irvine Ranch Water District (IRWD). IRWD water supplies consist of imported water, local groundwater, recycled water, and local surface water. Treated and untreated imported surface water is purchased from the Metropolitan Water District of Southern California (Metropolitan) through the Municipal Water District of Orange County (MWDOC). Potable and non-potable groundwater supplies are extracted from both the Main Orange County Groundwater Basin and the Irvine Sub-Basin. IRWD's local surface water sources are the drainage tributary areas to the Irvine Lake and Harding Canyon Reservoir. Recycled water production at IRWD's Michelson and Los Alisos Water Recycling Plants are primary supplies to IRWD's non-potable distribution system. Therefore, water supply for operation of the proposed project would likely involve the use of both surface and groundwater sources for use in restrooms and for irrigation of landscaped areas. According to water demand factors included in the California Emissions Estimator Model (CalEEMod) emissions model, the proposed project is estimated to demand approximately 107,410 gallons per day or 120 acre feet per year of water. The 2020 Urban Water Management Plan indicates the IRWD has sufficient water supplies to meet water demands through 2045, including during multiple dry years. Therefore, the proposed project's water needs would not contribute to a substantial depletion of groundwater supplies (IRWD 2021).

Development of the proposed project would result in an increase in impervious surfaces on the project site from approximately 6.8 to 7.5 acres, which could decrease on-site infiltration[2]. According to the *Infiltration Report* (Southern California Geotechnical 2021b) completed for the proposed project, infiltration rates at the project site range from 0.1 to 0.3 inch per hour due to the presence of dense engineered fill soils comprised of silty sands and clayey sands that possess very poor infiltration characteristics. Therefore, the project site is not a significant source of groundwater recharge, and the increase in impervious surface area that would result from the development of the proposed project would not significantly decrease groundwater supplies or interfere with groundwater recharge in a manner that may impede sustainable groundwater management, or adversely change the rate, direction or flow of groundwater.

For the reasons listed above, impacts related to the decrease of groundwater supplies or interference with groundwater recharge, rate, direction, or flow would be less than significant, and no mitigation is required.

[2] Street easements within the 8.83-acre project site have been excluded from the project's drainage area. Therefore, for the purposes of the Water Quality analysis within this EIR, the project's drainage area totals 8.4 acres.

Threshold 4.10.3: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site (Appendix G); and

Would the project deposit sediment and debris materials within existing channels obstructing flows? (City of Lake Forest CEQA Significance Threshold)

Less Than Significant Impact.

Construction. As previously discussed, storm water from the project site drains to various curb inlets where it enters storm drains. During construction activities, more than 1 acre of soil would be disturbed. Soil would be exposed and drainage patterns temporarily altered during grading and other construction activities, and there would be an increased potential for soil erosion and siltation compared to existing conditions. Additionally, during a storm event, soil erosion and siltation could occur at an accelerated rate. As required by **RCM WQ-1,** the CGP requires the preparation of an SWPPP to identify construction BMPs to be implemented as part of the proposed project to reduce impacts on water quality during construction, including those impacts associated with soil erosion and siltation. In addition, the proposed project must comply with Article XIII of Chapter 8.30 of the City's Municipal Code, which requires the preparation and submission of an Erosion Control Plan and that all grading be undertaken in accordance with BMPs for pollution prevention, as detailed in **RCM WQ-2**. With compliance with the requirements in the CGP and City of Lake Forest Municipal Code and implementation of construction BMPs, the proposed project would not result in erosion or siltation on- or off-site, and the project would not deposit sediment and debris materials within existing channels obstructing flows. Construction impacts related to on- or off-site erosion or siltation and deposition of sediment and debris within existing channels would be less than significant, and no mitigation is required.

Operation. After the completion of project construction, the proposed project would not significantly alter the existing drainage pattern of the site. However, operation of the proposed project would result in an increase in impervious surfaces on the project site from approximately 6.8 to 7.5 acres, which would result in a net increase in stormwater runoff that could lead to downstream erosion in receiving waters. However, as discussed above, the three linear modular wetland systems and three underground detention systems included in the project's design would be used for stormwater control and treatment in compliance with the requirements of the North Orange County MS4 Permit as detailed in **RCM WQ-3** and **RCM WQ-4**. With incorporation of LID techniques and hydromodification requirements as required by the North Orange County MS4 Permit, operational impacts related to on- or off-site erosion or siltation would be less than significant.

For the reasons listed above, impacts related to on- or off-site erosion or siltation would be less than significant, and no mitigation is required.

Threshold 4.10.3: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite (Appendix G); and

Would the project exceed the capacity of a channel and cause overflow during design storm conditions? (City of Lake Forest CEQA Significance Threshold)

Less Than Significant Impact. Under existing conditions, stormwater from the project site drains to various curb inlets where it enters storm drains that discharge to Serrano Creek, which flows into San Diego Creek Reach 2, which flows into San Diego Creek Reach 1, which flows into Newport Bay, which discharges into the Pacific Ocean (Kier & Wright 2023a). Development of the proposed project would result in an increase in impervious surfaces on the project site from approximately 6.8 acres to 7.5 acres, which could have the potential to increase the volume and rate of stormwater runoff discharged from the project site. However, as previously discussed, three linear modular wetland systems and three underground detention systems included in the project's design would be used for stormwater control and treatment in compliance with the requirements of the North Orange County MS4 Permit, as detailed in **RCM WQ-3** and **RCM WQ-4**. The proposed drainage facilities and BMPs needed to accommodate stormwater runoff would be appropriately sized to detain and control the release of stormwater runoff so that stormwater flows would not exceed the capacity of the storm drains and creek channels and cause overflow or on-site flooding during design storm conditions ~~would not occur~~. Therefore, with implementation of LID techniques and hydromodification requirements as required by the North Orange County MS4 Permit, the proposed project would not substantially increase the rate or amount of surface runoff in a manner that would exceed the capacity of a channel and cause overflow or result in flooding on- or off site during design storm conditions. Impacts would be less than significant, and no mitigation is required.

Threshold 4.10.3: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

iii. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact.

Stormwater Drainage System Capacity. Under existing conditions, stormwater from the project site drains to various curb inlets where it enters storm drains that discharge to Serrano Creek, which flows into San Diego Creek Reach 2, which flows into San Diego Creek Reach 1, which flows into Newport Bay, which discharges into the Pacific Ocean (Kier & Wright 2023a). The proposed project would include three linear modular wetland systems and three underground detention systems to reduce site discharge during the 100-year, 24-hour peak runoff rate by 47 percent. The proposed drainage facilities would be designed in compliance with the North Orange County MS4 Permit as detailed in **RCM WQ-3** and **RCM WQ-4**. The proposed drainage facilities and BMPs

needed to accommodate stormwater runoff would be appropriately sized to retain and gradually release stormwater runoff such that drainage facility capacity would not be exceeded during a design storm. Therefore, the proposed project would not result in an exceedance of planned or existing stormwater drainage systems and impacts would be less than significant.

Polluted Runoff. As discussed in Section 4.10.1, pollutants of concern during construction include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals, and each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. Drainage patterns would be temporarily altered during grading and other construction activities, and construction-related pollutants could be spilled, leaked, or transported via storm runoff into adjacent drainages and downstream receiving waters. However, as previously discussed and as detailed in **RCM WQ-1**, the proposed project would be required to comply with the requirements set forth by the CGP, including preparation of an SWPPP, which would specify BMPs to be implemented to control the discharge of pollutants in stormwater runoff as a result of construction activities. In addition, the proposed project must comply with Article XIII of Chapter 8.30 of the City's Municipal Code, which requires the preparation and submission of an Erosion Control Plan and that all grading be undertaken in accordance with BMPs for pollution prevention, as detailed in **RCM WQ-2**. Therefore, construction-related impacts would be less than significant, and no mitigation is required.

Expected pollutants of concern from long-term operations include suspended solids/sediment, nutrients, pathogens (bacteria/virus), pesticides, oil and grease, heavy metals, toxic organic compounds, and trash and debris. As previously discussed, and as detailed in **RCM WQ-3** and **RCM WQ-4**, compliance with the North Orange County MS4 Permit, the implementation of LID techniques, and the incorporation of operational BMPs to target pollutants of concern, would ensure that the proposed project would not discharge substantial sources of polluted runoff from the project site. Operation-related impacts would be less than significant, and no mitigation is required.

Threshold 4.10.3: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

iv. Impede or redirect flood flows <u>(Appendix G);</u>

<u>Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map (City of Lake Forest CEQA Significance Threshold); and</u>

<u>Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows? (City of Lake Forest CEQA Significance Threshold)</u>

No Impact. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) No. 06059C0316J, the project site is located in Zone X, which is identified as an area of minimal flood hazard (FEMA 2009). The proposed project would not alter the topography of the

project site, which is relatively flat, and would not substantially alter drainage patterns. Additionally, the proposed project does not include a housing component. Because the project site is not within a 100-year floodplain, the ~~Because the~~ proposed project would not place improvements and/or structures directly within a 100-year flood~~plain~~ hazard area, the proposed project would not impede or redirect flood flows, and there would be no impact. No mitigation is required.

Threshold 4.10.4: In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation (Appendix G);

Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam (City of Lake Forest CEQA Significance Threshold); and

Would the project cause inundation by seiche, tsunami, or mudflow? (City of Lake Forest CEQA Significance Threshold)

Less Than Significant Impact.

Flooding. According to FEMA FIRM No. 06059C0316J, the project site is located in Zone X, which is identified as an area of minimal flood hazard. Therefore, the proposed project would not risk release of pollutants due to project inundation due to flood hazard.

Tsunami. The project site is over 10 miles northeast of the Pacific Ocean at an elevation of approximately 700 feet above mean sea level. Based on the distance from the Pacific Ocean, the project site is not located in a tsunami hazard zone and therefore would not cause inundation by a tsunami, be susceptible to impacts associated with a tsunami, or expose people or structures to a significant risk of loss, injury or death as a result of a tsunami.

Seiches. Seiches are waves created in an enclosed body of water (e.g., a bay, lake, or harbor) that go up and down or oscillate and do not progress forward like standard ocean waves. Limited isolated damage to adjacent and down-slope structures has been observed from seiches occurring in swimming pools and in small shallow lakes and ponds. Manmade lakes within Lake Forest are shallow, with limited surface areas, and would not generate devastating seiches (City of Lake Forest 2019). There are no nearby enclosed bodies of water in the vicinity of the project site. Furthermore, there are no water bodies proposed as part of the project. Therefore, the proposed project would not cause inundation by seiche or risk release of pollutants due to project inundation due to seiche.

Dam Inundation/Levee Failure. According to the City of Lake Forest General Plan 2040, there are no dam inundation areas in the City of Lake Forest. Therefore, the proposed project would not risk release of pollutants due to dam inundation. Additionally, the proposed project is not located within a levee flood protection zone as defined by the State of California Department of Water

Resources[3]; therefore, the proposed project would not expose people or structures to a significant risk of loss, injury or death involving flooding as a result of a levee failure.

Mudflow. As described above, the topography of the project site is primarily flat with no steep slopes with loose soil, earth, or debris. Therefore, the proposed project would not cause inundation by mudflow.

The project site is not located within a flood, tsunami, seiche, mudflow, ~~or~~ dam or levee inundation area. Therefore, implementation of the proposed project would not cause inundation by seiche, tsunami, or mudflow, result in the release of pollutants from a flood, dam inundation, tsunami, or seiche; and would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam. Impacts would be less than significant, and no mitigation is required.

Threshold 4.10.5: Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan (Appendix G); and

Would the project have an impact on groundwater that is inconsistent with a groundwater management plan prepared by the water agencies with the responsibility for groundwater management? (City of Lake Forest CEQA Significance Threshold)

Less Than Significant Impact. The proposed project is within the jurisdiction of the Santa Ana RWQCB. The Santa Ana RWQCB adopted a Basin Plan (January 1995, with amendments effective on or before June 2019) that designates beneficial uses for all surface and groundwater within their jurisdiction and establishes the water quality objectives and standards necessary to protect those beneficial uses. As previously discussed, the proposed project would comply with existing NPDES permit requirements, including the CGP and North Orange County MS4 Permit, and would implement construction and operational BMPs to reduce pollutants of concern in stormwater runoff as detailed in **RCM WQ-1, RCM WQ-2, RCM WQ-3,** and **RCM WQ-4**. Compliance with these regulatory requirements would ensure that the proposed project would not degrade or alter water quality, cause the receiving waters to exceed the water quality objectives, or impair the beneficial use of receiving waters. As such, the proposed project would not result in water quality impacts that would conflict with the Basin Plan. Construction and operational impacts related to a conflict with the Basin Plan would be less than significant.

The Sustainable Groundwater Management Act (SGMA), which was enacted in September 2014, requires governments and water agencies of high- and medium-priority basins to halt overdraft of groundwater basins. The SGMA requires the formation of local Groundwater Sustainability Agencies (GSAs), which are required to adopt Groundwater Sustainability Plans (GSPs) to manage the sustainability of the groundwater basins. The project site is in the Coastal Plain of the Orange County Groundwater Basin, which the California Department of Water Resources designates as a medium priority basin (DWR 2020). As such, the preparation of a GSP is required for the Coastal Plain of the

[3] State of California Department of Water Resources, Water Code Section 9130. *Level Flood Protection Zone Map*. Website: https://gis.lfpz.water.ca.gov/lfpz/. Accessed: January 26, 2026.

Orange County Groundwater Basin. The GSAs identified for the Coastal Plain of the Orange County Groundwater Basin are Orange County Water District (OCWD), the City of La Habra, and the IRWD.

On January 1, 2017, the OCWD, the City of La Habra, and the IRWD submitted the Basin 8-1 Alternative to the California Department of Water Resources. The Basin 8-1 Alternative is an acceptable alternative to a GSP and includes elements that are described in the California Water Code (Sections 10727.2, 10727.4, and 10727.6) that are be included in GSPs. The Basin 8-1 Alternative includes four management areas consisting of the La Habra-Brea Management Area, the OCWD Management Area, the South East Management Area, and the Santa Ana Canyon Management Area. The project site is located within the South East Management Area (OCWD 2017).

The only groundwater production in the South East Management Area has historically been from six wells located in Lake Forest, within the IRWD service area. Currently only one well is active with an average production of about 125 acre-feet per year over the last 10 years. Imported water from the Metropolitan Water District is the primary water supply source for the entire South East Management Area. Groundwater production within the South East Management Area represents less than 2 percent of the potable water supply for IRWD's Lake Forest area and less than 0.2 percent of IRWD's 2015 potable supply. Despite several more recent years of significant drought, groundwater production in this area has generally remained the same. Due to the relatively low yield of the aquifer in the South East Management Area, groundwater production is expected to remain a relatively insignificant water supply source for the area. The sustainability goal for the South East Management Area is to recognize that it is a small part of the larger OCWD management area whose groundwater levels and water quality will be monitored to assure that conditions do not lead to significant and unreasonable lowering of groundwater levels, reduction in storage, water quality degradation, inelastic land subsidence or unreasonable adverse effect on surface water resources (OCWD 2017).

As previously discussed, the Geotechnical Investigation completed for the proposed project indicates the groundwater table is expected to exist at a depth in excess of 30 feet at the project site. The proposed project would require excavation to a maximum depth of 6 feet below the existing grade. Therefore, it is not anticipated that groundwater dewatering would be required during construction of the proposed project. Furthermore, construction would require minimal water supplies and only on a temporary basis. Therefore, construction of the proposed project would not conflict with or obstruct implementation of the GSP.

As discussed in Section 4.10.2, potable water would be partially obtained from groundwater. However, the 2020 Urban Water Management Plan indicates the IRWD has sufficient water supplies to meet water demands through 2045, including during multiple dry years. Additionally, the GSA has developed management actions to ensure that future development will not significantly impact groundwater resources. As described above, infiltration rates at the project site range from 0.1 to 0.3 inch per hour due to the presence of dense engineered fill soils comprised of silty sands and clayey sands that possess very poor infiltration characteristics. Therefore, the project site is not a significant source of groundwater recharge. As previously discussed, and as detailed in **RCM WQ-3,** compliance with the North Orange County MS4 Permit, the implementation of LID techniques, and the incorporation of operational BMPs to target pollutants of concern would ensure that the proposed project would not discharge substantial sources of polluted runoff from the project site. For these reasons, the proposed project would not conflict with or obstruct the implementation of a sustainable

groundwater management plan prepared by the water agencies with the responsibility for groundwater management. Therefore, construction and operational impacts related to conflicts with or obstruction of water quality control plans or sustainable groundwater management plans prepared by the water agencies with the responsibility for groundwater management would be less than significant, and no mitigation is required.

4.10.7 Cumulative Impacts

As defined in Section 15130 of the *State CEQA Guidelines*, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for hydrology and water quality.

For the cumulative analysis related to hydrology and water quality, the cumulative projects being considered include the related projects discharging to the same watersheds as the proposed project (i.e., the San Diego Creek and Newport Bay Watersheds). The related projects within the San Diego Creek and Newport Bay Watersheds include Related Project Nos. 1, 2, 3, 4, 6, 7, 9, 10, 11, 12, and 13. (Please refer to Table 4.A and Figure 4-1 in Section 4.0 of this Draft EIR for the descriptions and locations of these related projects.) Related Project Nos. 5 and 8 are within the Aliso Creek Watershed and are not considered in this analysis because they do not have the potential to contribute to the hydrology- and water quality-related impacts of the proposed project to result in cumulative impacts. Each of these related projects could potentially increase the volume of stormwater runoff and contribute to pollutant loading in stormwater runoff reaching both the City's storm drain system and the San Diego Creek and Newport Bay Watersheds, thereby resulting in cumulative impacts to hydrology and surface water quality.

Cumulative impacts are addressed only for those thresholds that would result in a project-related impact, whether it be less than significant or less than significant with mitigation. If the project would result in no impact with respect to a particular threshold, by definition, it would not contribute to a cumulative impact. Therefore, no analysis would be required.

As detailed in this section, the proposed project would not alter drainage patterns in a manner that would impede or redirect flood flows. Because the proposed project would not impede or redirect flood flows as a result of project-related changes to existing drainage patterns, it would not contribute to cumulatively considerable impacts on flood flows. Therefore, there would be no cumulatively considerable impact on flood flows resulting from changes to drainage patterns, and no mitigation is required.

As detailed in this section, new development and redevelopment can result in increased stormwater runoff and increased urban pollutants in stormwater runoff from project sites. Each related project must include BMPs to reduce impacts to water quality and hydrology in compliance with local ordinances and plans adopted to comply with requirements of the various NPDES permits including the CGP, the North Orange County MS4 Permit, and the City of Lake Forest Municipal Code. The preparation and approval of a SWPPP, erosion and sediment control plans (for construction), and a WQMP (for operation) would be required for each related project to determine appropriate BMPs to minimize water quality impacts. In addition, the preparation and approval of a hydrology study would be required to determine the hydrologic control required to minimize increases in runoff from each

site so they do not exceed existing conditions or result in hydromodification impacts. In addition, the City's Public Works Department reviews all development projects on a case-by-case basis to ensure that sufficient local and regional drainage capacity is available.

Each related project must consider impaired receiving waters and TMDLs for receiving waters. The TMDL program is designed to identify all constituents that adversely affect the beneficial uses of water bodies and then identify appropriate reductions in pollutant loads or concentrations from all sources so that the receiving waters can maintain/attain the beneficial uses in the Basin Plan. Thus, by complying with TMDLs, a project's contribution to overall water quality improvement in the San Diego/Newport Bay Watershed in the context of the regulatory program is designed to account for cumulative impacts.

Regional programs and BMPs such as TMDL programs and the MS4 Permit Program have been designed under an assumption that the San Diego Creek Watershed and Newport Bay Watershed would continue their pattern of urbanization. The regional control measures contemplate the cumulative effects of proposed development. The proposed project would be required to comply with the requirements of the CGP and the North Orange County MS4 Permit and implement construction and operational BMPs to reduce pollutants in stormwater runoff. Compliance with these regional programs and permits constitutes compliance with programs intended to address cumulative water quality impacts. As stated above, each related project would be required to develop a SWPPP, erosion and sediment control plans, a WQMP, and a hydrology study, and would be evaluated individually to determine appropriate BMPs and treatment measures to reduce impacts to surface water quality and hydrology. Because the proposed project and other related projects would comply with applicable NPDES requirements and would include BMPs to reduce the volume of stormwater runoff and pollutants of concern in stormwater runoff, the cumulative hydrology and water quality impacts of the proposed project and the related projects would be less than significant. Therefore, the proposed project would not contribute to a cumulatively considerable impact related to hydrology and water quality. Therefore, there would be no cumulatively significant impacts on hydrology and water quality, and no mitigation is required.

4.10.8 Level of Significance Prior to Mitigation

The proposed project would result in less than significant impacts related to hydrology and water quality.

4.10.9 Regulatory Compliance Measures and Mitigation Measures

4.10.9.1 Regulatory Compliance Measures

The following regulatory compliance measures are required for the proposed project:

RCM WQ-1 **Construction General Permit.** Prior to the issuance of a grading permit, the Construction Contractor shall obtain coverage under the State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2022-0057-DWQ, NPDES No. CAS000002) (Construction General Permit). This shall include submission of Permit Registration

Documents (PRDs), including a Notice of Intent for coverage under the permit to the SWRCB via the Stormwater Multiple Application and Report Tracking System (SMARTs). The Construction Contractor shall provide the Waste Discharge Identification Number (WDID) to the Lake Forest Public Works Director, or designee, to demonstrate proof of coverage under the Construction General Permit. Project construction shall not be initiated until a WDID is received from the SWRCB and is provided to the City, or designee.

A Storm Water Pollution Prevention Plan (SWPPP) shall be prepared by a Qualified SWPPP Developer in accordance with the requirements of the Construction General Permit and submitted vis SMARTs. These include: Best Management Practices (BMPs) for erosion and sediment control, site management/housekeeping/waste management, management of non-storm water discharges, run-on and runoff controls, and BMP inspection/maintenance/repair activities. BMP implementation shall be consistent with the BMP requirements in the most recent version of the California Stormwater Quality Association's Stormwater Best Management Handbook: Construction.

The SWPPP shall include a construction site monitoring program that identifies requirements for dry weather visual observations of pollutants at all discharge locations, and as appropriate (depending on the Risk Level), sampling of the site effluent and receiving waters. A Qualified SWPPP Practitioner shall be responsible for implementing the BMPs at the site and performing all required monitoring and inspection/maintenance/repair activities.

Upon completion of construction and stabilization of the site, a Notice of Termination shall be submitted via SMARTs.

RCM WQ-2 **City of Lake Forest Municipal Code.** Prior to the issuance of a grading permit, the Project Applicant shall submit and obtain approval of an Erosion Control Plan in compliance with Article XIII of Chapter 8.30 of the City of Lake Forest Municipal Code from the Lake Forest Public Works Director, or designee. The Erosion Control Plan shall be submitted to the City of Lake Forest Building Official for approval by September 15 each year for projects under a grading permit. All grading shall be undertaken in accordance with the BMPs for pollution prevention adopted by the City, the City's NPDES Permit regulating discharges into and from its Municipal Separate Storm Sewer System (MS4), the Drainage Area Management Plan (DAMP), and any other conditions, requirements and water quality management plans adopted by the City. Additionally, the project Applicant shall adhere to the erosion and sediment control and water quality system maintenance requirements listed in Section 8.30.154 of the Lake Forest Municipal Code.

RCM WQ-3 **Final Water Quality Management Plan.** Prior to issuance of a grading permit, the project Applicant shall submit and obtain approval of a Final Water Quality Management Plan (WQMP) to the Lake Forest Public Works Director, or designee. The project shall implement project design features identified in the Final WQMP. The

Final WQMP shall demonstrate that any proposed on-site development plan includes BMPs for source control, pollution prevention, site design, low impact development (LID) implementation, and structural treatment control. BMPs shall be designed and implemented to address 303(d) listed pollutants and retain the project site's **minimum** design capture volume and hydromodification volume to ensure that post-development storm water runoff volume or time of concentration does not exceed pre-development storm water runoff by more than 10 percent of the 2-year peak flow in accordance with the Santa Ana Regional Water Quality Control Board Order Number R8-2009-0030, NPDES Permit No. CAS618030, as amended by Order No. R8-2010-0062, also known as the North Orange County MS4 permit. The proposed LID BMPs specified in the Final WQMP shall be incorporated into the grading and development plans submitted to the City of Lake Forest for review and approval. Periodic maintenance of any required BMPs and landscaped areas during project occupancy and operation shall be in accordance with the schedule outlined in the Final WQMP.

RCM WQ-4 **Final Hydrology and Hydraulic Analyses.** Prior to issuance of grading permits, the project Applicant shall submit and obtain approval of the Final Hydrology and Hydraulic Analyses to the Lake Forest Director of Public Works, or designee, and the Orange County Flood Control District (OCFCD). The Final Hydrology and Hydraulic Analyses shall be prepared consistent with the requirements of the Orange County Hydrology Manual (Orange County Environment Agency 1986) and Orange County Hydrology Manual Addendum No. 1 (Orange County Environment Agency 1996), or subsequent guidance manuals. The Final Hydrology and Hydraulic Analyses shall confirm that the on-site storm drains, on-site detention basins, and any other drainage structures are appropriately sized to accommodate stormwater runoff from the design storm so that the peak flow of stormwater discharge from the project site is less than existing conditions. The Final Hydrology and Hydraulic Analyses shall also demonstrate that the detention facilities meet the hydromodification requirements of the *Waste Discharge Requirements for the County of Orange, Orange County Flood Control District and the Incorporated Cities of Orange County within the Santa Ana Region Areawide Urban Storm Water Runoff Orange County* (North Orange County MS4 Permit), Order R8-2009-0030, NPDES No. CAS618030 (as amended by Order No. R8-2010-0062). In compliance with the hydromodification requirements, the post-project runoff discharge volume for the 2-year storm shall not exceed that of the predevelopment condition by more than 5 percent, and the time of concentration of post-development runoff for the 2-year storm event shall not be greater than 5 percent less than that of the predevelopment condition. The Director of the City of Lake Forest Public Works Department, or designee, shall ensure that the drainage facilities specified in the Final Hydrology and Hydraulic Analyses are incorporated into the final project design.

4.10.9.2 Mitigation Measures

The proposed project would not result in significant impacts related to hydrology and water quality, and no mitigation is required.

4.10.10 Level of Significance after Mitigation

The proposed project would result in less than significant impacts related to hydrology and water quality.

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APPENDIX E

REVISED SECTION 4.11: LAND USE AND PLANNING

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4.11 LAND USE AND PLANNING

This section evaluates the potential impacts to land use and planning from implementation of the proposed project. This section is based in part on the following:

- *City of Lake Forest General Plan* (City of Lake Forest 2020);
- *City of Lake Forest General Plan Land Use Map* (City of Lake Forest 2023);
- *City of Lake Forest Zoning Code* (City of Lake Forest 2023); and
- *City of Lake Forest Zoning Map* (City of Lake Forest 2023).

In addition, pursuant to *State CEQA Guidelines* Section 15125(d), this Draft Environmental Impact Report (EIR) evaluates the proposed project's consistency with other applicable planning documents as they relate to specific topical sections within Chapter 4.0 of this Draft EIR.

4.11.1 Scoping Process

The Notice of Preparation (NOP) for the proposed project was published in March 2024, and public Scoping Meetings were held on April 3, 2024, and April 24, 2024. The City of Lake Forest (City) received 120 comment letters during the public review period of the Initial Study NOP. For a copy of the NOP comment letters received, refer to Appendix A of this Draft EIR. Twenty-six comment letters included comments related to land use and planning. These comments pertain to concerns about incompatibility with existing surrounding land uses and the Lake Forest 2040 General Plan and zoning.

4.11.2 Methodology

The analysis of potential land use and planning impacts is based on assessing the context of the proposed project (i.e., its geographic location and compatibility with surrounding development) and the proposed project's consistency with relevant land use plans, policies, or regulations contained in applicable planning documents adopted by the City and other agencies for the purpose of avoiding or mitigating an environmental effect that could cause a significant environmental impact. A project's inconsistency with a plan or policy is only considered significant if such inconsistency would result in a significant physical environmental impact.[1] In other words, a policy or program conflict is not in and of itself considered a significant environmental impact. An inconsistency between the proposed project and an applicable plan is a legal determination that may or may not indicate the likelihood of an environmental impact.

4.11.3 Existing Environmental Setting

4.11.3.1 On-Site Land Uses

The project site is located at 26200 Enterprise Way in the north-central portion of Lake Forest in Orange County, California. The 8.83-acre project site (Assessor's Parcel Number [APN] 610-401-06) is developed with an existing 144,906-square-foot (sq ft), two-story tilt-up office/industrial building, which was previously used as an office, manufacturing, and research testing facility by Panasonic

[1] *State CEQA Guidelines* Section 15382.

Avionics, but is currently vacant. The project site also consists of surface parking and associated landscaping.

The project site is generally flat; however, there are north- and west-facing slopes along the eastern and southern boundaries of the site. These slopes ascend 10 to 15 feet from the project site to the adjacent property. A concrete-lined drainage swale is near the midpoint of the slope. Vegetation covers the remaining areas of the slopes.

Access to the project site is currently provided via two driveways on Enterprise Way and a shared drive aisle that connects to the adjacent property at the northeast corner of the site.

4.11.3.2 Offsite Land Uses

As shown on Figure 3-2, Project Location, in Chapter 3.0, Project Description, the areas surrounding the project site consist of a mix of land uses, including industrial and residential. The project site is bordered to the north, south, and west by existing industrial buildings that include a mix of permitted uses, including office, manufacturing, and warehouse uses. The Meadows Residential Development (formerly the Nakase Nursery site) is to the northeast/east of the project site. Most of the Meadows Residential Development is constructed and occupied, but some residential buildings are still under construction. The existing on-site and adjacent off-site land uses are summarized in Table 4.11.A and are identified on previously referenced Figure 3-2.

Table 4.11.A: Existing On-Site and Adjacent Off-Site Land Uses and Land Use Designations

Location	Current Land Use	General Plan Land Use Designation	Zoning
On-site	Industrial/Office Building	Light Industrial	Pacific Commercentre Planned Community, LI – Light Industrial
North	Industrial/Office, single-family residential, neighborhood park	Light Industrial, Community Park/Open Space, Low-Medium Density Residential	Pacific Commercentre Planned Community, LI – Light Industrial The Meadows Planned Community, EH/BT-Estate Homes/Backyard Towns and NP-Neighborhood Park
South	Industrial/Office	Light Industrial	Pacific Commercentre Planned Community, LI – Light Industrial
East	Industrial/Office, single-family residential	Light Industrial, Low-Medium Density Residential	Pacific Commercentre Planned Community, LI – Light Industrial The Meadows Planned Community, EH/BT-Estate Homes/Backyard Towns
West	Industrial/Office	Light Industrial	Pacific Commercentre Planned Community, LI – Light Industrial

4.11.3.3 General Plan Land Use and Zoning Designations

The project site currently has a Lake Forest General Plan land use designation of Light Industrial. The Light Industrial designation is intended to provide for a variety of light industrial uses. Permitted uses include wholesale businesses, light manufacturing and processing, research and development uses,

warehousing and storage, distribution and sales, high technology production, ancillary retail sales, and related uses. Other uses that are determined to be compatible with the primary uses may also be allowed.

The project site is located within the Pacific Commercentre Planned Community and has a zoning designation of LI – Light Industrial. The LI Zoning District is intended to provide for a broad range of industrial uses as specified in City Municipal Code Section 9.72.090 (Non-Residential Land Use Matrix), column "I". Permitted uses include, but are not limited to, a variety of office, manufacturing, and warehouse uses.

4.11.4 Regulatory Setting

Federal, State, and local regulations and programs related to land use and planning that are applicable to the proposed project are described below.

4.11.4.1 Federal Regulations

There are no federal regulations that apply to the proposed project with respect to land use and planning.

4.11.4.2 State Regulations

California State Planning and Zoning Law. This law, which is codified in California Government Code Sections 65000-66037, delegates most of the State's local land use and development decisions to cities and counties. The California Government Code establishes specific requirements pertaining to the regulation of land uses by local governments, including general plan requirements, specific plans, subdivisions, and zoning. California Government Code Section 65302 requires that all California cities and counties including the following seven elements in their general plan: land use, circulation, housing, conservation, open space, noise, and safety. Cities and counties in the South Coast Air Quality Management District (SCAQMD) must also address air quality in their general plans. Cities and counties that have identified disadvantaged communities must also address environmental justice in their general plans, including air quality.[2]

Sustainable Communities and Climate Protection Act of 2008 (Senate Bill 375). Senate Bill (SB) 375 was enacted to reduce greenhouse gas emissions from automobiles and light trucks through integrated transportation, land use, housing, and environmental planning. This statute requires California's regional planning agencies to include a Sustainable Communities Strategy (SCS) or an Alternative Planning Strategy (APS)[3] in their Regional Transportation Plans (RTP). The SCS provides a

[2] Senate Bill 1000, adopted in 2016, requires both cities and counties that have disadvantaged communities to incorporate environmental justice (EJ) policies into their general plans, either in a separate EJ element or by integrating related goals, policies, and objectives throughout the other elements. This update, or revision if the local government already has EJ goals, policies, and objectives, must happen "upon the adoption or next revision of two or more elements concurrently on or after January 1, 2018."

[3] If the emissions reduction targets cannot be met through the Sustainable Communities Strategy, an Alternative Planning Strategy would be prepared that demonstrates how the reduction targets would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies.

plan for meeting the regional emissions reduction targets established by the California Air Resources Board (CARB). SB 375 also offers local governments regulatory and other incentives to encourage more compact new development and transportation alternatives.

The requirements of SB 375 are reflected in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) adopted by the Southern California Association of Governments (SCAG), which serves as the regional planning agency in the six-county metropolitan region composed of Orange, Los Angeles, Ventura, Riverside, San Bernardino, and Imperial Counties. The 2020-2045 RTP/SCS and 2024–2050 RTP/SCS is discussed in further detail below.

4.11.4.3 Regional Regulations

The project site is covered by several planning documents and programs that have varying degrees of regulation over use of the project site. The following paragraphs explain regional regulations, plans, and policies applicable to the project site that are analyzed in this EIR section.

Southern California Association of Governments (SCAG). As discussed above, regional planning in Orange, Los Angeles, Ventura, Riverside, San Bernardino, and Imperial Counties is conducted by SCAG. SCAG is also the federally designated Metropolitan Planning Organization (MPO) for these six counties. As the designated MPO, SCAG is mandated by the federal government to research and prepare plans for transportation, a growth forecast, hazardous waste, and air quality. The growth forecast serves as the foundation of these plans. Of the various plans adopted by SCAG, the Regional Comprehensive Plan and the 2020-2045 RTP/SCS and 2024–2050 RTP/SCS are relevant to the proposed project (SCAG 2022).

Regional Comprehensive Plan and Guide. In 2008, SCAG adopted the Regional Comprehensive Plan (RCP) for the purpose of providing a comprehensive strategic plan for defining and solving housing, traffic, water, air quality, and other regional challenges. The 2008 RCP has two primary objectives in implementing this strategic plan: (1) integrating transportation, land use, and air quality planning approaches, and (2) outlining key roles for public and private sector stakeholders to implement reasonable policies regarding transportation, land use, and air quality approaches. While the 2008 RCP outlines several policies to inform local decision-makers within the SCAG region with respect to policy and planning decisions, these policies are considered recommendations and are not mandated by law. With respect to land use policy, the 2008 RCP includes a Land Use and Housing chapter that aims to link land use and transportation planning decisions to the projected population and economic growth in the SCAG region. Specifically, the Land Use and Housing chapter of the 2008 RCP promotes sustainable planning for land use and housing in the SCAG region by maximizing the efficiency of the existing circulation network, providing a greater variety in housing types, promoting a diverse and growing economy, and protecting the existing natural environment.

Regional Transportation Plan/Sustainable Communities Strategy. SCAG adopted the 2024-2050 RTP/SCS on April 4, 2024. However, the CARB has not yet approved the 2024-2050 RTP/SCS. Therefore, this EIR evaluates the proposed project's consistency with both the 2020-2045 RTP/SCS and the more recent 2024-2050 RTP/SCS. The core vision of the 2020-2045 RTP/SCS and the 2024–2050 RTP/SCS is to better manage the existing transportation system through design

management strategies, integrate land use decisions and technological advancements, create complete streets that are safe to all roadway users, preserve the transportation system, and expand transit and foster development in transit-oriented communities. Both the 2020-2045 RTP/SCS and 2024–2050 RTP/SCS contain transportation projects to help more efficiently distribute population, housing, and employment growth, as well as forecast development that is generally consistent with regional-level general plan data. The forecasted development pattern, when integrated with the financially constrained transportation investments identified in the 2020-2045 RTP/SCS and the 2024–2050 RTP/SCS, would reach the regional target of reducing GHG emissions from autos and light-duty trucks by 19 percent by 2035 (compared to 2005 levels). Neither the 2020-2045 RTP/SCS nor the 2024–2050 RTP/SCS require that local general plans, specific plans, or zoning be consistent with the RTP/SCS but both plans provide incentives for consistency for governments and developers.

4.11.4.4 Local Regulations

City of Lake Forest General Plan 2040. The General Plan is a comprehensive plan intended to guide the physical development of the city and it serves as a blueprint for future growth and development. As a blueprint for the future, the plan contains policies and programs designed to provide decision-makers with a solid basis for decisions related to land use and development. The Land Use and Design Element of the Lake Forest General Plan 2040 includes the following goals, policies, and actions related to land use and planning:

Goal LU-1 Land Use Mix: A community with a balanced land use pattern that meets the City's long-term housing, employment, and civic needs.

Policy LU-1.1 Land Use Pattern: Promote an appropriate land use plan that fosters and enhances community livability and public health; supports economic development; promotes efficient development and multiple transportation options; reduces pollution, greenhouse gas emissions, and the expenditure of energy and other resources; and ensures compatibility between uses.

Policy LU-1.4 Density and Intensity: Allow sufficient density and intensity to enable new development to support all required infrastructure, community facilities, and open space.

Policy LU-1.8 Consistent Standards: Require projects to adhere to the City's Municipal Code.

Goal LU-2 Compatible Development: A community where new development blends harmoniously into the existing neighborhood fabric.

Policy LU-2.1 Physical Characteristic Compatibility: Ensure that new development fits within the existing community setting and is compatible with surrounding land uses and public infrastructure availability.

Policy LU-2.4 Scale and Character: Ensure that the scale and character of new development is appropriate to the setting and intended use.

Policy LU-2.5 Visual Compatibility: Require new development projects achieve visual compatibility with surrounding development through building, site, or design techniques, such as landscaping and architectural design, to achieve visual compatibility.

Policy LU-2.7 Interface with Residential Areas: Promote compatibility of adjacent land uses along the interface of different residential density and non-residential intensity categories by paying special attention to buffers and transitional areas.

Policy LU-2.9 Code Enforcement: Require property owners to maintain homes, structures, and property in good condition; continue code enforcement activities that address nuisances that detract from the City's health, safety, and community image.

Action LU-2a: As part of the City's development review process, ensure that commercial projects are designed to be compatible with residential uses, including appropriate building massing and scale and minimization of impacts related to the operation of the use. Review of employment-generating projects should ensure that the following design concepts are addressed in projects that abut residential areas:

- Appropriate building scale and/or siting;
- Site design and noise-attenuating features to avoid exposure to excessive noise due to long hours of operation or inappropriate location of accessory structures;
- Site and structure design to avoid excessive glare or excessive impacts from light sources onto adjacent properties; and
- Site design to avoid unnecessary loss of community and environmental resources (archaeological, historical, ecological, recreational, etc.).

Action LU-2e: Continue to enforce the Zoning Ordinance and other ordinances to achieve the desired level of regulation.

Goal LU-3 Placemaking: A distinct community image and identity that promotes Lake Forest as a desirable place to live and do business.

Policy LU-3.4 High-Quality Desing. Promote high-quality design for all public and private development projects, including building form, site design, landscaping, lighting, signage, and other components which impact the visual quality of a project.

Policy LU-3.5 Nonresidential Area Revitalization: Promote rehabilitation of older commercial and industrial properties and buildings to enhance their quality and competitive advantage.

Goal LU-4 Streetscapes: A community with streetscapes that enhance the economic vitality and overall visual quality of the City, support the circulation network, and encourage pedestrian-scale streets and patterns of activity.

Policy LU-4.3 Building Massing: Reduce the bulk and perceived size of large buildings by dividing their mass into smaller parts, stepping down to adjacent structures, recessing openings for doors/windows, and using pedestrian-scale features; single-plane massing is discouraged.

Policy LU-4.4 Building Footprint: Require and enforce appropriate residential and nonresidential development standards, including adequate building setbacks, to ensure that a building's footprint does not negatively affect adjacent uses or the visual quality of the area.

The Economic Development Element of the Lake Forest General Plan 2040 includes the following goals and policies related to land use and planning:

Goal ED-1 Economic Diversification: A City with a diverse economy that fosters fiscal sustainability.

Policy ED-1.1 Land Uses: Maintain land use policies that allow for a balanced variety of housing and business types.

Policy ED-1.2 Industry and Workforce: Pursue strategies that support the attraction and retention of diverse industries and a diverse workforce.

Policy ED-1.3 Revenue Sources: Pursue land use and business attraction and retention strategies that enhance the diversity of municipal revenue sources.

City of Lake Forest Municipal Code. Zoning is the division of a city into districts and the application of land use and development regulations specific to each district. The City of Lake Forest's Zoning Code is located in Title 9 of the Lake Forest Municipal Code. The City also has 10 Planned Communities that are part of the City's Zoning Code. Development in a Planned Community area is subject to compliance with the Planned Community text. Uses, structures, conditions, and situations that are not addressed in a Planned Community text, but are addressed in the Zoning Code, shall be governed by the Zoning Code. As such, the City's Zoning Code and Planned Community texts include use regulations and development standards, including but not limited to, zone-specific height limits, setback requirements, landscape requirements and parking regulations.

It is the intent of the City that the General Plan Land Use Element and the Zoning Code be consistent to ensure that long-term goals and objectives are implemented through land use regulations and other tools. The Zoning Code is a primary tool for implementing the City's General Plan. The project site is located within the Pacific Commercentre Planned Community and has a zoning designation of LI – Light Industrial. The LI Zoning District is intended to provide for a broad range of industrial uses as specified in City Municipal Code Section 9.72.090 (Non-Residential Land Use Matrix), column "I". Permitted uses include a variety of office, manufacturing, and warehouse uses.

4.11.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines* and the *City of Lake Forest CEQA Significance Thresholds Guide* (2025). A number of the City of Lake Forest

CEQA Significance Thresholds are fundamentally the same as those detailed in Appendix G of the State CEQQ Guidelines. However, some of the City of Lake Forest CEQA Significance Thresholds expand upon the State CEQA Guidelines Appendix G thresholds. In instances where the City of Lake Forest CEQA Significance Thresholds expand upon the *State CEQA Guidelines* Appendix G thresholds, the detailed threshold is provided below and is analyzed under Section 4.11.6, Project Impacts. Based on these thresholds, implementation of the proposed project would have a significant adverse impact with respect to land use and planning if it would:

Appendix G of the *State CEQA Guidelines*:

Threshold 4.11.1: Physically divide an established community; or

Threshold 4.11.2: Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

City of Lake Forest CEQA Significance Thresholds:

- Substantially conflict with existing on-site or adjacent land use due to project-related significant unavoidable indirect effects (e.g., noise, aesthetics, etc,) that precludes use of the land as it was intended by the General Plan.

- Conflict with the Central and Coastal Natural Communities Conservation Program/Habitat Conservation Plan (NCCP/HCP) of which the City of Lake Forest is a participant.

4.11.6 Project Impacts

Threshold 4.11.1: Would the project physically divide an established community?

No Impact. The physical division of an established community typically refers to the construction of a physical feature (e.g., an interstate highway or railroad tracks) or removal of a means of access (e.g., a local road or bridge) that would impair mobility within an existing community or between a community and outlying areas. For instance, the construction of an interstate highway through an existing community may constrain travel from one side of the community to another; similarly, such construction may also impair travel to areas outside the community.

The proposed project includes the demolition of an existing 144,906 sq ft, two-story office/industrial building and the construction and operation of a 35-foot-tall, 165,803 sq ft, two-story industrial building. Although the tenant has not been determined yet, the proposed project includes a mix of office (approximately 10,000 sq ft), manufacturing (up to 65,000 sq ft), and warehouse space (the remainder of the building square footage not otherwise utilized as office or manufacturing). A maximum of 23 usable dock high doors, a gated truck loading area, and up to 262 parking spaces for passenger vehicles would be provided for this proposed use. The project site is primarily surrounded by sites with the same zoning designation (i.e., LI), and the proposed project would be consistent with the type and intensity of development in the area. The project site is bordered by a residential

community to the east; however, access to the residential community is provided via Bake Parkway and Rancho Parkway and there are no shared access roads with the proposed project or surrounding industrial park uses. Therefore, implementation of the proposed project would not physically divide the established residential community to the east. Furthermore, vehicular access to the project site would continue to be provided via existing driveways on Enterprise Way and a shared drive aisle that connects to the adjacent property at the northeast corner of the site. The proposed project would not require the construction of any new infrastructure that would divide an established community and would not remove any means of access to the community. Therefore, the proposed project would have no impact related to physically dividing an established community, and no mitigation is required.

Threshold 4.11.2: Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect (Appendix G); and

Would the project substantially conflict with existing on-site or adjacent land use due to project-related significant unavoidable indirect effects (e.g., noise, aesthetics, etc,) that precludes use of the land as it was intended by the General Plan (City of Lake Forest CEQA Significance Threshold); and

Would the project conflict with the Central and Coastal Natural Communities Conservation Program/Habitat Conservation Plan (NCCP/HCP) of which the City of Lake Forest is a participant? (City of Lake Forest CEQA Significance Threshold)

No Impact. The main documents guiding development and regulating land uses in Lake Forest are the City's General Plan, Zoning Code, and Citywide Design Guidelines. The proposed project's relationship to these planning documents is described below. The proposed project's relationship to SCAG's Regional Comprehensive Plan and RTP/SCS is also discussed below.

City of Lake Forest General Plan. The General Plan is a comprehensive plan intended to guide the physical development of the city and it serves as a blueprint for future growth and development. As a blueprint for the future, the plan contains policies and programs designed to provide decision-makers with a solid basis for decisions related to land use and development. The project site currently has a Lake Forest General Plan land use designation of Light Industrial. The Light Industrial designation is intended to provide for a variety of light industrial uses. Allowable uses include wholesale businesses, light manufacturing and processing, research and development uses, warehousing and storage, distribution and sales, high technology production, ancillary retail sales, and related uses. Other uses that are determined to be compatible with the primary uses may also be allowed. The proposed project is an allowable use that is consistent with the Light Industrial land use designation.

Table 4.11.B provides a consistency analysis of the General Plan goals, policies, and actions that are applicable to the proposed project. As stated in Table 4.11.B, the proposed project would be consistent with the General Plan.

City of Lake Forest Zoning Ordinance. The City's Zoning Code is the primary implementation tool for its General Plan Land Use Element (2020) and the goals and policies therein. For this reason, the

Zoning Map must be consistent with the General Plan Land Use Map. The project site has a zoning designation of Light Industrial (LI) in the Pacific Commercentre Planned Community, which is consistent with the Light Industrial General Plan land use designation. The project site has been zoned LI since 1987. The property is regulated by the Pacific Commercentre Planned Community and the City's Zoning Code (Title 9 of the Lake Forest Municipal Code). The LI Zoning District is intended to provide for a broad range of industrial uses as specified in City of Lake Forest Municipal Code Section 9.72.090 (Non-Residential Land Use Matrix), column "I." Permitted uses include, but are not limited to, a variety of office, manufacturing, and warehouse uses. Pursuant to the zoning, the proposed industrial building is a permitted use and the construction of the proposed building requires a Site Development Permit.

Table 4.11.C provides a consistency analysis of the Site Development Standards from the LI zoning district in the Pacific Commercentre Planned Community and the Zoning Code that are applicable to the proposed project. As stated in Table 4.11.C, the proposed project would be consistent with all of the applicable development standards.

As stated above, the project site is located within the Pacific Commercentre Planned Community and has been zoned IL since 1987. The project site is bordered by industrial land uses except for the Meadows Residential Development which is located to the east. Chapter 4 of this EIR, provides a detailed analysis of the proposed project's direct and indirect impacts on the environment and concludes that the proposed project would not cause project-related significant unavoidable indirect effects that would preclude the use of on-site or adjacent land as intended by the City's General Plan. For example, as discussed under Threshold 4.1.3 (pages 4.1-23 and 4.1-28) in Section 4.1, Aesthetics, of this EIR (refer to Appendix B of the Final EIR for a copy of revised Section 4.1), the proposed project is consistent with the City's site development standards and the existing character of the immediately surrounding industrial business park. Therefore, the proposed project would not indirectly cause changes to the aesthetics of future surrounding developments and would not preclude the use of on-site or adjacent land as intended by the City's General Plan. Similarly, as discussed under Threshold 4.13.1 (pages 4.13-18 through 4.13-19) in Section 4.13, Noise, of this EIR (refer to Appendix F of the Final EIR for a copy of revised Section 4.13), construction and operation of the proposed project would not exceed the City's noise thresholds; and therefore, would not result in indirect noise-related impacts that would preclude use of on-site or adjacent land as intended by the City's General Plan.

As discussed in Section 4.8, Greenhouse Gas Emissions and Section 4.17, Transportation and Traffic, the proposed project exceeds the City's threshold for VMT and, therefore, conflicts with the goals of the State's 2022 Scoping Plan to reduce GHGs as they relate to VMT resulting in a direct project-related significant unavoidable impact. However, the proposed project's VMT and GHG impacts would not result in an indirect significant unavoidable impact and would not conflict with existing or proposed on-site or adjacent land uses or preclude use of the on-site or adjacent land as intended by the City's General Plan. Therefore, the proposed project would not result in significant unavoidable direct or indirect effects to on-site or off-site land uses that would preclude the use of the land as it was intended by the General Plan.

Table 4.11.B: General Plan Consistency Analysis

General Plan Goals, Policies, and Actions	General Plan Consistency Analysis
Goal LU-1 Land Use Mix: A community with a balanced land use pattern that meets the City's long-term housing, employment, and civic needs.	
Policy LU-1.8 Consistent Standards: Require projects to adhere to the City's Municipal Code.	**Consistent.** As detailed in Table 4.11.C, the proposed project would be consistent with the City's Zoning Code and the Pacific Commercentre Planned Community. Therefore, the proposed project would not conflict with these General Plan Policies.
Goal LU-2 Compatible Development: A community where new development blends harmoniously into the existing neighborhood fabric.	
Policy LU-2.1 Physical Characteristic Compatibility: Ensure that new development fits within the existing community setting and is compatible with surrounding land uses and public infrastructure availability.	**Consistent.** The proposed industrial building is located within the Pacific Commercentre Planned Community. The Pacific Commercentre Planned Community was developed as a master planned industrial business park with local streets providing internal circulation. The buildings in the Planned Community include a mix of warehouse, distribution, manufacturing, research and development and offices. The proposed industrial building is consistent with the type, scale, and intensity of the existing industrial development in the Pacific Commercentre Planned Community. The proposed project includes the replacement of an existing 2-story concrete tilt-up industrial building with a new 2-story concrete tilt-up industrial building. The subject site is adjacent to the Meadows Residential Community to the northeast/east. The project site is not connected to the Meadows Residential Community by any streets or walkways. Furthermore, a landscape buffer separates the Meadows Residential Community and the industrial area. The proposed project includes the installation of additional landscaping and mature trees along the northeastern corner of the project site, adjacent to the Meadows Community. This new landscaping will further reduce the visibility of the industrial site as viewed from the Meadows Community. Furthermore, the building was designed so that the truck dock and loading area of the proposed building is oriented to the southeast (not facing the residential properties), is located over 200 feet away from the nearest residential property line, and would not be readily visible from the residences. As such, the new proposed building is compatible with the surrounding land uses. As detailed in Sections 4.13 Noise, 4.1 Aesthetics, and 4.3 Air Quality, the proposed project would not result in excessive noise, smoke, dust, light or glare that would impact the nearby residences. The overall building treatment and façade is compatible with the existing architecture of the industrial buildings
Policy LU-2.2 Sensitive Uses: Locate residences away from areas of excessive noise, smoke, or dust and ensure that adequate mitigation measures, including buffers or transitional uses, are made to ensure the health and well-being of existing and future residents.	
Policy LU-2.4 Scale and Character: Ensure that the scale and character of new development is appropriate to the setting and intended use.	
Policy LU-2.5 Visual Compatibility: Require new development projects achieve visual compatibility with surrounding development through building, site, or design techniques, such as landscaping and architectural design, to achieve visual compatibility.	
Policy LU-2.7 Interface with Residential Areas: Promote compatibility of adjacent land uses along the interface of different residential density and non-residential intensity categories by paying special attention to buffers and transitional areas.	
Action LU-2a: As part of the City's development review process, ensure that commercial projects are designed to be compatible with residential uses, including appropriate building massing and scale and minimization of impacts related to the operation of the use. Review of employment-generating projects should ensure that the following design concepts are addressed in projects that abut residential areas: • Appropriate building scale and/or siting; • Site design and noise-attenuating features to avoid exposure to excessive noise due to long hours of operation or inappropriate location of accessory structures; • Site and structure design to avoid excessive glare or excessive impacts from light sources onto adjacent properties; and • Site design to avoid unnecessary loss of community and environmental resources (archaeological, historical, ecological, recreational, etc.).	

Table 4.11.B: General Plan Consistency Analysis

General Plan Goals, Policies, and Actions	General Plan Consistency Analysis
Action LU-2b: As part of the City's development review process, ensure that new developments are designed to minimize glare and light impacts onto adjacent properties.	in the Pacific Commercentre Planned Community. The proposed building would be constructed of architecturally enhanced tilt-up concrete panels and would be painted different shades of gray with a blue accent. The building architecture utilizes scoring, color transitions, and windows to provide articulation to the facades of the building. The truck doors, which would be painted to match the building, would be located on the south elevation of the building, and would not be visible from the surrounding streets or residential properties. All lighting associated with the proposed project would be hooded or shielded to focus the light downward and prevent light spillage onto adjacent properties. The Applicant has provided a photometric plan that shows low illumination at the property lines adjacent to the light industrial areas and no illumination at the property line adjacent to the residential property. The building materials (e.g., concrete, glass, metal) and proposed uses are typical of those found in the surrounding areas and would not create unusual or isolated glare effects that would affect daytime visibility or views in the project vicinity. As detailed in Table 4.11.C, the proposed project would be consistent with the permitted uses and development standards of the City's Zoning Code and the Pacific Commercentre Planned Community. Additionally, as detailed in the Biological Resources, Cultural Resources, Recreation, and Tribal Cultural Resources sections of this EIR, the proposed project would not result in an unnecessary loss of community and environmental resources (archaeological, historical, ecological, recreational, etc.). The proposed project would not conflict with these General Plan Policies or actions.
Goal LU-3 Placemaking: A distinct community image and identity that promotes Lake Forest as a desirable place to live and do business.	
Policy LU-3.4 High-Quality Design: Promote high-quality design for all public and private development projects, including building form, site design, landscaping, lighting, signage, and other components which impact the visual quality of a project.	**Consistent.** The proposed building would be similar in design, scale, and character to existing surrounding industrial uses. The proposed building would be constructed of architecturally enhanced tilt-up concrete panels and would be painted different shades of gray with a blue accent. The building architecture utilizes scoring, color transitions, and windows to provide articulation to long facades of the building. The truck doors, which would be painted to match the building, would be located on the south elevation of the building, and would not be visible from the surrounding streets, nor residential properties. The overall building treatment and façade will be compatible and consistent
Policy LU-3.6 Architectural Styles: Promote architectural styles that emphasize the established community identity while allowing for the introduction of other appealing architectural design strategies that are compatible with their surroundings.	

Table 4.11.B: General Plan Consistency Analysis

General Plan Goals, Policies, and Actions	General Plan Consistency Analysis
	with the remainder of the existing, surrounding industrial park. The proposed project would not impact any existing parks, trails, or scenic vistas and would enhance streetscapes by providing a variety of trees, shrubs and ground cover and maintaining the existing landscaping around the perimeter of the project site. The proposed project would result in the redevelopment of an older and underutilized site with a new industrial building with improved quality and enhanced site and building design. The proposed project would not conflict with these General Plan Policies.
Goal LU-4 Streetscapes: A community with streetscapes that enhance the economic vitality and overall visual quality of the City, support the circulation network, and encourage pedestrian-scale streets and patterns of activity.	
Policy LU-4.3 Building Massing: Reduce the bulk and perceived size of large buildings by dividing their mass into smaller parts, stepping down to adjacent structures, recessing openings for doors/windows, and using pedestrian-scale features; single-plane massing is discouraged.	**Consistent.** The proposed project would enhance streetscapes by providing a variety of trees, shrubs and ground cover and maintaining the existing landscaping around the perimeter of the project site. The proposed project would include an on-site accessible path of travel through the parking lot that would lead to a paved walkway along the north side of the building and would connect to an existing striped crosswalk across Enterprise Way. The proposed building would be constructed of architecturally enhanced tilt-up concrete panels and would be painted different shades of gray with a blue accent. The building's main entrances would be emphasized with vertical and horizontal bands, windows, and decorative light sconces. The building architecture utilizes scoring, color transitions, and windows to provide articulation to long facades of the building. The proposed building would be consistent with allowable building setbacks and, as detailed in Table 4.11.C, the proposed project would be consistent with the City's Zoning Code and permitted uses and developed standards of the Pacific Commercentre Planned Community. Additionally, the proposed project would include the installation of landscaping and mature trees around the project site and proposed building with densely placed mature trees along the northeastern corner of the proposed building and project site to reduce the visibility of the project site from adjacent residential uses and to improve the overall visual quality of the site The proposed project would not conflict with these General Plan Policies.
Policy LU-4.4 Building Footprint: Require and enforce appropriate residential and nonresidential development standards, including adequate building setbacks, to ensure that a building's footprint does not negatively affect adjacent uses or the visual quality of the area.	

Table 4.11.B: General Plan Consistency Analysis

General Plan Goals, Policies, and Actions	General Plan Consistency Analysis
Goal M-1 Regional and Local Roads: A transportation system that meets and balances local and regional mobility needs.	
Action M-1b: As part of the development review process, the Community Development Department and the Public Works Department shall require developers to complete and fund the following: 1. A local transportation analysis to ensure that the site plan incorporates City transportation goals, policies, and standards, that identifies the effects of the project on the local transportation system, and identifies improvements to maintain adopted LOS standards for operations at signalized city-controlled intersections; 2. The project's proportional share of the effects on the City's circulation network through payment of fees; and 3. For local project-related circulation effects requiring improvements that are not included in an adopted fee program, either complete the necessary improvements or pay a proportional share of the cost.	**Consistent.** As part of the proposed project, off-site improvements would be made at 5 intersections to enhance public safety and address concerns related to large truck turning movements. Based on the results of the TIA, the proposed project would not result in any level of service (LOS) deficiencies or impacts. Therefore, the existing intersections and roadways~~, including City-designated truck routes,~~ would be able to accommodate all traffic (passenger vehicles and trucks) associated with implementation of the proposed project. The TIA is consistent with the objectives and methodologies set forth in the City's TA Guidelines, the 2021 Congestion Management Program (CMP) for Orange County, and applicable provisions of CEQA. The proposed project would not conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Items 2 and 3 of this action are not applicable to the proposed project. The proposed project would not conflict with these General Plan Policies or actions.
Goal M-5 Bicycle, Pedestrian, and Equestrian Use: Support and promote the use of pedestrian, bicycle, and equestrian facilities.	
Policy M-5.1 Promote Non-Vehicular Modes: Promote the provision of non-vehicular circulation modes within Lake Forest.	**Consistent.** The proposed project would include bike racks (31 spaces total) and pedestrian connections to nearby sidewalks and crosswalks. The proposed project would not conflict with these General Plan Policies.
Policy M-5.2 Pedestrian Access Between Uses: Improve pedestrian access between complementary uses such as residential and commercial areas and seek to increase the number of bridges and/or grade-separated crossings over freeways and major roadways.	
Goal M-6 Safety: Provide a safe transportation system for all users.	
Policy M-6.3 Site Designs and Safety: Ensure, through the development review process, that development projects follow best design practices to reduce conflicts between multiple travel modes.	**Consistent.** The project includes off-site improvements at five intersections to enhance public safety and address concerns related to large truck turning movements, which would be completed consistent with design standards to reduce conflicts between multiple travel modes. By incorporating intersection improvements into the design of the proposed project, the proposed project does not include any geometric design features or incompatible uses that could substantially increase circulation/traffic hazards. The proposed project would not conflict with this General Plan Policy.

Table 4.11.B: General Plan Consistency Analysis

General Plan Goals, Policies, and Actions	General Plan Consistency Analysis
Goal M-9 Goods Movement: Accommodate safe goods movement through the City's transportation network.	
Policy M-9.1 Goods Movement Along City Arterials: Continue to restrict truck traffic through the City to its arterial roadways in order to facilitate goods movement to regional facilities; continue to prohibit truck traffic on residential streets.	**Consistent**. Truck traffic associated with the proposed project would be restricted to arterial roadways and truck traffic would not be allowed on residential streets. The City does not currently have any designated truck routes. The project site is not located along a City arterial ~~or designated truck route~~; however, the proposed off-site intersection improvements are located along City arterials ~~and designated truck routes~~. The off-site improvements are proposed to enhance public safety and address concerns related to large truck turning movements and would be completed consistent with design standards to facilitate truck access. The proposed project is anticipated to generate 727 total daily trips (in passenger car equivalents [PCEs]), which is broken down to 455 daily passenger vehicle trips and 272 daily truck trips (in PCEs). Based on the results of the TIA, the proposed project would not result in any level of service (LOS) deficiencies or impacts. Therefore, the existing intersections and roadways~~, including City-designated truck routes,~~ would be able to accommodate all traffic (passenger vehicles and trucks) of the proposed project. The proposed project would not conflict with these General Plan Policies.
M-9.2 Roadway Design: Maintain roadway design standards along City arterials to facilitate truck access to light industrial, manufacturing, commercial, and mixed-use areas along designated truck routes.	
Goal M-10 Funding: Ensure the utilization of various financing methods to improve and provide a fiscally sound transportation system.	
Policy M-10.2 New Developments: Ensure that new development projects contribute their appropriate fair share to transportation network improvements and that existing funding commitments are met.	**Consistent.** As detailed in Chapter 3.0, Project Description, the proposed project would include off-site improvements at five intersections within the City to enhance public safety and address concerns related to large truck turning movements. These improvements will be paid for by the applicant for this project. The proposed project would not conflict with this General Plan Policy.
Goal RR-3 Cultural Resources: A community that values its history and preserves its cultural features to bolster community identity and protect sensitive resources.	
Policy RR-3.1 Preservation: Protect areas containing significant historic, archaeological, and paleontological resources, as defined by the California Public Resources Code.	**Consistent.** As detailed in Section 4.5, Cultural Resources, and Section 4.7, Geology and Soils, the proposed project would not result in significant impacts to historic, archaeological, and paleontological resources. Human remains, if discovered, would be handled in compliance with the provisions of California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98. As detailed in Section 4.18, Tribal Cultural Resources, consultation with Native American tribes has occurred in accordance with
Policy RR-3.3 Development: Ensure that human remains are treated with sensitivity and dignity, and ensure compliance with the provisions of California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98.	
Policy RR-3.4 Tribal Consultation: Consult with Native American tribes that may be impacted by proposed development, as necessary, and in accordance with state, local, and tribal intergovernmental consultation requirements.	

Table 4.11.B: General Plan Consistency Analysis

General Plan Goals, Policies, and Actions	General Plan Consistency Analysis
Action RR-3a: City staff shall require applicants for future proposed ground disturbing projects to provide a technical cultural resources assessment consisting of a record search, survey, background context and project specific recommendations performed by a qualified archaeologist meeting Secretary of the Interior Standards and certified by the County of Orange. If resources are known or reasonably anticipated the recommendations shall provide a detailed mitigation plan which shall require monitoring during grading and other earthmoving activities in undisturbed sediments, provide a treatment plan for potential resources that includes data to be collected, requires professional identification, other special studies as appropriate, requires curation at an accredited museum such as the John D. Cooper Center operated by the County of Orange for artifacts meeting significance criteria, requires a comprehensive final mitigation compliance report including a catalog of specimens with museum numbers and an appendix containing a letter from the museum stating that they are in possession of the materials.	state, local, and tribal intergovernmental consultation requirements. A *Cultural Resources Assessment* was prepared for the proposed project by BCR Consulting (BCR Consulting 2021), which included a record search, survey, background context and project-specific recommendations performed by a qualified archaeologist meeting the Secretary of the Interior's Standards and certified by the County of Orange. The *Cultural Resources Assessment* indicated that no additional cultural resources work or monitoring is necessary during proposed activities associated with the development of the project site. However, in the unlikely event that previously undocumented cultural resources are identified during earthmoving activities, a qualified archaeologist should be contacted to assess the nature and significance of the find, diverting construction excavation if necessary. In the unlikely event archaeological resources are discovered at any time during construction, those activities would be halted in the vicinity of the find until the find can be assessed for significance by a qualified archaeologist (**Mitigation Measure CUL-1**). To mitigate adverse impacts to unknown buried paleontological resources that may exist on site, **Mitigation Measure GEO-3** would be implemented, which requires the preparation and implementation of a Paleontological Resources Impact Mitigation Program, as detailed in Section 4.7, Geology and Soils. The proposed project would not conflict with these General Plan Policies or actions.
Action RR-3b: Require all new development, infrastructure, and other ground-disturbing projects to comply with the following conditions in the event of an inadvertent discovery of cultural resources or human remains: • If construction or grading activities result in the discovery of significant historic or prehistoric archaeological artifacts or unique paleontological resources, all work within 100 feet of the discovery shall cease, the Director of Community Development shall be notified, the resources shall be examined by a qualified archaeologist, paleontologist, or historian for appropriate protection and preservation measures; and work may only resume when appropriate protections are in place and have been approved by the Community Development Director; and • If human remains are discovered during any ground disturbing activity, work shall stop until the Director of Community Development and the Orange County Coroner have been contacted. If the human remains are determined to be of Native American origin, the Native American Heritage Commission and the most likely descendants shall be consulted; and work may only resume when appropriate measures have been taken and approved by the Community Development Director.	
Action RR-3d: Require all development, infrastructure, and other ground-disturbing projects to comply with the following conditions in the event of an inadvertent discovery of a paleontological resource: • If construction or grading activities result in the discovery of significant prehistoric archaeological artifacts or unique paleontological resources, all work within 100 feet of the	

Table 4.11.B: General Plan Consistency Analysis

General Plan Goals, Policies, and Actions	General Plan Consistency Analysis
discovery shall cease, the Director of Community Development shall be notified, the resources shall be examined by a qualified archaeologist, paleontologist, or historian for appropriate protection and preservation measures; and work may only resume when appropriate protections are in place and have been approved by the Director of Community Development.	
Goal RR-4 Air Quality and Greenhouse Gas Emissions: A community with optimal air quality for its residents.	
Policy RR-4.7 Mitigation: Require the implementation of relevant mitigation measures for all future development upon identification of potential air quality impacts.	**Consistent.** As detailed in Section 4.3, Air Quality, implementation of **Mitigation Measures AQ-1** and **AQ-2** would be required reduce potential air quality impacts associated with the proposed project, which require use of construction equipment equipped with Tier 4 final engines or the most effective Verified Diesel Emission Control Strategies (VDECS) available for the engine type and use of "Super-Compliant" low volatile organic compounds (VOC) paints for interior and exterior surfaces and low VOC paint for parking lot surfaces. The proposed project would not conflict with this General Plan Policy.
Policy RR-4.8 Local Reduction Targets: The City of Lake Forest establishes the following per capita GHG reduction targets, in order to meet the requirements established by the state under AB 32 and SB 32, consistent with the CARB's 2017 Scoping Plan: • 3.99 MT CO2e per capita by 2030 • 2.66 MT CO2e per capita by 2040; and • 1.33 MT CO2e per capita by 2050.	**Partially Consistent.** As detailed in Section 4.8, Greenhouse Gas Emissions, the City's GHG reduction targets have not been formally adopted by the City as GHG reduction thresholds for development projects. The proposed project would result in a significant and unavoidable impact related to VMT even after implementation of **Mitigation Measure TRA-1** (addition of bike lanes). Therefore, the proposed project would conflict with SB 743 and the goals of the 2022 Scoping Plan for the purpose of reducing the emissions of greenhouse gases and would result in a significant and unavoidable impact related to GHG. As such, the proposed project would not meet the overall goals established by AB 32 and SB 32 for the reduction of GHGs and would not be consistent with the CARB's 2017 and 2022 Scoping Plans. However, with implementation of **Mitigation Measure GHG-1** requiring provisions be made at the project site for emerging electric truck technology and supporting the operation of zero-emissions trucks at the project site as such technology is commercially deployed and available, the proposed project would have the potential to further lower mobile source emissions associated with operation of the proposed project. **Mitigation Measure GHG-1** is required to contribute to the project's "fair share" of GHG emissions reductions required to support SB 743 and the goals of the 2017 and 2022 Scoping Plan (including SB 32 and AB 32). Based on the above, the proposed project would be partially consistent with this General Plan Policy.

Table 4.11.B: General Plan Consistency Analysis

General Plan Goals, Policies, and Actions	General Plan Consistency Analysis
Action RR-4a: Review all new industrial and commercial development projects for potential air quality impacts to residences and other sensitive receptors. Ensure that mitigation measures and best management practices are implemented to reduce significant emissions of criteria pollutants.	**Consistent**. As detailed in Section 4.3, Air Quality, with implementation of **Mitigation Measures AQ-1** and **AQ-2,** the proposed project would not result in the exposure of nearby sensitive receptors to significant emissions of criteria pollutants. The proposed project would not conflict with this General Plan Action.
Action RR-4b: Review development, infrastructure, and planning projects for consistency with SCAQMD requirements during the CEQA review process. Require project applicants to prepare air quality analyses to address SCAQMD and General Plan requirements, which include analysis and identification of: 1. Air pollutant emissions associated with the project during construction, project operation, and cumulative conditions. 2. Potential exposure of sensitive receptors to toxic air contaminants. 3. Significant air quality impacts associated with the project for construction, project operation, and cumulative conditions. Mitigation measures to reduce significant impacts to less than significant or the maximum extent feasible where impacts cannot be mitigated to less than significant.	**Consistent.** An Air Quality, Greenhouse Gas, and Energy Impact Report was completed for the proposed project,[4] which addresses all SCAQMD and General Plan requirements. As detailed in Section 4.3, Air Quality, the proposed project would meet local and regional air quality standards and SCAQMD requirements and emissions thresholds with the implementation of **Mitigation Measures AQ-1** and **AQ-2,** which require use of construction equipment equipped with Tier 4 final engines or the most effective Verified Diesel Emission Control Strategies (VDECS) available for the engine type and use of "Super-Compliant" low volatile organic compounds (VOC) paints for interior and exterior surfaces and low VOC paint for parking lot surfaces. The proposed project would not conflict with this General Plan Action.
Action RR-4d: Continue to review development projects to ensure that all new public and private development complies with the California Code of Regulations (CCR), Title 24 standards as well as the energy efficiency standards established by the Lake Forest Municipal Code.	**Consistent.** As detailed in Section 4.6, Energy, the proposed project would comply with the CCR Title 24 standards as well as energy efficiency standard established by the Lake Forest Municipal Code. The proposed project would not conflict with this General Plan Action.
Action RR-4n: Future development projects implemented under the General Plan will be required to demonstrate consistency with SCAQMD construction emission thresholds. Where emissions from individual projects exceed SCAQMD thresholds, the following actions shall be incorporated as necessary to minimize impacts. These measures do not exclude the use of other, equally effective mitigation measures. 1. Require all off-road diesel equipment greater than 50 horsepower (hp) used for this Project to meet USEPA Tier 4 final off-road emission standards or equivalent. Such equipment shall be outfitted with Best Available Control Technology (BACT) devices including a California Air Resources Board Certified Level 3 Diesel Particulate Filter (DPF) or equivalent. This DPF will reduce diesel particulate matter and NOx emissions during construction activities.	**Consistent.** Refer to the General Plan Consistency Analysis for Action RR-4b, above. The proposed project would not conflict with this General Plan Action.

[4] LSA Associates, Inc. 2025a. *Air Quality, Greenhouse Gas, and Energy Impact Report.* IPT Enterprise Business Center LLC Project, Lake Forest, California. August.

Table 4.11.B: General Plan Consistency Analysis

General Plan Goals, Policies, and Actions	General Plan Consistency Analysis
2. Require a minimum of 50 percent of construction debris be diverted for recycling. 3. Require building materials to contain a minimum 10 percent recycled content. Require materials such as paints, primers, sealants, coatings, and glues to have a low volatile organic compound concentration compared to conventional products. If low VOC materials are not available, architectural coating phasing should be extended sufficiently to reduce the daily emissions of VOCs.	
Action RR-4o: Future development projects implemented under the General Plan will be required to demonstrate consistency with SCAQMD's operational emission thresholds. For projects where operational emissions exceed regulatory thresholds, the following measures may be used to reduce impacts. Note the following measures are not all inclusive and developers have the option to add or substitute measures that are equally or more appropriate for the scope of their project. • Develop a project-specific TDM program for residents and/or employees that provides opportunities for carpool/vanpools. • Provide onsite solar/renewable energy in excess of regulatory requirements. • Require that owners/tenants of non-residential or multi-family residential developments use architectural coatings that are 10 grams per liter or less when repainting/repairing properties. • Require dripless irrigation and irrigation sensor units that prevent watering during rain storms. Ensure all parking areas are wired for capability of future EV charging and include EV charging stations that exceed regulatory requirements.	**Consistent.** Refer to the General Plan Consistency Analysis for Policy RR-4b, above. The proposed project would not conflict with this General Plan Action.
Goal RR-5 Biological Resources: A community that harmoniously coexists with existing plant and animal life.	
Policy RR-5.7 Development: Require that all new development identify potential impacts to existing biological resources and provide mitigation measures as necessary pursuant to CEQA in order to protect these resources from negative externalities.	
Action RR-5b: Require new development, as well as infrastructure projects, long-range planning projects, and other projects, to comply with the requirements of the Orange County Central-Coastal Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP) to ensure that potentially significant impacts to special-status species and sensitive resources are adequately addressed.	

Table 4.11.B: General Plan Consistency Analysis

General Plan Goals, Policies, and Actions	General Plan Consistency Analysis
Action RR-5c: Require new development which has the potential to result in water quality impacts to the City's creeks and the local groundwater basin to implement all feasible mitigation measures to reduce impacts.	**Consistent.** As detailed in Section 4.4, Biological Resources, the proposed project would result in less than significant impacts to sensitive, rare, or endangered plant and wildlife species with the implementation of Regulatory Compliance Measure (**RCM) BIO-1**, which requires compliance with the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code. A *Biological Resources Report* (ELMT Consulting, 2021) was completed for the proposed project, which did not identify any potential significant impacts to biological resources. Additionally, the proposed project would be consistent with the rules and regulations of the NCCP/HCP. A variety of trees, shrubs, and groundcover surrounding the proposed industrial building is proposed. As detailed in Section 4.10, Hydrology and Water Quality, the proposed project would implement **RCMs WQ-1**, **WQ-2**, **WQ-3**, and **WQ-4** to reduce water quality impacts to the City's creeks and the local groundwater basin. The proposed project would not conflict with these General Plan Policies or actions.
Goal PS-1 Seismic and Geologic Hazards: A community that is adequately prepared for natural hazards related to landslides, geologic instability, and seismic activity.	
Policy PS-1.2 Earthquake Protection: Enforce State Seismic design guidelines and all relevant building codes to reduce the risk of damage associated with seismic activity.	**Consistent.** As detailed in Section 4.7, Geology and Soils, the proposed project would comply with the most current California Building Code (CBC) and the City Building Code, which stipulate appropriate seismic design provisions. A Geotechnical Investigation was completed for the proposed project (Southern California Geotechnical 2021a), which did not identify the project site as susceptible to liquefaction, landslides, or flooding. The proposed project would not conflict with these General Plan Policies.
Policy PS-1.4 Development: Require assessment and mitigation of hazards related to liquefaction, landslides, and flooding for new development projects or City improvement projects that are identified by the City as susceptible to these hazards.	
Goal PS-2 Fire Safety: A City that is safe and adequately prepared for urban and wildfire emergencies.	
Policy PS-2.1 Building Fire Codes: Require that all buildings and facilities within Lake Forest comply with local, state, and federal regulatory standards such as the California Building and Fire Codes as well as other applicable fire safety standards.	**Consistent.** The proposed project would comply with local, state, and federal regulatory standards such as the California Building and Fire Codes as well as other applicable fire safety standards as detailed in Section 4.20, Wildfire. The proposed project would not conflict with these General Plan Policies.

Table 4.11.B: General Plan Consistency Analysis

General Plan Goals, Policies, and Actions	General Plan Consistency Analysis
Goal PS-4 Hazardous Waste and Materials: A community that is protected from the potential for hazardous waste and materials contamination.	
Action PS-4b: Continue to require the submittal of information regarding hazardous materials manufacturing, storage, use, transport, and/or disposal by existing and proposed businesses and developments to the Orange County Fire Authority.	**Consistent.** As detailed in Section 4.9, Hazards and Hazardous Materials, the proposed project would comply with existing hazardous materials regulations and programs, including requirements for HMBPs and RMPs for facilities handling significant quantities of hazardous materials, OSHA and Cal/OSHA regulations, CCR Title 8; the CGP; and DOT, RCRA, Orange County Health Care Agency regulations, Orange County Fire Authority (OCFA) regulations and State regulations. The proposed project would not conflict with these General Plan Policies or actions.
Goal PS-6 Noise: A comfortable community environment that is free from excessive noise pollution.	
Policy PS-6.1 Land Use Planning: Require development and infrastructure projects to be consistent with the maximum allowable noise exposure standards identified in Table PS-1 to ensure acceptable noise levels for existing and future development.	**Consistent.** As detailed in Section 4.13, Noise, a *Noise and Vibration Impact Analysis* was completed for the proposed project, which included an acoustical study with representative noise measurements, estimates of existing and projected noise measures, and mitigation measures as necessary to ensure compliance with applicable regulatory documents. The project would implement design techniques to minimize noise impacts to adjacent sensitive uses including shielding by the proposed building and a planed 16-foot-high, 60-foot-long wall located at the eastern end of the loading docks, west of the proposed trash enclosure. The proposed project would not exceed the maximum allowable noise exposure standards or the noise limits established in the Municipal Code, or result in a substantial increase in ambient noise levels as detailed in Action PS-6d. The proposed project would comply with the City's noise ordinance with implementation of **RCM NOI-1** and would not result in any significant noise impacts during the construction period. Vibration impacts during construction would be less than significant level with implementation of **RCM NOI-2**. The proposed project would not conflict with these General Plan Policies or actions.
Policy PS-6.3 Site Design: Require site planning and project design techniques to minimize noise impacts adjacent to sensitive uses in order to comply with City standards.	
Policy PS-6.4 Noise Control: Ensure that noise levels do not exceed the limits established in the Municipal Code by incorporating sound-reduction design in new construction and retrofit projects impacted by non-transportation-related noise sources.	
Policy PS-6.8 Commercial Noise: Require the use of noise attenuation measures, including screening and buffering techniques, for all new commercial development expected to produce excessive noise; in existing cases where the City's noise standards are exceeded, work with Code Enforcement to require compliance.	
Action PS-6b: To ensure that noise does not adversely affect new sensitive receptors, the City will use land use compatibility noise criteria for various land use types in Table PS-1 when making planning and development decisions. The criteria in Table PS-1 represent the acceptable noise level for new sensitive receptors. Existing and future noise contours from transportation noise in the City will be used as a guide for land use and development decisions. If the noise level at a project does not exceed the outdoor activity area allowable noise level in Table PS-1, the project is considered compatible with the noise environment. If the project will exceed the allowable outdoor activity area and interior space noise levels in Table PS-1, the project proponent shall be required to demonstrate (with an acoustical analysis) that the project is designed to attenuate noise to meet the criteria in Table PS-1, and California Building Standards Code,	

Table 4.11.B: General Plan Consistency Analysis

General Plan Goals, Policies, and Actions	General Plan Consistency Analysis
and California Green Building Standards Code (Title 24) interior noise standards. If the project is not designed to meet the noise criteria, noise reduction measures may be recommended in the analysis. If the analysis demonstrates that the noise criteria can be met with implementation of the noise reduction measures, the project may be approved with the noise reduction measures required as conditions of project approval.	
Action PS-6c: To ensure that noise from new development does not adversely affect existing sensitive receptors, the City will require acoustical studies for all new discretionary projects, including those related to development and transportation, which have the potential to generate stationary noise impacts which exceed the criteria identified in the Municipal Code. The studies shall include existing ambient noise measurements, estimates of projected noise levels, and noise reduction measures necessary to ensure compliance with this element.	
Action PS-6d: In making a determination of traffic noise impact under the California Environmental Quality Act (CEQA), a significant impact will occur if ambient noise levels have a substantial increase and the resultant noise levels are in excess of the City's guidelines. Generally, a 3 A-weighted decibel (dBA) increase in noise levels is barely perceptible. Therefore, increases in noise levels shall be considered substantial when the following occurs: • When existing noise levels are between 60 dBA Ldn and 65 dBA Ldn, a 3 dBA increase in noise will be considered substantial; • When existing noise levels exceed 65 dBA Ldn, a 1.5 dBA increase in noise will be considered substantial.	
Goal PF-5 Storm Drain System: A community with an efficient, attractive, and environmentally sound storm drain.	
Policy PF-5.3 Stormwater Runoff: Encourage that stormwater be directed towards permeable surfaces to allow for more percolation of stormwater into the ground.	**Consistent.** As detailed in Section 4.10, Hydrology and Water Quality, the proposed project would include three modular wetland systems and three underground detention chambers to reduce site discharge during the 100-year, 24-hour peak runoff rate by 40 percent in accordance with City requirements to reduce flows and associated erosion potential in Serrano Creek. The proposed project would also be required to prepare a Final Water Quality Management Plan (WQMP), as detailed in **RCM WQ-3**, consistent with the requirement of the City's MS4 permit, because the project consists of significant redevelopment that would replace 5,000 sq ft or more of impervious surface. The Final WQMP would specify the Site Design, Source Control, LID, and Treatment Control BMPs that would be implemented to capture, treat, and reduce pollutants of concern in storm water runoff. Additionally, as specified in **RCM WQ-4**, a Final Hydrology Study would be required to be prepared, which would demonstrate that the final design of the
Policy PF-5.4 Stormwater Capture: Encourage the use of professionally designed stormwater capture methods to aid in the reuse of rain water for non-potable uses in compliance with applicable State regulations.	
Policy PF-5.6 Stormwater Treatments: Promote Best Management Practices (BMPs) and Low Impact Development measures (LID) to treat stormwater before discharge from the site. The facilities shall be sized to meet regulatory requirements.	
Action PF-5b: Project designs shall minimize drainage concentrations, minimize impervious coverage, utilize pervious paving materials, utilize low impact development (LID) strategies, and utilize Best Management Practices (BMPs) to reduce stormwater runoff.	
Action PF-5c: Promote the use of LID strategies in new development and redevelopment projects, including but not	

Table 4.11.B: General Plan Consistency Analysis

General Plan Goals, Policies, and Actions	General Plan Consistency Analysis
limited to the use of canopy trees and shrubs, vegetated swales, and permeable paving.	proposed project meets the hydromodification requirements and that, with implementation of detention facilities and modular wetland systems, the peak flow of stormwater runoff in the proposed condition would be less than existing conditions. The proposed project would not conflict with these General Plan Policies or actions.
Action PF-5d: Require new development to mitigate increases in stormwater peak flows and/or volume. Mitigation measures, such as LID strategies, should take into consideration impacts on adjoining lands in the City.	
Goal PF-6 Energy Management: A community with adequate power, provided through economically and environmentally sustainable means.	
Policy PF-6.2 New Development: Continue to require new development and redevelopment to provide verification from energy utilities that states they are able to accommodate the additional demand for service.	**Consistent.** As detailed in Section 4.6, Energy, the proposed project would not result in the inefficient, wasteful, or unnecessary consumption of energy and SCE would be able to accommodate the additional demand for service. The proposed project would obtain verification from SCE prior to development of the proposed project. The proposed project would be required to adhere to all federal, State, and local requirements for energy efficiency, including the Title 24 standards. Title 24 building energy efficiency standards establish minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting, which would reduce energy usage. Additionally, the proposed project will be seeking Leadership in Energy and Environmental Design (LEED) certification through the applicant's LEED Volume program. Some of the features included in the design include, but are not limited to, drought-tolerant landscaping, low-flow fixtures, high-efficiency lighting and infrastructure for EV charging. The proposed project would not conflict with these General Plan Policies.
Policy PF-6.5 Conservation: Promote conservation strategies during design, construction, and maintenance of facilities.	
Goal PF-8 Community Safety: A community protected from illicit activities and crime by high-quality public safety services, facilities, and technology.	
Policy PF-8.3 Department Consultation: Promote coordination between the City of Lake Forest and Police and Fire services during the review of new development applications to ensure that adequate attention is being paid to fire and safety concerns during the design and planning of a project.	**Consistent.** As detailed in Section 4.15, the proposed project would be required to comply with all Orange County Fire Authority (OCFA) access requirements and California Fire Code requirements and all development projects submitted for review by OCFA must use a fair share approach to mitigate fire service response impacts and facility/equipment needs.
Policy PF-8.6 Site Design: Recognize the role of site design in crime prevention and implement best practices into existing plans and new development strategies.	

Table 4.11.B: General Plan Consistency Analysis

General Plan Goals, Policies, and Actions	General Plan Consistency Analysis
Action PF-8a: The Orange County Fire Authority and City Engineer will review proposed development projects and street networks to evaluate the accessibility for fire engines and other emergency response functions.	The proposed project would implement Crime Prevention through Environmental Design (CPTED) techniques that would discourage and or reduce crime from occurring on site. Such CPTED techniques would include, but not be limited to, surface drive aisle/parking lighting, building façade lighting, low-lying landscaping designed to minimize opportunities for concealment, continued maintenance activities on the site, and deadbolts/locks on building exterior doors. The proposed project would not conflict with these General Plan Policies or actions.

Table 4.11.C: Pacific Commercentre Planned Community Site Development Standards Consistency Analysis

Applicable Site Development Standards	Consistency Analysis
Building Height Limit: No maximum except that building heights shall comply with the provisions of Section 9.144.050 (Height Limits) of the Lake Forest Municipal Code. Within the High Technology and Light Industrial Planning Areas, prior to the issuance of any building permit for any structure or buildings which are proposed to be greater than 35 feet above the proposed grade elevation, applicant shall obtain approval of a Use Permit.	**Consistent.** The proposed building would be a maximum height of 35 feet and would comply with the provisions of Section 9.144.050 (Height Limits) of the Lake Forest Municipal Code. The proposed project would not conflict with this development standard.
Building Setbacks: All setbacks shall be measured from the ultimate right-of-way line and interior property lines. • **Adjacent to Local Street:** Along any local street, buildings shall be set back a minimum of 15 feet from the ultimate right-of-way line, except that unsupported roofs or architectural elements may project 6 feet into the required setback area • **Adjacent to a Non-Residential Parcel:** Along property lines that separate business park and non-residential uses there shall be no required minimum setback.	**Consistent.** The proposed building would be greater than 15 feet from the right-of-way lines for adjacent local streets, including Enterprise Way and Enterprise Court. The proposed project would not conflict with this development standard.
Off-Street Parking: Off-street parking shall be provided in accordance with Chapter 9.168 (Off-Street Parking) of the Lake Forest Municipal Code.	**Consistent**. The proposed project includes 262 parking spaces around the perimeter of the proposed structure and the parcel boundary. In compliance with Municipal Code requirements, bike racks (31 spaces total) would also be provided on site. Parking would be in accordance with Chapter 9.168 of the Lake Forest Municipal Code. The proposed project would not conflict with this development standard.

Table 4.11.C: Pacific Commercentre Planned Community Site Development Standards Consistency Analysis

Applicable Site Development Standards	Consistency Analysis
Loading: All loading shall be performed on the site. Loading platforms and areas shall be screened from view from adjacent streets and highways.	**Consistent**. The proposed project includes a gated truck loading area. Loading docks would be located on the southwest side of the proposed building and screened from the adjacent streets. The proposed project would not conflict with this development standard.
Trash and Storage Areas: All storage, including cartons, containers, materials, products or trash, shall be shielded from view within a building or area enclosed by a solid masonry wall not less than 6 feet in height.	**Consistent.** The proposed project would include two trash enclosures to shield trash storage. The trash enclosures would be composed of a painted concrete tilt-up wall panel and would be approximately 11.13 feet high with a roof that extends to 13.13 feet. The proposed project would not conflict with this development standard.
Streets and Intersections: Screening (including walls and fences) along all streets and boundaries shall have a height of not less than 36 inches nor more than 42 inches within 20 feet of the point of intersection of: • A vehicular accessway or driveway and a street; • A vehicular accessway or driveway and a sidewalk and • Two or more vehicular accessways, driveways or streets.	**Consistent**. The proposed project includes perimeter landscaping that would serve as a screen along all streets and boundaries. Vegetation within 20 feet of driveway and street intersections would be between 36 inches and 42 inches high. The proposed project would not conflict with this development standard.
Mechanical Equipment: Mechanical equipment placed on any roof such as, but not limited to, air conditioning, heating, ventilating ducts, and exhaust shall be screened from view from any abutting street or highway.	**Consistent.** Equipment located on the roof of the proposed building would be screened by the building parapet and would be out of the line of sight from the property line. The proposed project would not conflict with this development standard.
Landscaping: Landscaping, consisting of evergreen or deciduous trees, shrubs, ground cover, or hardscape shall be installed and maintained subject to the following standards: • Boundary landscaping along public streets, other than arterial highways, is required to an average depth of 10 feet and a minimum depth of 5 feet. • **Separation:** Any landscaped area shall be separated from an adjacent vehicular area by a wall or curb at least 6 inches higher than the adjacent vehicular area or in some manner be protected from vehicular damage. • **Watering:** Permanent automatic watering facilities shall be provided for all landscaped areas. Site development plans shall incorporate provisions for a dual water system utilizing reclaimed wastewater for irrigation purposes, consistent with the requirements of the Irvine Ranch Water District.	**Consistent.** The proposed project includes boundary landscaping that would be an average depth of 10 feet and a minimum depth of 5 feet along public streets. Landscaped areas would be separated by a curb at least 6 inches or higher from adjacent vehicular areas. Landscaped areas would be watered using permanent automatic watering facilities and would be maintained in a neat, clean, and healthy condition. The proposed project would not conflict with this development standard.

Table 4.11.C: Pacific Commercentre Planned Community Site Development Standards Consistency Analysis

Applicable Site Development Standards	Consistency Analysis
• **Maintenance:** All landscaping shall be maintained in a neat, clean and healthy condition. This shall include proper pruning, mowing of lawns, weeding, removal of litter, fertilizing, replacement of plants when necessary, and the regular watering of all plantings.	
Environmental Control: Any permitted business or light industrial use shall be performed or carried out entirely within a building that is designed and constructed so that the enclosed operations and uses do not cause or produce a nuisance to adjacent sites, such as, but not limited to the following: Radio frequency interference, sound, vibration, electromechanical disturbance, electromagnetic disturbance, radiation, air pollution, dust, odors, fumes, emission of toxic or non-toxic matter, humidity, heat, cold or glare.	**Consistent.** As discussed in Sections 4.1 Aesthetics; 4.3 Air Quality; 4.6 Energy; 4.8 Greenhouse Gas Emissions; 4.9 Hazards and Hazardous Materials; and 4.13 Noise; the proposed project would not cause or produce a nuisance to adjacent sites related to sound, vibration, radiation, air pollution, dust, odors, fumes, emissions of toxic or non-toxic matter, or glare. Additionally, the uses associated with the proposed project would not result in radio frequency interference, electromechanical disturbance, electromagnetic disturbance, humidity, heat, cold or glare. The proposed project would not conflict with this development standard.

City of Lake Forest Citywide Design Guidelines. The Citywide Design Guidelines are intended to supplement the goals and policies set forth in the City's General Plan Land Use Element and the development standards in the City's Municipal Code. The design guidelines are intended to guide proposed development so that it is aesthetically pleasing, high quality, and reflective of the character of the surrounding community. The Citywide Design Guidelines are general in nature and provide examples of the expected level of design for development within the City. For example, the design guidelines provide direction on issues not typically covered by the development standards (e.g., building orientation, architectural styles, and building materials). Individual design guidelines should be viewed as qualitative rather than mandatory development standards, provided the project design meets or exceeds the intent of the guidelines. The proposed project has been designed consistent with all discretionary measures included in the Citywide Design Guidelines. Furthermore, the proposed project would require a Site Development Permit, which would provide an opportunity for the City to review the physical improvements to the project site, including the overall building scale, massing, and design to ensure compatibility and compliance with the Citywide Design Guidelines.

SCAG Regional Comprehensive Plan. The 2008 Regional Comprehensive Plan (RCP) addresses regional goals related to growth and infrastructure in the Southern California region. The RCP also addresses issues such as housing, traffic, air quality, and water resources as a guide for local agencies to use in preparing plans that deal with regional issues. The RCP outlines a vision of how the Southern California region can balance growth with conservation to achieve a higher quality of life. In order to achieve this balance, the RCP establishes the following land use goals: (1) focus growth in existing centers and along major transportation corridors, (2) encourage mixed-use development, (3) provide new housing opportunities, (4) encourage development near existing and planned transportation stations to reduce traffic congestion and associated air pollutants, (5) preserve existing single-family

neighborhoods, and (6) protect open space and environmentally sensitive habitat areas from development. RCP Goals 2, 3, and 6 do not apply to the proposed project.

The project site is located approximately 700 feet southeast of Bake Parkway, which is considered a Primary Arterial consisting of four lanes. Additionally, the project site is located approximately 550 feet east of Commercentre Drive, which is considered a secondary arterial consisting of four lanes. The proposed project would be surrounded by existing commercial and industrial uses and would replace an existing office/industrial building with a new industrial building. The project site can be easily accessed from Bake and Rancho Parkways and other major transportation corridors near the site (e.g., State Route 241 [SR-241]). The nearest bus stop is located approximately 550 feet southwest of the project site and the Irvine Transportation Center is located approximately 3.4 miles southwest of the project site, which is a multimodal transit station that includes a Metrolink/Amtrak train station and serves as hub for express, local and rail-feeder bus services operated by the Orange County Transportation Authority (OCTA). Therefore, the proposed project would be consistent with RCP Goal 1 to focus growth along major transportation corridors and Goal 4 to encourage new development near existing transportation stations.

The proposed project would replace an existing office/industrial building with a new industrial building. As such, the proposed project is consistent with the existing site use and would not interfere or conflict with the existing land use patterns and visual character of surrounding industrial business park or established residential neighborhoods near the site. Therefore, the proposed project would be consistent with RCP Goal 5 of preserving existing single-family neighborhoods.

For the reasons stated above, the proposed project would be consistent with applicable goals and policies in SCAG's 2008 RCP.

Southern California Area of Governments RTP/SCS. The core vision of the 2020-2045 RTP/SCS and the 2024–2050 RTP/SCS is to better manage the existing transportation system through design management strategies, integrate land use decisions and technological advancements, create complete streets that are safe to all roadway users, preserve the transportation system, and expand transit and foster development in transit-oriented communities.

The proposed project aims to re-envision an existing underutilized office/industrial property to build a new financially and environmentally sustainable building and to provide a building type that is flexible and accommodating to a variety of permitted land uses.. Additionally, the proposed project aims to provide employment opportunities and facilitate job-creation for the residents of Lake Forest and surrounding communities to reduce the need for members of the local workforce to commute outside the area for employment and to contribute to the City's fiscal benefits. The proposed project would cluster land uses in proximity to other similar industrial/commercial uses and close to access points of the State highway system, such as SR-241, which reduces traffic congestion on surface streets and reduces local air pollution emissions from vehicle sources. Therefore, the general objectives/goals of the proposed project would be consistent with the intent and goals of the 2020-2045 RTP/SCS and the 2024–2050 RTP/SCS. Overall, the proposed project would be consistent with the City's General Plan, the City's Zoning Code, including applicable regulations in the Pacific Commercentre Planned Community, and SCAG's RCP and RTP/SCS. Therefore, the proposed project

would have no impacts associated with conflicts with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and no mitigation is required.

Central and Coastal Subregion Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP). Refer to Threshold 4.4.6 in Section 4.4, Biological Resources, for a discussion of the project-related impacts to the Central and Coastal Subregion NCCP/HCP. As stated in Section 4.4.6, the proposed project would not impact an adopted Natural Community Conservation Plan, Habitat Conservation Plan, or other approved local, regional, or State habitat conservation plan.

4.11.7 Cumulative Impacts

As defined in Section 15130 of the *State CEQA Guidelines*, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for land use and planning. The cumulative study area for land use and planning is described in Chapter 4.0; the cumulative project list is provided in Chapter 4.0, Table 4.A, and a map of the cumulative project locations is provided in Chapter 4.0, Figure 4-1.

Cumulative impacts are addressed only for those thresholds that would result in a project-related impact, whether it be less than significant or less than significant with mitigation. If the project would result in no impact with respect to a particular threshold, by definition, it would not contribute to a cumulative impact. Therefore, no analysis would be required.

As detailed in this section, the proposed project would have no impact on land use and planning. Because the proposed project would have no impact on land use and planning, it would not contribute to a cumulatively considerable impact on land use and planning. Therefore, there would be no cumulatively significant impact on land use and planning, and no mitigation is required.

4.11.8 Level of Significance Prior to Mitigation

The proposed project would result in less than significant impacts related to land use and planning.

4.11.9 Regulatory Compliance Measures and Mitigation Measures

4.11.9.1 Regulatory Compliance Measures

There are no regulatory compliance measures applicable to the proposed project pertaining to land use and planning.

4.11.9.2 Mitigation Measures

The proposed project would not result in significant impacts related to land use and planning, and no mitigation is required.

4.11.10 Level of Significance after Mitigation

The proposed project would result in no impacts related to land use and planning.

APPENDIX F

REVISED SECTION 4.13: NOISE

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4.13 NOISE

This section evaluates the potential impacts from noise with implementation of the proposed project. This section is based in part on the following:

- *Noise and Vibration Impact Analysis* (LSA 2025c) (provided in Appendix H) that was prepared for the proposed project and included in this Draft Environmental Impact Report (EIR);
- *City of Lake Forest General Plan Public Safety Element* (City of Lake Forest 2025);
- *City of Lake Forest Municipal Code* (City of Lake Forest 2025); and
- *City of Lake Forest CEQA Significance Thresholds Guide* (City of Lake Forest 2025).

4.13.1 Scoping Process

The Notice of Preparation (NOP) was published in March 2024 for the proposed project, and Scoping Meetings were held on April 3, 2024, and April 24, 2024. The City of Lake Forest (City) received 120 comment letters during the public review period of the Initial Study (IS)/NOP. For a copy of the IS/NOP comment letters received, refer to Appendix A of this Draft EIR. Fifty-seven (57) comment letters included comments related to noise. These comments raised concerns about the potential of the proposed project to generate noise during construction (including demolition of the existing structures) and operations of the proposed project, such as an increase in heavy vehicle traffic associated with the warehouse operations and on-site loading/unloading activities, which would be disruptive to nearby residents.

4.13.2 Methodology

The evaluation of noise and vibration impacts was prepared in conformance with appropriate standards, utilizing procedures and methodologies in the City of Lake Forest Public Safety Element, Municipal Code, and CEQA Significance Thresholds Guide. The Federal Highway Administration (FHWA) Traffic Noise Prediction Model (FHWA-RD-77-108)[1] was used to determine traffic noise impacts. Please refer to the *Noise and Vibration Impact Analysis* (LSA 2025c) for additional details on the noise and vibration modeling methodology and assumptions used to estimate construction and operation impacts of the proposed project.

To assess the potential for long-term operational and short-term construction noise and vibration annoyance impacts, noise measurements were taken at sensitive receptor locations in the vicinity of the project site (refer to Figure 4.13-1, Sensitive Receptor Locations) to use as baseline noise conditions. Sensitive receivers near the project site include existing residential uses as described below. Other sensitive land uses in the project study area that are located at greater distances than those identified in this report would experience lower noise levels than those presented in this report due to the additional attenuation from distance and the shielding by intervening structures.

[1] Federal Highway Administration (FHWA). 2006. *FHWA Roadway Construction Noise Model User's Guide.* January. Washington, D.C. Website: www.fhwa.dot.gov/environment/noise/construction_noise/rcnm/rcnm.pdf (accessed August 2024).

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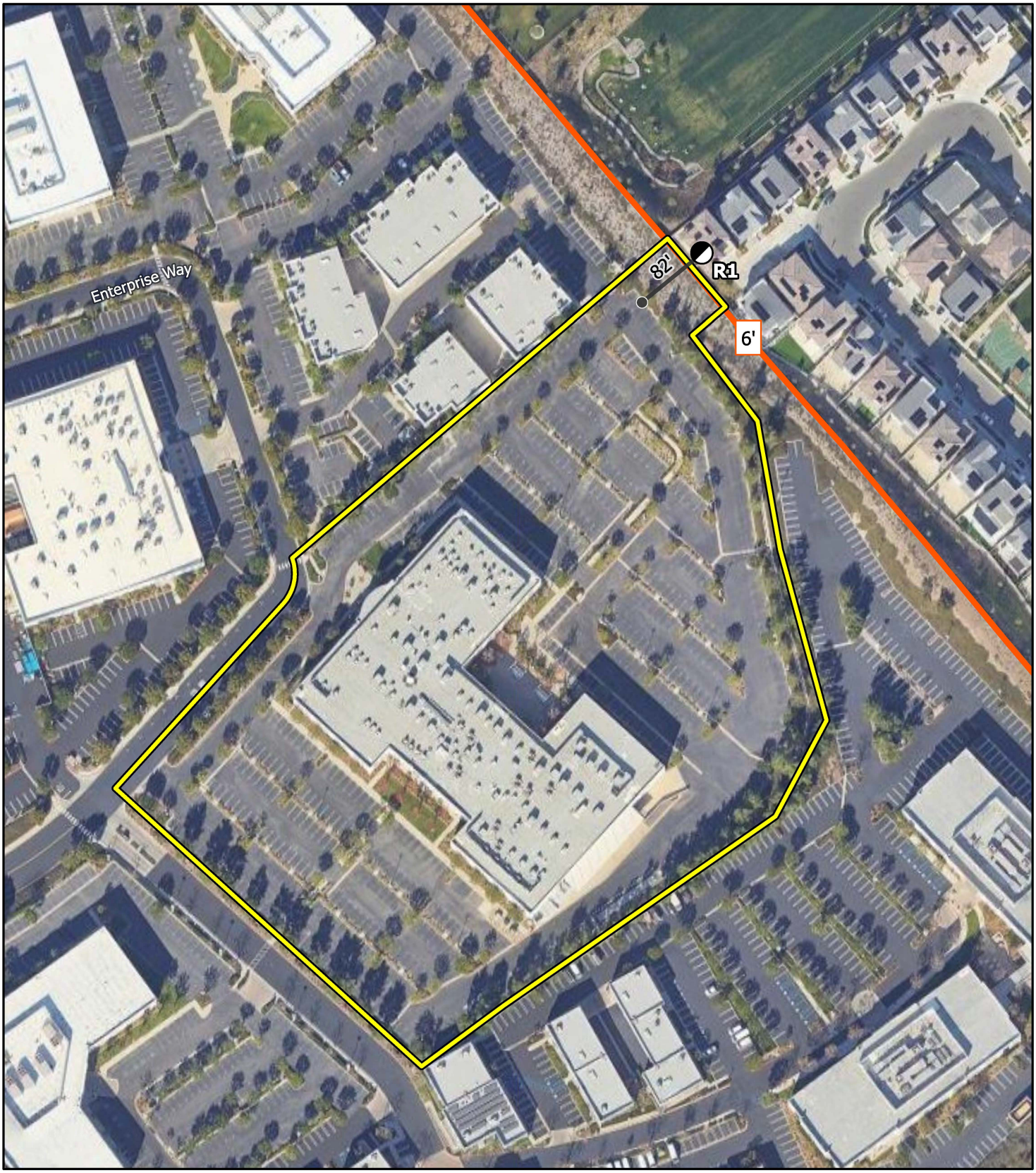

LSA

Project Location

Receptor Location

Existing Barrier

Distance from Receptor to Project Boundary

N

0 75 150

FEET

FIGURE 4.13.1

IPT Enterprise Business Center LLC

Sensitive Receptor Locations

SOURCE: Google Maps (2023)

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- **R1:** Represents existing residential uses located approximately 82 feet (ft) east of the project site boundary to the building's façade.

Other residential uses are located north of the project site, at approximately 900 ft from the project's northern boundary limit as measured to the residential building façade. In addition, a nature park is located to the south of the proposed project site, within 450 ft from the proposed project site southern boundary as measured to the center of the park. Land uses that are considered relatively insensitive to noise include commercial, and office developments.

Land uses that are typically not affected by noise include: industrial, manufacturing, utilities, agriculture, natural open space, undeveloped land, parking lots, warehousing, liquid and solid waste facilities, salvage yards, and transit terminals.

To assess the potential for short-term vibration damage, impacts were assessed at the buildings located at 26180 and 26190 Enterprise Way. The buildings are located within 10 ft of the northern property line.

4.13.3 Existing Environmental Setting

4.13.3.1 Existing Project Site and Vicinity

The 8.83-acre project site is located at 26200 Enterprise Way in the north-central portion of Lake Forest in Orange County, California. The project site is currently developed with an existing 144,904-square-foot (sq ft) building. Existing residential uses are located east of the project site, and light industrial uses are located north, west, and south of the project site. Residential uses are located to the east of the project site.

The nearest sensitive receptors to the project site are single-family homes approximately 82 ft from the project's eastern boundary line.

The nearest buildings to the project site are approximately 10 ft from the project's northern property line (26180 and 26190 Enterprise Way).

4.13.3.2 Existing Noise Levels

The ambient noise levels in the project study area are dominated by transportation-related noise associated with Bake Parkway, Dimension Drive, and other driveways in the industrial area in the vicinity of the project site. To assess existing noise levels, LSA conducted three long-term (24-hour) noise measurements in the vicinity of the project site. The noise-monitoring locations are described in Table 4.13.A and are shown on Figure 4.13-2. The existing ambient noise levels are also detailed in Table 4.13.A. The daytime and nighttime equivalent continuous noise levels (L_{eq}) shown in this table represent the range of all hourly noise levels observed during the monitoring time periods. The 24-hour noise level is represented by the Day-Night Noise Level (L_{dn}), which is the weighted average of the intensity of a sound, with corrections for time of day, and averaged over 24 hours.

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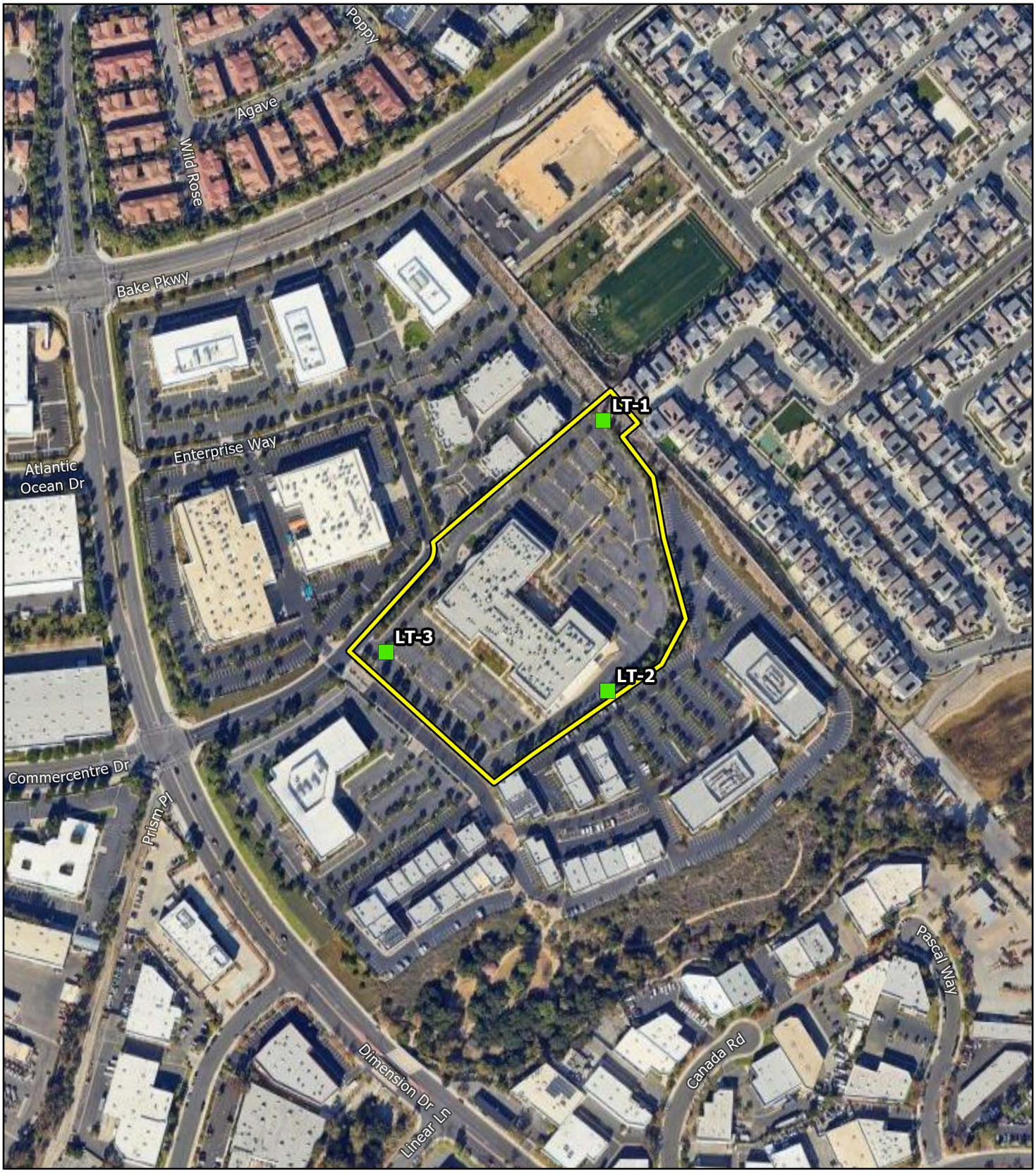

LSA

Project Location

Noise Monitoring Location

FIGURE 4.13.2

N

0 150 300

FEET

SOURCE: Google Maps (2023)

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IPT Enterprise Business Center LLC

Noise Monitoring Location

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Table 4.13.A: Long-Term 24-Hour Ambient Noise Monitoring Results

Location		Daytime Noise Levels[1] (dBA L_{eq})	Nighttime Noise Levels[2] (dBA L_{eq})	Daily Noise Levels (dBA L_{dn})
LT-1	Along the northern property line of the project site on a tree near a residential retaining wall, approximately 725 ft away from the Bake Parkway centerline.	45.1-56.7	40.8-52.8	55.0
LT-2	Center of the southern property line of the project site near the existing loading dock on a light pole, approximately 975 ft away from the Dimension Drive centerline.	40.3-51.9	40.1-49.5	52.0
LT-3	Along the western property line of the project site near Enterprise Way and Enterprise Court on a tree, approximately 70 ft away from the Enterprise Way centerline.	47.9-56.6	41.6-54.0	56.8

Source: Compiled by LSA (2025).
Note: Noise measurements were conducted from March 9 to March 10, 2024, starting at 2:00 p.m.
[1] Daytime Noise Levels = noise levels during the hours from 7:00 a.m. to 10:00 p.m.
[2] Nighttime Noise Levels = noise levels during the hours from 10:00 p.m. to 7:00 a.m.
dBA = A-weighted decibels
ft = foot/feet
L_{dn} = Day-night Noise Level
L_{eq} = equivalent continuous sound level

4.13.4 Regulatory Setting

State and local regulations and programs related to noise that are applicable to the proposed project are described below.

4.13.4.1 State Regulations

State of California Green Building Standards Code. The State of California's Green Building Standards Code (CALGreen Code) contains mandatory measures for non-residential building construction in Section 5.507 on Environmental Comfort. These noise standards are applied to new construction in California for controlling interior noise levels resulting from exterior noise sources. The regulations specify that acoustical studies must be prepared when non-residential structures are developed in areas where the exterior noise levels exceed 65 A-weighted decibel Community Noise Equivalent Level (dBA CNEL) or L_{dn}, such as within a noise contour of an airport, freeway, railroad, or other noise source. If the development falls within an airport or freeway 65 dBA CNEL or L_{dn} noise contour, buildings shall be constructed to provide an interior noise level environment attributable to exterior sources that does not exceed an hourly equivalent level of 50 dBA L_{eq} in occupied areas during any hour of operation.

California Department of Transportation (Caltrans). Vibration standards included in the California Department of Transportation (Caltrans) *Transportation and Construction Vibration Guidance Manual* (Caltrans 2020) (Caltrans Manual) are used in this analysis for ground-borne vibration impacts on human annoyance and building damage. The criteria for environmental impact from ground-borne vibration are based on the maximum levels for a single event and the root-mean-square (RMS) vibration level. Table 4.13.B provides the criteria for assessing the potential for interference or annoyance from vibration levels in a building.

Table 4.13.B: Interpretation of Vibration Criteria for Detailed Analysis

Human Response	Vibration Level (RMS in/sec)
Barely perceptible	0.01
Distinctly perceptible	0.04
Strongly perceptible	0.10
Severe	0.40

Source: *Transportation and Construction Vibration Guidance Manual* (Caltrans 2020).
in/sec = inch/inches per second RMS = root-mean-square

Table 4.13.C lists the potential vibration building damage criteria associated with construction activities, as suggested in the Caltrans Manual. Caltrans guidelines show that a vibration level of up to 0.3 in/sec in PPV is considered safe for newer residential structures and modern industrial or commercial buildings and would not result in any construction vibration damage.

Table 4.13.C: Construction Vibration Damage Criteria

Structure / Condition	PPV (in/sec)
Extremely fragile historic buildings, ruins, ancient monuments	0.08
Fragile buildings	0.10
Historic and some old buildings	0.25
Older residential structures	0.30
New residential structures	0.50
Modern industrial / commercial buildings	0.50

Source: *Transportation and Construction Vibration Guidance Manual,* Table 19 (Caltrans 2020).
in/sec = inch/inches per second
PPV = peak particle velocity

4.13.4.2 Regional Regulations

There are no regional regulations that apply to the proposed project with respect to noise.

4.13.4.3 Local Regulations

City of Lake Forest General Plan 2040. The Noise section within the Public Safety Element of the City of Lake Forest General Plan (2025) is intended to identify sources of noise and provide objectives and policies that ensure that noise from various sources does not create an unacceptable noise environment. Overall, the City's Noise Element describes the noise environment (including noise sources) in the City; addresses noise mitigation regulations, strategies, and programs; and delineates federal, State, and City jurisdiction relative to rail, automotive, aircraft, and nuisance noise. Based on Table 4.13.D below, the noise levels for industrial land uses such as the proposed project is 75 dBA L_{dn} for outdoor activity areas and 45 dBA L_{eq} for interior spaces.

Table 4.13.D: Land Use Compatibility for Community Noise Environment

Land Use[1]	Outdoor Activity Areas [2,3] L_{dn}, dBA	Interior Spaces	
		L_{dn} dBA	L_{eq}, dBA[4]
Residential	60	45	-
Motels/Hotels	65	45	-
Mixed-Use	65	45	-
Hospitals, Nursing Homes	60	45	-
Theaters, Auditoriums	-	-	35
Churches	60	-	40
Office Buildings	65	-	45
Schools, Libraries, Museums	70	-	45
Playgrounds, Neighborhood Parks	70	-	-
Industrial	75	-	45
Golf Courses, Water Recreation	70	-	-

Source: *City of Lake Forest General Plan* (2025).

1. Where a proposed use is not specifically listed, the use shall comply with the criteria for the most similar use as determined by the City.
2. Outdoor activity areas for residential developments are considered to be the private exterior living area of single-family homes and the main common areas where people generally congregate for multi-family and residential components of mixed-use developments. Outdoor activity areas for non-residential developments are the common areas where people generally congregate, including community centers, pool areas, and outside lunch facilities. New multi-family developments and residential components of mixed-use developments with balconies or patios that are exposed to noise that exceeds the outdoor criteria in this table are required to provide occupancy disclosure notices to all future tenants regarding potential noise impacts.
3. In areas where it is not possible for a new project to reduce exterior noise levels to achieve the outdoor activity area criteria using a practical application of the best noise-reduction technology, as determined by a qualified acoustician, an increase of up to 5 CNEL over the outdoor standard will be allowed provided that available exterior noise reduction measures have been implemented and interior noise levels are in compliance with this table.
4. Determined for a typical operating hour during periods of use.
5. In accordance with Policy PS-6b, this table shall be used for land use compatibility noise criteria for when making planning and development decisions. These criteria represent the acceptable noise level for new sensitive receptors. These criteria are not to be retroactively applied for existing uses. These criteria are also not generally intended for use as CEQA significance thresholds for noise generated by new projects to existing receptors; that purpose is achieved by compliance with Municipal Code standards,.

dBA = A-weighted decibels L_{eq} = equivalent noise level
L_{dn} = Day-Night Average Level

The City's noise standards correlate with land use zoning classifications to maintain identified ambient noise levels and to limit, mitigate, or eliminate intrusive noise that exceeds the ambient noise levels within a specified zone. The following policies and actions to provide a comfortable community environment that is free from excessive noise pollution are applicable to the proposed project:

PS-6 Policies.

- PS-6.1: Land Use Planning. Require development and infrastructure projects to be consistent with the maximum allowable noise exposure standards identified in Table PS-1 (refer to Table 4.13.D, below) to ensure acceptable noise levels for future development.

- PS-6.3: Site Design. Require site planning and project design techniques to minimize noise impacts adjacent to sensitive uses in order to comply with City standards.

- PS-6.4: Noise Control. Ensure that noise levels do not exceed the limits established in the Municipal Code (refer to Table 4.13.E, below) by incorporating sound-reduction design in new construction and retrofit projects impacted by non-transportation-related noise sources.

- PS-6.8: Commercial Noise. Require the use of noise attenuation measures, including screening and buffering techniques, for all new commercial development expected to produce excessive noise; in existing cases where the City's noise standards are exceeded, work with Code Enforcement to require compliance.

PS-6 Actions.

- PS-6b: To ensure that noise does not adversely affect new sensitive receptors, the City will use land use compatibility noise criteria for various land use types in Table PS-1 (Table 4.13.D of this document) when making planning and development decisions. The criteria in Table PS-1 (Table 4.13.D of this document) represent the acceptable noise level for new sensitive receptors.

  Existing and future noise contours from transportation noise in the City will be used as a guide for land use and development decisions. If the noise level at a project does not exceed the outdoor activity area allowable noise level in Table PS-1 (Table 4.13.D of this document), the project is considered compatible with the noise environment.

  If the project will exceed the allowable outdoor activity area and interior space noise levels in Table PS-1 (Table 4.13.D of this document), the project proponent shall be required to demonstrate (with an acoustical analysis) that the project is designed to attenuate noise to meet the criteria in Table PS-1 (Table 4.13.D of this document), and California Building Standards Code, and California Green Building Standards Code (Title 24) interior noise standards. If the project is not designed to meet the noise criteria, noise reduction measures may be recommended in the analysis. If the analysis demonstrates that the noise criteria can be met with implementation of the noise reduction measures, the project may be approved with the noise reduction measures required as conditions of project approval.

- PS-6c: To ensure that noise from new development does not adversely affect existing sensitive receptors, the City will require acoustical studies for all new discretionary projects, including those related to development and transportation, which have the potential to generate stationary noise impacts which exceed the criteria identified in the Municipal Code. The studies shall include existing ambient noise measurements, estimates of projected noise levels, and noise reduction measures necessary to ensure compliance with this element.

- PS-6d: In making a determination of traffic noise impact under the California Environmental Quality Act (CEQA), a significant impact will occur if ambient noise levels have a substantial increase and the resultant noise levels are in excess of the City's guidelines. Generally, a 3 A-weighted decibel (dBA) increase in noise levels is barely perceptible. Therefore, increases in noise levels shall be considered substantial when the following occurs:

- When existing noise levels are between 60 dBA L_{dn} and 65 dBA L_{dn}, a 3 dBA increase in noise will be considered substantial;
- When existing noise levels exceed 65 dBA L_{dn}, a 1.5 dBA increase in noise will be considered substantial.

Municipal Code. Chapter 11.16, Noise Control, of the City's Municipal Code provides direction and criteria related to operational and construction noise and vibration. Additionally, requirements such as allowable hours of construction and applicable exemptions are identified.

Section 11.16.040 A, Exterior Noise Standards, identifies exterior noise standards which set limits for noise that land uses are allowed to generate as received by other land uses. These standards may be used during Code enforcement of potential noise violations. For purposes of determining potential project impacts during environmental impact review processes pursuant to CEQA, the average hourly level (L_{eq}) standards shall be utilized unless all sources are impact in nature. The standards shall apply to the corresponding land use in Residential and Mixed-Use zones only. It is unlawful for any person to create any noise either within or outside the City due to a Stationary Noise Source (or any Mobile Noise Source not pre-empted by State or Federal laws), or to allow the creation of any noise on property owned, leased, occupied, or otherwise controlled by such person, which causes the Noise Level when measured at the property line of any residential use in a residential or mixed use zone, to exceed the applicable noise standards listed in Table 1 – Exterior Noise Standards (Table 4.13.E of this document).

Table 4.13.E: Exterior Stationary Noise Standard[1]

Noise Level Descriptor	Noise Level (dBA L_{eq})	Noise Level (dBA L_{max})	Time Period
Residential in Residential Zones	60	80	7:00 a.m. – 10:00 p.m.
	50	70	10:00 p.m. – 7:00 a.m.
Residential Portion of Mixed-Use in Mixed-Use Zones	65	85	7:00 a.m. – 10:00 p.m.
	50	70	10:00 p.m. – 7:00 a.m.
Churches, Hospitals, and Schools in Residential and Mixed-Use Zone	65	85	All Hours
Churches, Hospitals, and Schools in Commercial and Industrial Zones	70	90	All Hours

Source: *City of Lake Forest Municipal Code* (2025).

[1] No standards have been included for interior noise levels. Standard construction practices should, with the exterior noise levels identified, result in acceptable interior noise levels.

dBA = A-weighted decibels

L_{eq} = equivalent continuous sound level

Section 11.16.040 D clarifies that in the event the measured ambient noise level exceeds any of the noise limit categories above, the noise limit as applied to the contribution of the source(s) in question shall be the ambient noise level.

Section 11.16.050 states the exemptions from the aforementioned exterior noise standards. Subsection D prescribes that the exemption would apply to noise sources associated with

construction, repair, remodeling, or grading of any real property, provided that: (1) the City has issued a building permit, grading permit, or similar permit for such activities; (2) said activities do not take place between the hours of 8:00 p.m. and 7:00 a.m., Monday through Saturday, or at any time on Sunday or a legal City of Lake Forest holiday; and (3) the average Construction Noise Levels do not exceed 80 dBA L_{eq} at the first floor of nearby Noise-Sensitive Residential Uses Exterior Noise Standards.

Section 11.16.080, Construction, provides additional direction associated with construction noise. The following regulations set hours, allowed noise levels, and best management practices for construction noise that occurs within the City of Lake Forest. These standards may be used during code enforcement of potential noise violations or used to determine potential project impacts during environmental review processes. The following is required for construction:

A. Construction activities, including delivery of material or equipment, shall not take place between the hours of 8:00 p.m. and 7:00 a.m., Monday through Saturday, or at any time on Sunday or a City holiday; and the average Construction Noise Levels shall not exceed 80 dBA L_{eq} (1-hour) at the first floor of nearby noise-sensitive land uses.

B. If construction noise has the potential to exceed the standards in section 11.16.090.A., as determined by code enforcement of noise violations, analysis of potential construction noise impacts during a review pursuant to CEQA, or if construction using heavy equipment is proposed within 100 feet of noise-sensitive land uses, a Construction Noise Management Plan shall be prepared by a qualified acoustician and submitted by the applicant. The noise reduction measures shall be determined in the plan and shall be quantified to demonstrate that noise levels would not exceed the standards.

Section 11.16.090, Vibration, provides additional direction associated with vibration standards.

A. Operating or permitting the operation of any device that creates vibration that exceeds current published Caltrans vibration criteria at a receiving vibration-sensitive land use is prohibited.

B. For projects implementing a phase or phases of construction that incorporate equipment as presented in Table 2 below (Table 4.13.F of this document): during the pre-building permit issuance phase and after a specific equipment list has been determined: 1) A qualified structural engineer, as approved by the Director of Community Development, or designee shall identify all structures that are located within the distances established in Table 2 (Table 4.13.F of this document) and that have the potential to be affected by ground-borne vibration originating from the construction; and 2) A qualified acoustical engineer shall compile a list of proposed construction equipment and compare to the City's accepted vibration criteria. If it is determined that the proposed equipment would generate vibration levels below the City's standard of 0.3 inches per

second (in/sec) peak particle velocity (PPV), no further vibration assessment is necessary. However, if vibration levels would potentially exceed the City's standard of 0.3 in/sec PPV, the Project Applicant shall develop a Vibration Monitoring and Construction Contingency Plan for approval by the Director of Community Development, or designee, to ensure that vibration levels would not exceed the City's accepted vibration damage criteria of 0.3 in/sec PPV. If a Vibration Monitoring and Construction Contingency Plan is deemed necessary, monitoring of vibration during initial construction activities shall be required. Monitoring results may indicate the need for more or less intensive measurements. The Vibration Monitoring and Construction Contingency Plan, at the discretion of the Director of Community Development or designee, shall include the following items as necessary:

- Identification of structures where monitoring would be conducted;
- A vibration monitoring schedule;
- Defined structure-specific vibration limits;
- Photographic, elevation, and crack surveys to document before and after construction conditions; and
- Identification of construction contingencies for when vibration levels approach the limits.

When vibration levels approach the limits specified in this Chapter, construction shall be suspended and contingencies identified in the approved Vibration Monitoring and Construction Contingency Plan shall be implemented as necessary to lower vibration levels. For some projects, the ability to shield or protect the affected building from potential vibration impacts may be possible as an alternative to changing construction methods.

Table 4.13.F: Vibration Assessment Guidelines

Phase of Construction	Distance (ft)
Grading	
● Large Equipment *Example: D9 Dozer, Loaded Dump Truck	15
● Impact Hand tools *Example: Jackhammer	10
Pile Driving	
● Impact Pile Driver	300 of within 5 times the depth of the pile, whichever is less
● Vibratory Pile Driver	150 of within 5 times the depth of the pile, whichever is less

Source: *City of Lake Forest Municipal Code* (2025).

4.13.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines* and the *City of Lake Forest CEQA Significance Thresholds Guide* (2025). Refer to Section 4.13.5.1 below

for a summary of the City of Lake Forest CEQA significance thresholds. Based on these thresholds, implementation of the proposed project would have a significant adverse impact with respect to noise if it would:

Threshold 4.13.1: Result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;

Threshold 4.13.2: Result in the generation of excessive groundborne vibration or groundborne noise levels; or

Threshold 4.13.3: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels.

4.13.5.1 City Significance Criteria Summary

Table 4.13.G ~~shows~~ provides a summary of the significance criteria within the *City of Lake Forest CEQA Significance Threshold Guide* for which a proposed project would normally result in a significant noise impact ~~summary matrix~~. According to the ~~previous~~ criteria, noise and vibration impacts shall be considered significant if any of the following occur as a direct result of the proposed development:

Table 4.13.G: Significance Criteria Summary

Analysis	Receiving Land Use	Condition(s)	Significance Criteria	
			Daytime[1]	Nighttime[2]
Off-Site Traffic Noise	Noise-Sensitive	Exterior Noise Level Criteria	≥ 3 dBA CNEL Project Increase & Resulting With Project Noise Level > 60 dBA L_{dn} and < 65 dBA L_{dn} ≥ 1.5 dBA L_{dn} Project Increase & Resulting With Project Noise Level > 65 dBA L_{dn}	
~~Operational~~ Stationary Noise	Noise-Sensitive	Exterior Noise Level Standards	See Table 4.13.E.	
Construction Noise & Vibration	Noise-Sensitive	Noise Level Threshold	80 dBA L_{eq}	N/A
		Vibration Level Threshold (Annoyance)	0.04 in/sec RMS	N/A
		Vibration Level Threshold (Building Damage)	0.3 in/sec PPV	N/A

Source: *City of Lake Forest Municipal Code* (City of Lake Forest 2025).
[1] Daytime = 7:00 a.m. to 10:00 p.m.
[2] Nighttime = 10:00 p.m. to 7:00 a.m.
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibels
in/sec = inches per second
L_{eq} = equivalent continuous sound level
N/A = no nighttime construction activity is permitted, so no nighttime construction noise level limits are identified.
PPV = peak particle velocity
VdB = vibration velocity decibels

- ~~**Off-Site**~~ **Traffic Noise:** When either ~~both~~ of the following criteria are met at noise-sensitive land uses (e.g., residential, hotels, motels, nursing homes, hospitals, parks, playgrounds and recreation areas, and schools):

    - Project traffic will cause a noise level increase of 3 dBA L_{dn} or more on a roadway segment adjacent to a noise-sensitive land use; and existing noise levels are between 60 dBA L_{dn} and 65 dBA $L_{dn.}$

    - Project traffic will cause a noise level increase of 1.5 dBA L_{dn} or more on a roadway segment adjacent to a noise-sensitive land use; and existing noise levels are greater than 65 dBA $L_{dn.}$

- ~~**Operational**~~ **Stationary Noise:** If project-related operational (stationary source) noise levels exceed the noise level standards for sensitive land uses as presented in Table 4.13.E.

- **Construction Noise and Vibration:**

    - If project-related construction activities create noise levels that exceed the 80 dBA L_{eq} acceptable noise level threshold at the nearby sensitive receiver locations between the hours of 7:00 a.m. and 8:00 p.m., Monday through Saturday; or

    - If project-related construction activities generate vibration levels that exceed the City's building damage vibration level threshold of 0.3 inch per second (in/sec) peak particle velocity (PPV), or the *distinctly perceptible* human annoyance vibration level threshold of 0.04 in/sec RMS at nearby sensitive receiver locations.

4.13.6 Project Impacts

Please refer to Section 4.13.9 for a full text description of the regulatory compliance and/or mitigation measures referenced in the analysis below.

Threshold 4.13.1: **Would the project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies (Appendix G);**

Would the project result in a 3 dBA CNEL increase in noise when existing noise levels are between 60 dBA and 65 dBA CNEL (City of Lake Forest CEQA Significance Threshold);

Would the project result in a 1.5 dBA CNEL increase in noise when existing noise levels exceed 65 dBA CNEL (City of Lake Forest CEQA Significance Threshold);

Would the project exceed the stationary source noise criteria for the City of Lake Forest as specified by the exterior noise standards set forth in the Noise Control Chapter (11.16) of the Lake Forest Municipal Code (City of Lake Forest CEQA Significance Threshold); and

During construction, would the project exceed 80 dBA Leq(1-hour) between the hours of 7:00 a.m. and 8:00 p.m., Monday through Saturday? (City of Lake Forest CEQA Significance Threshold)

Less Than Significant Impact.

Construction Noise Impacts. This section summarizes potential impacts resulting from the short-term construction activities associated with the development of the proposed project. Based on the reference construction noise levels, the project-related construction noise levels, when the highest reference noise level is operating from the center of primary construction activity nearest the sensitive receiver location, would average 71 dBA L_{eq} at the sensitive receiver locations, and therefore would not exceed the daytime construction noise level threshold of 80 dBA L_{eq} at any receiver location. Compliance with **Regulatory Compliance Measure (RCM) NOI-1** would ensure that construction activities would only occur during the allowed hours within the City's Municipal Code. Therefore, construction-related noise impacts would be less than significant, and no mitigation is required.

Off-Site Traffic Noise Impacts. To assess the off-site transportation CNEL noise level impacts associated with the proposed project operations, the existing (2024) and opening year without and with project scenario traffic volumes were obtained from the *Traffic Impact Analysis for the IPT Enterprise Business Center LLC* (LSA 2025d). The FHWA Highway Traffic Noise Prediction Model (FHWA-RD-77-108) was used to evaluate highway traffic-related noise conditions along roadway segments in the project vicinity. This model requires various parameters, including traffic volumes, vehicle mix, vehicle speed, and roadway geometry to compute typical equivalent noise levels during daytime, evening, and nighttime hours. The resultant noise levels are weighted and summed over 24-hour periods to determine the L_{dn} values. A summary of off-site traffic noise impacts is presented in Table 4.13.H. To provide a conservative approach, traffic volume distribution based on the traffic impact analysis was applied to the with project scenarios to assess traffic noise due to increased heavy truck trips.

Project-related traffic noise would generate the greatest increase of 3.3 dBA along Enterprise Way. There are no noise sensitive uses along this roadway segment and the resultant noise level would be well below 65 dBA L_{dn}. All other roadway segments would be less than 1 dBA. Noise level increases below 3 dBA would not be perceptible to the human ear in an outdoor environment. Furthermore, off-site traffic noise level increases from the project would not result in a 3 dBA CNEL increase in noise at noise sensitive uses when existing noise levels are between 60 dBA and 65 dBA CNEL or a 1.5 dBA CNEL increase in noise levels when existing noise levels exceed 65 dBA CNEL. Therefore, project-related traffic noise generated by the proposed project would not cause significant unavoidable direct or indirect impacts that would preclude the use of on-site or adjacent land as intended by the City's General Plan. The proposed project would have a less than significant impact on off-site sensitive receptors, and no mitigation is required.

Off-Site Operational Stationary Source Noise Impacts. Adjacent off-site land uses would be potentially exposed to stationary-source noise impacts from the proposed on-site heating,

ventilation, and air conditioning (HVAC) equipment, trash bin emptying activities, parking lot activities, and truck deliveries and loading and unloading activities associated with the proposed project.

A 3-D noise model, SoundPLAN, was used to determine the future noise impacts from project operations to the noise-sensitive uses. The noise model considered site topography, the shielding provided by the proposed on-site building, and a planned 16 ft high, 60 ft long wall, which would be located at the eastern end of the loading docks, west of the proposed trash enclosure. The hourly noise levels associated with the proposed on-site HVAC equipment, trash bin emptying activities, parking lot activities, and truck deliveries and loading and unloading activities were modeled at the surrounding sensitive receptors to range from 50.0 dBA L_{eq} to 52.7 dBA L_{eq}. Therefore, the project would not exceed the stationary source noise criteria for the City of Lake Forest as specified by the exterior noise standards set forth in the Noise Control Chapter (11.16) of the Lake Forest Municipal Code. Because ~~T~~these levels would be below the City's daytime and nighttime noise standards, project operations would not cause significant unavoidable direct or indirect impacts that would preclude the use of on-site or adjacent land as intended by the City's General Plan; project-related stationary noise impacts would be ~~and therefore are considered~~ less than significant ~~noise impacts~~, and no mitigation is required.

Table 4.13.H: Traffic Noise Levels Without and With Proposed Project

Roadway Segment	Existing – No Project		Existing – With Project			Opening Year With Cumulative Projects – No Project		Opening Year With Cumulative Projects – With Project		
	ADT	L_{dn} (dBA) 50 ft from Centerline of Nearest Lane	ADT	L_{dn} (dBA) 50 ft from Centerline of Nearest Lane	Increase from Existing Conditions (dBA)	ADT	L_{dn} (dBA) 50 ft from Centerline of Nearest Lane	ADT	L_{dn} (dBA) 50 ft from Centerline of Nearest Lane	Increase from Opening Year Conditions (dBA)
Bake Parkway west of Commercentre Drive	7,290	64.8	7,380	64.9	0.1	7,590	65.0	7,680	65.0	0.0
Bake Parkway between Commercentre Drive and Dimension Drive	19,850	69.1	19,850	69.1	0.0	21,080	69.4	21,080	69.4	0.0
Bake Parkway east of Dimension Drive	22,040	69.6	22,090	69.6	0.0	23,390	69.9	23,440	69.9	0.0
Commercentre Drive west of Dimension Drive	6,040	56.2	6,490	56.7	0.5	7,590	57.2	7,680	57.3	0.1
Enterprise Way east of Dimension Drive	1,320	50.0	2,310	53.3	3.3	2,670	53.0	3,360	54.5	1.5
Dimension Drive north of Commercentre Drive	6,380	62.0	6,430	62.1	0.1	6,670	62.2	6,820	62.4	0.2
Dimension Drive south of Commercentre Drive	19,640	66.9	19,930	67.0	0.1	21,010	67.2	21,000	67.2	0.0
Lake Forest Drive west of Dimension Drive	7,580	63.9	8,070	64.3	0.4	8,460	64.4	8,950	64.7	0.3
Lake Forest Drive east of Dimension Drive	960	54.9	960	54.9	0.0	1,280	56.2	980	54.6	-1.6
Rancho Parkway north of Lake Forest Drive	14,250	65.5	14,370	65.6	0.1	14,990	65.7	15,110	65.8	0.1

Source: Compiled by LSA (2025).
Note: Shaded cells indicate roadway segments adjacent to the project site.
ADT = average daily traffic
CNEL= Community Noise Equivalent Level
dBA = A-weighted decibels
ft = foot/feet

***Threshold 4.13.2: Would the project result in the generation of excessive groundborne vibration or groundborne noise levels* (Appendix G); and**

Would the project exceed the applicable standards from the Federal Transit Administration (FTA) or Caltrans vibration limits? (City of Lake Forest CEQA Significance Threshold)

Less Than Significant Impact.

Construction. Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures and soil type. It is expected that ground-borne vibration from project construction activities would cause only intermittent localized effects. The proposed project's construction activities most likely to cause vibration impacts are:

- **Heavy Construction Equipment:** Although all heavy mobile construction equipment has the potential to cause at least some perceptible vibration while operating close to buildings, the vibration is usually short-term and is not of sufficient magnitude to cause building damage.

- **Trucks:** Trucks hauling building materials to construction sites can be sources of vibration intrusion if the haul routes pass through residential neighborhoods on streets with bumps or potholes. Repairing the bumps and potholes generally eliminates the problem.

Ground-borne vibration levels resulting from construction activities occurring within the project site were estimated using data published in the Caltrans Manual. Construction activities that would have the potential to generate low levels of ground-borne vibration within the project site include mobile equipment activities and pile driving, among others. Using the vibration source level of construction equipment and the construction vibration assessment methodology published by the Caltrans Manual, it is possible to estimate the project vibration impacts.

Based on the reference vibration levels provided by the Caltrans Manual, a large bulldozer represents the peak source of vibration with a reference velocity of 0.089 in/sec PPV at 25 ft. The closest building structures are the industrial buildings (26180 & 26190 Enterprise Way, Lake Forest, California), which are within 10 ft of the northern project construction boundary. If large construction equipment with a reference vibration level of 0.089 in/sec PPV is used within 8 ft of these structures, they would experience vibration levels of up to 0.312 PPV (in/sec). These vibration levels would exceed the 0.3 in/sec PPV threshold. However, with implementation of **RCM NOI-2**, which details construction vibration assessments pursuant to Municipal Code section 11.16.090, construction vibration impacts would be less than significant. Compliance with the requirements of Municipal Code section 11.16.090 would ensure that the project would meet the applicable Caltrans vibration standards. Since there are no other receptor locations within 12 ft of the project site, vibration levels at all other buildings would be below the 0.3 in/sec PPV threshold and no construction-related vibration impacts would occur. Therefore, construction impacts would be less than significant, and no mitigation is required.

Operation. The proposed project would not result in vibration impacts related to on-site stationary source operations because the proposed stationary equipment would not generate perceptible vibration levels. In addition, the proposed project would not result in vibration impacts from project-related traffic on site or on the adjacent roadways because the rubber tires and suspension systems of on-road vehicles reduce vibration. Based on a reference vibration level of 0.076 in/sec PPV, structures greater than 20 ft from the roadways along which project vehicles would be traveling, would experience vibration levels below the standard of 0.3 in/sec PPV. Therefore, vibration levels generated from project-related traffic on site or on the adjacent roadways would be less than significant, and no mitigation is required.

Threshold 4.13.3: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the Project area to excessive noise levels?

No Impact. Aircraft flyovers may be audible on the project site due to aircraft activity in the vicinity. The nearest airport to the project site is John Wayne Airport (JWA), a commercial airport approximately 10.8 miles to the west. The project site is well outside the JWA 60 dBA CNEL noise contour.[2] Because the project site is not within the vicinity of a private airstrip or an airport land use plan or within 2 miles of a public airport or public use airport and is outside the 60 dBA CNEL noise contour of JWA, which is 10.8 miles from the project site, the proposed project would not expose people residing or working in the project area to excessive noise levels. There would be no impacts, and no mitigation is required.

4.13.7 Cumulative Impacts

As defined in Section 15355 of the *State CEQA Guidelines*, cumulative impacts refer to the incremental effects of an individual project when viewed in connection with the effects of past projects, current projects, and probable future projects. The cumulative study area for noise and vibration is described in Chapter 4.0; the cumulative project list is provided in Chapter 4.0, Table 4.A, and a map of the cumulative project locations is provided in Chapter 4.0, Figure 4-1.

Because noise levels dissipate exponentially with distance from the noise source, noise impacts are localized. Therefore, the cumulative analysis for noise and vibration is focused on the potential cumulative noise and vibration impacts associated with development of the proposed project combined with Western Realco Projects 1 and 2, which are reasonably foreseeable projects that would be located immediately adjacent to the project site and for the purposes of this analysis are assumed to have construction schedules that overlap with the proposed project. As such, a quantitative evaluation of the combined noise and vibration impacts of constructing and operating the proposed project and Western Realco Projects 1 and 2 has been prepared and is presented in this section.

[2] John Wayne Airport (JWA). 2022. Annual CNEL Noise Contours. Website: https://www.ocair.com/about/administration/access-noise/reports-resources/ (accessed August 2024).

Cumulative impacts are addressed only for those thresholds that would result in a project-related impact, whether it be less than significant or less than significant with mitigation. If the project would result in no impact with respect to a particular threshold, by definition, it would not contribute to a cumulative impact. Therefore, no analysis would be required. As detailed in this section, the proposed project would have no impacts associated with exposing people residing or working in the project area to excessive noise levels within 2 miles of a public airport or public use airport. Therefore, no analysis would be required.

As detailed in this section, the closest residence to the project site is located 470 ft from the center of the project site. Based on the reference construction noise levels, construction noise levels from the proposed project and Western Realco Projects 1 and 2 would be 71 dBA L_{eq} and 68 dBA L_{eq}, respectively, at the sensitive receptor. The cumulative construction noise levels from both the proposed project and Western Realco Projects 1 and 2 would be 72.8 dBA L_{eq} at the sensitive receptor, which is below the construction noise level threshold of 80 dBA L_{eq}. Therefore, implementation of the proposed project, when evaluated in combination with Western Realco Projects 1 and 2, would not contribute to cumulatively considerable construction-related noise impacts in excess of standards established in a general plan or noise ordinance. Therefore, there would be no cumulatively significant construction noise impact, and no mitigation is required.

Hourly noise levels generated by operational activities from Western Realco Projects 1 and 2 were modeled at the closest off-site land uses using SoundPLAN. Operational assumptions were similar to those for the proposed project and were scaled based on the number of docks and estimated trip generation for Western Realco Projects 1 and 2.

The results show that the noise levels generated by the combination of the proposed project and Western Realco Projects 1 and 2 would be below the daytime and nighttime standards of 55 dBA L_{eq} and 50 dBA L_{eq}, respectively, and would not approach thresholds levels at the nearby sensitive uses. Therefore, implementation of the proposed project, when evaluated in combination with Western Realco Projects 1 and 2, would not contribute to a cumulatively considerable operational stationary noise impact in excess of standards established in a general plan or noise ordinance. Therefore, there would be no cumulatively significant operational stationary noise impact, and no mitigation is required.

As previously shown in Table 4.13.H, cumulative traffic noise levels associated with the operation of the proposed project and Western Realco Projects 1 and 2 would increase noise levels by up to 1.0 dBA along Enterprise Way. Noise level increases below 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, implementation of the proposed project, when evaluated in combination with Western Realco Projects 1 and 2, would not contribute to a cumulatively considerable operational traffic noise impact in excess of standards established in a general plan or noise ordinance. Therefore, there would be no cumulatively significant operational traffic noise impact, and no mitigation is required.

As detailed in this section, vibration impacts would not occur at buildings located beyond 12 ft from the edge of construction at the project site. Similarly, vibration impacts associated with Western Realco Projects 1 and 2 would also not extend beyond 12 ft from the edge of construction. There are

no buildings that are within 12 ft of both the proposed project and Western Realco Projects 1 and 2. Therefore, implementation of the proposed project, when evaluated in combination with Western Realco Projects 1 and 2, would not contribute to a cumulatively considerable construction vibration impact. Therefore, there would be no cumulatively significant construction vibration impact, and no mitigation is required.

The proposed project would not result in vibration impacts related to on-site stationary source operations because the proposed stationary equipment would not generate perceptible vibration levels. Similarly, the vibration impacts related to on-site stationary source operations from Western Realco Projects 1 and 2 would also be below perceptible vibration levels. Stationary sources do not generate significant vibration levels. Therefore, implementation of the proposed project, when evaluated in combination with Western Realco Projects 1 and 2, would not contribute to a cumulatively considerable on-site stationary source-induced vibration impact. Therefore, there would be no cumulatively significant on-site stationary source-induced impact, and no mitigation is required.

The proposed project would not result in vibration impacts from project-related traffic on-site or on the adjacent roadways because the rubber tires and suspension systems of on-road vehicles reduce vibration. Similarly, and for the same reason, the vibration impacts from on-site and off-site traffic associated with Western Realco Projects 1 and 2 would also remain below impact thresholds. Therefore, implementation of the proposed project, when evaluated in combination with Western Realco Projects 1 and 2, would not contribute to a cumulatively considerable traffic-induced vibration impact. Therefore, there would be no cumulatively significant traffic-induced vibration impact, and no mitigation is required.

4.13.8 Level of Significance Prior to Mitigation

Impacts related to construction noise and vibration would be potentially significant prior to implementation of regulatory compliance measures.

4.13.9 Regulatory Compliance Measures and Mitigation Measures

4.13.9.1 Regulatory Compliance Measures

The following regulatory compliance measures are required to reduce potentially significant impacts related to construction noise and vibration to a less than significant level:

RCM NOI-1 **City of Lake Forest Municipal Code, Section 11.16.060(D).** During construction, construction activities shall be limited to between the hours of 7:00 a.m. and 8:00 p.m. Mondays through Saturdays. No construction shall be permitted outside of these hours or on legal City of Lake Forest holidays, without a specific exemption issued by the City of Lake Forest.

RCM NOI-2 **Pre-Construction Vibration Assessment.** After a specific project equipment list has been determined and prior to the issuance of a building permit, the following actions shall be implemented:

1. A qualified structural engineer, as approved by the Director of Community Development, or designee shall identify all structures that are located within the distances established in Table 2 of Section 11.16.090 of the City's Municipal Code and that have the potential to be affected by ground-borne vibration originating from the construction; and

2. A qualified acoustical engineer shall compile a list of proposed construction equipment and compare to the City's accepted vibration criteria. If it is determined that the proposed equipment would generate vibration levels below the City's standard of 0.3 inches per second (in/sec) peak particle velocity (PPV), no further vibration assessment is necessary. However, if vibration levels would potentially exceed the City's standard of 0.3 in/sec PPV, the Project Applicant shall develop a Vibration Monitoring and Construction Contingency Plan for approval by the Director of Community Development, or designee, to ensure that vibration levels would not exceed the City's accepted vibration damage criteria of 0.3 in/sec PPV. If a Vibration Monitoring and Construction Contingency Plan is deemed necessary, monitoring of vibration during initial construction activities shall be required. Monitoring results may indicate the need for more or less intensive measurements. The Vibration Monitoring and Construction Contingency Plan, at the discretion of the Director of Community Development or designee, shall include the following items as necessary:

   - Identification of structures where monitoring would be conducted;
   - A vibration monitoring schedule;
   - Defined structure-specific vibration limits;
   - Photographic, elevation, and crack surveys to document before and after construction conditions; and
   - Identification of construction contingencies for when vibration levels approach the limits.

   When vibration levels approach the limits specified in Section 11.16.090 of the City's Municipal Code, construction shall be suspended and contingencies identified in the approved Vibration Monitoring and Construction Contingency Plan shall be implemented as necessary to lower vibration levels, which could include shielding or protecting the affected building from potential vibration impacts as a possible alternative to changing construction methods.

4.13.9.2 Mitigation Measures

The proposed project would not result in any significant impacts related to noise and vibration, and no mitigation is required.

4.13.10 Level of Significance after Mitigation

The proposed project would result in less than significant impacts related to noise and vibration.

APPENDIX G

REVISED SECTION 4.17: TRANSPORTATION AND TRAFFIC

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4.17 TRANSPORTATION AND TRAFFIC

This section evaluates the potential impacts to transportation and traffic from implementation of the proposed project. This section is based in part on the following:

- *Traffic Impact Analysis* (LSA 2025d) (provided in Appendix J);
- *City of Lake Forest Transportation Analysis Guidelines* (TA Guidelines) (City of Lake Forest 2020); and
- *City of Lake Forest General Plan 2040 Mobility Element* (City of Lake Forest 2020).

4.17.1 Scoping Process

The Notice of Preparation (NOP) was published in March 2024 for the proposed project, and public Scoping Meetings were held on April 3, 2024, and April 24, 2024. The City of Lake Forest (City) received 120 comment letters during the public review period of the NOP. For a copy of the NOP comment letters received, refer to Appendix A of this Draft EIR. 59 comment letters included comments related to transportation and traffic. These comments pertain to concerns that the proposed project would increase traffic and congestion, generate truck trips that would cause impacts on nearby residential uses, and cause safety hazards for pedestrians and cyclists on nearby roadways.

4.17.2 Methodology

The analysis of potential impacts to transportation and traffic is based on the site-specific Traffic Impact Analysis[1] (TIA) completed for the proposed project (Appendix J). The TIA is consistent with the objectives and methodologies set forth in the City's Transportation Analysis Guidelines (2020), the 2021 Congestion Management Program (CMP) for Orange County, and applicable provisions of CEQA. The project study area, methodology, and cumulative projects were determined through coordination with the City, prior to the preparation of the TIA.

4.17.2.1 Trip Generation

The trip generation for the proposed project was developed using rates from the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (2021)[2] for Land Use Code 140 (Manufacturing), Land Use Code 150 (Warehousing), and Land Use Code 710 (General Office Building).

4.17.2.2 Vehicle Miles Traveled

Until July 1, 2020, roadway congestion or level of service (LOS) was used as the primary study metric for planning and environmental review of development projects in California. However, Senate Bill (SB) 743 required the Governor's Office of Planning and Research (OPR) to establish a new metric

1 LSA. 2025d. *Traffic Impact Analysis, IPT Enterprise Business Center LLC Project, Lake Forest, California*. August.

2 Institute of Transportation Engineers (ITE). 2021. *Trip Generation Manual,* 11th Edition.

for identifying and mitigating transportation impacts pursuant to the California Environmental Quality Act (CEQA) to meet the State's goals to reduce greenhouse gas (GHG) emissions, encourage infill development, and improve public health through more active transportation.

California Public Resources Code (PRC) Section 21099(b) states that, upon certification of the revised guidelines for determining transportation impacts, automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment under CEQA. On July 1, 2020, OPR identified vehicle miles traveled (VMT) as the required CEQA transportation metric (not LOS) and is the only legally acceptable threshold for transportation-related environmental impacts pursuant to CEQA. However, because the City still uses LOS in its General Plan for local planning purposes, a thorough discussion about LOS within the project area is provided in the *Traffic Impact Analysis* (Appendix J).

VMT is a measurement of the amount and distance that a person drives, accounting for the number of passengers within a vehicle. Many interdependent factors affect the extent and distance a person might drive. In particular, the type of built environment affects how many places a person can access within a given distance, time, and cost, using different ways of travel (e.g., private vehicle, public transit, bicycling, walking). Typically, low-density development located at great distances from other land uses and in areas with few alternatives to the private vehicle provides less access than a location with high density, a mix of land uses, and numerous ways of travel. Therefore, low-density development typically generates more VMT per capita compared to a similarly sized development located in urban areas. In general, higher VMT areas are associated with more air pollution, including GHG emissions and energy usage, than lower VMT areas. VMT is calculated by multiplying the number of trips generated by a project by the total distance of each of those trips.

Lead agencies have the discretion to set their own thresholds of significance with the goals of the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. On July 21, 2020, the Lake Forest City Council adopted the *City of Lake Forest Transportation Analysis Guidelines* (TA Guidelines) (City of Lake Forest 2020). The TA Guidelines include the screening criteria, VMT analysis methodology, VMT impact thresholds, and VMT mitigation measures.

4.17.3 Existing Environmental Setting

The project site is located at 26200 Enterprise Way in the north-central portion of Lake Forest in Orange County, California. As shown on Figure 3-1, Project Vicinity, in Chapter 3.0, Project Description, regional access to the project site is provided by State Route 241 (SR-241), which is located approximately 0.7 mile north of the project site, and Interstate 5 (I-5), which is located approximately 3.75 miles southwest of the project site.

4.17.3.1 Existing Circulation System

Key roadways in the vicinity of the proposed project are as follows:

- **Bake Parkway** is classified as a Primary Arterial in the City of Lake Forest General Plan 2040 Mobility Element (City of Lake Forest 2020). It is a four-lane, divided roadway north of the

project site. In the project vicinity, the posted speed is 55 miles per hour (mph). Bike lanes (Class II) and sidewalks are provided on both sides of the roadway, and on-street parking is prohibited on both sides of the roadway.

- **Commercentre Drive** is a roadway west of the project site. Commercentre Drive from Alton Parkway to Dimension Drive is classified as a Secondary Arterial in the City of Lake Forest General Plan 2040 Mobility Element, and it is a four-lane, undivided facility with a centered two-way left-turn lane (TWLTL). In the project vicinity, the posted speed is 45 mph. Sidewalks are provided on both sides of the roadway, and on-street parking is prohibited on both sides of the roadway.

- **Enterprise Way** is a two-lane local private roadway with a posted speed of 25 mph. A sidewalk is provided on one side of the roadway, and on-street parking is permitted in select locations along this roadway. Project access is provided via two full-access driveways on Enterprise Way.

- **Dimension Drive** is a four-lane, divided local roadway west of the project site. In the project vicinity, the posted speed is 45 mph. Sidewalks are provided on both sides of the roadway, and on-street parking is permitted in select locations along this roadway, except for recreational vehicles.

- **Lake Forest Drive** is classified as a Primary Arterial in the City of Lake Forest General Plan 2040 Mobility Element. It is a four-lane, divided roadway south and east of the project site. In the project vicinity, the posted speed is 50 mph. Bike lanes (Class II) and sidewalks are provided on both sides of the roadway, and on-street parking is prohibited on both sides of the roadway.

- **Rancho Parkway** is classified as a Primary Arterial in the City of Lake Forest General Plan 2040 Mobility Element. It is a four-lane, divided roadway north of the project site. In the project vicinity, the posted speed is 45 mph. Bike lanes (Class II) and sidewalks are provided on both sides of the roadway, and on-street parking is prohibited on both sides of the roadway.

Local access to the project site for both passenger cars and wheelbase-67 (WB-67) trucks is provided by Enterprise Way, which is accessed from Dimension Drive.

4.17.3.2 Existing Transit System

The study area is currently served by the Orange County Transportation Authority (OCTA) via Route 480, which runs along Dimension Drive and Commercentre Drive near the project site, and Route 177, which runs along Lake Forest Drive. Route 480 is a Metrolink Stationlink Route and provides transportation to and from the Irvine Metrolink Station and Lake Forest via Alton Parkway/Bake Parkway/Lake Forest Drive. OCTA stops are provided at the northwest and southwest corners of the intersection of Dimension Drive/Commercentre Drive – Enterprise Way (Route 480) approximately 800 feet away from the project driveways. Transit facilities are accessible to and from the project site via sidewalks along Enterprise Way.

Route 177 is an OCTA Community Route and provides transportation to and from Foothill Ranch to Laguna Hills via Lake Forest Drive/Muirlands Boulevard/Los Alisos Boulevard. Route 177 has bus

stops at the southwest and northeast corners of the intersection of Lake Forest Drive/Dimension Drive approximately 2,200 feet away from the project driveways. Transit facilities are accessible to and from the project site via sidewalks along Enterprise Way, Dimension Drive, and Lake Forest Drive.

4.17.3.3 Existing Bicycle and Pedestrian System

On-street (Class II) bicycle lanes are provided along Bake Parkway, Lake Forest Drive, and Rancho Parkway. Sidewalks currently exist in the project vicinity on both sides of Bake Parkway, Commercentre Drive, Dimension Drive, Lake Forest Drive, and Rancho Parkway, and along one side of Enterprise Way.

4.17.4 Regulatory Setting

Federal, State, and local regulations and programs related to transportation and traffic that are applicable to the proposed project are described below.

4.17.4.1 Federal Regulations

There are no federal regulations that apply to the proposed project with respect to transportation and traffic.

4.17.4.2 State Regulations

Senate Bill 743. SB 743 was signed in 2013, with the intent to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions." SB 743 changes the focus of the transportation impact discussion within CEQA environmental review analyses from measuring impacts to drivers, to measuring the impact of driving on the environment. The change is made by replacing the historically and commonly utilized LOS metric with an analysis of VMT. This shift in applicable metrics is expected to better align transportation impact analysis and mitigation outcomes with the State's goals to reduce GHG emissions, encourage infill development, and improve public health through more active transportation. When implemented, "traffic congestion shall not be considered a significant impact on the environment" within a CEQA transportation environmental analysis.

After an extensive public review period, in late 2018, updates to the *State CEQA Guidelines* were finalized and adopted. These changes became effective on December 28, 2018. The updated *State CEQA Guidelines* address the requirements of SB 743 and require lead agencies to assess VMT impacts for projects in Section 15064.3. The updated *State CEQA Guidelines* indicate that "a development project that is not exempt and that results in vehicle miles traveled greater than regional average for the land use type may indicate a significant impact." Mandatory implementation of the VMT metric and application of Section 15064.3 must occur by July 2020, pursuant to the applicable *State CEQA Guidelines*.

On July 21, 2020, the Lake Forest City Council adopted the *City of Lake Forest Transportation Analysis Guidelines* (TA Guidelines). The TA Guidelines include the screening criteria, VMT analysis

methodology, VMT impact thresholds, and VMT mitigation measures. The City's VMT Guidelines have been used to conduct this analysis.

4.17.4.3 Regional Regulations

Orange County Congestion Management Program. OCTA is a multimodal transportation agency that was created in 1991 with the consolidation of seven separate agencies. OCTA serves Orange County residents and travelers by providing: countywide bus and paratransit service; Metrolink rail service; the 91 Express Lanes; freeway, street, and road improvement projects; individual and company commuting solutions; motorist aid services; and regulation of taxi operations. State law requires that a Congestion Management Program (CMP) be developed, adopted, and updated biennially for every county that includes an urbanized area, and requires that it include every city and the county government within that county. As the Congestion Management Agency for Orange County, OCTA is responsible for implementing the Orange County CMP. The CMP describes strategies to address congestion problems in the CMP network, which includes State highways and principal arterials. The CMP Guidelines require analysis of the CMP network and uses level of service standards as a means to measure congestion and to determine how local governments meet CMP standards.

Based on CMP requirements, a Traffic Impact Analysis (TIA) is required for CMP purposes for any proposed development generating 2,400 or more daily trips, with the exception of developments that will directly access a CMP Highway System roadway segment, for which the threshold for requiring a TIA is reduced to 1,600 or more trips per day. The proposed project is estimated to generate a total of 727 daily trips. Therefore, the proposed project does not require a TIA for CMP purposes.

4.17.4.4 Local Regulations

City of Lake Forest General Plan 2040. The Mobility Element of the Lake Forest General Plan 2040 includes the following goals, policies, and actions related to transportation and traffic that would apply to the proposed project:

> **Goal M-1 Regional and Local Roads:** A transportation system that meets and balances local and regional mobility needs.
>
> > **Action M-1b:** As part of the development review process, the Community Development Department and the Public Works Department shall require developers to complete and fund the following:
> >
> > 1. A local transportation analysis to ensure that the site plan incorporates City transportation goals, policies, and standards, that identifies the effects of the project on the local transportation system, and identifies improvements to maintain adopted LOS standards for operations at signalized city-controlled intersections;
> >
> > 2. The project's proportional share of the effects on the City's circulation network through payment of fees; and

3. For local project-related circulation effects requiring improvements that are not included in an adopted fee program, either complete the necessary improvements or pay a proportional share of the cost.

Goal M-5 Bicycle, Pedestrian, and Equestrian Use: Support and promote the use of pedestrian, bicycle, and equestrian facilities.

Policy M-5.1 Promote Non-Vehicular Modes: Promote the provision of non-vehicular circulation modes within Lake Forest.

Policy M-5.2 Pedestrian Access Between Uses: Improve pedestrian access between complementary uses such as residential and commercial areas and seek to increase the number of bridges and/or grade-separated crossings over freeways and major roadways.

Goal M-6 Safety: Provide a safe transportation system for all users.

Policy M-6.3 Site Designs and Safety: Ensure, through the development review process, that development projects follow best design practices to reduce conflicts between multiple travel modes.

Goal M-9 Goods Movement: Accommodate safe goods movement through the City's transportation network.

Policy M-9.1 Goods Movement Along City Arterials: Continue to restrict truck traffic through the City to its arterial roadways in order to facilitate goods movement to regional facilities; continue to prohibit truck traffic on residential streets.

Policy M-9.2 Roadway Design: Maintain roadway design standards along City arterials to facilitate truck access to light industrial, manufacturing, commercial, and mixed-use areas along designated truck routes.

Goal M-10 Funding: Ensure the utilization of various financing methods to improve and provide a fiscally sound transportation system.

Policy M-10.2 New Developments: Ensure that new development projects contribute their appropriate fair share to transportation network improvements and that existing funding commitments are met.

City of Lake Forest Municipal Code. Guidelines and provisions related to traffic and circulation are addressed in Title 12 (Vehicles and Traffic) of the City's Municipal Code and parking is addressed in Title 9 of the City's Zoning Code. Chapter 9.160 (Facility Design Regulations) of the City's Municipal Code includes transportation demand management requirements.

4.17.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*~~.~~ and the *City of Lake Forest CEQA Significance Thresholds Guide* (2025). A number of the City of Lake Forest CEQA Significance Thresholds are fundamentally the same as those detailed in Appendix G of the State CEQQ Guidelines. However, some of the City of Lake Forest CEQA Significance Thresholds expand upon the State CEQA Guidelines Appendix G thresholds. In instances where the City of Lake Forest CEQA Significance Thresholds expand upon the State CEQA Guidelines Appendix G thresholds, the detailed threshold is provided below and is analyzed under Section 4.17.6, Project Impacts. Based on these thresholds, implementation of the proposed project may have a significant adverse impact with respect to transportation and traffic if it would:

Appendix G of the *State CEQA Guidelines*:

Threshold 4.17.1: Conflict with program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;

Threshold 4.17.2: Conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b);

Threshold 4.17.3: Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or

Threshold 4.17.4: Result in inadequate emergency access.

City of Lake Forest CEQA Significance Thresholds:

- Not meet any of the screening criteria described in the *City of Lake Forest Transportation Analysis Guidelines*; and
- Exceed any of the vehicle miles traveled (VMT) thresholds described in the *City of Lake Forest Transportation Analysis Guidelines;* and/or
- Include design features or uses that may cause traffic hazards such as sharp curves, tight turning radii from streets, limited roadway visibility, short merging lanes, uneven road grades, or any other conditions determined by the City traffic engineer to be a hazard.

4.17.6 Project Impacts

Please refer to Section 4.17.9 for full text description of the regulatory compliance and/or mitigation measures referenced in the analysis below.

Threshold 4.17.1: Would the project conflict with program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less Than Significant Impact. The following includes an evaluation of the proposed project's potential to conflict with applicable programs, plans, ordinances, and policies addressing the circulation system, including the Mobility Element of the Lake Forest General Plan 2040. The section begins with a description of the proposed project's trip generating potential compared to existing conditions, followed by a level of service (LOS) analysis, and an analysis of potential impacts to transit, bicycle, pedestrian, and roadway facilities. Table 4.17.A outlines the City General Plan goals and policies related to transportation and traffic that are applicable to the proposed project and evaluates the consistency of the proposed project with these goals and policies.

Trip Generation. Trip generation is the process of estimating the number of vehicles that would likely access the project site. The trip generation for the proposed project was developed using rates from the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 11th Edition (2021) for Land Use Code 140 (Manufacturing), Land Use Code 150 (Warehousing), and Land Use Code 710 (General Office Building). As further detailed in the TIA, the proposed project is estimated to generate 727 daily trips, including 94 trips (70 inbound and 24 outbound) in the a.m. peak hour and 99 trips (31 inbound and 68 outbound) in the p.m. peak hour in passenger car equivalents (PCEs). As mentioned before, the existing office building on site is currently vacant. Therefore, no trip reductions for the previous uses on site have been applied.

Table 4.17.A: General Plan Consistency Analysis

General Plan Goals, Policies, and Actions	General Plan Consistency Analysis
Goal M-1 Regional and Local Roads: A transportation system that meets and balances local and regional mobility needs.	
Action M-1b: As part of the development review process, the Community Development Department and the Public Works Department shall require developers to complete and fund the following: 1. A local transportation analysis to ensure that the site plan incorporates City transportation goals, policies, and standards, that identifies the effects of the project on the local transportation system, and identifies improvements to maintain adopted LOS standards for operations at signalized city-controlled intersections; 2. The project's proportional share of the effects on the City's circulation network through payment of fees; and 3. For local project-related circulation effects requiring improvements that are not included in an adopted fee program, either complete the necessary improvements or pay a proportional share of the cost.	**Consistent.** As part of the proposed project, off-site improvements would be made at 5 intersections to enhance public safety and address concerns related to large truck turning movements. Based on the results of the Traffic Impact Analysis (TIA), the proposed project would not result in any level of service (LOS) deficiencies or impacts. Therefore, the existing intersections and roadways~~, including City-designated truck routes,~~ would be able to accommodate all traffic (passenger vehicles and trucks) associated with implementation of the proposed project. The TIA is consistent with the objectives and methodologies set forth in the City's TA Guidelines, the 2021 Congestion Management Program (CMP) for Orange County, and applicable provisions of CEQA. The proposed project would not conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Items 2 and 3 of this action are not applicable to the proposed project. The proposed project would not conflict with these General Plan Policies or actions.
Goal M-5 Bicycle, Pedestrian, and Equestrian Use: Support and promote the use of pedestrian, bicycle, and equestrian facilities.	
Policy M-5.1 Promote Non-Vehicular Modes: Promote	**Consistent.** The proposed project would include bike racks

Table 4.17.A: General Plan Consistency Analysis

General Plan Goals, Policies, and Actions	General Plan Consistency Analysis
the provision of non-vehicular circulation modes within Lake Forest.	(31 spaces total) and pedestrian connections to nearby sidewalks and crosswalks. The proposed project would not conflict with these General Plan Policies.
Policy M-5.2 Pedestrian Access Between Uses: Improve pedestrian access between complementary uses such as residential and commercial areas and seek to increase the number of bridges and/or grade-separated crossings over freeways and major roadways.	
Goal M-6 Safety: Provide a safe transportation system for all users.	
Policy M-6.3 Site Designs and Safety: Ensure, through the development review process, that development projects follow best design practices to reduce conflicts between multiple travel modes.	**Consistent.** The project includes off-site improvements at five intersections to enhance public safety and address concerns related to large truck turning movements, which would be completed consistent with design standards to reduce conflicts between multiple travel modes. By incorporating intersection improvements into the design of the proposed project, the proposed project does not include any geometric design features or incompatible uses that could substantially increase circulation/traffic hazards. The proposed project would not conflict with this General Plan Policy.
Goal M-9 Goods Movement: Accommodate safe goods movement through the City's transportation network.	
Policy M-9.1 Goods Movement Along City Arterials: Continue to restrict truck traffic through the City to its arterial roadways in order to facilitate goods movement to regional facilities; continue to prohibit truck traffic on residential streets.	**Consistent**. Truck traffic associated with the proposed project would be restricted to arterial roadways, and truck traffic would not be allowed on residential streets. <u>The City does not currently have any designated truck routes.</u> The project site is not located along a City arterial ~~or designated truck route~~; however, the proposed off-site intersection improvements are located along City arterials ~~and designated truck routes~~. The off-site improvements are proposed to enhance public safety and address concerns related to large truck turning movements and would be completed consistent with design standards to facilitate truck access. The proposed project is anticipated to generate 727 total daily trips (in passenger car equivalents [PCEs]), which is broken down to 458 daily passenger vehicle trips and 269 daily truck trips (in PCEs). Based on the results of the TIA, the proposed project would not result in any level of service (LOS) deficiencies or impacts. Therefore, the existing intersections and roadways~~, including City designated truck routes,~~ would be able to accommodate all traffic (passenger vehicles and trucks) of the proposed project. The proposed project would not conflict with these General Plan Policies.
M-9.2 Roadway Design: Maintain roadway design standards along City arterials to facilitate truck access to light industrial, manufacturing, commercial, and mixed-use areas along designated truck routes.	

Table 4.17.A: General Plan Consistency Analysis

General Plan Goals, Policies, and Actions	General Plan Consistency Analysis
Goal M-10 Funding: Ensure the utilization of various financing methods to improve and provide a fiscally sound transportation system.	
Policy M-10.2 New Developments: Ensure that new development projects contribute their appropriate fair share to transportation network improvements and that existing funding commitments are met.	**Consistent.** As detailed in Chapter 3.0, Project Description, the proposed project would include off-site improvements at five intersections within the City to enhance public safety and address concerns related to large truck turning movements. These improvements will be paid by the project Applicant. The proposed project would not conflict with this General Plan Policy.

Source: Mobility Element, City of Lake Forest General Plan 2040.

Level of Service. The City has identified LOS D as the threshold for acceptable intersection operations. The following criteria shall be used to determine if a project would be responsible for LOS deficiencies and whether feasible roadway improvements should be identified to improve performance.

- If, under without project conditions, an intersection operates at LOS D or better and the addition of project trips results in unacceptable LOS (LOS E or F); or

- If, under without project conditions, an intersection operates at LOS E or F and the impact of the development is greater than 0.01 in ICU.

Based on the LOS analysis provided in the TIA (refer to Appendix J), the seven study area intersections are forecast to operate at an acceptable LOS during the a.m. and p.m. peak hours both in Existing (2024) with Project and Opening Year (2027) with Cumulative Projects with Project traffic conditions. Additionally, the project driveways are forecast to operate at satisfactory LOS (B or better) during both the a.m. and p.m. peak hours.

The proposed project would not conflict with any program, plan, ordinance or policy addressing roadways and intersection facilities, or decrease the performance of such facilities.

Bicycle and Pedestrian System. On-street (Class II) bicycle lanes are provided along Bake Parkway, Lake Forest Drive, and Rancho Parkway. Sidewalks currently exist in the project vicinity on both sides of Bake Parkway, Commercentre Drive, Dimension Drive, Lake Forest Drive, and Rancho Parkway and along one side of Enterprise Way. The proposed project would maintain the existing walkways/sidewalks in the vicinity of the project site. In addition, the proposed project would construct an accessible on-site pedestrian path through the parking lot to a paved walkway along the north side of the building that leads to the primary office area in the northwest corner of the building and the secondary office area in the northeast corner of the building. Additionally, the proposed project would provide 31 bicycle racks, including exterior racks along the northwest corner of the building and directly west of the parking stalls along the northern perimeter of the building, as well as indoor bicycle storage/racks on the west side of the first floor of the building.

The Mobility Element of Lake Forest General Plan 2040 includes Goal M-5, which is to support and promote the use of pedestrian, bicycle, and equestrian facilities. By including pedestrian walkways that connect to existing nearby crosswalks and sidewalks and bike racks, the proposed project would support and promote the use of alternate modes of transportation. Implementation of the proposed project would not conflict with plans, programs, and policies regarding pedestrian and bicycle facilities, or decrease the performance of such facilities.

Transit Services. There are no established standards regarding transit LOS that have been adopted by the City or transit agencies. The proposed project would not affect any existing or planned bus stops or sidewalks in the study area or otherwise degrade access to public transit facilities. The proposed project would potentially increase transit ridership by constructing a project with access to nearby transit facilities; however, the existing transit facilities in the nearby proximity to the project site would be able to accommodate the potential increase in ridership. Therefore, implementation of the proposed project would not conflict with plans, programs, and policies regarding transit facilities or decrease the performance of such facilities.

Overall, the proposed project would not conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant, and no mitigation is required.

Threshold 4.17.2: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)? (Appendix G); and

Would the project not meet any of the screening criteria described in the *City of Lake Forest Transportation Analysis Guidelines* (City of Lake Forest CEQA Significance Threshold); and

Would the project exceed any of the vehicle miles traveled (VMT) thresholds described in the *City of Lake Forest Transportation Analysis Guidelines*? (City of Lake Forest CEQA Significance Threshold)

Significant and Unavoidable Impact. On December 28, 2018, the California Office of Administrative Law cleared the revised California CEQA Guidelines for use. Among the changes to the guidelines was removal of vehicle delay and LOS from consideration under CEQA, which was mandated by Senate Bill (SB) 743. As a result, the City of Lake Forest updated its TA Guidelines (July 21, 2020) to require a VMT analysis for CEQA documents.

Per the City's TA Guidelines, there are five types of screening that lead agencies can apply to effectively screen projects from project-level assessment. These are summarized below:

- Small Project Screening (net daily trips less than 100 daily trips)
- Map-Based (Low VMT Area) Screening for Residential and Office/Employment Projects
- Proximity to High-Quality Transit Screening
- Project Type Screening based on Local-Serving Uses
- Affordable Residential Development Screening

The proposed project cannot be screened out as explained below:

- **Small Project Screening:** The proposed project is expected to generate 727 daily trips, which is more than 100 daily trips. Therefore, this screening criterion does not apply.

- **Map-Based (Low VMT Area) Screening for Residential and Office/Employment Projects:** The project site does not fall into the low-VMT area based on Attachment A-2 from the City's VMT Look-Up Table (Excel file). Therefore, this screening criterion does not apply.

- **Proximity to High-Quality Transit Screening:** No major transit stops or stops along a high-quality transit corridor were identified within 0.5 mile of the project site. Therefore, this screening criterion does not apply.

- **Project Type Screening based on Local-Serving Uses:** The proposed project is not a local-serving project. Therefore, this screening criterion does not apply.

- **Affordable Residential Development Screening:** The proposed project is not an affordable residential development. Therefore, this screening criterion does not apply.

Since the proposed project cannot be screened out based on any of the above criteria, a VMT analysis is required. Since the proposed project is not expected to cause a measurable change in trip distribution and travel patterns, the following methodology is consistent with the City's TA Guidelines:

1. Based on the proposed project's location, identify the applicable Lake Forest Transportation Analysis Model (LFTAM) Traffic Analysis Zone (TAZ).

2. Using the VMT Look-Up Table, find the applicable Home-Based Work (HBW) VMT per employee for an office/employment project.

3. Compare LFTAM TAZ VMT data against the applicable VMT threshold (i.e., countywide Home-Based Work [HBW] VMT per employee for an office/employment project).

4. Mitigate the net difference between the LFTAM VMT per employee and the countywide (for employment project) VMT threshold.

The proposed project is located in LFTAM TAZ 45 and is considered a non-residential office/ employment project. Section 3.2, VMT Methodology, of the City's Traffic Analysis Guidelines states that VMT is defined as the amount and distance of automobile travel attributed to a project. Heavy duty vehicles (e.g., medium and large trucks) are not intended to be the subject of a VMT analysis; however, it is acceptable to include heavy duty vehicle trips when included by the travel demand model used as the source of VMT data. The Lake Forest VMT Look-Up Table does not incorporate heavy-duty truck trips; therefore, heavy-duty truck trips were not included in the VMT analysis prepared for the proposed project. Table 4.17.B shows the VMT reduction targets per the latest City TA Guidelines. As shown in Table 4.17.B, the project VMT rate exceeds the City's VMT threshold

(Target VMT Rate) of 20.5 by 20 percent and, therefore, the proposed project is required to reduce its VMT by 20 percent.

Table 4.17.B: City of Lake Forest VMT Reduction Targets

VMT Analysis Scenario	VMT Rate	
	VMT	Metric
Countywide VMT Threshold[1]	20.5	VMT/Employee
Project VMT Rate[2]	24.6	VMT/Employee
Above or Below Citywide VMT Threshold	**Above**	
Significant Impact?	**Yes**	
VMT Reduction Required	**4.1 (20%)**	

Source: Compiled by LSA (2025).
[1] Per the City of Lake Forest Transportation Analysis Guidelines (July 2020).
[2] Project VMT rate was from City of Lake Forest SB 743 VMT Look-Up Table, as provided in Appendix G of the TIA.
SB = Senate Bill
VMT = vehicle miles traveled

The proposed project would be required to implement feasible Traffic Demand Management (TDM) measures that would reduce project VMT, as stipulated by **Mitigation Measure (MM) TRA-1 and MM TRA-2**. Providing bike lanes and an enhanced bikeway/pedestrian network with the provision of pedestrian-scale transit access lighting, and facilities/amenities that promote the use of transit, as required by **MM TRA-1 and MM TRA-2**, can increase access to and from transit hubs and~~. This~~ encourage~~s~~ a mode shift from vehicles to bicycles, thereby reducing ~~and displaces~~ VMT. Additionally, because of the size of the proposed development, the project Applicant is required to comply with the site development standards specified in Section 9.160 of the City's Municipal Code related to employee parking spaces, parking for carpool vehicles, parking for vanpool vehicles, bicycle parking, shower facilities, locker facilities, commuter information areas, rideshare vehicle loading areas, and the provision of transit/bus shelters as specified in **RCM TRA-1**. According to the California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (October 2024) (CAPCOA Handbook), the addition of bike lanes (T-20 Expand Bikeway Network) can provide a maximum VMT reduction of 0.5 percent. In addition, the provision of pedestrian-scale transit access lighting serves as a critical enhancement to T-18 (Provide Pedestrian Network Improvement) within the CAPCOA framework and it is an essential supportive and qualitative feature that improves the safety, comfort, and visibility of the walking environment. Because T-18 (Provide Pedestrian Network Improvement) primarily quantifies VMT reduction through the physical expansion of sidewalk coverage (calculated as a ratio of existing vs. new sidewalk miles) which is not part of MM TRA-2, the VMT reduction of the provision of pedestrian-scale transit access lighting (MM TRA-2) is not quantifiable. Consequently, this analysis does not claim a standalone VMT reduction for the lighting improvements. Assuming these two ~~that this~~ TDM measures could achieve the maximum 0.5 percent VMT reduction in total, the reduction achieved would not reduce the project's VMT to below the City's VMT threshold. Therefore, even with implementation of **RCM TRA-1, MM TRA-1, and MM TRA-2** ~~(addition of bike lanes)~~, the project's VMT impact would be significant and unavoidable.

Threshold 4.17.3: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (Appendix G); and

Would the project include design features or uses that may cause traffic hazards such as sharp curves, tight turning radii from streets, limited roadway visibility, short merging lanes, uneven road grades, or any other conditions determined by the City traffic engineer to be a hazard? (City of Lake Forest CEQA Significance Threshold)

Less Than Significant Impact. The design of the proposed project does not include any geometric design features or incompatible uses that could substantially increase circulation/traffic hazards. The proposed project would result in the demolition of an existing 144,906 square-foot (sq ft), two-story office/industrial building and the redevelopment, construction, and operation of a 35-foot-tall, 165,803 sq ft industrial building. Vehicular access to the project site would continue to be provided via two existing driveways on Enterprise Way and an existing shared drive aisle that connects to the adjacent property at the northeast corner of the site. Both existing driveways on Enterprise Way would provide access for circulation for autos, loading and delivery trucks, waste vehicles, and emergency vehicles. Both existing driveways on Enterprise Way can accommodate trucks and would not require widening to accommodate truck turns. Truck circulation would be accommodated from the west and east sides of the building. Loading docks would be located on the southwest side of the proposed building. The proposed project would be required to design, construct, and maintain structures, roadways, and facilities in accordance with applicable standards governing vehicular access.

Additionally, the proposed project would include the following intersection improvements to enhance public safety and address concerns related to large truck turning movements. These off-site improvements would be constructed by the project applicant prior to occupancy of the proposed industrial building:

- **Intersection of Bake Parkway and Commercentre Drive:** Modifications would be made to the traffic signal to accommodate protected eastbound and westbound left-turn phasing (from split phasing). Lane geometrics would be modified for the westbound approach to accommodate dual left-turn lanes and a shared through right-turn lane. Additionally, modifications would be made to the traffic signal equipment.

- **Intersection of Bake Parkway and Dimension Drive:** Modifications would be made to the median to accommodate a 430-foot westbound left-turn lane. Additionally, modifications would be made to the traffic signal equipment.

- **Intersection of Dimension Drive/Commercentre Drive – Enterprise Way:** Modifications would be made to the traffic signal to accommodate protected eastbound and westbound left-turn phasing (from permissive phasing). The curb radius of the southeast corner at this intersection would be modified to accommodate wheelbase-67 (WB-67) truck turns (northbound right turn). Additionally, modifications would be made to the traffic signal equipment.

- **Intersection of Lake Forest Drive and Dimension Drive:** Modifications would be made to accommodate a 250-foot northbound left-turn lane and a 205-foot eastbound left-turn lane. Additionally, modifications would be made to the traffic signal equipment.

    - **Intersection of Lake Forest Drive and Rancho Parkway:** Modifications would be made to accommodate a new 225-foot northbound right-turn lane, a 470-foot northbound left-turn lane, and a 440-foot southbound left-turn lane. Additionally, modifications would be made to the traffic signal equipment.

As detailed in the TIA, a stopping sight distance analysis was conducted along Enterprise Way at the project driveways to ensure driver visibility and safety. In the project vicinity, the speed limit along Enterprise Way is 25 mph. As stated in Table 201.1 of the California Department of Transportation (Caltrans) *Highway Design Manual* (CHDM),[3] the minimum stopping sight distance[4] is 150 feet for a design speed of 25 mph. There are no sight distance obstructions at the proposed project driveway. The sight distances at the project driveways along Enterprise Way exceed 150 feet looking left and 150 feet looking right. Therefore, the proposed project driveways would meet the minimum sight distance requirements specified in the HDM.

As detailed in the TIA, the AutoTurns Pro (Computer-Aided Design [CAD]) program and Google Earth aerial photos were used to estimate the maneuverability of the inbound and outbound turning movements at the following study area intersections:

- Bake Parkway/Commercentre Drive: northbound right-turn (inbound) and westbound left-turn (outbound)

- Dimension Drive/Commercentre Drive – Enterprise Way: northbound right-turn (inbound) and westbound left-turn (outbound)

- Lake Forest Drive/Dimension Drive: northbound left-turn (inbound), southbound right-turn (inbound), eastbound left-turn (outbound), and eastbound right-turn (outbound)

- Lake Forest Drive/Rancho Parkway: northbound right-turn (outbound) and westbound left-turn (inbound)

The turning movements were determined to be feasible for trucks if the following conditions were met:

1. A truck did not encroach beyond the nearside curb;
2. A truck did not encroach beyond the center median;
3. A truck did not encroach into opposing traffic lanes; or

[3] California Department of Transportation (Caltrans). 2020. *Highway Design Manual*. July. Website: https://dot.ca.gov/programs/design/manual-highway-design-manual-hdm (accessed June 13, 2024).

[4] According to the Caltrans *Highway Design Manual* (HDM) (dated July 2020), the stopping sight distance is the minimum sight distance along a roadway required to allow a driver to decrease their speed from the design speed to a complete stop.

4. A truck would not conflict with an opposing truck turning left.

A WB-67 truck was evaluated for this analysis. As a result of the WB-67 truck turn templates, the inbound and outbound turning movements at the study area intersections are considered feasible, except for northbound right-turn (inbound) movement at Dimension Drive/Commercentre Drive – Enterprise Way. However, as described above, the proposed project would include a curb radius modification at the southeast corner of Dimension Drive/Commercentre Drive – Enterprise Way to accommodate WB-67 truck turns (northbound right turn). With implementation of this improvement, all inbound and outbound truck turning movements at the study area intersections are considered feasible.

The proposed project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves, ~~or~~ dangerous intersections, tight turning radii from streets, limited roadway visibility, short merging lanes, uneven road grades, or any other conditions determined by the City traffic engineer to be a hazard) or incompatible uses (e.g., farm equipment). Impacts would be less than significant, and no mitigation is required.

Threshold 4.17.4: Would the project result in inadequate emergency access?

Less Than Significant Impact. The proposed project's impacts to emergency access are discussed below.

Construction. The proposed project would require temporary lane closures to complete the proposed intersection improvements and may require temporary lane closures on Enterprise Way for the completion of utility connections. However, the proposed project would be required to comply with the California Manual on Uniform Traffic Control Devices[5] (CA MUTCD), which provides uniform standards and specifications for all official traffic control devices in California. Compliance with standards included in the CA MUTCD would ensure that any temporary lane closures that may result from the proposed project would not result in inadequate emergency access at the project site or in the project vicinity. . Therefore, construction of the proposed project would not physically impair or otherwise interfere with emergency access in the project vicinity. Impacts related to emergency access in the project vicinity during project construction would be less than significant, and no mitigation is required.

Operation. Similar to existing conditions, access to and from the project site once the project is operational would be provided via the two existing driveways on Enterprise Way and an existing reciprocal access in the northeast corner of the site to the adjacent property. Implementation of the proposed project would increase the number of trucks operating near the site and would generate an increase in the amount and volume of traffic on local and regional roadway networks. In accordance with the California Fire Code, the project applicant is required to design, construct, and maintain structures, roadways, and facilities to maintain appropriate emergency/evacuation access to and from the project site. Entrances and exits to and from

[5] California Department of Transportation (Caltrans). 2014. *California Manual on Uniform Traffic Control Devices.* Revised January 11, 2024.

parking and loading facilities would be marked with appropriate directional signage. All site access points and driveway aprons would be designed and constructed to adequate widths for public safety pursuant to the Orange County Fire Authority (OCFA). Site design and compliance with standard and emergency OCFA and City requirements, such as the size and location of fire access routes and fire truck turning radii, would allow for proper site evacuation, if necessary, during project operations. Therefore, the project would not result in inadequate emergency access during project operation, impacts would be less than significant, and no mitigation is required.

4.17.7 Cumulative Impacts

As defined in Section 15130 of the *State CEQA Guidelines*, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for land use and planning. The cumulative study area for transportation and traffic is described in Chapter 4.0; the cumulative project list is provided in Chapter 4.0, Table 4.A, and a map of the cumulative project locations is provided in Chapter 4.0, Figure 4-1.

Cumulative impacts are addressed only for those thresholds that would result in a project-related impact, whether it be less than significant or less than significant with mitigation. If the project would result in no impact with respect to a particular threshold, by definition, it would not contribute to a cumulative impact. Therefore, no analysis would be required.

The proposed project would result in a less than significant impact related to conflicts with a program, plan, ordinance, or policy addressing the circulation system, roadway design hazards, and emergency access. However, based on the latest City's TA Guidelines, the project VMT rate exceeds the City's VMT threshold (Target VMT Rate) by 20 percent. The proposed project would be required to implement RCM and TDM measures as specified in **RCM TRA-1, MM TRA-1, and MM TRA-2** ~~(addition of bike lanes)~~, to promote alternative transportation with the intent of reducing VMT. According to the CAPCOA Handbook (October 2024), the addition of bike lanes (T-20 Expand Bikeway Network) can provide a maximum VMT reduction of 0.5 percent. As discussed above, the provision of pedestrian-scale transit access lighting serves as a critical enhancement to T-18 (Provide Pedestrian Network Improvement) within the CAPCOA framework and it is an essential supportive and qualitative feature that improves the safety, comfort, and visibility of the walking environment. Because T-18 (Provide Pedestrian Network Improvement) primarily quantifies VMT reduction through the physical expansion of sidewalk coverage (calculated as a ratio of existing vs. new sidewalk miles), the VMT reduction associated with the provision of pedestrian-scale transit access lighting is not quantifiable. Consequently, this analysis does not claim a standalone VMT reduction for the lighting improvements. Assuming these two ~~that this~~ TDM measures could achieve the maximum 0.5 percent VMT reduction, the reduction achieved would not reduce the project's VMT impact to below the City's VMT threshold. Therefore, even with implementation of **RCM TRA-1, MM TRA-1, and MM TRA-2**, the proposed project would result in a cumulatively significant and unavoidable transportation impact related to VMT.

Other past, present, and reasonably foreseeable projects would be required to comply with existing City General Plan goals, policies, and actions; California Fire Code requirements; and standard and emergency OCFA and City requirements to provide project-specific transportation facilities that accommodate pedestrian, bicycle, and vehicle travel and that meet the City's design requirements to avoid increasing hazards due to a geometric design feature and/or ensure adequate emergency access to and within the project site. In this way, potential transportation impacts would be evaluated and mitigated to a less than significant level by each cumulative project and would not individually contribute to a cumulatively considerable impact on transportation or traffic.

Therefore, when the proposed project is considered with the cumulative projects identified in Table 4.A, it would not result in cumulatively considerable conflicts with transportation policies governing the circulation system, create roadway design hazards, or create emergency access impacts.

However, as stated above, even with implementation of mitigation, the proposed project would result in a significant and unavoidable transportation impact related to VMT. Of the 13 cumulative projects listed in Table 4.A in Chapter 4.0, the Western Realco Projects (Projects 3 and 4 in Table 4.A) are located within the same TAZ as the proposed project. The TAZ zone associated with the proposed project and Projects 3 and 4 is above the countywide threshold for VMT, and all projects within this TAZ zone would contribute to higher VMT rates within the TAZ zone. The proposed project would have a significant project-specific impact on VMT and when considered with the other cumulative projects, particularly those within the same TAZ, the proposed project would have a cumulatively considerable impact on VMT. There are no feasible mitigation measures that can reliably guarantee that VMT can be reduced below the City's threshold; therefore, the proposed project would have a cumulatively significant and unavoidable transportation impact related to VMT even with implementation of mitigation.

4.17.8 Level of Significance Prior to Mitigation

Prior to mitigation, the proposed project would result in a potentially significant transportation and traffic impact related to VMT.

4.17.9 Regulatory Compliance Measures and Mitigation Measures

4.17.9.1 Regulatory Compliance Measures

~~There are no regulatory compliance measures applicable to the proposed project pertaining to transportation and traffic.~~

The following regulatory compliance measure is required for the proposed project:

RCM TRA-1: Development Standards Pursuant to Section 9.160.040 of the City's Municipal Code. The provisions of Zoning Code Chapter 9.160.040 (Facility Design Regulations) shall be implemented as follows:

- Prior to the issuance of the building permits for the construction of the primary building, the site plan and/or floor plans in the construction drawings shall clearly show the location of the required carpool parking stalls, vanpool parking

stalls, ride share vehicle loading area, bicycle parking, shower facilities, locker facilities, and commuter information area, in accordance with the regulations in Zoning Code Section 9.160.040.

- Prior to issuance of building permits for the construction of the primary building, the applicant shall retain a licensed Civil Engineer by the State of California to prepare Civil Street Improvement Plans for the installation of a bus shelter with solar-powered lights, a bus bench, and a trash receptacle for the existing bus stop located on the northwest corner of the intersection of Dimension Drive at Commercentre Drive/Enterprise Way, in accordance with the regulations in Zoning Code Section 9.16.040 and Orange County Transportation Authority Guidelines.

  The bus stop improvements shall be designed in accordance to the standards provided in the Orange County Transportation Authority (OCTA) Transit-Supportive Design Guidelines (June 30, 2021 or latest edition). As appropriate, the existing sidewalk shall be widened within the existing right-of-way (ROW) to a minimum eight feet wide to accommodate wheelchair bus boardings. If that is not feasible due to ROW constraints, then the sidewalk shall be widened to greatest extent practical.

  The project Applicant shall submit these Civil Street Improvement Plans to the City's Engineering Division and obtain a Public Works Encroachment Permit to construct the improvements to the existing bus stop.

- Prior to issuance of Certificate of Occupancy of the building, all provisions of Chapter 9.160 shall be implemented, as approved on the construction drawings and civil street improvement plans, including but not limited to, the required carpool parking stalls, vanpool parking stalls, ride share vehicle loading area, bicycle parking, shower facilities, locker facilities, commuter information area, and improvements to the existing bus stop located on the northwest corner of the intersection of Dimension Drive at Commercentre Drive/Enterprise Way.

4.17.9.2 Mitigation Measures

The following mitigation measures are ~~is~~ required to reduce impacts related to VMT:

MM TRA-1 **Bike Lanes.** Prior to issuance of a certificate of occupancy for the proposed industrial building, the project Applicant shall retain a licensed Civil Engineer by the State of California to prepare Civil Street Improvements and Signing & Striping Plans (collectively Construction Plans) for the implementation of bike lanes in both directions on Commercentre Drive between Alton Parkway and Dimension Drive. These bike lanes on Commercentre Drive would connect the proposed project site on Enterprise Way to the existing bike lanes on Alton Parkway, which eventually

connects to the Irvine Transportation Center, a multi-model transit hub including Metrolink and Amtrak commuter train services and OCTA bus services.

Based on a preliminary design assessment, the Construction Plans shall include an asphalt slurry seal of Commercentre Drive to modify the existing lane striping for the addition of standard striped bike lanes and green bike markings. The project Applicant shall use these Construction Plans to obtain a Public Works Encroachment Permit to construct said improvements for bike lanes on Commercentre Drive. The construction of said improvements shall be completed per the plans and to the satisfaction of the Public Works Department. The project Applicant shall use these Construction Plans to obtain a Public Works Encroachment Permit to construct said improvements for bike lanes on Commercentre Drive.

MM TRA-2: **Pedestrian-Scale Transit Access Lighting.** To reduce vehicle miles traveled (VMT) and improve first-/last-mile access to transit, the applicant/developer shall install pedestrian-scale lighting along the on-site pedestrian pathway between the primary building entrance and the public right-of-way, leading to the existing bus stops. Lighting shall provide adequate nighttime visibility for pedestrians (generally achieving a maintained average of 1.0 foot-candle), avoid glare, and limit spillover to adjacent properties in accordance with Lake Forest Municipal Code section 9.72.085(3). Fixtures shall include automatic dusk-to-dawn controls.

Prior to issuance of building permits, a lighting plan depicting fixture types, locations, heights, and illumination levels shall be submitted by the Applicant to the City for review and approval.

Prior to issuance of a certificate of occupancy, all required lighting shall be installed and operational and shall be maintained by the property owner for the life of the project.

4.17.10 Level of Significance after Mitigation

As discussed above, even with implementation of **MM TRA-1 and MM TRA-2**, the proposed project would result in a significant and unavoidable transportation and traffic impact related to VMT. As such the proposed project would contribute to a significant and unavoidable cumulatively considerable impact related to VMT.

APPENDIX H

REVISED CHAPTER 7.0: MITIGATION MONITORING AND REPORTING PROGRAM

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7.0 MITIGATION MONITORING AND REPORTING PROGRAM

7.1 MITIGATION MONITORING REQUIREMENTS

Public Resources Code (PRC) Section 21081.6 (enacted by the passage of Assembly Bill 3180) mandates that where significant effects have been identified, the following requirements shall apply to all reporting or mitigation monitoring programs:

- The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes that have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead agency or a responsible agency, prepare and submit a proposed reporting or monitoring program.

- The lead agency shall specify the location and custodian of the documents or other materials that constitute the record of proceedings upon which its decision is based.

- A public agency shall provide measures to mitigate or avoid significant effects on the environment that are fully enforceable through permit conditions, agreements, or other measures. Conditions of project approval may be set forth in referenced documents that address required mitigation measures or, in the case of the adoption of a plan, policy, regulation, or other project, by incorporating the mitigation measures into the plan, policy, regulation, or project design.

- Prior to the close of the public review period for a Draft Environmental Impact Report (EIR), a responsible agency, or a public agency having jurisdiction over natural resources affected by the project, shall either (1) submit to the lead agency complete and detailed performance objectives for mitigation measures that would address the significant effects on the environment identified by the responsible agency or agency having jurisdiction over natural resources affected by the project, or (2) refer the lead agency to appropriate, readily available guidelines or reference documents. Any mitigation measures submitted to a lead agency by a responsible agency or an agency having jurisdiction over natural resources affected by the project shall be limited to measures that mitigate impacts to resources that are subject to the statutory authority of, and definitions applicable to, that agency. Compliance or noncompliance with that requirement by a responsible agency or agency having jurisdiction over natural resources affected by a project shall not limit the authority of the responsible agency or agency having jurisdiction over natural resources affected by a project, or the authority of the lead agency, to approve, condition, or deny projects as provided by this division or any other provision of law.

7.2 MITIGATION MONITORING PROCEDURES

The Mitigation Monitoring and Reporting Program (MMRP) has been prepared in compliance with PRC Section 21081.6. It describes the requirements and procedures to be followed by the City of Lake Forest (City) to ensure that all mitigation measures adopted as part of the IPT Enterprise Business Center LLC Project (proposed project) will be carried out as described in the Final EIR.

Table 7.A lists each of the **Mitigation Measures (MMs)** and **Regulatory Compliance Measures (RCMs)** specified in the Draft EIR and identifies the party or parties responsible for implementation and monitoring of each measure.

Table 7.A: Mitigation and Monitoring Reporting Program

	Draft EIR Mitigation Measures (MMs) and Regularly Compliance Measures (RCMs)	Timing	Responsible Party / Approving Agency	Date Completed and Initials
4.1 Aesthetics				
There are no significant impacts related to aesthetics. No mitigation is required.				
4.2 Agriculture and Forestry Resources				
There are no significant impacts related to agriculture and forestry resources. No mitigation is required.				
4.3 Air Quality				
MM AQ-1:	**Tier 4 Interim Construction Equipment.** Prior to issuance of a building permit, the project Applicant shall submit construction plans to the City of Lake Forest verifying that all construction equipment used during construction of the project shall be equipped with Tier 4 Interim engines or the most effective Verified Diesel Emission Control Strategies (VDECS) available for the engine type (Tier 4 engines automatically meet this requirement) as certified by the California Air Resources Board (CARB). [1] During construction activities, the equipment shall be properly maintained and tuned in accordance with manufacturer specifications.	Prior to issuance of a building permit.	Project Applicant / City of Lake Forest	
MM AQ-2:	**Volatile Organic Compounds.** Prior to issuance of a grading permit, the Project Applicant shall submit construction plans to the City of Lake Forest that state that the project shall utilize "Super-Compliant" low volatile organic compounds (VOC) paints for nonresidential interior and exterior surfaces and low VOC paint for parking lot surfaces. Super-Compliant low VOC paints have been reformulated to exceed the regulatory VOC limits put forth by SCAQMD Rule 1113. Super-Compliant low VOC paints shall be no more than 10 grams per liter (g/L) of VOC.	Prior to issuance of a grading permit.	Project Applicant / City of Lake Forest	
MM AQ-3:	**Tier 4 Final Construction Equipment.** Prior to issuance of a building permit, the project Applicant shall consult with the City on the status of Western Realco Projects 1 and 2. If in this consultation, the City identifies that the construction schedule of Western Realco Projects 1 and 2, and the IPT Enterprise Business Center LLC Project (proposed project) will be under construction at the same time, the proposed project shall equip all construction equipment during the overlapping period with Tier 4 Final engines or the most effective Verified Diesel Emission Control Strategies (VDECS) available for the engine type (Tier 4 engines automatically meet this requirement) as certified by the California Air Resources Board. The equipment shall be properly maintained and tuned in accordance with manufacturer specifications. The project Applicant shall submit construction plans to the City of Lake Forest denoting the projected equipment Tier rating that will be used during the construction period.	Prior to issuance of a building permit.	Project Applicant / City of Lake Forest	
4.4 Biological Resources				
RCM BIO-1:	**Nesting Bird Clearance Survey.** If construction/ground disturbing activities, including demolition, occurs between February 1 and August 31, a Qualified Biologist shall conduct a pre-construction clearance survey for nesting birds within 3 days of the start of any construction, vegetation clearing, or grading activities (including disking and demolition) to ensure that no nesting birds are disturbed during construction. The Qualified Biologist shall be retained by the Construction Contractor. The Qualified Biologist conducting the clearance survey shall document a negative survey with a brief letter report indicating that no impacts to active avian nests would occur. If an active avian nest is discovered during the pre-construction clearance survey, construction activities shall stay outside of a no-disturbance buffer. In general, the no-disturbance buffer shall be a minimum of 50 feet for passerines and 250 feet for raptors. However, a species' sensitivity to disturbance can vary among species, the level of noise or construction disturbance, and the line of sight between the nest and the disturbance. Limits of construction to avoid an active nest shall be established in the field with flagging, fencing, or other appropriate barriers; and construction personnel shall be instructed on the sensitivity of nest areas. A biological monitor, with experience in monitoring active nests, shall be present to delineate the boundaries of the buffer area and to monitor daily all active nests to observe the efficacy of the no-disturbance buffers and to document any new nesting occurrences to ensure that nesting behavior is not adversely affected by the construction activity. Adversely affected nesting behavior, as determined by the biological monitor, includes, but is not limited to, disrupting reproductive behavior, nest abandonment, and/or prolonged absences of parents while incubating eggs. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, construction, vegetation clearing, or grading activities (including disking and demolition) within the buffer area can occur. Field memorandums shall be prepared by the biological monitor within 24 hours of each day of monitoring and shall be submitted to the City of Lake Forest to document compliance with the applicable resource protection measures.	Prior to any construction, demolition, vegetation clearing, or grading activities and during construction.	Construction Contractor / City of Lake Forest	
4.5 Cultural Resources				
RCM CUL-1:	**Unknown Archaeological Resources.** In the event that archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 100 feet of the find until a qualified archaeologist from the Orange County List of Qualified Archaeologists has evaluated the find in accordance with federal, State, and local guidelines to determine whether the find constitutes a "unique archaeological resource," as defined in Section 21083.2(g) of the California Public Resources Code (PRC). Personnel of the proposed project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded beyond 100 feet from the find on other portions of the project site. The found deposits shall be treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. Prior to issuance of a grading permit, the Director of Community Development, or designee, shall ensure that this regulatory compliance measure is documented on the grading plans.	During ground-disturbing construction activities, upon discovery of archaeological resources.	Construction Contractor and Qualified Archaeologist / City of Lake Forest Director of Community Development or designee	

[1] CARB. 2015. Verified Diesel Emission Control Strategy (VDECS). Website: https://ww2.arb.ca.gov/sites/default/files/classic/msprog/ordiesel/faq/vdecsfaq.pdf (accessed June 2025)

Table 7.A: Mitigation and Monitoring Reporting Program

Draft EIR Mitigation Measures (MMs) and Regularly Compliance Measures (RCMs)		Timing	Responsible Party / Approving Agency	Date Completed and Initials
RCM CUL-2:	**Human Remains.** If human remains are encountered, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to State PRC Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be Native American, the County Coroner would notify the Native American Heritage Commission (NAHC), which would determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The MLD recommendations may include scientific removal and nondestructive analysis of human remains and items associated with Native American burials, preservation of Native American human remains and associated grave goods in place, relinquishment of Native American human remains and associated items to the descendants for treatment, or any other culturally appropriate treatment. Prior to issuance of a grading permit, the Director of Community Development, or designee, shall ensure that this regulatory compliance measure is documented on the grading plans.	During ground-disturbing construction activities, upon discovery of human remains.	Construction Contractor and County Coroner / City of Lake Forest Director of Community Development or designee	
4.6 Energy				
There are no significant impacts related to energy. No mitigation is required.				
4.7 Geology and Soils				
MM GEO-1:	**Compliance with Applicable California Building Code and Project-Specific Geotechnical Specifications**. Prior to the final grading permit and the issuance of building permits, the project Applicant shall provide final project plans to applicable City of Lake Forest (City) staff for review and approval showing that the project, including site preparation and construction of proposed buildings, has been designed and will be constructed in conformance with applicable provisions of the most current California Building Code at the time of City review, the City's Building Code, and the specifications cited in the Geotechnical Investigation, prepared by Southern California Geotechnical, dated November 2021. During grading, an on-site inspection shall be conducted by the Applicant-hired Project Geotechnical Consultant and the City of Lake Forest Director of Public Works/ City Engineer, or designee, to ensure compliance with geotechnical specifications as incorporated into project plans. Prior to the final grading permit, the Project Geotechnical Consultant shall submit a Final Testing and Observation Geotechnical Report for Rough Grading to the City of Lake Forest Director of Public Works/City Engineer, or designee. Prior to the issuance of a Certificate of Occupancy for the new building, the Project Geotechnical Consultant shall provide a letter regarding contractor compliance with project plans and required geotechnical. The letter shall be submitted to the City of Lake Forest Building Division for review and approval.	Prior to the final grading permit and issuance of building permits.	Project Applicant and Project Geotechnical Consultant / City of Lake Forest Director of Public Works, City Engineer, or designee	
MM GEO-2:	**Corrosive Soils.** Prior to issuance of building permits, the project Applicant/Developer shall retain the services of a licensed corrosion engineer to conduct additional site testing and final design evaluation regarding the possible on-site presence of significant volumes of corrosive soils. At a minimum, the corrosion engineer shall (1) verify the soluble sulfate concentrations of the soils that are present at pad grade within the building areas at the completion of rough grading; (2) provide detailed corrosion protection measures for cast iron and/or ductile iron pipes, as necessary; (3) confirm that soluble sulfates and chloride levels in the on-site soils do not warrant specialized concrete mix design; and (4) confirm that nitrates present in the on-site soil do not warrant protection for copper materials. During grading, on-site inspection shall be conducted by the Project Geotechnical Consultant and City of Lake Forest Director of Public Works/City Engineer, or designee, to ensure compliance with the corrosion protection measures of the corrosion engineer, as incorporated into the project plans. Prior to issuance of a building permit, the Director of the City of Lake Forest Public Works Department, or designee, shall verify that the project plans incorporate the corrosion protection measures of the corrosion engineer.	Prior to issuance of building permits.	Project Applicant and Project Geotechnical Consultant / City of Lake Forest Director of Public Works, City Engineer, or designee	
MM GEO-3:	**Paleontological Resources Impact Mitigation Program.** Prior to the final grading permit and the issuance of building permits, the project Applicant/Developer shall provide a letter to the Director of Community Development Department, or designee, stating that they have retained a qualified paleontologist (defined as a practicing paleontologist who is recognized in the paleontological community and proficient in vertebrate paleontology) who is listed on the County of Orange list of certified paleontologists. Prior to the final grading permit and the issuance of building permits, the qualified paleontologist shall submit to the City, a Paleontological Resources Impact Mitigation Program (PRIMP) for this project. The PRIMP shall include the methods that will be used to protect paleontological resources that may exist within the project site, as well as procedures for monitoring, fossil preparation and identification, curation into a repository, and preparation of a report at the conclusion of grading. The PRIMP shall be consistent with the guidelines of the Society of Vertebrate Paleontology. The City shall not issue a grading permit for the project until the letter and PRIMP, both referenced above, have been received.	Prior to the final grading permit and issuance of building permits.	Project Applicant / City of Lake Forest Director of Community Development Department or designee	

Table 7.A: Mitigation and Monitoring Reporting Program

Draft EIR Mitigation Measures (MMs) and Regularly Compliance Measures (RCMs)	Timing	Responsible Party / Approving Agency	Date Completed and Initials
During construction, excavation and grading activities in deposits with high paleontological sensitivity shall be monitored by a paleontological monitor as defined by the PRIMP. No monitoring is required for excavations in deposits with no or low paleontological sensitivity (i.e., engineered fill soils). If paleontological resources are encountered during the course of ground disturbance, the paleontological monitor shall have the authority to temporarily redirect construction away from the area of the find in order to assess its significance. In the event that paleontological resources are encountered when a paleontological monitor is not present, work in the immediate area of the find shall be redirected, and a paleontologist shall be contacted to assess the find for significance. Collected resources shall be prepared to the point of identification, identified to the lowest taxonomic level possible, cataloged, and curated into the permanent collections of a scientific institution prepared by the Applicant-hired qualified paleontologist. Prior to the issuance of building permits, a report of findings shall be prepared to document the results of the monitoring program prepared by the Applicant-hired qualified paleontologist. The report shall be provided to the Director of Community Development, or designee.			
Refer to **RCM WQ-1 through RCM WQ-4** under Section 4.10 below.			
4.8 Greenhouse Gas Emissions			
MM GHG-1: **Electric Vehicle Charging.** Provisions shall be made at the project site for emerging electric truck technology. Prior to the issuance of a shell building permit, the ~~City shall verify that the site plan identifies an on-site location for future electric truck charging stations, with space available for a minimum of four (4) trucks to simultaneously charge when charging stations are installed in the future. The conduit trenching shall be installed to that location for future conduit pull as a requirement of the shell building permit. In conjunction with the approval of tenant improvement plans and permits, the applicant shall install electric truck charging stations on the site for a minimum of four (4) electric truck to simultaneously charge.~~ construction plan set shall: a) Provide for installation of all necessary infrastructure, including conduit, wiring, and sufficient electrical capacity, to support the future installation of on-site electric truck charging stations; and b) Designate sufficient space to accommodate a minimum of four electric trucks charging simultaneously. Prior to issuance of tenant improvement permits for the building, the tenant improvement plans shall include installation of a minimum of four electric truck charging stations at the predesignated locations. The charging stations shall be installed and operational prior to tenant occupancy of the building.	Prior to issuance of a shell building permit and in conjunction with the approval of tenant improvement plans and permits.	Project Applicant / City of Lake Forest	
4.9 Hazards and Hazardous Materials			
There are no significant impacts related to hazards and hazardous materials. No mitigation is required.			
4.10 Hydrology and Water Quality			
RCM WQ-1: **Construction General Permit.** Prior to the issuance of a grading permit, the Construction Contractor shall obtain coverage under the State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2022-0057-DWQ, NPDES No. CAS000002) (Construction General Permit). This shall include submission of Permit Registration Documents (PRDs), including a Notice of Intent for coverage under the permit to the SWRCB via the Stormwater Multiple Application and Report Tracking System (SMARTs). The Construction Contractor shall provide the Waste Discharge Identification Number (WDID) to the Lake Forest Public Works Director, or designee, to demonstrate proof of coverage under the Construction General Permit. Project construction shall not be initiated until a WDID is received from the SWRCB and is provided to the City, or designee. A Storm Water Pollution Prevention Plan (SWPPP) shall be prepared by a Qualified SWPPP Developer in accordance with the requirements of the Construction General Permit and submitted via SMARTs. These include: Best Management Practices (BMPs) for erosion and sediment control, site management/housekeeping/waste management, management of non-storm water discharges, run-on and runoff controls, and BMP inspection/maintenance/repair activities. BMP implementation shall be consistent with the BMP requirements in the most recent version of the California Stormwater Quality Association's Stormwater Best Management Handbook: Construction. The SWPPP shall include a construction site monitoring program that identifies requirements for dry weather visual observations of pollutants at all discharge locations, and as appropriate (depending on the Risk Level), sampling of the site effluent and receiving waters. A Qualified SWPPP Practitioner shall be responsible for implementing the BMPs at the site and performing all required monitoring and inspection/maintenance/repair activities.	Prior to the issuance of a grading permit.	Construction Contractor / Lake Forest Public Works Director or designee	

Table 7.A: Mitigation and Monitoring Reporting Program

	Draft EIR Mitigation Measures (MMs) and Regularly Compliance Measures (RCMs)	Timing	Responsible Party / Approving Agency	Date Completed and Initials
	Upon completion of construction and stabilization of the site, a Notice of Termination shall be submitted via SMARTs.			
RCM WQ-2:	**City of Lake Forest Municipal Code.** Prior to the issuance of a grading permit, the Project Applicant shall submit and obtain approval of an Erosion Control Plan in compliance with Article XIII of Chapter 8.30 of the City of Lake Forest Municipal Code from the Lake Forest Public Works Director, or designee. The Erosion Control Plan shall be submitted to the City of Lake Forest Building Official for approval by September 15 each year for projects under a grading permit. All grading shall be undertaken in accordance with the BMPs for pollution prevention adopted by the City, the City's NPDES Permit regulating discharges into and from its Municipal Separate Storm Sewer System (MS4), the Drainage Area Management Plan (DAMP), and any other conditions, requirements and water quality management plans adopted by the City. Additionally, the project Applicant shall adhere to the erosion and sediment control and water quality system maintenance requirements listed in Section 8.30.154 of the Lake Forest Municipal Code.	Prior to the issuance of a grading permit.	Project Applicant / Lake Forest Public Works Director	
RCM WQ-3:	**Final Water Quality Management Plan.** Prior to issuance of a grading permit, the project Applicant shall submit and obtain approval of a Final Water Quality Management Plan (WQMP) to the Lake Forest Public Works Director, or designee. The project shall implement project design features identified in the Final WQMP. The Final WQMP shall demonstrate that any proposed on-site development plan includes BMPs for source control, pollution prevention, site design, low impact development (LID) implementation, and structural treatment control. BMPs shall be designed and implemented to address 303(d) listed pollutants and retain the project site's minimum design capture volume and hydromodification volume to ensure that post-development storm water runoff volume or time of concentration does not exceed pre-development storm water runoff by more than 10 percent of the 2-year peak flow in accordance with the Santa Ana Regional Water Quality Control Board Order Number R8-2009-0030, NPDES Permit No. CAS618030, as amended by Order No. R8-2010-0062, also known as the North Orange County MS4 permit. The proposed LID BMPs specified in the Final WQMP shall be incorporated into the grading and development plans submitted to the City of Lake Forest for review and approval. Periodic maintenance of any required BMPs and landscaped areas during project occupancy and operation shall be in accordance with the schedule outlined in the Final WQMP.	Prior to issuance of a grading permit.	Project Applicant / Lake Forest Public Works Director, or designee	
RCM WQ-4:	**Final Hydrology and Hydraulic Analyses**. Prior to issuance of grading permits, the project Applicant shall submit and obtain approval of the Final Hydrology and Hydraulic Analyses to the Lake Forest Director of Public Works, or designee, and the Orange County Flood Control District (OCFCD). The Final Hydrology and Hydraulic Analyses shall be prepared consistent with the requirements of the Orange County Hydrology Manual (Orange County Environment Agency 1986) and Orange County Hydrology Manual Addendum No. 1 (Orange County Environment Agency 1996), or subsequent guidance manuals. The Final Hydrology and Hydraulic Analyses shall confirm that the on-site storm drains, on-site detention basins, and any other drainage structures are appropriately sized to accommodate stormwater runoff from the design storm so that the peak flow of stormwater discharge from the project site is less than existing conditions. The Final Hydrology and Hydraulic Analyses shall also demonstrate that the detention facilities meet the hydromodification requirements of the Waste Discharge Requirements for the County of Orange, Orange County Flood Control District and the Incorporated Cities of Orange County within the Santa Ana Region Areawide Urban Storm Water Runoff Orange County (North Orange County MS4 Permit), Order R8-2009-0030, NPDES No. CAS618030 (as amended by Order No. R8-2010-0062). In compliance with the hydromodification requirements, the post-project runoff discharge volume for the 2-year storm shall not exceed that of the predevelopment condition by more than 5 percent, and the time of concentration of post-development runoff for the 2 year storm event shall not be greater than 5 percent less than that of the predevelopment condition. The Director of the City of Lake Forest Public Works Department, or designee, shall ensure that the drainage facilities specified in the Final Hydrology and Hydraulic Analyses are incorporated into the final project design.	Prior to issuance of grading permits.	Project Applicant / Lake Forest Director of Public Works, or designee, and the OCFCD	
4.11 Land Use and Planning				
There are no significant impacts related to land use and planning. No mitigation is required.				
4.12 Mineral Resources				
There are no significant impacts related to mineral resources. No mitigation is required.				
4.13 Noise ~~and Vibration~~				
RCM NOI-1:	**City of Lake Forest Municipal Code, Section 11.16.060(D)**. During construction, construction activities shall be limited to between the hours of 7:00 a.m. and 8:00 p.m. Mondays through Saturdays. No construction shall be permitted outside of these hours or on legal City of Lake Forest holidays ~~Sundays or federal holidays~~, without a specific exemption issued by the City of Lake Forest.	During construction.	Construction Contractor / City of Lake Forest	
RCM NOI-2:	**Pre-Construction Vibration Assessment.** After a specific project equipment list has been determined and prior to the issuance of a building permit, the following actions shall be implemented: 1) A qualified structural engineer, as approved by the Director of Community Development, or designee shall identify all structures that are located within the distances established in Table 2 of Section 11.16.090 of the City's Municipal Code and that have the potential to be affected by ground-borne vibration originating from the construction; and 2) A qualified acoustical engineer shall compile a list of proposed construction equipment and compare to the City's accepted vibration criteria. If it is determined that the proposed equipment would generate vibration levels below the City's standard of 0.3 inches per second (in/sec) peak	After a specific project equipment list has been determined and prior to issuance of a building permit.	Project Applicant / Lake Forest Director Community Development or designee	

Table 7.A: Mitigation and Monitoring Reporting Program

Draft EIR Mitigation Measures (MMs) and Regularly Compliance Measures (RCMs)	Timing	Responsible Party / Approving Agency	Date Completed and Initials
particle velocity (PPV), no further vibration assessment is necessary. However, if vibration levels would potentially exceed the City's standard of 0.3 in/sec PPV, the Project Applicant shall develop a Vibration Monitoring and Construction Contingency Plan for approval by the Director of Community Development, or designee, to ensure that vibration levels would not exceed the City's accepted vibration damage criteria of 0.3 in/sec PPV. If a Vibration Monitoring and Construction Contingency Plan is deemed necessary, monitoring of vibration during initial construction activities shall be required. Monitoring results may indicate the need for more or less intensive measurements. The Vibration Monitoring and Construction Contingency Plan, at the discretion of the Director of Community Development or designee, shall include the following items as necessary: ● Identification of structures where monitoring would be conducted; ● A vibration monitoring schedule; ● Defined structure-specific vibration limits; ● Photographic, elevation, and crack surveys to document before and after construction conditions; and ● Identification of construction contingencies for when vibration levels approach the limits. When vibration levels approach the limits specified in Section 11.16.090 of the City's Municipal Code, construction shall be suspended and contingencies identified in the approved Vibration Monitoring and Construction Contingency Plan shall be implemented as necessary to lower vibration levels, which could include shielding or protecting the affected building from potential vibration impacts as a possible alternative to changing construction methods.			
4.14 Population and Housing			
There are no significant impacts related to population and housing. No mitigation is required.			
4.15 Public Services			
There are no significant impacts related to public services. No mitigation is required.			
4.16 Recreation			
There are no significant impacts related to recreation. No mitigation is required.			
4.17 Transportation			
RCM TRA-1: **Development Standards Pursuant to Section 9.160.040 of the City's Municipal Code.** The provisions of Zoning Code Chapter 9.160.040 (Facility Design Regulations) shall be implemented as follows: • Prior to the issuance of the building permits for the construction of the primary building, the site plan and/or floor plans in the construction drawings shall clearly show the location of the required carpool parking stalls, vanpool parking stalls, ride share vehicle loading area, bicycle parking, shower facilities, locker facilities, and commuter information area, in accordance with the regulations in Zoning Code Section 9.160.040. • Prior to issuance of building permits for the construction of the primary building, the applicant shall retain a licensed Civil Engineer by the State of California to prepare Civil Street Improvement Plans for the installation of a bus shelter with solar-powered lights, a bus bench, and a trash receptacle for the existing bus stop located on the northwest corner of the intersection of Dimension Drive at Commercentre Drive/Enterprise Way, in accordance with the regulations in Zoning Code Section 9.16.040 and Orange County Transportation Authority Guidelines. The bus stop improvements shall be designed in accordance to the standards provided in the Orange County Transportation Authority (OCTA) Transit-Supportive Design Guidelines (June 30, 2021 or latest edition). As appropriate, the existing sidewalk shall be widened within the existing right-of-way (ROW) to a minimum eight feet wide to accommodate wheelchair bus boardings. If that is not feasible due to ROW constraints, then the sidewalk shall be widened to greatest extent practical. The project Applicant shall submit these Civil Street Improvement Plans to the City's Engineering Division and obtain a Public Works Encroachment Permit to construct the improvements to the existing bus stop. • Prior to issuance of Certificate of Occupancy of the building, all provisions of Chapter 9.160 shall be implemented, as approved on the construction drawings and civil street improvement plans, including but not limited to, the required carpool parking stalls, vanpool parking stalls, ride share vehicle loading area, bicycle parking, shower facilities, locker facilities, commuter information area, and improvements to the existing bus stop located on the northwest corner of the intersection of Dimension Drive at Commercentre Drive/Enterprise Way.	Prior to the issuance of the building permits and prior to issuance of Certificate of Occupancy of the building.	Project Applicant / City of Lake Forest	
MM TRA-1: **Bike Lanes.** Prior to issuance of a certificate of occupancy for the proposed industrial building, the project Applicant shall retain a licensed Civil Engineer by the State of California to prepare Civil Street Improvements and Signing & Striping Plans (collectively Construction Plans) for the implementation of bike lanes in both directions on Commercentre Drive between Alton Parkway and Dimension Drive. These bike lanes on Commercentre Drive would connect the proposed project site on Enterprise Way to the existing bike lanes on Alton Parkway, which eventually	Prior to issuance of a certificate of occupancy.	Project Applicant / City of Lake Forest	

Table 7.A: Mitigation and Monitoring Reporting Program

Draft EIR Mitigation Measures (MMs) and Regularly Compliance Measures (RCMs)	Timing	Responsible Party / Approving Agency	Date Completed and Initials
connects to the Irvine Transportation Center, a multi-model transit hub including Metrolink and Amtrak commuter train services and OCTA bus services. Based on a preliminary design assessment, the Construction Plans shall include an asphalt slurry seal of Commercentre Drive to modify the existing lane striping for the addition of standard striped bike lanes and green bike markings. The project Applicant shall use these Construction Plans to obtain a Public Works Encroachment Permit to construct said improvements for bike lanes on Commercentre Drive. The construction of said improvements shall be completed per the plans and to the satisfaction of the Public Works Department. The project Applicant shall use these Construction Plans to obtain a Public Works Encroachment Permit to construct said improvements for bike lanes on Commercentre Drive.			
MM TRA-2: Pedestrian-Scale Transit Access Lighting. To reduce vehicle miles traveled (VMT) and improve first-/last-mile access to transit, the applicant/developer shall install pedestrian-scale lighting along the on-site pedestrian pathway between the primary building entrance and the public right-of-way, leading to the existing bus stops. Lighting shall provide adequate nighttime visibility for pedestrians (generally achieving a maintained average of 1.0 foot-candle), avoid glare, and limit spillover to adjacent properties in accordance with Lake Forest Municipal Code section 9.72.085(3). Fixtures shall include automatic dusk-to-dawn controls. Prior to issuance of building permits, a lighting plan depicting fixture types, locations, heights, and illumination levels shall be submitted by the Applicant to the City for review and approval. Prior to issuance of a certificate of occupancy, all required lighting shall be installed and operational and shall be maintained by the property owner for the life of the project.	Prior to the issuance of the building permits.	Project Applicant / City of Lake Forest	
4.18 Tribal Cultural Resources			
MM TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities. A. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity. C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe. D. On-site tribal monitoring shall conclude upon the later of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) prior to approval of final building permit, a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.	Prior to commencement of ground-disturbing activities.	Project Applicant/Lead Agency / City of Lake Forest Community Development Department	

Table 7.A: Mitigation and Monitoring Reporting Program

Draft EIR Mitigation Measures (MMs) and Regularly Compliance Measures (RCMs)	Timing	Responsible Party / Approving Agency	Date Completed and Initials
MM TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funeral/Non-Ceremonial). A. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.	During construction, upon discovery of any tribal cultural resources.	Construction Contractor and Kizh monitor and/or Kizh archaeologist / City of Lake Forest Community Development Department	
MM TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects. A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. B. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed. C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.	During construction, upon discovery of human remains or associated funerary or ceremonial objects.	Construction Contractor and County Coroner/ City of Lake Forest Director of Community Development Department	
4.19 Utilities and Service Systems			
There are no significant impacts related to utilities and service systems. No mitigation is required.			
4.20 Wildfire			
There are no significant impacts related to wildfire. No mitigation is required.			

Source: Compiled by LSA (2025).

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