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Assigned for all purposes
Judge William D. Claster
CX-101

Attorneys for Petitioner
WE THE MEADOWS

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE

WE THE MEADOWS,	)	CASE NO.: 30-2026-01589125-CU-WM-CXC
	)	
Petitioner,	)	PETITION FOR WRIT OF MANDATE
v.	)	
	)	(Violations of California Environmental
CITY OF LAKE FOREST; and DOES 1	)	Quality Act; Lake Forest General Plan)
through 20, inclusive;	)	
Respondents;	)	
	)	
<u>IPT ENTERPRISE BUSINESS CENTER, LLC;</u>	)	
and ROES 1 through 20, inclusive,	)	
	)	
Real Parties in Interest.	)	
	)	

INTRODUCTION

1. Over significant public opposition, the City of Lake Forest (“City”) certified an environmental impact report (EIR) and approved permits authorizing the IPT Enterprise Business Center project (Project) on July 7, 2026. Petitioner We the Meadows brings this verified Petition for Writ of Mandate challenging the City’s approval of: (1) environmental findings pursuant to the California Environmental Quality Act (CEQA); (2) Statement of Overriding Considerations; (3) certification of IPT Enterprise Business Center LLC (Project) Final Environmental Impact Report (EIR) (SCH #2024030755); (4) Mitigation Monitoring and Reporting Program; and (5) Site Development Permit 06-21-5437 for the Project.

2. With the Project, the City has authorized construction and operation of a 165,803-square foot warehouse and industrial facility within 82 feet of homes occupied by City residents and within 200 feet of designated senior housing in Lake Forest’s Meadows community.

3. By virtue of its location, the Project would send heavy truck traffic through a residential neighborhood populated by small children and seniors on a nearly constant basis. The harmful health effects of diesel particulate matter and other toxic air pollutants are well known, as are the impacts of industrial noise on health, mental wellbeing, language development, and sleep. Heavy trucks travelling through neighborhoods will also introduce traffic and safety hazards as they share streets used by children and families to walk and bike.

4. The Project will cause extensive, unacceptable impacts to an existing, vibrant community. Even so, the environmental impact report (EIR) prepared by the City failed to adequately disclose, analyze, and mitigate these environmental impacts. Specifically, the EIR failed to disclose and discuss the full breadth of the Project’s impacts on the several thousand Meadows residents living nearby, including those related to air quality and human health, noise, nighttime lighting, and traffic safety.

5. As the City is currently considering approval of two additional warehouse projects nearby, these impacts will be magnified. Even so, the EIR fails to address the cumulative impact of the construction and operation of three warehouse projects adjacent to the Meadows community.

6. The City approved the Meadows community in 2020, and it has become an established and thriving community in the years since. Also in 2020, the City’s 2040 General Plan was adopted, in

1 part, to “foster a sense of community” and “retain its charming character.” It establishes a “Quality of
2 Life” guiding principle directing the City to “carefully consider how and where development should
3 occur to protect the safe, quiet, and peaceful ambiance of the City’s residential neighborhoods.” Despite
4 the protections contained in the general plan’s policies, and despite the City’s relatively recent
5 consideration and approval of the construction of this community, the City has authorized an industrial
6 warehouse Project that clearly violates the intent of Lake Forest’s general plan.

7 7. The California Environmental Quality Act (CEQA) requires a lead agency to evaluate and
8 consider alternatives designed to “avoid or substantially lessen” a project’s significant impacts. (Pub.
9 Resources Code section 21002.) Here, feasible alternatives to the residential warehouse project, such as
10 an office park, were ignored and rejected, in violation of CEQA’s substantive mandate.

11 8. Instead, the City inexplicably overrode the Project’s significant and adverse environmental
12 impacts, finding that the Project’s benefits would outweigh the very real harm to the environment and
13 people living nearby. Feasible and effective mitigation measures for the Project’s noise, truck traffic and
14 diesel particulate pollution, greenhouse gas emissions, and nighttime lighting were proposed but not
15 incorporated. While some conditions were added to the Project during the Planning Commission hearing,
16 these conditions were not made publicly available prior to the meeting, and there was not opportunity for
17 them to be evaluated by the public before Project approval. Moreover, these conditions will not eliminate
18 the Project’s adverse community impacts.

19 9. The EIR’s analysis assumes the Project will not use all 23 loading docks or all 8 loading
20 dock doors. Yet the Project contains no conditions of approval limiting the use of all loading docks or
21 doors authorized for construction. An EIR must evaluate the whole of a Project.

22 10. Petitioner We the Meadows brings this verified Petition for Writ of Mandate challenging
23 the City’s approval of the Project in an effort to require the rescission of Project approvals and
24 decertification of the Project’s EIR until the City has adequately protected community health in
25 compliance with CEQA.

26 **JURISDICTION**

27 11. This Court has jurisdiction over the writ action under section 1085 and 1094.5 of the Code
28 of Civil Procedure, and sections 21168 and 21168.5 of the Public Resources Code.

PARTIES

12. Petitioner We the Meadows is an unincorporated association formed under California law by those who care about the City of Lake Forest and the surrounding area. We the Meadows diligently addresses issues with potential to adversely impact the community while simultaneously working to enhance daily living conditions. Its members are directly affected by the City's land use decisions approving development of warehouses. The interests the association seeks to protect in this action are germane to its purpose, and its members would otherwise have standing to sue in their own right. We The Meadows has a beneficial interest in the City's compliance with CEQA.

13. Respondent City of Lake Forest ("City") is a political subdivision of the State of California and the lead agency for environmental review of the Project. The City approved: (1) environmental findings pursuant to the California Environmental Quality Act (CEQA); (2) Statement of Overriding Considerations; (3) certification of IPT Enterprise Business Center LLC (Project) Final Environmental Impact Report (EIR) (SCH #2024030755); (4) Mitigation Monitoring and Reporting Program; and (5) Site Development Permit 06-21-5437 for the Project.

14. Real Party in Interest IPT Enterprise Business Center, LLC is the applicant that proposes to develop the Project that is subject of this litigation and is named on the Notice of Determination issued by the City after Project approval.

15. Does 1 through 20, inclusive, are persons or entities presently unknown to Petitioner, who are employees, agents or officers of the City or other public entities, that are responsible for the actions described herein or for carrying out the functions of the City that may be affected by this litigation. Petitioner will amend this Petition to specifically identify each such Respondent as required and as the capacity and identity of each such Respondent becomes known.

16. Roes 1 through 20, inclusive, are persons or entities presently unknown to Petitioner, who are employees, agents or officers of the Real Parties in Interest, that are responsible for the actions described herein or for carrying out the functions of the Real Parties in Interest or are parties that may be affected by this litigation. Petitioner will amend this Petition to specifically identify each such Roe as required and as the capacity and identity of each such Real Party in Interest becomes known.

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THE PROJECT AND SITE

A. The Meadows Community.

17. The Meadows community was established by the City in 2020, when the City approved the rezoning of the Nakase Nursery site to accommodate residential development. The first family moved in October 2022.

18. The City had only recently approved the residential rezone, and the neighborhood was under construction when the Applicant first contacted the City about the Project in 2021. Since that time, the neighborhood has grown to 597 single-family homes holding two to three-thousand residents and a 65-unit senior apartment community.

B. The Project.

19. The Project consists of permits authorizing the demolition of an existing 144,906-square foot building and its replacement through construction of new, 165,803-square foot industrial building on an 8.83-acre site, located at 26200 Enterprise Way, in the north-central portion of the City of Lake Forest, California.

20. Although City documents emphasize that the Project's surrounding land uses include a mix of industrial and residential uses, in reality, the Project would construct a warehouse, with twenty-three loading docks and eight dock doors in an established residential community known as The Meadows. Nearly 600 single-family homes are located within 82 feet of the Project site. Sixty-five apartments populated by seniors are located within 200 feet of the Project. The site is surrounded by sensitive receptors in the form of residents, including those especially sensitive to air emissions: seniors and children.

21. The Project is easily accessible to heavy truck traffic, which will have to travel along and through the neighborhood. The site is assessable by State Route 241, which is located approximately 0.7 miles north and by Interstate 5, which is located 3.75 miles southwest.

C. Project Application and Administrative Process.

22. Project Applicant, IPT Enterprise Business Center, LLC first filed an application for the Project on June 17, 2021. It was not deemed complete until July 5, 2023.

1 23. After first attempting to undertake the Project’s CEQA review pursuant to a mitigated
2 negative declaration (MND) and encountering strong community opposition, the City ultimately deemed
3 an environmental impact report (EIR) necessary in late 2023.

4 24. The Applicant submitted revised plans for the warehouse Project to the City on August 29,
5 2024 and again on January 15, 2025.

6 25. The City released a Notice of Preparation for the Project EIR in April of 2024. The NOP
7 described the Project as:

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

15 Petitioner and its members submitted comments to the City detailing the potential environmental impacts
16 of a warehouse on the Meadows community and asking for detailed analysis and mitigation of those
17 impacts.

18 26. A draft EIR was made available on July 10, 2025. Petitioner and its members submitted
19 extensive comments to the City regarding the Project’s potential harms, including toxic air emissions, the
20 impacts of heavy diesel trucking on nearby residents and schools, traffic safety, noise, and nighttime
21 lighting before the comment period ended on September 15, 2025. On September 15, 2025, Douglas
22 Carstens, on behalf of Petitioner, submitted a comment letter on the DEIR to the City Council.

23 27. The City released the Final EIR on May 21, 2026. Petitioner and its members again
24 commented on the Project’s likely harms and asked for additional mitigation and conditions of approval
25 to protect community health and well-being.

26 28. On June 5, 2026, the City’s Planning Commission held a hearing on the Project to
27 consider certification of the Final Environmental Impact Report (FEIR), make certain environmental
28

findings, adopt a mitigation monitoring and reporting program, adopt a statement of overriding considerations, and consider the Site Development Plan.

29. Members of We the Meadows and the public brought robust opposition to the Project and its community harms. During the meeting, Commissioners took a recess, returning to the hearing room with conditions of approval that had not been previously publicly reviewed. These conditions were ultimately approved with the Project, despite not having been reviewed in the EIR or thoroughly by the public. While some copies of these new conditions were distributed to the audience, copies were not available for all parties wishing to review the conditions. Moreover, while these conditions were displayed on screens in the meeting room, they were not read aloud, in full, before approval.

30. Shortly after midnight on June 5, 2026, the Planning Commission unanimously adopted two resolutions resulting in the certification of the FEIR and approval of the Site Development Plan.

31. On June 18, 2026, Petitioner We the Meadows submitted a timely written notice of appeal, requesting that the City Council “overturn the Planning Commission’s approval of the Site Plan and environmental impact report.”

32. After a hearing held on July 7, 2026, the City Council denied Petitioner’s appeal of the approval of Site Development Permit 06-21-5437 and the certification of its environmental review, thereby approving the Final EIR. Members of We the Meadows submitted letters to the City in support of the appeal and detailed their concerns to the City during in-person testimony.

33. The City filed a Notice of Determination for the Project on July 8, 2026.

EXHAUSTION OF ADMINISTRATIVE REMEDIES

AND INADEQUATE REMEDIES AT LAW

34. Petitioner includes members who objected to the Project in the administrative process by submitting letters and providing testimony at all public meetings and hearings regarding the Project. Petitioner’s membership raised each of the legal deficiencies asserted in this Petition during the Respondent’s administrative review process and detailed how these legal deficiencies will adversely affect the community. Accordingly, the issues raised in this petition were fairly presented to the City before its final action. Petitioner has standing and has a beneficial interest in the outcome.

35. Petitioner has no plain, speedy or adequate remedy in the course of ordinary law unless this Court grants the requested writ of mandate and injunctive relief.

36. In the absence of such remedies, the City's approval of the Project would form the basis for a development project that would proceed in violation of applicable law.

37. Petitioner complied with Public Resources Code section 21167.7 by filing a copy of this Petition with the California Attorney General. A copy of that notice is attached as Exhibit A.

38. Petitioner submitted a notice of commencement of this action to the City prior to filing this Petition. A copy of that notice is attached as Exhibit B.

39. Petitioner elects to prepare the administrative record. A copy of that election is attached as Exhibit C.

40. Petitioner requests a hearing of this matter be set on June 8, 2027 or as soon as is convenient for the Court. A Request for Hearing has been filed concurrent with this Petition.

FIRST CAUSE OF ACTION

Violation of the California Environmental Quality Act

41. All prior paragraphs are incorporated by reference.

The Project's Environmental Impact Report Violates CEQA

42. CEQA requires the City to conduct an adequate environmental review prior to making any formal decision regarding projects subject to CEQA. (14 Cal. Code Regs. (“CEQA Guidelines”), §15004).

43. CEQA imposes upon the City a clear, present and mandatory duty to certify an EIR only if the EIR fully discloses to the public the significant environmental effects that may occur. The EIR for the Project lacks the necessary analysis.

44 .Further, CEQA requires adoption of all feasible mitigation measures that will reduce
adverse environmental impacts. Many feasible mitigation measures were ignored in the EIR.

45. This Project would establish a warehouse and industrial facility within 82 feet of residences. Senior housing is located roughly 200 feet away. By virtue of its location adjacent to residences, the Project would send heavy truck traffic through a residential neighborhood populated by small children and seniors, on a nearly constant basis. The harmful health effects of diesel particulate

1 matter and other toxic air pollutants are well known, as are the impacts of industrial noise on health,
2 mental wellbeing, language development, and sleep.

3 46. Even so, the EIR prepared for the Project fails to adequately analyze and mitigate the
4 Project's environmental impacts. These deficiencies include, but are not limited to, the following issue
5 areas:

6 *Air Quality Impacts*

7 47. The EIR's air quality disclosure, analysis, and mitigation are not adequate. The EIR fails
8 to adequately address impacts related to air quality degradation and human health.

9 48. For example, the EIR fails to recognize that national and state ambient air quality
10 standards (AAQS) represent thresholds of significance. Accordingly, the EIR does not evaluate potential
11 violations of the AAQS caused by the Project, or to mitigate any impacts.

12 49. The EIR fails to quantify peak (1-hour) construction emissions for the Project.

13 50. The EIR further fails to evaluate the formation of secondary pollutants from the
14 conversion of NOx and VOC into PM2.5 that will occur during Project construction and operation.

15 51. The EIR fails to recognize the Project would violate the 1-hour NOx standards during the
16 construction phase.

17 52. The result of these analytical omissions is that the EIR fails to evaluate the significance of
18 these potential impacts and fails to incorporate feasible and effective mitigation.

19 *Greenhouse Gas Impacts*

20 53. The EIR fails to adequately analyze and address impacts related to Greenhouse gas (GHG)
21 emissions. The EIR's disclosed emissions are just shy of the chosen significance threshold, leaving the
22 actual significance determination vulnerable to manipulation.

23 54. The EIR admits the Project would exceed City vehicle miles travelled (VMT) thresholds,
24 in conflict with the Scoping Plan. The Project does not eliminate this conflict or mitigate this impact.

25 55. The EIR further acknowledges that traffic mitigation would be ineffective.

26 56. The EIR fails to incorporate all feasible mitigation to reduce the Project's GHG emissions.

27 *Traffic And Vehicle Miles Travelled (VMT) Impacts*

28 57. The EIR fails to adequately analyze and address impacts related to traffic and VMT.

1 58. The Project will authorize the continuous circulation, ingress, and egress of heavy trucks,
2 along and between residences, given that the Project site falls within 82 feet of homes.

3 59. The Project will operate 24 hours per day, 7 days per week, with 15 trucks per hour
4 expected from 7 am to 10 pm and 4 trucks per hour expected from 10 pm to 7 am.

5 60. The EIR's Traffic Impact Analysis fails to comply with the City's adopted Transportation
6 Analysis Guidelines, and therefore results in a failure of the EIR to fully disclose, analyze, or mitigate the
7 Project's impacts on traffic and VMT.

8 61. The DEIR concludes that the Project's VMT will be addressed by the installation of bike
9 lanes, even though the Project warehouse Project will generate scant bike traffic to be mitigated by the
10 use of bike lanes. The Project will largely generate truck trips, not bicycle trips. Even so, the EIR fails to
11 evaluate or adopt feasible traffic mitigation options for truck traffic.

12 62. Further, the EIR fails to address the safety impacts of continuous truck circulation,
13 ingress, and egress, and the potential for conflicts between Project trucks and neighborhood vehicles,
14 pedestrians, cyclists, and children.

15 *Community and Community Health Impacts*

16 63. The EIR fails to adequately analyze and address impacts related to the communities
17 surrounding the Project. Project proximity to residential neighborhoods will have significant, noticeable,
18 and harmful effects. including but not limited to the following.

19 64. The Project will introduce heavy diesel truck traffic within 100 feet of family homes and
20 schools. This is not adequately acknowledged or mitigated in the EIR.

21 65. The Project has the potential to exacerbate cancer and respiratory health risks, particularly
22 among vulnerable populations. This risk is not adequately acknowledged or mitigated in the EIR.

23 66. The Project will increase air, noise, and light pollution in a currently surrounding quiet
24 residential zone. This is not adequately acknowledged or mitigated in the EIR.

25 67. The Project's construction and continuous operations in the community will undermine
26 the long-term livability, safety, and environmental integrity of the City of Lake Forest.

27 68. To protect human health, the Attorney General and California Air Resources Board
28 (CARB) recommend siting warehouse facilities "so that their property lines are at least 1,000 feet from

the property lines of the nearest sensitive receptors.” This has not occurred, nor has the EIR designated a less damaging alternative as the preference to the Project. Beyond the violation of the CARB recommendations, the Project siting violates the intent of the City’s 2040 General Plan.

69. The City has emphasized the distance between homes and loading dock doors in its environmental documentation and responses to community concerns. However, loading dock location does not protect residents from the toxic air emissions, nor does it relate to the noise of truck travel and ongoing truck movement near homes that will occur outside of the loading and unloading processes. Moreover, even the loading docks will be located within 200 feet of homes, contrary to CARB guidance.

Noise Pollution Impacts

70. The EIR fails to adequately analyze and address impacts related to noise pollution.

71. The EIR fails to adequately grapple with the intrusive noise associated with logistics facilities. Various sources, such as unloading activity, diesel truck movement, and rooftop air conditioning units, can contribute substantial noise pollution to the community.

72. These impacts are exacerbated by logistics facilities’ typical 24-hour, seven-days-per-week operation.

73. While the EIR gives lip service to noise reduction, the incorporated mitigation measures are either not enforceable, or it is unclear who will be responsible for them.

74. Moreover, the Final EIR references operational noise levels of approximately 55 dBA during daytime hours and 40 dBA during nighttime hours. These assumptions cannot be reconciled with the reality of continuous truck ingress and egress occurring less than 100 feet from residential homes.

75. The assumptions used in the EIR’s analysis do not reflect real-world operating conditions and therefore cannot provide the substantial evidence required to support the City’s findings and conclusions.

Light Pollution

76. The EIR fails to adequately analyze and address impacts related to light pollution.

77. The EIR fails to discuss the cumulative night lighting impacts of the Project, as combined with several other warehouse facilities that will be located nearby. “[A]ny future project where the applicant has devoted significant time and financial resources to prepare for any regulatory review should

1 be considered as probable future projects for the purposes of cumulative impact.” (*Gray v. County of*
2 *Madera* (2008) 167 Cal.App.4th 1099, at 1127-28.) Other warehouse projects currently under
3 consideration in the City must be evaluated for cumulative impacts.

4 *Land Use*

5 78. Adopted in 2020, the Lake Forest 2040 General Plan contains guiding principles and
6 supporting policies designed to protect residential neighborhoods from harmful and incompatible
7 development.

8 79. The general plan’s guiding principles are aimed at “foster[ing] a sense of community” and
9 “retain[ing] its charming character.” The general plan establishes a “Quality of Life” guiding principle
10 directing the City to “carefully consider how and where development should occur to protect the safe,
11 quiet, and peaceful ambiance of the City’s residential neighborhoods.”

12 80. CEQA Guidelines section 15125 requires an EIR to disclose a project’s inconsistencies
13 with applicable land use plans. Where a local or regional policy of general applicability, such as an
14 ordinance, is adopted in order to avoid or mitigate environmental effects, a conflict with that policy in
15 itself indicates a potentially significant impact on the environment. (*Pocket Protectors v. City of*
16 *Sacramento* (2005) 124 Cal.App.4th 903.)

17 81. The Lake Forest 2040 General Plan is an applicable land use plan with which the Project
18 must be consistent.

19 82. The EIR fails to adequately analyze and how the Project will comply with policies related
20 to protecting nearby communities. The warehouse Project’s proximity to residential neighborhoods will
21 introduce heavy diesel truck traffic within 100 feet of family homes and schools, which will exacerbate
22 cancer and respiratory health risks, particularly among vulnerable populations. It will also introduce new
23 sources of air, noise, and light pollution to an established residential neighborhood, thereby undermining
24 the long-term livability, safety, and environmental integrity of the Meadows neighborhood.

25 83. The EIR has also failed to disclose inconsistencies with the General Plan’s quality of life
26 guiding principles and other policies aimed at protecting human health, land use compatibility, and
27 neighborhood character, among others.

1 84. Consequently, the EIR has failed to mitigate the land use impacts caused by these
2 inconsistencies with the Lake Forest 2040 General Plan. A Project's inconsistencies with local plans and
3 policies constitute significant impacts under CEQA. (*Endangered Habitats League, Inc. v. County of*
4 *Orange* (2005) 131 Cal.App.4th 777, 783-4,

5 85. These conflicts are not harmless and have consequences. To protect human health, the
6 Attorney General and California Air Resources Board (CARB) recommend siting warehouse facilities
7 "so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive
8 receptors." This has not occurred, nor has the EIR designated a less damaging alternative as the
9 preference to the Project.

10 86. The EIR's failure to disclose and mitigate this applicable plan conflict violates CEQA.
11 *Cumulative Impacts*

12 87. The EIR fails to adequately analyze and address the Project's cumulative impacts.
13 Throughout, the EIR minimizes or fails to address the cumulative impacts of the Project, along with the
14 two proposed Western Realco warehouse projects.

15 88. The Project's approved conditions reference limits of 15 truck trips per hour between 7:00
16 a.m. and 10:00 p.m. and 4 truck trips per hour between 10:00 p.m. and 7:00 a.m. However, if the two
17 proposed Western Realco warehouse projects are developed and operated at a similar scale, truck
18 volumes could effectively double. The EIR does not disclose, analyze, or mitigate this community impact
19 or the cumulative health impacts of heavy diesel truck traffic.

20 *Project Description*

21 89. Every EIR must set forth a project description that is sufficient to allow an adequate
22 evaluation and review of the project's environmental impacts. (CEQA Guidelines §15124.) "An accurate,
23 stable and finite project description is the sine qua non of an informative and legally sufficient EIR."
24 (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192-93.)

25 90. The EIR fails to adequately analyze and address informational shortcoming impacts
26 related to the project description.

27 91. These concerns are underscored by deficiencies in the Project description that prevent
28 independent confirmation of the EIR's assumptions.

1 92. The City has maintained that the Project has no specific tenant, and that the Project was
2 intentionally designed to provide maximum flexibility for future users. At the same time, the EIR makes
3 and relies on assumptions regarding truck activity and trip generation, operational intensity, operating
4 hours, and general activities to inform the EIR's assessment of traffic impacts, air quality impacts, safety
5 hazards, and noise impacts. Accordingly, these assumptions lack substantial evidence.

6 93. Throughout the administrative process, residents have questioned how these assumptions
7 were determined when the future tenant, operational model, logistics model, and intensity of use remain
8 unknown.

9 94. Without knowing the activities or business the Project will be used for, decisionmakers
10 and members of the public cannot evaluate whether the EIR adequately discloses, analyzes, or mitigates
11 the impacts of the Project. The EIR's "bona fide subject" must be "[t]he defined project and not some
12 different project." (*Concerned Citizens of Costa Mesa v. 32nd Dist. Agric. Assn.* (1986) 42 Cal.3d 929,
13 938.)

14 95. In order to protect against under-reported potential impacts of an unknown tenant and use,
15 community commenters requested that the EIR evaluate the worst-case scenario. This did not occur.

16 96. The deficient analysis extends to the number of dock doors included within the Project.
17 When a Commissioner asked why the project included 23 dock doors, the Applicant indicated that not all
18 dock doors would necessarily be used, and that the EIR's analysis was based on not using all doors.

19 97. However, the Project's permitting and conditions of approval allow the use of all doors
20 that will be constructed. If the Project would not entail use of all doors, the number of permitted doors
21 and loading docks would have been reduced. The EIR and City's assumptions fail to include the use of
22 the entire Project.

23 98. Residents found the Applicant's response difficult to reconcile with the Project's design,
24 which includes 23 dock doors because the number of dock doors appears to support a potentially high
25 level of truck activity.

26 99. The community requested that either the EIR be revised to disclose, analyze, and fully
27 mitigate the impacts of full use of all dock doors, or that the Project's dock door quantity be capped so as
28 not to exceed the level of impacts disclosed in the EIR. This did not occur. Accordingly, the EIR does not

1 analyze and mitigate the impacts of the Project using all 23 dock doors, and it does not analyze all
2 reasonably foreseeable uses of the Project, as required.

3 *Alternatives Analysis and Statement of Overriding Considerations*

4 100. The EIR fails to adequately analyze and address alternatives to the Project designed to
5 reduce noise, nighttime lighting, and toxic emissions, as required, to comply with CEQA's mandate to
6 review alternatives to a project designed to "avoid or substantially lessen" a Project's significant impacts.
7 (Pub. Resources Code section 21002.)

8 101. Under this standard, CEQA requires EIR evaluation of alternative land uses that are
9 economically viable and compatible with nearby residential communities—such as mixed-use
10 developments (e.g., small business + residential condos), business office complexes, research, medical, or
11 clean-tech non-industrial facilities.

12 102. The Project objectives call for reimagining an underused site in a way that is economically
13 beneficial, provides jobs, and is consistent with City land use plans.

14 103. Many types of developments would meet these goals, including less-intensive or smaller
15 versions of the same Project that would reduce community impacts. Analysis and selection of these
16 alternatives would satisfy CEQA's mandate that the EIR evaluate alternatives designed to avoid or
17 significantly lessen the Project's significant environmental impacts. (Pub. Resources Code section
18 21002.)

19 104. Without such analysis, the City could not support the required Statement of Overriding
20 Considerations findings that it considered and found infeasible all alternatives or mitigation measures that
21 would reduce Project impacts on the community. (Pub. Resources Code section 21082; CEQA
22 Guidelines sections 15043, 15093(b).)

23 105. The City also failed to support a finding that the Project's community benefits will
24 outweigh its adverse impacts. (Pub. Resources Code section 21081; CEQA Guidelines sections
25 15093(a).)

26 106. Petitioner We the Meadows asked for clear, specific details regarding the Project's
27 anticipated employment, tax revenue, public benefits, and regarding other factors supporting the
28 Statement of Overriding Considerations, but it was not provided.

1 107. The City’s revised alternatives analysis should have recognized the current land use
2 composition of the area surrounding the Project site. Instead, it relied on outdated zoning assumptions
3 inconsistent with the community as designed today.

4 108. During the administrative process, City staff repeatedly argued that the Project site’s light
5 industrial zoning existed before the Meadows residential development. However, the City authorized
6 construction of the Meadows residential development, that will now be harmed by the industrial Project,
7 prior to its receipt of the warehouse Project application. Furthermore, as the Meadows neighborhood was
8 approved in 2020, it is likely that the same City staff and officials were involved in these decisions.
9 Regardless of the layout on paper, the City authorized establishment of a vibrant residential community
10 and senior housing that are now populated by real, not hypothetical, people. The City’s analysis of
11 Project alternatives and development constraints cannot ignore its recent residential approvals.

12 *Feasible and Effective Mitigation Measures Were Not Adopted*

13 109. The City Council should have considered and adopted feasible mitigation measures,
14 including, but not limited to:

- 15 a. Reducing the scale or intensity of warehouse operations;
 - 16 b. Increasing buffers and physical separation between the Project and homes and senior housing,
 - 17 c. Landscaping buffers between the Project and homes and senior housing, in combination with
18 sound attenuation measures such as walls;
 - 19 d. Eliminating truck ingress and egress routes immediately adjacent to residential
20 neighborhoods;
 - 21 e. Relocating loading and truck activity areas to the portions of the Project site furthest from
22 homes;
 - 23 f. Enforceable limits on the number of truck trips permitted in any time interval;
 - 24 g. Ongoing monitoring and reporting requirements for metrics measuring truck traffic, Project
25 noise, and air quality;
 - 26 h. Clear compliance and enforcement mechanisms, including consequences for violations
27 (required by CEQA for all mitigation);
- 28

- 1 i. Restrictions on higher-intensity warehouse uses that could generate impacts beyond those
2 analyzed in the EIR; and
3 j. Additional City review if future tenants propose materially different operations than those
4 assumed during environmental review.

5 *Adopted Mitigation Measures Have Not Been Evaluated for Efficacy or Environmental Impacts*

6 110. The City adopted conditions of approval that were first presented during the Planning
7 Commission hearing. After a recess, the Commissioners returned to the hearing with approximately two
8 pages of additional conditions that had not been previously disclosed for public review or evaluation. A
9 few hard copies were provided to homeowners upon request, but copies of these conditions were not
10 provided to all interested parties. The conditions were projected on a screen, but not read aloud line by
11 line, before the Commission voted to approve the project. These conditions had not been previously
12 disclosed for public review or evaluation and were not evaluated in the EIR, in violation of CEQA

13 111. CEQA requires that both the efficacy and consequences of a Project's mitigation measures
14 be evaluated before a Project is approved. (*San Joaquin Raptor Rescue Center v. County of Merced*
15 (2007) 149 Cal.App.4th 645; CEQA Guidelines section 15126.4.) Given the timing of the development
16 of these conditions, the EIR could not evaluate their effectiveness. Further, their late-disclosure at the
17 Planning Commission hearing prevented any comment on these new conditions, let alone the requisite
18 "meaningful" public comment. (See, *Save Our Capitol! v. Department of General Services* (2023) 87
19 Cal.App.5th 655, 684.)

20 112. In any case, these conditions do not satisfy CEQA's requirements for concrete,
21 enforceable mitigation. The City has not explained who will monitor round-the-clock compliance with
22 these conditions, how violations will be reported and investigated, what penalties will attach for
23 violations, and what mechanisms exist to ensure compliance by future tenants, truck operators, and third-
24 party drivers. Signage alone is insufficient to ensure compliance with truck routing restrictions, quiet-
25 zone requirements, truck limits, and access restrictions.

26 **SECOND CAUSE OF ACTION**

27 **Violation of Planning and Zoning Law**

28 113. All prior paragraphs incorporated by reference.

1 114. A General Plan is the “ ‘constitution’ for future development,” located at the top of the
2 “the hierarchy of local government law regulating land use.” (*DeVita v. County of Napa* (1995) 9 Cal.4th
3 763, 773.)

4 115. State Planning and Zoning Law prohibit a City from approving a project that is
5 inconsistent with its adopted general plan.

6 116. The applicable general plan for the Project site is the Lake Forest 2040 General Plan, an
7 intent of which is to protect residential neighborhoods from harmful and incompatible development.

8 117. Like the Meadows neighborhood, the City approved the general plan in 2020, prior to the
9 Applicant’s submission of its first application for the warehouse Project.

10 118. The general plan’s guiding principles include “Sense of Community” and “Quality of
11 Life.” The Quality of Life guiding principle directs the City to “carefully consider how and where
12 development should occur to protect the safe, quiet, and peaceful ambiance of the City’s residential
13 neighborhoods.” “Sense of Community” speaks to retaining the City’s “charming character.” Additional
14 policies and guiding principles direct the City to consider compatibility, scale, health and welfare, and
15 community character when approving new development.

16 119. Despite the protections contained in the general plan’s policies, and despite the City’s
17 relatively recent consideration and approval of the construction of the Meadows neighborhood that will
18 be affected by the Project, the City has authorized an industrial warehouse Project that clearly violates the
19 intent of Lake Forest’s general plan.

20 **WHEREFORE, Petitioner prays:**

21 A. That the Court issue a peremptory Writ of Mandate, commanding Respondent City to
22 rescind the approval of the Project and to prohibit Project construction until the Project and its approvals
23 are revised and found to comply with CEQA;

24 B. For a stay of the City’s approvals for the Project, including, but not limited to

25 (1) the City’s environmental findings made pursuant to the California Environmental
26 Quality Act (CEQA);

27 (2) CEQA Statement of Overriding Considerations;
28

(3) certification of IPT Enterprise Business Center LLC (Project) Final Environmental Impact Report (EIR) (SCH #2024030755);
(4) adoption of the Mitigation Monitoring and Reporting Program; and
(5) Site Development Permit 06-21-5437.

C. For an alternative writ and permanent injunction enjoining Real Party in Interest, its agents, employees, officers and representatives from undertaking any and all activities on the Project site including the alteration of the current conditions on the project site, any and all pre-construction and construction activities related to the development Project; from issuing any authorizations, permits or entitlements for; from entering into any contracts for; and for taking any other action to implement in any way the pre-construction and construction activities that would affect the environmental integrity of the affected Project site, until there is compliance with CEQA;

D. For costs of the suit;

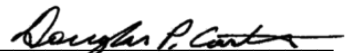
E. For attorney's fees pursuant to the Code of Civil Procedure section 1021.5; and

F. For such other and further relief as the Court deems just and proper.

DATED: August 6, 2026

Respectfully Submitted,

CARSTENS, BLACK & MINTEER, LLP

By: 
Douglas Carstens
Michelle N. Black
Sunjana Supekar
Attorneys for Petitioner

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VERIFICATION

I, Haibo Jiang, declare: I am duly authorized by Petitioner in this action to sign this verification. I have read the foregoing Verified Petition for Writ of Mandate and know its contents. The factual matters stated therein are true of my own knowledge, except as to those matters stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on August 05, 2026, at Lake Forest, California.

A handwritten signature in black ink, appearing to read 'Haibo Jiang', is written over a horizontal line.

EXHIBIT A



Main Office Phone:

310 - 798-2400

Direct Dial:

310-798-2405

Carstens, Black & Minter LLP
700 North Pacific Coast Highway, Ste. 200
Redond Beach, CA 90277
www.cbcearthlaw.com

Douglas P. Carstens

Email Address:

dpc@cbcearthlaw.com

August 6, 2026

By Electronic Mail
California Attorney General
CEQA@doj.ca.gov

Re: Challenge under the California Environmental Quality Act to approval of Site
Development Permit 6-21-5437 and the IPT Enterprise Business Center Project

Honorable Attorney General:

Please find enclosed a copy of the Petition for Writ of Mandate filed to challenge the City of Lake Forest's, and its City Council's, failure to comply with the California Environmental Quality Act ("CEQA") and the Lake Forest General Plan in approving a warehouse and industrial facility, located within 100-feet of local residences ("Project").

This Petition is being provided pursuant to the notice provisions of the Public Resources Code. Please contact me if you have any questions.

Sincerely,

Douglas P. Carstens

Enclosure

PROOF OF SERVICE

I am employed by Carstens, Black & Minter LLP in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 700 North Pacific Coast Highway, Ste. 200, Redondo Beach, CA 90277. On August 6, 2026, I served the within documents:

**LETTER TO THE CA ATTORNEY GENERAL REGARDING
PETITION FOR WRIT OF MANDATE**

VIA ELECTRONIC MAIL.

Based on Public Resources Code 21167 of CEQA, I caused the above-referenced document to be sent to the CA Attorney General at the following electronic address: CEQA@doj.ca.gov

I declare that I am employed in the office of a member of the bar of this court whose direction the service was made. I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on August 6, 2026, at Redondo Beach, California 90277.

/s/Sarah Bloss
Sarah Bloss

SERVICE LIST

CEQA Coordinator
Office of the CA Attorney General
CEQA@doj.ca.gov

EXHIBIT B

Main Office Phone:
310 - 798-2400
Direct Dial:
310-798-2405



Carstens, Black & Minter LLP
700 North Pacific Coast Highway, Ste. 200
Redondo Beach, CA 90277
www.cbcearthlaw.com

Douglas P. Carstens
Email Address:
dpc@cbcearthlaw.com

August 5, 2026

By U.S. Mail
Thy Merritt, City Clerk
Office of the City Clerk, City of Lake Forest
100 Civic Center Dr.
Lake Forest, CA 92630
cityclerk@lakeforestca.gov

Re: Challenge under the California Environmental Quality Act to approval of Site
Development Permit 6-21-5437 and the IPT Enterprise Business Center Project

Dear Ms. Merritt,

Please take notice that We the Meadows plan to file a Petition for Writ of Mandate challenging the failure of the City of Lake Forest, and its City Council, (collectively, the City) to comply with the California Environmental Quality Act ("CEQA") and the Lake Forest General Plan in approving a warehouse and industrial facility, located within 100-feet of local residences ("Project").

Sincerely,

Douglas P. Carstens

PROOF OF SERVICE

I am employed by Carstens, Black & Minter LLP in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 700 North Pacific Coast Highway, Ste. 200, Redondo Beach, CA 90277. On August 5, 2026 I served the within documents:

LETTER TO LAKE FOREST CITY CLERK

VIA UNITED STATES MAIL. I am readily familiar with this business' practice for collection and processing of correspondence for mailing with the United States Postal Service. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid. I enclosed the above-referenced document(s) in a sealed envelope or package addressed to the person(s) at the address(es) as set forth below, and following ordinary business practices I placed the package for collection and mailing on the date and at the place of business set forth above.

I declare that I am employed in the office of a member of the bar of this court whose direction the service was made. I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on August 5, 2026 at Redondo Beach, California 90277.

/s/ Sarah Bloss
Sarah Bloss

SERVICE LIST

Thy Merritt, City Clerk
Office of the City Clerk, City of Lake Forest
100 Civic Center Dr.
Lake Forest, CA 92630
cityclerk@lakeforestca.gov

EXHIBIT C

CARSTENS, BLACK & MINTEER LLP
Douglas P. Carstens, SBN 193439; dpc@cbcearthlaw.com
Michelle N. Black, SBN 261962; mnb@cbcearthlaw.com
Sunjana S. Supekar, SBN 328663; sss@cbcearthlaw.com
700 North Pacific Coast Highway, Suite 200
Redondo Beach, CA 90277-2147
Tel: (310) 798-2400 | Fax (323) 347-7228

Attorneys for Petitioner
WE THE MEADOWS

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

WE THE MEADOWS,	)	CASE NO.:
	)	
Petitioner,	)	NOTICE OF ELECTION TO PREPARE
v.	)	ADMINISTRATIVE RECORD AND
	)	NOTICE OF ALTERNATIVE DISPUTE
CITY OF LAKE FOREST; and DOES 1 through	)	RESOLUTION INFORMATION PACKET
20, inclusive;	)	
	)	(Violations of California Environmental
Respondents;	)	Quality Act; Lake Forest General Plan)
	)	
IPT ENTERPRISE BUSINESS CENTER, LLC;	)	
and ROES 1 through 20, inclusive;	)	
	)	
Real Parties in Interest.	)	
	)	
	)	

1 PLEASE TAKE NOTICE:

2 1). Pursuant to Public Resources Code section 21167.6, Petitioner **We the Meadows**
3 hereby elects to prepare the administrative record in this matter. This notice also serves as a
4 request for documents pursuant to the Public Records Act.

5 2). In accordance with California Rules of Court Rule 3.221, subd. (c), Petitioner hereby
6 serves the Alternative Dispute Resolution information package provided by the Superior Court
7 of the County of Orange, located on the Court's website at
8 <https://www.occourts.org/system/files/11200.pdf>. This document is attached as Exhibit A.

9
10 DATE: August 6, 2026

Respectfully Submitted,
CARSTENS, BLACK & MINTEER LLP

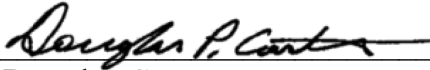
11
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13 By: 
14 Douglas Carstens
15 Attorneys for Petitioner
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EXHIBIT A

SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

ALTERNATIVE DISPUTE RESOLUTION (ADR)
INFORMATION PACKAGE

NOTICE TO PLAINTIFF(S) AND/OR CROSS-COMPLAINANT(S):

Rule 3.221(c) of the California Rules of Court requires you to serve a copy of the ADR Information Package along with the complaint and/or cross-complaint.

California Rules of Court – Rule 3.221
Information about Alternative Dispute Resolution (ADR)

(a) Each court shall make available to the plaintiff, at the time of filing of the complaint, an ADR Information Package that includes, at a minimum, all of the following:

- (1) General information about the potential advantages and disadvantages of ADR and descriptions of the principal ADR processes.
- (2) Information about the ADR programs available in that court, including citations to any applicable local court rules and directions for contacting any court staff responsible for providing parties with assistance regarding ADR.
- (3) Information about the availability of local dispute resolution programs funded under the Dispute Resolutions Program Act (DRPA), in counties that are participating in the DRPA. This information may take the form of a list of the applicable programs or directions for contacting the county's DRPA coordinator.
- (4) An ADR stipulation form that parties may use to stipulate to the use of an ADR process.

(b) A court may make the ADR Information Package available on its website as long as paper copies are also made available in the clerk's office.

(c) The plaintiff must serve a copy of the ADR Information Package on each defendant along with the complaint. Cross-complainants must serve a copy of the ADR Information Package on any new parties to the action along with the cross-complaint.

SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

ADR Information

Introduction.

Most civil disputes are resolved without filing a lawsuit, and most civil lawsuits are resolved without a trial. The courts and others offer a variety of Alternative Dispute Resolution (ADR) processes to help people resolve disputes without a trial. ADR is usually less formal, less expensive, and less time-consuming than a trial. ADR can also give people more opportunity to determine when and how their dispute will be resolved.

BENEFITS OF ADR.

Using ADR may have a variety of benefits, depending on the type of ADR process used and the circumstances of the particular case. Some potential benefits of ADR are summarized below.

Save Time. A dispute often can be settled or decided much sooner with ADR; often in a matter of months, even weeks, while bringing a lawsuit to trial can take a year or more.

Save Money. When cases are resolved earlier through ADR, the parties may save some of the money they would have spent on attorney fees, court costs, experts' fees, and other litigation expenses.

Increase Control Over the Process and the Outcome. In ADR, parties typically play a greater role in shaping both the process and its outcome. In most ADR processes, parties have more opportunity to tell their side of the story than they do at trial. Some ADR processes, such as mediation, allow the parties to fashion creative resolutions that are not available in a trial. Other ADR processes, such as arbitration, allow the parties to choose an expert in a particular field to decide the dispute.

Preserve Relationships. ADR can be a less adversarial and hostile way to resolve a dispute. For example, an experienced mediator can help the parties effectively communicate their needs and point of view to the other side. This can be an important advantage where the parties have a relationship to preserve.

Increase Satisfaction. In a trial, there is typically a winner and a loser. The loser is not likely to be happy, and even the winner may not be completely satisfied with the outcome. ADR can help the parties find win-win solutions and achieve their real goals. This, along with all of ADR's other potential advantages, may increase the parties' overall satisfaction with both the dispute resolution process and the outcome.

Improve Attorney-Client Relationships. Attorneys may also benefit from ADR by being seen as problem-solvers rather than combatants. Quick, cost-effective, and satisfying resolutions are likely to produce happier clients and thus generate repeat business from clients and referrals of their friends and associates.

DISADVANTAGES OF ADR.

ADR may not be suitable for every dispute.

Loss of protections. If ADR is binding, the parties normally give up most court protections, including a decision by a judge or jury under formal rules of evidence and procedure, and review for legal error by an appellate court.

Less discovery. There generally is less opportunity to find out about the other side's case with ADR than with litigation. ADR may not be effective if it takes place before the parties have sufficient information to resolve the dispute.

Additional costs. The neutral may charge a fee for his or her services. If a dispute is not resolved through ADR, the parties may have to put time and money into both ADR and a lawsuit.

Effect of delays if the dispute is not resolved. Lawsuits must be brought within specified periods of time, known as statutes of limitation. Parties must be careful not to let a statute of limitations run out while a dispute is in an ADR process.

TYPES OF ADR IN CIVIL CASES.

The most commonly used ADR processes are arbitration, mediation, neutral evaluation and settlement conferences.

Arbitration. In arbitration, a neutral person called an "arbitrator" hears arguments and evidence from each side and then decides the outcome of the dispute. Arbitration is less formal than a trial, and the rules of evidence are often relaxed. Arbitration may be either "binding" or "nonbinding." Binding arbitration means that the parties waive their right to a trial and agree to accept the arbitrator's decision as final. Generally, there is no right to appeal an arbitrator's decision. Nonbinding arbitration means that the parties are free to request a trial if they do not accept the arbitrator's decision.

Cases for Which Arbitration May Be Appropriate. Arbitration is best for cases where the parties want another person to decide the outcome of their dispute for them but would like to avoid the formality, time, and expense of a trial. It may also be appropriate for complex matters where the parties want a decision-maker who has training or experience in the subject matter of the dispute.

Cases for Which Arbitration May Not Be Appropriate. If parties want to retain control over how their dispute is resolved, arbitration, particularly binding arbitration, is not appropriate. In binding arbitration, the parties generally cannot appeal the arbitrator's award, even if it is not supported by the evidence or the law. Even in nonbinding arbitration, if a party requests a trial and does not receive a more favorable result at trial than in arbitration, there may be penalties.

Mediation. In mediation, an impartial person called a "mediator" helps the parties try to reach a mutually acceptable resolution of the dispute. The mediator does not decide the dispute but helps the parties communicate so they can try to settle the dispute themselves. Mediation leaves control of the outcome with the parties.

Cases for Which Mediation May Be Appropriate. Mediation may be particularly useful when parties have a relationship they want to preserve. So when family members, neighbors, or business partners have a dispute, mediation may be the ADR process to use. Mediation is also effective when emotions are getting in the way of resolution. An effective mediator can hear the parties out and help them communicate with each other in an effective and nondestructive manner.

Cases for Which Mediation May Not Be Appropriate. Mediation may not be effective if one of the parties is unwilling to cooperate or compromise. Mediation also may not be effective if one of the parties has a significant advantage in power over the other. Therefore, it may not be a good choice if the parties have a history of abuse or victimization.

Neutral Evaluation. In neutral evaluation, each party gets a chance to present the case to a neutral person called an "evaluator." The evaluator then gives an opinion on the strengths and weaknesses of each party's evidence and arguments and about how the dispute could be resolved. The evaluator is

often an expert in the subject matter of the dispute. Although the evaluator's opinion is not binding, the parties typically use it as a basis for trying to negotiate a resolution of the dispute.

Cases for Which Neutral Evaluation May Be Appropriate. Neutral evaluation may be most appropriate in cases in which there are technical issues that require special expertise to resolve or the only significant issue in the case is the amount of damages.

Cases for Which Neutral Evaluation May Not Be Appropriate. Neutral evaluation may not be appropriate when there are significant personal or emotional barriers to resolving the dispute.

Settlement Conferences. Settlement conferences may be either mandatory or voluntary. In both types of settlement conferences, the parties and their attorneys meet with a judge or a neutral person called a "settlement officer" to discuss possible settlement of their dispute. The judge or settlement officer does not make a decision in the case but assists the parties in evaluating the strengths and weaknesses of the case and in negotiating a settlement. Settlement conferences are appropriate in any case where settlement is an option. Mandatory settlement conferences are often held close to the date a case is set for trial.

ADDITIONAL INFORMATION.

In addition to mediation, arbitration, neutral evaluation, and settlement conferences, there are other types of ADR, including conciliation, fact finding, mini-trials, and summary jury trials. Sometimes parties will try a combination of ADR types. The important thing is to try to find the type or types of ADR that are most likely to resolve your dispute.

To locate a dispute resolution program or neutral in your community:

- Contact the California Department of Consumer Affairs, Consumer Information Center, toll free, at 1-800-852-5210
- Contact the Orange County Bar Association at (949) 440-6700
- Look in the telephone directories under "Arbitrators" or "Mediators"

Low cost mediation services are provided under the Orange County Dispute Resolution Program Act (DRPA). For information regarding DRPA, contact:

- OC Human Relations (714) 480-6575, mediator@ochumanrelations.org
- Waymakers (949) 250-4058

For information on the Superior Court of California, County of Orange court ordered arbitration program, refer to Local Rule 360.

The Orange County Superior Court offers programs for Civil Mediation and Early Neutral Evaluation (ENE). For the Civil Mediation program, mediators on the Court's panel have agreed to accept a fee of \$300 for up to the first two hours of a mediation session. For the ENE program, members of the Court's panel have agreed to accept a fee of \$300 for up to three hours of an ENE session. Additional information on the Orange County Superior Court Civil Mediation and Early Neutral Evaluation (ENE) programs is available on the Court's website at www.occourts.org.

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name & Address):		<i>FOR COURT USE ONLY</i> For your protection and privacy, please press the Clear This Form button after you are done printing this form.
Telephone No.:	Fax No. (Optional):	
E-Mail Address (Optional):	Bar No:	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE JUSTICE CENTER: ☒ Central - 700 Civic Center Dr. West, Santa Ana, CA 92701-4045 ☐ Civil Complex Center - 751 W. Santa Ana Blvd., Santa Ana, CA 92701-4512 ☐ Costa Mesa - 3390 Harbor Blvd., Costa Mesa, CA 92626-1554 ☐ Harbor-Laguna Hills Facility – 23141 Moulton Pkwy., Laguna Hills, CA 92653-1251 ☐ Harbor – Newport Beach Facility – 4601 Jamboree Rd., Newport Beach, CA 92660-2595 ☐ North – 1275 N. Berkeley Ave., P.O. Box 5000, Fullerton, CA 92838-0500 ☐ West – 8141 13 th Street, Westminster, CA 92683-0500		
PLAINTIFF/PETITIONER:		
DEFENDANT/RESPONDENT:		
ALTERNATIVE DISPUTE RESOLUTION (ADR) STIPULATION		CASE NUMBER:

Plaintiff(s)/Petitioner(s), _____

and Defendant(s)/Respondent(s), _____

agree to the following dispute resolution process:

- ☐ Mediation
- ☐ Arbitration (must specify code)
- ☐ Under section 1141.11 of the Code of Civil Procedure (Judicial Arbitration)
- ☐ Under section 1280 of the Code of Civil Procedure (Contractual Arbitration)

The ADR process must be completed no later than 90 days after the date of this Stipulation or the date the case was referred, whichever is sooner.

☐ An approved fee waiver (FW-003) is attached to this Stipulation, and the selected ADR Neutral(s) are eligible to provide pro bono services.

We understand that there may be a charge for services provided by neutrals. We understand that participating in an ADR process does not extend the time periods specified in California Rules of Court rule 3.720 et seq.

Date: _____ (SIGNATURE OF PLAINTIFF OR ATTORNEY) _____ (SIGNATURE OF PLAINTIFF OR ATTORNEY)

Date: _____ (SIGNATURE OF DEFENDANT OR ATTORNEY) _____ (SIGNATURE OF DEFENDANT OR ATTORNEY)

ALTERNATIVE DISPUTE RESOLUTION (ADR) STIPULATION

Approved for Optional Use
L1270 (Rev, May 2023)

California Rules of Court, rule 3.221

Print This Form

For your protection and privacy, please press the Clear This Form button after you are done printing this form.

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