



www.mdacoustics.com

AZ Office
4960 S. Gilbert Road, Ste 1-461
Chandler, AZ 85249
p. (602) 774-1950

CA Office
1197 Los Angeles Avenue, Ste C-256
Simi Valley, CA 93065
p. (805) 426-4477

July 17, 2026

Mr. Albert Blanck
Padel Up
2045 Harbor Blvd.
Costa Mesa, CA 92627

Subject: Padel Up 2045 Air Quality, Greenhouse Gas, and Energy Study – Responses to Comments, City of Costa Mesa, CA

MD Acoustics, LLC (MD) is pleased to provide responses to comments regarding the proposed Padel Up Project in the City of Costa Mesa, CA. The Focused Air Quality, Greenhouse Gas, and Energy Study was prepared by MD (March 2, 2026). EPD Solutions, Inc., submitted comments to MD Acoustics, LLC (MD) on June 1, 2026. MD has provided responses to these comments below.

Air Quality Analysis Review

AQ Comment 1 **Incorrectly reported on-site CO construction emissions for the grading phase; off-site VOC, NOx, CO, SO2 construction emissions for the grading phase; and on-site CO construction emissions for the paving phase:** The maximum on-site CO construction emissions during the grading phase do not correspond to values represented in Appendix C, *CalEEMod Output & EMFAC2017 Data*. The total CO construction emissions for on-site and off-site may be misrepresented. Additionally, off-site grading emissions identified for VOC, NOx, CO, and SO2 appear inconsistent with the values represented in Appendix C. Lastly, off-site paving emissions for CO appear inconsistent with the values represented in Appendix C. Reevaluation of off-site grading emissions for these four criteria pollutants is suggested. Page 2, *Table 1: Regional Significance – Construction Emissions (lbs/day)*; EPD AQ Comment 1,2,3.

AQ Response 1 The data in Table 1 has been reviewed and corrected.

AQ Comment 2 **Use of EMFAC2021 Adjustment Factors (EPA 2025) for Off-Site Vehicles:** Construction emissions analysis does not appear to implement EMFAC Adjustment Factors, approved by the EPA in November 2025, for off-site vendor and hauling vehicles associated with the construction of the Project.¹ Current EPA and SCAQMD guidance recommends application of the EMFAC Adjustment Factors to the approved EMFAC2021 data utilized in CalEEMod more accurately reflect the latest emission inventory. Exclusion of these factors may result in inconsistencies and underrepresentation of construction emissions. Page 2, *Table 1: Regional Significance – Construction Emissions (lbs/day)*; EPD AQ Comment 4.

AQ Response 2 Off-site vehicle emissions have been revised for EMFAC Adjustment Factors and a reference has been added to the table footnotes.

AQ Comment 3 **Discrepancy in modeled construction phases and discussion of site preparation:** Section 5.2, *Localized Construction Emissions*, mentions “the maximum number of acres disturbed in a day would be 1.0 acres during site preparation and grading...”; however, Appendix C Section 5.1, *Construction Schedule*, does not present a site preparation phase for the Project’s construction. Please clarify if the modeling does not reflect a proposed site preparation phase or if this an error in discussion. Page 3, *Section 5.2, Localized Construction Emissions*; EPD AQ Comment 5.

AQ Response 3 The reference to a site preparation phase is incorrect. It has been corrected to grading.

AQ Comment 4 **Incorrectly reported on-site CO construction emissions for the grading phase and on-site CO construction emissions for the paving phase:** As mentioned previously concerning AQ Comments 1 and 3, on-site CO emissions for the grading and paving phases of the Project’s construction may be misrepresented and do not correlate with on-site CO emissions presented in Appendix C Section 3, *Construction Emissions Details*. Page 3, Table 3: *Localized Significance – Construction Emissions (lbs/day)*; EPD AQ Comment 6 and 7.

AQ Response 4 All data in Table 3 has been reviewed and corrected.

AQ Comment 5 **Incorrectly reported operational CO emissions for area sources:** Operational area sources emissions for CO appear to be inconsistent with the emissions presented in Appendix C Section 3. Page 4, *Table 4: Regional Significance – Operational Emissions (lbs/day)*; EPD AQ Comment 8.

AQ Response 5 The data for area source CO emissions has been corrected.

Greenhouse Gas Analysis Review

GHG Comment 1 **Incorrectly reported GHG CO2e emissions for solid waste:** The CO2e emissions for solid waste are not correctly represented from the values disclosed in Appendix C Section 2.4. Page 4, *Table 5: Opening Year Project-Related Greenhouse Gas Emissions*; EPD GHG Comment 1.

GHG Response 1 Solid waste CO2e data in Table 5 has been reviewed and corrected.

Energy Analysis Review

Energy Comment 1 **Incorrect reported architectural coating worker trips per day:** The architectural worker trips appear inconsistent with the values identified in Appendix C Section 5.3. Estimated fuel consumption may be underrepresented. Page 11, Table 10: *Construction Worker Fuel Consumption*; EPD Energy Comment 1.

- Energy Response 1** The CalEEMod model has been corrected to include the analyzed trips. Corrected architectural coating off-site emissions have been included in Table 1.
- Energy Comment 2** **Incorrect reported paving vendor trips per day.** The paving vendor trips appear inconsistent with the values identified in Appendix C Section 5.3. Estimated fuel consumption may be underrepresented. Page 12, *Table 10: Construction Vendor Fuel Consumption*; EPD Energy Comment 2.
- Energy Response 2** The CalEEMod model has been corrected to include the analyzed trips. Corrected paving off-site emissions have been included in Table 1.
- Energy Comment 3** **Request for clarification regarding mitigated operational energy analysis:** The annual operational energy analysis found in Table is titled “Project Mitigated Annual Operational Demand Summary”; however, corresponding unmitigated operational energy demand and the mitigation implemented should be disclosed. If this table title is incorrect, EPD suggests global revisions to use of the term within the document and supporting appendices. Page 14, *Table 14: Project Mitigated Annual Operational Energy Demand Summary*; EPD Energy Comment 3.
- Energy Response 3** The word “mitigated” has been removed from the title as it does not apply. Mitigation is neither included nor required for the project.

Conclusion

MD is pleased to provide this response to comments for the Padel Up Project. If you have any questions regarding this analysis, please don’t hesitate to call us at (602) 774-1950.

Sincerely,
MD Acoustics, LLC



Tyler Klassen, EIT
Air Quality Specialist