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SENT VIA E-MAIL: November 25, 2026

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Draft Environmental Impact Report (EIR) for the
Western Realco Enterprise Way Industrial Project (Proposed Project)
(SCH No.: 2024120646)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review 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 have provided a brief summary of the project information and prepared the following comments which are organized by topic of concern.

Summary of Proposed Project Information in the Draft EIR

Based on the Draft EIR, the Proposed Project consists of demolishing existing office buildings and constructing three new tilt-up concrete industrial buildings across two sites:

1) Site 1 (8.41 acres) with two buildings (156,800 square feet total, 35 feet in height) including manufacturing, warehouse, and office space with 291 parking spaces;

2) Site 2 (4.77 acres) with one building (77,000 square feet, 35 feet in height) including office and warehouse space with 107 parking spaces, with off-site intersection improvements at five locations.

The Proposed Project also includes off-site intersection improvements at five locations.

Based on a review of aerial photographs, South Coast AQMD Staff found that the nearest sensitive receptor (e.g., senior apartment building) is located 125 feet east of site 1.[1] Construction of the Proposed Project is anticipated to commence in September 2027 and last approximately 12 months.[2] The Proposed Project is located in the City of Lake Forest, with Site 1 at 26110-26160 Enterprise Way and Site 2 at 26250 Enterprise Way.[3]

South Coast AQMD Comments

CalEEMod Modeling Assumptions and Emission Estimates

[1] Draft EIR. Page 449.
[2] *Ibid.* Page 276.
[3] *Ibid.* Page 30.

Based on the Air Quality, Greenhouse Gas, and Energy Impact Report, internal diesel-powered fire pumps are identified on the proposed site plans for Site 1 and Site 2. However, upon reviewing the CalEEMod modeling inputs, as well as the AERMOD modeling inputs and the emission source methodology presented in the Health Risk Assessment (HRA), South Coast AQMD staff could not identify any emergency generators or fire pumps. Therefore, it is unclear whether emissions associated with the proposed diesel-powered fire pumps were accounted for in the operational air quality analysis and HRA, particularly given the scale of approximately 233,800 square feet of industrial development, including manufacturing, warehouse, and office uses.

Moreover, based on the CalEEMod output files, the warehouse uses at both Site 1 and Site 2 were modeled using the Unrefrigerated Warehouse-No Rail land use category in CalEEMod. However, the Draft EIR does not explicitly state whether cold storage uses or trucks and trailers equipped with transport refrigeration units (TRUs) would be allowed during operation of the Proposed Project. Cold storage warehouses typically utilize more trucks and trailers equipped with TRUs compared to those warehouses without cold storage. Because future tenants have not been identified, the Lead Agency is recommended to clarify whether refrigerated warehousing or other cold storage uses would be allowed and whether the operational assumptions include trucks or trailers equipped with TRUs. If these uses are allowed but were not modeled, the Lead Agency should evaluate the associated emissions and disclose whether the analysis and conclusions would change. Failing to account for emissions associated with TRUs, if applicable, could lead to an underestimation of the total operational emissions and associated health risks.

Additionally, upon reviewing the CalEEMod output files, South Coast AQMD staff identified discrepancies between the CalEEMod modeling results and the emissions presented in the air quality analysis. Specifically, Table 4.3.K of the Draft EIR reports maximum mitigated construction volatile organic compound (VOC) and oxides of nitrogen (NOx) emissions of 23.0 lbs/day and 41.0 lbs/day, respectively, for Site 1.[4] However, based on the Air Quality, Greenhouse Gas, and Energy Impact Report the corresponding CalEEMod output files report maximum mitigated daily VOC and NOx emissions of approximately 5.0 lbs/day and 36.9 lbs/day, respectively.[5] It is unclear how the emission estimates presented in Table 4.3.K were derived from the CalEEMod modeling results.

Therefore, the Lead Agency is recommended to clarify whether emissions associated with the proposed diesel-powered fire pumps were accounted for in the operational air quality analysis and HRA. Additionally, the Lead Agency should clarify whether cold storage uses or trucks and trailers equipped with TRUs would be allowed during operation of the Proposed Project. Furthermore, the Lead Agency should reconcile the identified discrepancies between the CalEEMod modeling results and the emission estimates presented in Table 4.3.K and provide supporting calculations in the Final EIR.

Consistency of Localized Significance Threshold Modeling Assumptions

In the Air Quality, Greenhouse Gas, and Energy Impact Report, South Coast AQMD staff identified an inconsistency in the acreage assumptions used to evaluate localized construction air

[4] *Ibid.* Page 193.
[5] Air Quality, Greenhouse Gas, and Energy Impact Report. Page 12/94.

quality impacts. Specifically, the methodology identifies a maximum daily disturbed area of five acres for both Site 1 and Site 2, whereas the footnotes to Tables X and Z identify a daily disturbed area of three acres.[6]

Therefore, it is recommended that the Lead Agency clarify the maximum daily disturbed acreage for each site based on the anticipated construction activities and equipment usage, provide supporting calculations, and revise the localized air quality analysis in the Final EIR, as appropriate. The Lead Agency should also identify the receptor distance used to select the Localized Significance Thresholds (LSTs) and confirm that it reflects the nearest sensitive receptor to the applicable construction area. If construction activities at the two sites could overlap, the Final EIR should explain how the maximum daily disturbed acreage and concurrent on-site emissions were addressed.

Use of Outdated AERMET and Meteorological Data in AERMOD Modeling

Based on the AERMOD modeling files included in the Air Quality, Greenhouse Gas, and Energy Impact Report, although AERMOD version 24142 was used to conduct the Health Risk Assessment (HRA), the analysis relied on South Coast AQMD's AERMOD-ready meteorological data Version 9 for the Mission Viejo meteorological station, which were processed using AERMET version 16216.[7] However, South Coast AQMD released a newer, approved version of AERMOD-ready MET data files (Version 11) in October 2024.[8] The updated dataset was developed using the U.S. EPA's AERMET processor Version 22112, along with pre-processors AERMINUTE Version 15272 and AERSURFACE Version 20060.[9] The U.S. EPA's current preferred and recommended meteorological data preprocessor for AERMOD, as of the latest release, is AERMET version 24142, released in November 2024.[10]

The use of outdated meteorological data for the analysis contained in the Draft EIR may not be consistent with the U.S. EPA's Guideline on Air Quality Models (40 CFR Part 51, Appendix W)[11] and may have resulted in inaccurate or underestimated health risk estimates. To ensure accuracy and consistency with federal modeling guidelines, the Lead Agency is recommended to re-run the air dispersion modeling using the more recent meteorological data processed by the most recent U.S. EPA-recommended versions of AERMET.

South Coast AQMD Air Permits and Role as a Responsible Agency

Because the internal diesel-powered fire pumps and manufacturing use are included in the Proposed Project, air permits from South Coast AQMD will be required. The Final EIR should include a discussion about the potentially applicable South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to

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[6] *Ibid*. Page 77.
[7] *Ibid.* Page 1209.
[8] South Coast AQMD AERMOD-Ready MET Data Files available at https://www.aqmd.gov/assets/aermet/AERMET_files_And_HRA_Tool.html
[9] South Coast AQMD Data for AERMOD available at https://www.aqmd.gov/home/air-quality/meteorological-data/data-foraermod
[10] U.S. EPA Air Quality Dispersion Modeling - Preferred and Recommended Models available at https://www.epa.gov/scram/meteorological-processors-and-accessory-programs
[11] Code of Federal Regulations. Title 40. Part 51. Appendix W available at https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-51/appendix-Appendix%20W%20to%20Part%2051

Construct,[12] Rule 203 – Permit to Operate,[13] Rule 401 – Visible Emissions,[14] Rule 402 – Nuisance,[15] Rule 403 – Fugitive Dust,[16] Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,[17] Rule 1113 – Architectural Coatings,[18] Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,[19] Regulation XIII – New Source Review,[20] Rule 1401 – New Source Review of Toxic Air Contaminants,[21] Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,[22] Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,[23] etc. It is important to note if air permits from South Coast AQMD are required, the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 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. 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. South Coast AQMD is concerned that the project description and analysis in its current form in the Draft EIR are inadequate to be relied upon for this purpose.

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.

Conclusion

[12] South Coast AQMD, Rule 201 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf
[13] South Coast AQMD, Rule 203 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf
[14] South Coast AQMD, Rule 401 is available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf
[15] South Coast AQMD, Rule 402 is available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf
[16] South Coast AQMD, Rule 403 is available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403
[17] South Coast AQMD, Rule 1110.2 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf
[18] South Coast AQMD, Rule 1113 is available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf
[19] South Coast AQMD, Rule 1166 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf
[20] South Coast AQMD, Regulation XIII is available at: https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii
[21] South Coast AQMD, Rule 1401 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf
[22] South Coast AQMD, Rule 1466 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf
[23] South Coast AQMD, Rule 1470 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf

As set forth in California 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.

South Coast AQMD staff are available to work with the Lead Agency to ensure that impacts to air quality, GHG emissions, and health risk from the Proposed Project are accurately evaluated and mitigated to the greatest extent possible. Please contact Sahar Ghadimi, Ph.D., Air Quality Specialist, at sghadimi@aqmd.gov or me at SWang1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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

SW:SG
ORC261014-10
Control Number