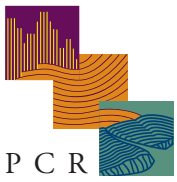
FINAL INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION

Capistrano Unified School District Compressed Natural Gas (CNG) Fueling Dispenser at Aliso Viejo Transportation Center Project

City of Aliso Viejo, California



January 2010

FINAL INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION

Capistrano Unified School District Compressed Natural Gas (CNG) Fueling Dispenser at Aliso Viejo Transportation Center Project

City of Aliso Viejo, California

Prepared for:
Capistrano Unified School District
33122 Valle Road
San Juan Capistrano, California 92675

Prepared by:
PCR Services Corporation
One Venture
Suite 150
Irvine, California 92618
Tel: 949.753.7001
Fax: 949.753.7002

January 2010

TABLE OF CONTENTS

APPENDICES

LIST OF FIGURES

LIST OF TABLES

Environmental Checklist Form

ENVIRONMENTAL CHECKLIST FORM

1. **Project Title:** Compressed Natural Gas (CNG) Fueling Dispenser at Aliso Viejo Transportation Center

2. **Lead agency name and address:** Capistrano Unified School District
33122 Valle Road
San Juan Capistrano, CA 92675

3. **Contact person and phone number:** Cary Brockman - Director, Facilities Planning (949) 234-9449

4. **Project location:** 2b Liberty, Aliso Viejo, Orange County, CA 92656-3829

5. **Project sponsor's name and address:** Capistrano Unified School District (CUSD)

6. **General plan designation:** Community Facilities (CF)

7. **Zoning:** Business Park (BP)

8. **Description of project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)**
The project is the installation of a new compressed natural gas (CNG) bus fueling dispenser within the District's existing Aliso Viejo Transportation Center. The fueling dispenser would serve 20 existing CNG buses operated by the District in an effort to promote and enhance its clean, alternative-fueled bus fleet.

9. **Surrounding land uses and setting: Briefly describe the project's surroundings:**
The project site is developed with the District's Transporation Center. The Transportation Center is utilized for bus, staff and visitor parking, maintenance, and fueling (diesel) and serves schools in the northerly portion of the District. It is occupied by shop and administration buildings, a diesel fueling dispenser with underground storage tanks, and paved-parking and landscaped areas. Uses surrounding the site include office and warehouse buildings to the north, mult-family residential to the east, and an existing religious facility and assocaited parking area to the west. There is also an undeveloped property to the west that is proposed to be developed with senior housing. Property south of the site is undeveloped land.

10. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)**
The project may require grading and building permits, and a Conditional Use Permit (CUP) from the City of Aliso Viejo.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Geology/Soils
☐ Hazards/Hazardous Materials	☐ Hydrology/Water Quality	☐ Land Use/Planning
☐ Mineral Resources	☒ Noise	☐ Population/Housing
☐ Public Services	☐ Recreation	☐ Transportation/Traffic
☐ Utilities/Service Systems	☐ Mandatory Findings of Significance	

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature — Date: 11-24-09

Cary Brockman, Director, Facilities Planning
Printed Name

For

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

    a) Earlier Analysis Used. Identify and state where they are available for review.

    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and

   b) the mitigation measure identified, if any, to reduce the impact to less than significance.

Issues:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
I. AESTHETICS – Would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☐	☒
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒
II. AGRICULTURE RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:				
a) 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?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	☒

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
GREENHOUSE GAS EMISSIONS – Would the Project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, based on any applicable threshold of significance?	☐	☐	☒	☐
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒
IV. BIOLOGICAL RESOURCES – Would the project:				
a) 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 Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b) 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 Game or US Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) 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 nursery sites?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☐	☒
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒
VI. GEOLOGY AND SOILS – Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) 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? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) 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?	☐	☐	☒	☐

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
e) 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?	☐	☐	☐	☒
VII. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) 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?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) 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, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project 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, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒
VIII. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b) 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)?	☐	☐	☐	☒

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☐	☒
d) Substantially alter the existing drainage pattern of the site or area, including through the alternation of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☐	☒
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☐	☒
f) Otherwise substantially degrade water quality?	☐	☐	☒	☐
g) 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?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
i) 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?	☐	☐	☐	☒
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒
IX. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒
X. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) 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?	☐	☐	☐	☒

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. NOISE – Would the project result in:				
a) Exposure of persons to or generation of noise level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
e) For a project 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, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
XII. POPULATION AND HOUSING – Would the project:				
a) 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)?	☐	☐	☐	☒
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
XIII. PUBLIC SERVICES				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☐	☒
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. RECREATION				
a) Would the project 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?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒
XV. TRANSPORTATION/TRAFFIC – Would the project:				
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	☐	☐	☒	☐
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☒
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e) Result in inadequate emergency access?	☐	☐	☐	☒
f) Result in inadequate parking capacity?	☐	☐	☐	☒
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	☐	☐	☐	☒
XVI. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐	☒
e) 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?	☐	☐	☐	☒
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐	☒
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒
XVII. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Attachment A - Project Description

ATTACHMENT A – PROJECT DESCRIPTION

A. INTRODUCTION

The Capistrano Unified School District (CUSD or "District") is proposing the installation of a new compressed natural gas (CNG) bus fueling dispenser within its existing Aliso Viejo Transportation Center. The fueling dispenser would serve 20 existing low-emitting CNG buses operated by the District in an effort to promote and enhance its clean, alternative-fueled bus fleet.

B. PROJECT LOCATION AND SURROUNDING USES

The approximate 10.1-acre Transportation Center (project site) is located in Planning Area 52 in the south central portion of the City of Aliso Viejo. The project site is approximately 3.6 miles northeast of the Pacific Ocean. The closest freeway to the site is the 73 Toll Road, located approximately 1.1 miles northeast of the project site. The Interstate 5 (I-5) freeway is approximately 3.1 miles east of the site. A regional and vicinity map is provided in **Figure A-1**, *Regional and Project Vicinity Map*. More specifically, the project site is located at 2B Liberty Drive, and is generally bounded by Aliso Viejo Parkway to the north, Aliso Creek Road to the east, vacant land to the south, and Liberty street to the west. Access to the project site is from an access road off Liberty.

Land uses surrounding the site include multi-story office and warehouse buildings to the north of Aliso Viejo Parkway. To the east of Aliso Creek Road are three-story, multi-family residential uses. Immediately south of the project is undeveloped vacant land. To the immediate west of the site is undeveloped land as a well as an improved site consisting of a two-story, religious center and associated parking lot. The religious center is also utilized for educational and presumably childcare purposes. There is an outdoor play area on the southern side of the religious center building. A development plan for 164 senior housing units has been submitted to the City of Aliso Viejo for the undeveloped land to the west. Beyond Liberty to the west are single-family residential uses and a commercial facility operated by The Gas Company. **Figure A-2**, *Aerial Photograph,* provides an aerial photograph of the site and its surrounding uses.

The existing Transportation Center is relatively flat with no significant topographical constraints. However, the site does sit on an elevated pad in relationship to surrounding uses to the north and east. From the north and east, due to the elevated pad, the site is not visible; with the exception of the perimeter concrete block wall and upper portion of some buses that park along the northern and eastern perimeters within the site. The undeveloped land to the south is located at a slightly higher elevation (approximately 10-15 feet) than the project site. The uses to the immediate west (religious center and vacant site) are located at the same elevation as the project site. An approximate eight-foot high concrete block walls surrounds the eastern, northern and western perimeter of the Transportation Center. On the western perimeter, the wall extends from the site's northern boundary to a terminus at the end of the adjacent religious center parking lot. Thus, there is no wall separation between the Transportation Center and the vacant land to the west.

According to the current Aliso Viejo General Plan Land Use Policy Map (Figure LU-1 of the City's General Plan Land Use Element), the land use designation for the project site is Community Facilities (CF). The surrounding land uses are designated as follows: North – Business Park (BP); East – High Density Residential (HDR); South – BP; and West – CF and BP.

C. EXISTING SITE CONDITIONS

The project site is owned and occupied by the CUSD, and is developed with the District's Transportation Center. **Figure A-3**, *Existing Site Conditions,* provides an illustration of the existing Transportation Center. The Transportation Center houses the District's Transportation Department within a one-story administration building. The administration building includes office space for the District's transportation staff; the Bus Pass office; and break rooms for the bus drivers. A separate one-story bus servicing building contains the garage facilities for maintaining the District buses and other District vehicles. There is a tire shop, waste oil storage facility and a steam cleaning area adjacent to the bus serving building. The site includes a total of 284 parking spaces that accommodate large and small buses, District vehicles, and employees and visitors. There is a diesel and unleaded fueling dispenser for the District buses and vehicles, which includes underground storage tanks. A bus washing station is located adjacent to the fuel dispenser area. As stated above, the site is relatively flat and there are no topographical constraints existing within the project site. Landscaping is provided along the site's entrance driveway from Liberty and around the perimeter of the administration building.

The District operates 92 buses of its fleet of 138 buses at the Transportation Center and no additional buses are currently anticipated at this location. Also, there are typically approximately seven other District vehicles at the Transportation Center (passenger vans, trucks, and cars). Twenty (20) of the 92 buses are CNG-fueled buses. All the CNG-fueled buses are for Special Education. The 72 diesel buses are all fueled at the Transportation Center. However, the CNG-fueled buses must travel approximately 12 miles (or 24 miles round trip) to the City of Irvine's Operational Support Facility, at 6427 Oak Canyon, to re-fuel, which is the nearest available CNG facility to serve the buses. Currently, 15 of the 20 CNG buses make this round trip and re-fuel each day at the Irvine CNG fueling facility.

D. PURPOSE AND NEED OF PROJECT

Although there are no plans to increase the size of the District's bus fleet, the District is proposing to replace existing operational diesel-fueled buses with CNG-fueled buses in accordance with South Coast Air Quality Management District (SCAQMD) Clean Fleet Vehicle Rule 1195 regarding "Clean On-Road School Buses" and the State of California Air Resources Board (ARB) Lower-Emission School Bus Program that provides funding for new and replacement school buses fueled by CNG. These programs have been implemented to replace diesel-fueled school buses with CNG-fueled buses in a statewide effort to reduce air pollution and specifically, toxic air contaminates emitted from diesel-fueled buses. The proposed CNG fueling dispenser would contribute to this effort by providing a net environmental air quality benefit to the region by reducing daily vehicle miles traveled (VMT) by existing and future CNG buses at the Transportation Center, as well as promoting the use of more sustainable fuels.

As stated above, approximately 15 of the 20 CNG buses re-fuel each day at the Irvine CNG fueling station, which equates to approximately 360 vehicles miles driven daily. With 204 days of service per year, over 73,000 miles are currently driven and 3,060 man-hours are expended, annually, just to refuel the CNG buses. It costs the District approximately $5,000 per month to transport the CNG-fueled buses to the Irvine station, refuel them and drive them back to the Transportation Center. With the proposed CNG fueling dispenser at the Transportation Center, the CNG buses would be able to re-fuel on-site prior to leaving the Transportation Center and the time and expense of traveling to an off-site facility would be avoided. The CNG fueling dispenser would serve as a fueling site for additional CNG buses as the remaining diesel buses are retired. If CNG buses continue to be refueled in Irvine, the vehicles miles driven and man-hours expended will grow in

PCR

Regional and Project Vicinity Map

CUSD - CNG Fueling Dispenser Project

Source: ESRI, 2009.

FIGURE

A-1

PCR

N

0 400 Feet

Aerial Photograph

CUSD - CNG Fueling Dispenser Project

Source: ESRI, 2009.

FIGURE

A-2

PCR

N

0 100 Feet

Existing Site Conditions

CUSD - CNG Fueling Dispenser Project

Source: ESRI, 2009; PCR Services Corporation, 2009.

FIGURE

A-3

future years as the fleet of CNG buses grows. Further, the District would achieve cost savings associated with reduced fuel costs by using CNG as compared to diesel fuel in its bus fleet.

E. DESCRIPTION OF PROPOSED PROJECT

The District is proposing to install a CNG fueling dispenser in the southwest portion of the existing Transportation Center adjacent to the bus servicing building. The fueling dispenser would include three compressors and seven CNG fuel posts with a total of 20 lines/hoses to fill the buses. The CNG fueling dispenser would be able to fill a maximum of 20 buses simultaneously. The compressors would be located within a U-shaped, concrete block wall- enclosure on a concrete slab. The wall-enclosure would be seven-feet high and approximately 21-feet (length) by 17-feet (long), which would total approximately 370 square feet. The enclosure would be constructed as a masonry cinder block wall to match the exterior of the existing bus serving building. The wall is being constructed as a sound enclosure to minimize noise generated by the compressors. The project would require re-paving of the existing asphalt after completion of saw cut work. **Figure A-4**, *Site Plan,* provides a site plan illustration of the proposed CNG fueling dispenser.

The CNG fueling dispenser would be a "slow-fill" dispenser, in which natural gas is drawn from the domestic gas main in Liberty and compressed directly into the bus fuel tanks. The CNG fueling dispenser would be located at the terminus point of the existing natural gas line within the Transportation Center. No CNG storage tanks are necessary to operate the CNG fueling dispenser. The location of the fueling dispenser was determined by the District based on consultation with Sempra Utilities, which concluded that relocating the line to an alternative site location (i.e., on the eastern side of the bus servicing building) would not provide the necessary gas pressure to feasibly operate the fueling dispenser.

It would take approximately four (4) hours to fill a bus depending on the number of buses being fueled and how much fuel is needed. There are 20 existing bus parking spaces that would be utilized when fueling the CNG buses. Thus, no new parking spaces or changes to existing bus parking spaces on-site would occur as a result of the project.

Buses typically leave the Transportation Center in the early morning and return by approximately 9:00 AM. The buses again leave the Transportation Center by approximately 1:00 PM and return by 5:00 PM. Thus, the anticipated hours of operation for the CNG fueling dispenser would be Monday to Friday from 9:00 AM to 1:00 PM; and 5:00 PM to 1:00 AM. The Transportation Center operates a total of approximately 204 days per year. In the nighttime hours, the CNG fueling dispenser's automated system would not require drivers to wait while buses are being refueled.

F. CONSTRUCTION SCHEDULE

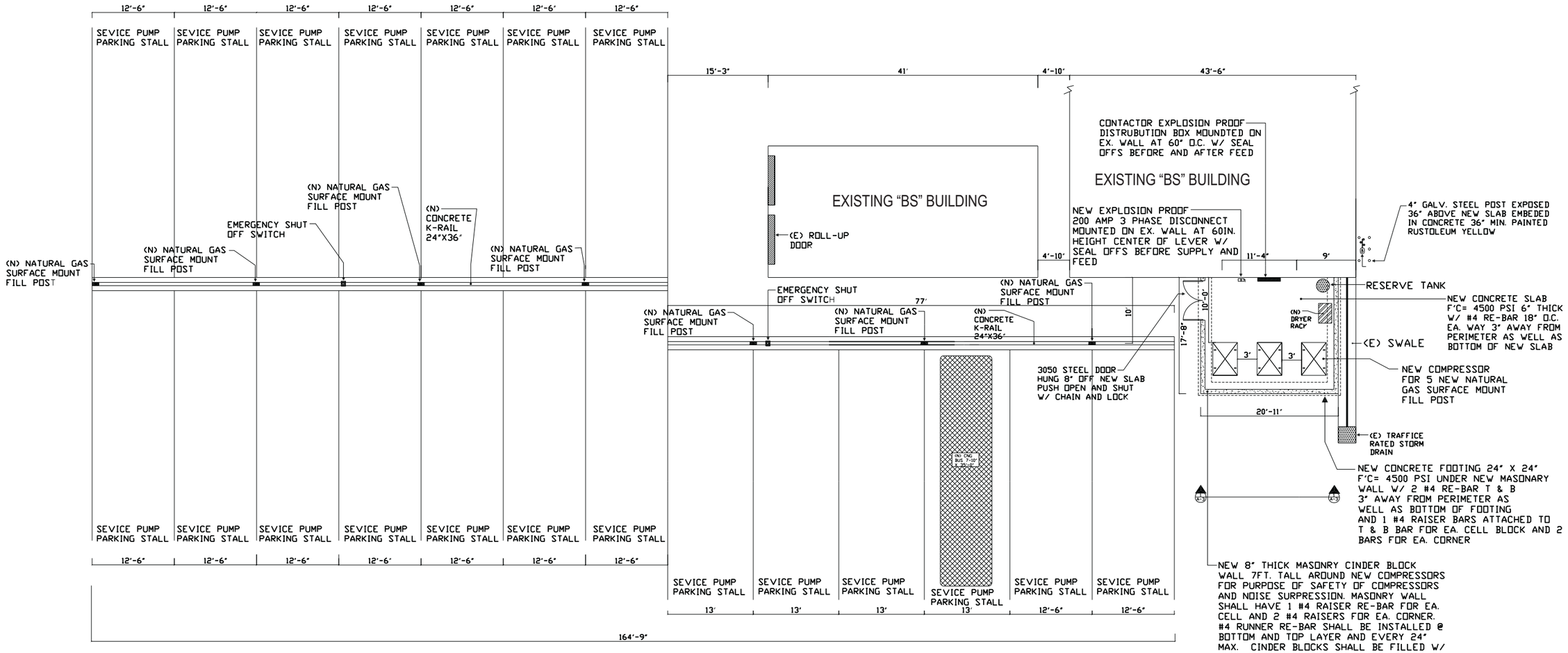
Construction of the proposed CNG fueling dispenser is anticipated to occur in the first quarter of 2010. The project would be constructed in one phase and is anticipated to last approximately three weeks.

G. NECESSARY APPROVALS

Approvals required for the project may include, but may not be limited to, the following:

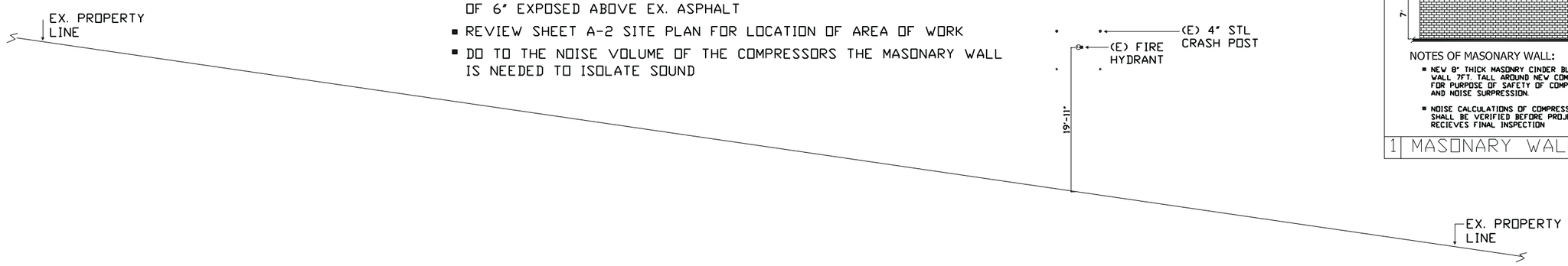
- Grading and building permits from the City of Aliso Viejo;
- Conditional Use Permit for a CNG fueling dispenser from the City of Aliso Viejo; and
- Any additional actions as may be deemed necessary.

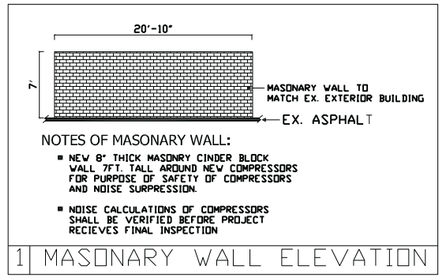
This page intentionally blank.



NOTES:

- CONCRETE PAD FOR COMPRESSORS AND FILL POST SHALL BE MIN. OF 6" EXPOSED ABOVE EX. ASPHALT
- REVIEW SHEET A-2 SITE PLAN FOR LOCATION OF AREA OF WORK
- DO TO THE NOISE VOLUME OF THE COMPRESSORS THE MASONARY WALL IS NEEDED TO ISOLATE SOUND





PCR

N

No scale

Site Plan

CUSD - CNG Fueling Dispenser Project

Source: JB Construction, 2009.

FIGURE

A-4

Attachment B - Explanation of Checklist Determinations

ATTACHMENT B EXPLANATION OF CHECKLIST DETERMINATIONS

I. AESTHETICS.

Would the project:

a. Have a substantial adverse effect on a scenic vista?

No Impact. The general project vicinity is urban in character and the site is not within a scenic vista. The project would not alter the scale or massing of the Transportation Center such that views beyond the site would be altered. Further, the 8-foot wall along the eastern, northern, and western perimeters of the site preclude adjacent land uses from viewing the interior of the Transportation Center where the proposed CNG fueling dispenser would be located. Thus, no impacts regarding scenic vistas would occur with project implementation.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcrops, and historic buildings within a state scenic highway?

No Impact. The project site is located within the District's Transportation Center, which is located in a highly urban area. No scenic resources, including trees, rock outcrops or historic buildings, exist on the project site. No roadways in the vicinity of the project site are designated as a state or local scenic highway. As such, project implementation would not impact views or visual resources from any scenic highway. Thus, no impacts would occur in this regard.

c. Substantially degrade the existing visual character or quality of the site and its surroundings?

No Impact. Generally, the surrounding vicinity is characterized by urbanized uses, although it is acknowledged that undeveloped lots currently exist to the south and west of the project site. The project site is not visible from surrounding land uses along Aliso Viejo Parkway or Aliso Creek Road to the north and east, respectively, due to topographical differences. To the west of the site are undeveloped land and an existing religious center facility. An eight-foot high concrete block wall separates the religious center facility from the Transportation Center. In addition, numerous approximately 25-foot tall trees along the western perimeter wall (on religious center side) provide additional screening of the site from the religious center facility. Given the location of the site and the existing perimeter wall, views of the interior of the Transportation Center are generally limited to those available from the undeveloped land to the south and west.

The project would add a new CNG fueling dispenser to the District's existing Transportation Center. More specifically, the CNG fueling dispenser would be located adjacent to the existing bus servicing building. The compressors of the proposed CNG fueling dispenser would be screened by a 7-foot high masonry cinder block wall that would be designed to match the exterior of the existing bus servicing building. The CNG fueling dispenser and associated operations would be a visually compatible use with the existing maintenance, service and fueling activities that occur within the Transportation Center. Due to the relatively small size and scale of the proposed CNG fueling dispenser, the visual character of the Transportation Center

would not substantially change. Further, the addition of the CNG fueling dispenser would not substantially alter bus operations within the Transportation Center since no new bus parking spaces or changes to existing bus parking spaces would occur with project implementation.

Overall, as the proposed CNG fueling dispenser would be visually compatible with the existing Transportation Center and its surrounding uses, no impact would occur in this regard.

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

No Impact. The project site is located in an urban area, although it is acknowledged that land to the immediate south and west of the project site are currently undeveloped. The Transportation Center currently includes low-level exterior building lighting for nighttime way finding and security purposes. Off-site sources of light that contribute to ambient nighttime light levels in the area include headlights from cars traveling along Liberty. No lighting is currently proposed as part of the project as it anticipated that existing lighting from the site would be satisfactory to operate the proposed CNG fueling dispenser during nighttime hours. Nonetheless, should lighting be determined necessary, it would be low-level lighting for operational and security purposes. Any such lighting would be would focused on the site and compatible with surrounding land uses similar to existing conditions. In addition, the project would not introduce glare to the area as the proposed CNG fueling dispenser would not be built with reflective materials. Thus, no light and glare impacts would occur with project implementation.

II. AGRICULTURAL RESOURCES.

Would the project:

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown the maps prepared pursuant to the Farmland Mapping Monitoring Program of the California Resources Agency, to non-agricultural uses?

No Impact. No agricultural uses or related operations exist within the project site or surrounding area. In addition, the project site has not been mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Therefore, the project would not result in impacts to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The project site is zoned Business Park (BP) by the City of Aliso Viejo's zoning map and no agricultural uses are present on the project site. Similarly, the surrounding area is not zoned or used for agricultural purposes. As no portions of the project site or immediate surrounding area are enrolled in a Williamson Act contract or anticipated to affect agricultural zones, development of the project would not result in a conflict relative to existing zoning for an agricultural use or with Williamson Act contracts. Therefore, no impacts associated with this issue would occur.

c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

No Impact. As stated above, the project would be constructed on a site currently improved with the District's Transportation Center and is not located on any land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The addition of the proposed CNG fueling dispenser to the existing Transportation Center would not result in the conversion of farmland to non-agricultural use. Thus, no impacts to agricultural resources would occur.

III. AIR QUALITY

Existing Conditions

The project site is located within the South Coast Air Basin (Basin), bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin lies in the semi-permanent high-pressure zone of the eastern Pacific. As a result, the climate is mild, tempered by cool sea breezes. The usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The extent and severity of the air pollution problem in the Basin is a function of the area's natural physical characteristics (weather and topography), as well as man-made influences (development patterns and lifestyle). The Basin has been designated as a non-attainment area as the area does not meet National Ambient Air Quality Standards (NAAQS) for certain pollutants regulated under the Federal Clean Air Act (CAA). The SCAB fails to meet national standards for O_3, PM_{10}, and $PM_{2.5}$, and therefore is considered a Federal "non-attainment" area for these pollutants.

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:

a. Conflict with or obstruct implementation of the AQMP or Congestion Management Plan?

No Impact. The South Coast Air Quality Management District (SCAQMD) is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, PM_{10}, and $PM_{2.5}$). The project would be subject to the SCAQMD's Air Quality Management Plan (AQMP). The AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG).

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties and addresses regional issues relating to transportation, the economy, community development and the environment.[1] With regard to air quality planning, SCAG has prepared the Regional

[1] *SCAG serves as the federally designated metropolitan planning organization (MPO) for the southern California region.*

Comprehensive Plan and Guide (RCPG), which includes Growth Management and Regional Mobility chapters that 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.

A project is consistent with the AQMP if it is consistent with the population, housing and employment assumptions which were used in the development of the AQMP. The 2007 AQMP, the most recent AQMP adopted by the SCAQMD, incorporates SCAG's Regional Transportation Plan (RTP) socioeconomic forecast projections of regional population and employment growth. SCAG locates the project site within the Orange County subregion. Since the project is not adding any new employees or residents to the region, it can be concluded that the proposed Project would be consistent with the projections in the AQMP.

The Congestion Management Program (CMP) was enacted by the Metropolitan Transportation Authority (Metro) to address traffic congestion issues that could impact quality of life and economic vitality. The intent of the program is to provide an analytical basis for transportation decisions throughout the state. An analysis is required at all CMP monitoring intersections for which a project is projected to add 50 or more trips during any peak hour. In addition, analysis is required for all freeway segments for which a project is projected to add 150 or more hourly trips, in each direction, during the peak hours analyzed.

As described in further detail below, the proposed project would provide the region a net environmental benefit by reducing overall vehicle miles traveled (VMT) in the region. Operation of the proposed project would not add any additional employees to the existing Transportation Center as the "slow fill" refueling process does not require constant monitoring. As a result, the CMP thresholds listed above would not be applicable, and no impact to the CMP network would occur. Thus, the project would not conflict with or obstruct implementation of the CMP.

Based on the above discussion of applicable air quality plans, implementation of the proposed project would be beneficial and would support implementation of the AQMP and the CMP. Therefore, no impact associated with obstructing implementation of these plans would occur.

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact. The proposed project would add a "slow fill" CNG fueling dispenser to the existing Transportation Center located in the City of Aliso Viejo. The existing operation requires all CNG busses to refuel at an off-site location. Development of on-site CNG refueling dispenser is calculated to save a fleet-wide total of 360 daily VMT resulting in a net environmental benefit with implementation of the proposed project.

Construction Impacts

Although the construction activities associated with the proposed project are small in scale and would occur within an approximate three week time frame, construction has the potential to create regional air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the project site. In addition, fugitive dust emissions would result from excavation and construction activities. Mobile source emissions, primarily particulate matter (PM) and nitrogen oxides (NOx), would result from the use of construction equipment. The paving operations and

application of building materials would release volatile organic compounds (VOCs). Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Regional Impacts

Regional construction-related emissions associated with heavy construction equipment were calculated using the URBEMIS2007 emissions inventory model originally developed by the California Air Resources Board (CARB). Model results are provided in Appendix A. The analysis assumed that all construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust. A summary of maximum daily regional emissions by construction phase are presented in **Table B-1**, *Proposed Project - Estimate of Regional Construction Emissions*, along with the regional significance thresholds for each air pollutant. As shown therein, maximum regional construction emissions would be well under and would not exceed the thresholds for VOC, NOx, CO, SOx, PM_{10}, or $PM_{2.5}$.

Table B-1

Proposed Project -
Estimate of Regional Construction Emissions
(pounds per day) [a, e]

	VOC	NOx	CO	SO_X	PM_{10} [b]	$PM_{2.5}$ [b]
REGIONAL EMISSIONS						
Maximum Regional Emissions[c]	**1**	**11**	**6**	**0**	**1**	**1**
Daily Significance Threshold	75	100	550	150	150	55
Over/(Under)	(74)	(89)	(544)	(150)	(149)	(54)
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
LOCALIZED EMISSIONS						
Maximum Localized Emissions	**1**	**11**	**5**	**<1**	**1**	**1**
Localized Significance Threshold [d]	-	108	1,234	-	24	8
Over/(Under) Threshold	-	(97)	(1229)	-	(23)	(7)
Exceed Threshold?	**-**	No	No	-	No	No

[a] *Pounds per day. Compiled using the URBEMIS 2007 emissions inventory model. The equipment mix and use assumption for each phase is provided in Appendix A of this MND.*

[b] *PM_{10} and $PM_{2.5}$ emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.*

[c] *Asphalt Paving overlap with Building Construction Phase. Maximum emissions account for this overlap.*

[d] *The SCAQMD LSTs are based on Source Receptor Area 21 (Capistrano Valley) for a one acre site with sensitive receptors located within 100 meters of construction activity.*

[e] *Conservative construction assumptions were utilized to present a worst-case scenario.*

Source: PCR Services Corporation, 2009.

Localized Impacts

The potential for localized air quality impacts to off-site sensitive receptors from construction emissions was evaluated according to the SCAQMD's localized significance threshold (LST) methodology, which utilizes mass emissions rate look-up tables and project specific modeling, where appropriate. LSTs are only applicable to the following criteria pollutants: NOx, CO, PM_{10}, and $PM_{2.5}$. LSTs represent 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 (SRA) and distance to the nearest sensitive receptor. For PM_{10} and $PM_{2.5}$, LSTs were derived based on the requirements of SCAQMD Rule 403, Fugitive Dust. The mass rate look-up tables were developed for each SRA and can be used to determine whether or not a project may generate significant adverse localized air quality impacts. The LST mass rate look-up tables only apply to projects that are less than or equal to five acres in size. A conservative estimate of maximum local (on-site) daily emissions for NOx, PM_{10}, $PM_{2.5}$, and CO during construction is presented in **Table B-1**. The closest sensitive receptors during construction of the project would be the religious center facility located approximately 260 feet to the west and the multi-family residential located approximately 780 feet east of the project site. Localized construction emissions thresholds, based on the construction site acreage and distance to the closest off-site sensitive receptor, were obtained from the LST look-up tables and are also listed in **Table B-1**.

As presented in **Table B-1**, construction-related daily maximum localized emissions would be well under and would not exceed the SCAQMD daily localized significance thresholds for NOx, CO, PM_{10}, and $PM_{2.5}$. Therefore, localized construction emissions resulting from the project would have a less than significant short-term impact.

The greatest potential for Toxic Air Contaminate (TAC) emissions would be related to diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology.

Although a cancer risk factor has been established for DPM, the OEHHA HRA cancer risk factors assume a continuous exposure over a 70-year time frame. Because the construction schedule estimates that the phases which require the most heavy-duty diesel vehicle usage, such as site grading and excavation, would last approximately three weeks, construction of the proposed project would not result in a long-term (i.e., 70 years) substantial source of TAC emissions. Additionally, the SCAQMD CEQA guidance does not require a health risk assessment for short-term construction emissions. It is therefore not meaningful to evaluate long-term cancer impacts from construction activities which occur over such a short duration. In addition, there would be no residual emissions after construction and corresponding individual cancer risk. As such, project-related toxic emission impacts during construction would be less than significant.

As shown above, emissions from project construction activities would fall well below both localized and regional SCAQMD significance thresholds. Therefore, project construction would not violate an air quality standard or contribute significantly to an existing or projected air quality violation, and impacts would be less than significant.

Operational Impacts

The SCAQMD has established separate significance thresholds to evaluate potential impacts associated with the incremental increase in criteria air pollutants associated with long-term project operations. However, the proposed CNG fueling dispenser would not add or contribute any additional adverse impacts to air quality as fueling operations would not add any new employees or any new bus trips. Operation and use of CNG buses in lieu of existing diesel buses would directly support regional, State, and Federal goals for improved air quality in the South Coast Air Basin. Operations of the proposed project, as discussed above, would contribute to a net environmental benefit due to reductions in the bus fleet VMT compared to current operational conditions. As a result, project operations would benefit regional air quality.

Emission savings were calculated based on the Natural Gas Vehicle Technology and Fuel Performance Evaluation Program conducted by the CARB.[2] This report followed a testing program that included light and heavy duty mobile source CNG emission profiles. Based on the data contained in this report the reduction in air pollutant emissions with implementation of the project was quantified. The fueling dispenser would provide reductions in emissions of CO, NOx, PM_{10}, and $PM_{2.5}$. The proposed project is predicted to save up to 11 lbs/day CO, 18 lbs/day NOx, and < 1 lbs/day for both PM_{10} and $PM_{2.5}$ based on the daily savings of 360 miles from the re-routing of CNG buses at the existing Transportation Center. On an annual basis, the proposed project is predicted to save up to 2,183 lbs/year CO, 3,654 lbs/year NOx, 15 lbs/year PM_{10}, and 3 lbs/year $PM_{2.5}$ compared to existing conditions.

Based on SCAQMD R*ule 219-Equipment Not Requiring a Written Permit*, equipment used exclusively to compress or hold purchased natural gas are considered exempt. In addition, the project plans would require review and approval from the Orange County Fire Authority (OCFA) to ensure the proposed installation satisfies local and state fire safety requirements. While the OCFA does not have specific advisories, guidelines, or circulars relating to CNG fueling installations, in lieu of such standards, OCFA relies on the California Fire Code (CFC), 2007 edition, and applicable sections of the National Fire protection Association (NFPA) document 52, relating to the installation of CNG fueling systems. OCFA does not require a separate permit application for CNG fueling dispensers. The project is anticipated to be in compliance with the above listed-requirements/guidelines utilized by the OCFA applicable to CNG fueling dispensers.

As indicated above, the project site is located within the South Coast Air Basin, which is characterized by relatively poor air quality. State and federal air quality standards are often exceeded in many parts of the Basin, including those monitoring stations nearest to the project location. The proposed project would contribute to local and regional air pollutant emissions during construction over a short-term, approximately three week period. However, based on the above analysis, construction would result in less than significant impacts that would fall well below the daily significance thresholds for criteria air pollutant emissions established by the SCAQMD for construction. Project operation would provide a net environmental benefit to the region by reducing daily VMT and promoting the use of more sustainable fuels. As a result, the proposed project would have no regional or localized operational impacts.

[2] *www.arb.ca.gov/regact/**cng**-lpg/appb.doc*

c. 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less Than Significant Impact. As discussed under Responses Nos. III.a and III.b, above, the project as proposed, would have a beneficial effect on air quality and would not result in any significant air quality impacts. Therefore, it would not contribute to a cumulatively considerable net increase of critical pollutants. Cumulatively, the operation of CNG buses and associated reduction in diesel emissions and VMT would reduce the exhaust emissions associated with the school buses, helping to meet the goals of the Clean Air Act as implemented by the SCAQMD. The project would obtain and comply with all terms of permits to be issued by the SCAQMD.

d. Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. During construction, the closest sensitive receptors are would be the religious center facility located approximately 260 feet west of the project site. Construction emissions from construction activity would fall well below thresholds of significance for both regional and localized criteria pollutants. As discussed above, the proposed project operations would have no impact and result in a net environmental benefit. Therefore operation of the proposed project would not expose sensitive populations to substantial pollutant concentrations. The project would meet all appropriate emissions standards established by SCAQMD according to the Authority to Construct/Permit to Operate required prior to project implementation. Refer to Response No. III.a, above. Cumulatively, the relocation of CNG fueling would reduce the exhaust emissions associated with school buses and other vehicles, helping to support attainment of the goals of the Clean Air Act as implemented by the SCAQMD.

e. Create objectionable odors affecting a substantial number of people?

No Impact. The proposed project would promote the use of alternatively-fueled buses, which do not generate objectionable odors. The natural gas that supplies the CNG operation would be contained in a manner that would prevent any substantial venting into the ambient atmosphere. Therefore, no impact related to odors would occur.

GREENHOUSE GAS EMISSIONS

Would the project:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, based on any applicable threshold of significance?

Less Than Significant Impact. Greenhouse gases (GHGs) are those compounds in the Earth's atmosphere which play a critical role in determining temperature near the Earth's surface. Specifically, these gases allow high-frequency shortwave solar radiation to enter the Earth's atmosphere, but retain some of the low frequency infrared energy which is radiated back from the Earth towards space, resulting in a warming of

the atmosphere. This phenomenon is known as the greenhouse effect. Increased concentrations of GHGs in the Earth's atmosphere have been linked to global climate change and such conditions as rising surface temperatures, melting icebergs and snowpack, rising sea levels, and the increased frequency and magnitude of severe weather conditions. Existing climate change models also show that climate warming portends a variety of impacts on agriculture, including loss of microclimates that support specific crops, increased pressure from invasive weeds and diseases, and loss of productivity due to changes in water reliability and availability. In addition, rising temperatures and shifts in microclimates associated with global climate change are expected to increase the frequency and intensity of wildfires.

GHGs include carbon dioxide (CO_2), methane (CH_4), ozone (O_3), water vapor (H_2O), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Carbon dioxide is the most abundant GHG in the atmosphere, and represents 77 percent of total GHG emissions.[3] GHGs are the result of both natural and anthropogenic activities. Forest fires, decomposition, industrial processes, landfills, and consumption of fossil fuels for power generation, transportation, heating, and cooking are the primary sources of GHG emissions. In the state of California, the transportation sector is the greatest source of GHG emissions, accounting for 38 percent of total GHG emissions in 2004, the latest year for which data are available.[4]

Not all GHGs exhibit the same ability to induce climate change; as a result, GHG contributions are commonly quantified in the equivalent mass of CO_2, denoted as CO_2e. CO_2e allows for comparability among GHGs with regard to the global warming potential (GWP). Mass emissions are calculated by converting pollutant specific emissions to CO_2e emissions by applying the proper global warming potential (GWP) value.[5] These GWP ratios are available from the United States Environmental Protection Agency (USEPA) and published in the California Climate Action Registry (CCAR) Protocol. By applying the GWP ratios, project related CO_2e emissions can be tabulated in metric tons per year. The CO_2e values are calculated for the entire construction period. Construction output values used in this analysis are adjusted to represent a CO_2e value representative of CO_2, CH_4, and N_2O emissions from project construction activities. HFCs, PFCs, and SF_6 are not byproducts of combustion, the primary source of construction-related GHG emissions, and therefore are not included in the analysis. Construction CH_4 and N_2O values are derived from factors published in the 2006 Intergovernmental Panel on Climate Change (IPCC) Guidelines for National Greenhouse Gas Inventories. These values are then converted to metric tons of CO_2e for consistency.

In response to growing scientific and political concern regarding global climate change, California has recently adopted a series of laws to reduce both the level of GHGs in the atmosphere and to reduce emissions of GHGs from commercial and private activities within the State. In September 2002, Governor Gray Davis signed Assembly Bill (AB) 1493, requiring the development and adoption of regulations to achieve "the maximum feasible reduction of greenhouse gases" emitted by noncommercial passenger vehicles, light-duty trucks, and other vehicles used primarily for personal transportation in the State.

---

[3] *Intergovernmental Panel on Climate Change, Fourth Assessment Report, Synthesis Report, 2007.*

[4] *California Air Resources Board, Greenhouse Gas Emissions Inventory Data: 2004 GHG emissions by Sector, 2008.*

[5] *CO_2e was developed by the Intergovernmental Panel on Climate Change (IPCC), and published in its Second Assessment Report (SAR) 1996.*

In September 2006, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, also known as AB 32, into law. AB 32 commits the State to achieving the following:

- A reduction of GHG emissions to 2000 levels by 2010 (which represents an approximately 11 percent reduction from business as usual).
- A reduction of GHG emissions to 1990 levels by 2020 (approximately 30 percent below business as usual).

To achieve these goals, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved.

The Governor's Office of Planning and Research (OPR) has not yet adopted formal significance thresholds; however, it issued a guidance document on June 19, 2008 to provide interim advice to lead agencies regarding the analysis of GHG emissions in environmental documents. The technical advisory suggests three components for CEQA disclosure: quantification of GHG emissions from a project's construction and operation, determination of significance of the project's impact to climate change, and if the project is found to be significant, the identification of suitable alternatives and mitigation measures. The analysis contained herein follows this guidance. CAPCOA released a white paper, entitled CEQA and Climate Change, in January, 2008. The white paper examines various threshold approaches available to air districts and lead agencies for determining whether GHG emissions are significant. One of CAPCOA's proposed approaches in the white paper is a "non-zero" threshold of 900 annual metric tons for residential and office projects. This threshold is considered appropriate for this project and would be utilized for determining significance on a project level.

Construction emissions are calculated using the URBEMIS2007 model, which is based on OFFROAD2007 model outputs. OFFROAD2007 is an emissions estimation model developed by CARB to calculate emissions from construction activities. The output values used in this analysis were adjusted to be project-specific, based on usage rates of construction equipment, type of fuel, and construction schedule. These values were then applied to the construction phasing assumptions used in the criteria pollutant analysis to generate GHG emissions values for each construction year (refer to Appendix A). The URBEMIS2007 model outputs CO_2 emissions only. Therefore, CH_4 and N_2O emissions were estimated based on the emissions ratios for construction and industrial equipment from the 2006 IPCC Guidelines for National Greenhouse Gas Inventories.

Construction of the project is projected to emit a total of approximately 11 metric tons CO_2e. Results of this analysis are presented in **Table B-2**, *Construction GHG Emissions (metric tons)*. These emissions are far less than the 900 annual metric ton threshold proposed by CAPCOA.

As discussed above, proposed project operations would result in a net environmental benefit resulting from the reduction of school bus VMT. Emission savings were calculated similar to criteria pollutant emissions, and based on the CARB Natural Gas Vehicle Technology and Fuel Performance Evaluation Program.[6] The

[6] *www.arb.ca.gov/regact/cng-lpg/appb.doc*

Table B-2

Construction GHG Emissions (metric tons)

Emission Source	
CO_2 Emissions	11.32
CH_4 Emissions	0.03
N_2O Emissions	0.03
Total CO_2e Emissions[a]	11.39
2004 Statewide Total[b]	479,740,000
Net Increase as Percentage of 2004 Statewide Inventory	0.0000024%

[a] *All CO_2e factors were derived using the California Climate Action Registry General Reporting Protocol; Version 3.0, April 2008.*

[b] *Statewide total was derived from the CARB California GHG Inventory.*

Source: PCR Services Corporation, 2009.

proposed project is predicted to provide emissions savings of up to 122 metric tons/year of CO_2e. The reductions resulting from operation of the proposed project would help achieve the goals set out in AB32, effectively reducing human influence on global climate change. The proposed project would not result in new long-term stationary sources or additional vehicular trips and thus would not generate new or additional GHG emissions. Total net GHG emissions from construction and operations would fall well below the most stringent threshold proposed by CAPCOA, 900 metric tons. Overall, the proposed project would result in a less than significant impact during construction and a beneficial impact during operation with regard to GHGs.

b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

No Impact. The proposed project results in minimal GHG emissions during construction, only 0.0000024 percent the State's 2004 inventory. Additionally, the proposed project would provide emissions savings up to 122 metric tons/year of CO_2e during project operations. The project is therefore supportive of the State's goals regarding global climate change, and does not conflict with any applicable plan, policy, or regulation for reducing GHG emissions. As discussed in Response No. a, Greenhouse Gas Emissions, the project would result in a beneficial impact during project operation.

IV. BIOLOGICAL RESOURCES

Would the project:

a. 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 Game or U.S. Fish and Wildlife Service?

No Impact. The project site is currently improved with the Transportation Center and does not support any natural habitat or special status species. Thus, no impacts to candidate, sensitive or special status species would result from the proposed project.

b. 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 Game or U.S. Fish and Wildlife Service?

No Impact. The project site is currently improved with the District's Transportation Center and does not support include any riparian habitat or sensitive natural communities. Thus, no impacts to sensitive biological resources from the proposed project.

c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The project site is currently improved with the District's Transportation Center and no federally protected wetlands as defined by Section 404 of the Clean Water Act are present on the project site. As such, no impacts would occur in this regard.

d. 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 nursery sites?

No Impact. The project site does not include any migratory fish movement corridors or wildlife corridors. As such, project implementation would result in no impacts in this regard.

e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?

No Impact. No local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance, are applicable to the project site. Thus, no impacts would occur in this regard.

f. 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. The project site is currently improved with the District's Transportation Center and does not support any biological resources protected under the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. As such, no impacts would occur in this regard.

V. CULTURAL RESOURCES

Would the project:

a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5?

No Impact. A historical resource is defined in Section 15064.5(a)(3) of the CEQA Guidelines as any object, building, structure, site, area, place, record, or manuscript determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Historical resources are further defined as being associated with significant events, important persons, or distinctive characteristics of a type, period, or method of construction; representing the work of an important creative individual; or possessing high artistic values. Resources listed in or determined eligible for the National Register, California Register, included in a local register, or identified as significant in a historic resource survey are also considered historical resources under CEQA.

The project site consists of the District's existing Transportation Center that was constructed in the late 1990's. No structures within the Transportation Center qualify as a historic resource under CEQA. Thus, project implementation would result in no impacts to historic resources.

b. Cause a substantial adverse change in significance of an archaeological resource pursuant to §15064.5?

No Impact. The project site is improved with the District's Transportation Center and has been previously disturbed through grading and development. There are no known archaeological resources on or proximate to the project site. Regardless, as the project would involve limited excavation into fill materials, project construction would not encounter native soils that could potentially contain archaeological resources. Therefore, no impacts to archaeological resources would occur with project implementation.

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

No Impact. The project site is currently improved with the District's Transportation Center and has been previously disturbed through grading and development. There are no known paleontological resources on or proximate to the project site. Regardless, as the project would involve limited excavation into fill

materials, project construction would not encounter native soils that could potentially contain paleontological resources. Therefore, no impacts to paleontological resources would occur with project implementation.

d. Disturb any human remains, including those interred outside of formal cemeteries?

No Impact. The project site is currently improved with the District's Transportation Center and has been previously disturbed through grading and development. There are no known human remains, former cemeteries or burial grounds on or proximate to the project site. Regardless, as the project would involve limited excavation into fill materials, project construction is not anticipated to disturb any human remains. Therefore, no impacts to human remains would occur with project implementation.

VI. GEOLOGY AND SOILS.

Would the project:

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

No Impact. According to the City of Aliso Viejo General Plan Safety Element, the project site is not located within a fault-rupture hazard zone as defined by the Alquist-Priolo Earthquake Fault Zone Act of 1962. Further, there is no evidence of active faulting on the project site. Accordingly, no impacts regarding fault rupture would occur with project implementation.

ii. Strong seismic ground shaking?

Less Than Significant Impact. Although no known active fault exists within Aliso Viejo, due to the City's proximity to active regional faults there is the potential for strong-seismic ground shaking. The closest active major fault is the Newport-Inglewood Fault, located approximately seven miles northwest of the City. In 1933, the Newport-Inglewood Fault produced a 6.3 magnitude earthquake devastating portions of Long Beach. Because there and no known fault zones at the project site, groundshaking potential at the site is not any greater than for other properties in the southern California area. The project would be designed and constructed in accordance with applicable seismic design standards in the California Building Code (CBC), as applicable, as well as current City of Aliso Viejo building code requirements.

As discussed in Response No VII.a, below, CNG has a narrow flammability range, and only presents a risk of explosion at specific concentrations that are difficult to achieve.[7] While the risk of upset associated with CNG is considered minimal, the design of the proposed CNG fueling dispenser would include various features to further ensure the safety of the system should an earthquake occur. These features may include, but are not

[7] *Natural Gas Vehicles for America: http://www.ngvc.org/about_ngv/index.html; Accessed November 2009.*

limited to, the following: a gas (methane) detection system; explosion proof motors and breaker box; automatic discharge pressure regulation (or regulator); oil level shut-down switch; and gas inlet pressure valves. The above listed safety measures in addition to the low-risk nature of CNG would minimize any risk of accident associated with the proposed CNG refueling system. Further, it is acknowledged that no earthquake related accidents have been reported by the contractor installing the system in any of the 10 similar CNG fueling dispensers located throughout the greater southern California area since their inception in the late 1990s, including dispensers operated by Colton Unified School District (USD), Torrance USD, Chino Valley USD, Rialto USD, Huntington Beach High School District, Menifee USD and Moreno Valley USD.[8]

Based on the above, earthquake-related risks associated with proposed CNG fueling dispenser would be minimal. Compliance with the established standards and design safety features identified above would ensure that impacts associated with seismic ground shaking are reduced to a less than significant level.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a phenomenon where loose, saturated, granular soils lose their inherent shear strength due to excess water pressure that builds up during repeated movement from seismic activity. Factors that contribute to the potential for liquefaction include a low relative density of granular materials, a shallow groundwater table, and a long duration and high acceleration of seismic shaking. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Liquefaction typically occurs in areas where the soils below the water table are composed of poorly consolidated, fine-to medium-grained, primarily sandy soil.

According to the United States Geological Survey (USGS) San Juan Capistrano Quadrangle map, the site does not appear to be located in a liquefaction zone. Regardless, the proposed CNG project would be located on a previously developed site with no known geological hazards, including liquefaction hazards. The project would be developed over engineered fill materials that are considered stable from a geological perspective. Given the limited nature and scope of the project, the geotechnical feasibility of the site would not be substantially altered with project implementation. Therefore, less than significant impacts regarding seismic-related ground-failure, including liquefaction, would occur with project implementation.

iv. Landslides?

Less Than Significant Impact. Landslides tend to occur in loosely consolidated soils, wet soil, and/or rock on sloping terrain. Over-steepened slopes are often prone to collapse when shaken by an earthquake. The project site is characterized by relatively flat topography, although it is acknowledged that the site is on an elevated building pad. The site has been developed in accordance with applicable local and State regulations to ensure that the site is stable from a geological perspective. Further, the site includes no known geological hazards, including landslide hazards. The project would be developed over engineered fill materials that are considered stable from a geological perspective. Given the limited nature and scope of the project, the geotechnical feasibility, including landslide potential, of the site would not be substantially altered with project implementation. Based on the above, less than significant impacts regarding landslides would occur with project implementation.

[8] *Source: Jack Garat, SW Compressors, telephone correspondence, October 8, 2009.*

b. Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Construction activities would have a limited potential to result in minor soil erosion during excavation and grading activities. The project would be implemented within the District's existing Transportation Center. Specifically, within the site, the CNG fueling dispenser would be located in an area that is currently entirely paved. The project would require removal of approximately 156 cubic feet of soil for footings. Excavation and grading activities would occur in accordance with standard construction practices and applicable local and/or State requirements that would minimize soil impacts to the extent practicable. Construction of the CNG fueling dispenser would be completed within approximately three weeks. Furthermore, installation of the CNG fueling dispenser would not result change the amount of impervious areas on site. Overall, given the limited nature and scope of the project, less than significant impacts regarding soil erosion or the loss of topsoil would occur with project implementation.

c. 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 landslides, lateral spreading, subsidence, liquefaction, or collapse?

Less Than Significant Impact. The project site is characterized by relatively flat topography, although it is acknowledged that the site is on an elevated building pad. However, the site has been developed in accordance with applicable local and State regulations to ensure that the site is stable from a geological perspective. Further, the site includes no known geological hazards. The project would be developed over engineered fill materials that are considered stable from a geological perspective. Given the limited nature and scope of the project, the geotechnical feasibility of the site would not be substantially altered with project implementation. Based on the above, less than significant impacts in this regard would occur with project implementation.

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Less Than Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. Shrinking and swelling of soils underlying a project area may cause structures to become physically unsound or walkways to buckle and become dangerous or difficult to navigate. As described above, the underlying soil on the project site consists of engineered fill materials which are not considered to have a high expansion potential and thus are considered suitable for development. As the project area is not located on expansive soils, project implementation would not create substantial risks to life or property associated with expansive soils and impacts would be less than significant.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The project would not include the use of septic tanks or an alternative wastewater disposal system. Thus, no impacts would occur in this regard.

VII. HAZARDS AND HAZARDOUS MATERIALS.

Would the project:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Compressed natural gas (CNG) is considered a hazardous substance as defined by the Occupational Safety & Health Administration (OSHA). Therefore, the following provides a discussion of potential hazards associated with the daily operation of the fueling dispenser.

CNG has a narrow flammability range, and only presents a risk of explosion at specific concentrations that are difficult to achieve. The "slow fill" system employed in the proposed project is a tank-less system utilizing an existing CNG pipeline on the project site. The system is passive, which would allow the vehicle to remain unattended after the driver has connected the bus to the fuel source. A risk of accident may occur if the CNG tanks on the individual vehicles were to rupture. Strict safety standards make CNG vehicles as safe as gasoline-powered vehicles in this respect. CNG disperses rapidly, and only high concentrations are flammable, minimizing ignition risk compared to alternative fuels.[9]

In addition, natural gas buses have onboard gas detectors and other safety devices, such as tank safety valves that allow fuel flow only when the engine is keyed on. Also, the tanks must be inspected and approved by the U.S. Department of Transportation after marked periods of use. In the event of a spill or accidental release, CNG poses no threat to land or water, as it is nontoxic.

The few reported incidences of CNG bus fires are related to engine failures, not the general use of natural gas. The contractor for this system has never had a pipeline rupture or accidental release from a refueling system in any of the 10 similar CNG fueling dispensers located throughout the greater southern California area since their inception in the late 1990s, including dispensers operated by Colton USD, Torrance USD, Chino Valley USD, Rialto USD, Huntington Beach High School District, Menifee USD and Moreno Valley USD.[10]

While the risk of upset associated with CNG is considered minimal, the design of the proposed CNG fueling dispenser would include various features to further ensure the safety of the system. These features may include, but are not limited to, the following: a gas (methane) detection system; explosion proof motors and breaker box; automatic discharge pressure regulation (or regulator); oil level shut-down switch; and gas inlet pressure valves.

Further, the project plans would require review and approval from the OCFA to ensure the proposed installation satisfies local and state fire safety requirements. While the OCFA does not have specific advisories, guidelines, or circulars relating to CNG fueling installations, in lieu of such standards, OCFA relies on the CFC, 2007 edition, and applicable sections of the NFPA document 52, relating to the installation of CNG fueling systems. OCFA does not require a separate permit application for CNG fueling dispensers.

[9] *Source USEPA: http://eerc.ra.utk.edu/etcfc/docs/EPAFactSheet-cng.pdf*

[10] *Source: Jack Garat, SW Compressors, telephone correspondence, October 8, 2009.*

Overall, based on the above listed safety measures, the low-risk nature of CNG and compliance with applicable regulatory review, there would be minimal risk of accident associated with the proposed CNG refueling system. Therefore, impacts associated with the proposed CNG fueling dispenser are considered to be less than significant.

b. 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. As discussed in Response No. VII.a, based on the project's safety measures, the low-risk nature of CNG and compliance with applicable regulatory review, there would be minimal risk of accident associated with operation of the proposed CNG refueling system.

In addition, during project construction, the use of hazardous materials would not result in any significant hazards that would endanger the public or environment. Construction and development would include the limited use of potentially hazardous materials in the form of cleaning solvents and mechanical fluids. The use and storage of such materials would comply with applicable standards and regulations, and would not pose significant hazards.

In conclusion, less than significant impacts regarding hazards to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment would occur with project implementation.

c. 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. The project area is located within one-quarter mile of an existing school. Van Damme Academy operates out of the adjacent religious center facility to the west of the Transportation Center, which is approximately 260 feet from the site. Project construction activities would include the limited use of hazardous materials, however, it would not result in any significant impacts that would endanger the adjacent school facility. The greatest potential for TAC emissions during construction and operation would include the limited use of potentially hazardous materials including diesel particulate emissions associated with heavy equipment. The use and storage of such materials would comply with applicable standards and regulations, and emissions over the limited three week construction period would not pose a significant health hazard to nearby sensitive receptor locations.

Hazardous emissions are typically associated with TACs as defined by the SCAQMD and CARB. Together the SCAQMD and CARB have established guidelines and recommend screening distances, or buffer zones, for development of sensitive land uses in proximity to TAC sources. However, the proposed project would not include any operational TACs sources as defined by the SCAQMD and CARB, as the CNG refueling process is non-toxic. Furthermore, it is noted that the project would not add any new bus trips to the existing Transportation Center. As such, 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. Overall, less than significant impacts on human health would occur.

d. 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, would create a significant hazard to the public or the environment?

No Impact. The project site is not included on a list of hazardous materials sites pursuant to Government Code Section 65962.5.[11] Therefore, there would be no impacts in this regard.

e. For a project 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, would the project result in a safety hazard for people residing or working in the project area?

No Impact. The closest airport to the project site is John Wayne Airport, located approximately 11 miles northwest of the project site. In addition, the project site is not located within an airport land use plan. No safety hazards to people residing or working in the project area due to a public use airport would occur. Thus, no impacts would occur in this regard.

f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?

No Impact. There are no private airstrips in the vicinity of the project site and the site is not located within a designated airport land use plan. Therefore, the project would not result in airport-related safety hazards for the people residing or working in the area. Thus, no impacts would occur in this regard.

g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. Immediate access to the project site is provided via Liberty. Project implementation would not result in an increase in traffic levels compared to existing conditions since the project would not involve increasing the number of buses at the Transportation Center. As such, the project would not cause any delay in response time for fire and police protection along local roadways. Construction activities would take place for approximately three weeks. No heavy equipment would be parked on adjacent streets and no road closures would occur during construction.

Natural gas is not listed as a regulated substance under the California Accidental Release Program (CalARP). Exposure to substances not regulated by CalARP would have no impact on sensitive populations. Therefore, no impacts with regards to implementing or physically interfering with an adopted emergency response plan or emergency evacuation plan would occur with project implementation.

[11] *United States Environmental Protection Agency, Envirofacts http://www.epa.gov/enviro/index.html, accessed October 15, 2009.*

h. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. The project site is located in an urbanized area, however, it is acknowledged that the surrounding landscaping does include large trees and areas of dense vegetation. The undeveloped sites to the west and south of the site have been previously rough graded and primarily support limited areas of low-lying vegetation in addition to some perimeter trees. Regardless, the proposed CNG fueling dispenser would be located within the interior of the Transportation center and partially enclosed by a masonry wall precluding it from fire hazards. Thus, no impact would occur in this regard.

VIII. HYDROLOGY AND WATER QUALITY

Would the project:

a. Violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. The project site contains no surface water bodies nor are any present in the vicinity. The project site also discharges directly into the City of Aliso Viejo storm drain system. The scope of the project is limited to the installation of a CNG fueling dispenser within the District's existing Transportation Center. Since the proposed activities do not involve the paving or disturbance of an area equal to or greater than one acre, a Storm Water Pollution Prevention Plan (SWPPP) would not be required for the proposed project. Nonetheless, implementation of standard construction practices and compliance with the conditions set forth in the project grading and building permits would ensure that construction activities do not violate any water quality standards. In addition, the proposed project would not introduce any new source of waste discharge or new contaminants to the area that could reach water resources. Therefore, the proposed project would result in less than significant impacts regarding water quality standards or waste discharge requirements.

b. 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 land uses for which permits have been granted)?

No Impact. Construction, operation, and maintenance of the proposed project would not involve any new groundwater wells and would not require groundwater supplies from existing wells. Therefore, the proposed project would not deplete existing water supplies and no impact would occur.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

and

d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

No Impact (c-d). As previously stated, there are no streams or rivers on the project site or in the vicinity. In addition, the project involves the installation of CNG fueling dispenser within the District's existing Transportation Center and would not alter the existing drainage pattern of the site or area. Therefore, the project would not result in flooding or substantial erosion or siltation on- or off-site. No impacts would occur in this regard.

e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

No Impact. The scope of the project is limited to the installation of a CNG fueling dispenser within the District's existing Transportation Center, which would not result in a change in the amount of stormwater runoff. As the existing stormwater system in the project area is adequate to convey existing runoff volumes and the project would not increase the amount or rate of surface water runoff, project development would not exceed the capacity of existing stormwater drainage systems. In addition, the proposed project would not introduce any new contaminants to the area that could reach water resources. Thus, no impacts would occur in this regard.

f. Otherwise substantially degrade water quality?

Less Than Significant Impact. The project site is generally flat and is developed with the District's existing Transportation Center. The majority of surface flow is conveyed by paved surfaces and gutters to the public storm drain system. As the scope of the project is limited to the installation of a CNG fueling dispenser within the District's existing Transportation Center, the project would not result in new or altered storm water runoff from the site. Therefore, the project would not otherwise substantially degrade water quality and less than significant impacts would occur.

g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. The scope of the project is limited to the installation of a CNG fueling dispenser within the District's existing Transportation Center. No housing is proposed as part of the Project. Thus, no impacts would occur in this regard.

h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. The project site is not located within a FEMA 100-year flood zone or subject to flooding during 100-year storm events (a rain storm with a one percent chance of occurring in any given year). Thus, no impacts would occur in this regard.

i. 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?

No Impact. According to the City of Aliso Viejo General Plan, no dam inundation hazards have been identified for the project site. Further, the project site is not located within a depression where localized flooding may occur during severe storm events or within a coastal area susceptible to flooding. Therefore, no impacts would occur in this regard.

j. Inundation by seiche, tsunami, or mudflow?

No Impact. A tsunami is a great sea wave produced by a significant undersea disturbance. Given that the project site is located approximately 3.6 miles northeast of the Pacific Ocean, the project site is not susceptible to inundation by a tsunami. Mudflows result from the downslope movement of soil and/or rock under the influence of gravity. Given the flat nature of the site and the fact that the site is not down gradient from surrounding land areas, mudflows are not considered to be a potential hazard to the site. A seiche is an oscillation of an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. No waterbodies are present in the immediate site vicinity that could result in the project site being affected by a seiche. Therefore, no impacts would occur in these regards.

IX. LAND USE AND PLANNING.

Would the project:

a. Physically divide an established community?

No Impact. The scope of the project is limited to the installation of a CNG fueling dispenser within the District's existing Transportation Center. As the site is currently developed with the Transportation Center, the project would not divide an established community. As such, no impact would occur in this regard.

b. Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. The project site is located in Planning Area 52 in the south central portion of the City of Aliso Viejo. According to the current Aliso Viejo General Plan Land Use Policy Map (Figure LU-1 of the City's GP Land Use Element), the land use designation for the project site is Community Facilities (CF). The surrounding land uses are designated as follows: North – Business Park (BP); East – High Density Residential (HDR); South – BP; and West – CF and BP. The zoning for the project site is Business Park (BP).

The scope of the project is limited to the installation of a CNG fueling dispenser within the District's existing Transportation Center. The CNG fueling dispenser would support existing CNG buses at the Transportation Center and be compatible with the existing bus service and maintenance operations occurring at the project site. The proposed project is an allowable use at the project site and may be subject to approval of a Conditional Use Permit (CUP) to install and operate the proposed CNG fueling dispenser, which would be obtained from the City of Aliso Viejo. The project may also require building and grading permits from the City of Aliso Viejo.

In addition, the OCFA would need to review and sign-off on the plans for the proposed CNG fueling dispenser, however, so specific permit is being requested from the OCFA. Also, it is acknowledged that the fueling dispenser is exempt from regulation by the SCAQMD. Specifically, refer to AQMD Rule 219 – Equipment not requiring a Written Permit Pursuant to Regulation II, which states in part…"Written permits are not required for:…Equipment used exclusively to compress or hold purchased quality natural gas."

Overall, the project would not conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. Thus, no impact would occur in this regard.

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. The project site is currently improved with the District's Transportation Center and does not support any biological resources protected under the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. As such, no impact would occur in this regard.

X. MINERAL RESOURCES.

Would the project:

a. Result in the loss or availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. No mineral resources (i.e., oil, sand, gravel, rock) are known to exist on the project site and no mineral extraction activities occur on the site. The project site is not located within a designated mineral extraction area. In addition, the project does not have the capability to result in the loss of availability of a mineral resource. Thus, no impacts to mineral resources would occur.

b. 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. Refer to Response No. X.a.

XI. NOISE

Would the project result in:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact With Mitigation Incorporated. The following analysis evaluates the potential noise impacts at noise-sensitive land uses resulting from construction and operation of the

proposed project. The analysis also evaluates the potential noise impacts from the site noise environment to the proposed residential uses.

Applicable Noise Regulations

Noise Element

The purpose of the Noise Element is to identify current and potential future sources of noise so that future land uses can be organized and new development adequately designed in a manner that minimizes noise impacts to community residents and businesses. Standards that may be applicable to this project are discussed below.

Noise Standards

Table B-3 summarizes County of Orange residential noise standards adopted by the City of Aliso Viejo. The standards represent the maximum acceptable noise levels as measured from any residential property in the City. Accordingly, it is unlawful to cause the noise level on any residential property to exceed the exterior noise standards: 1) for a cumulative period of more than thirty minutes in any hour; 2) plus five dB(A) for a cumulative period of more than 15 minutes in any hour; 3) plus 10 dB(A) for a cumulative period of more than five minutes in any hour; 4) plus 15 dB(A) for a cumulative period of more than one minute in any hour; or 5) plus 20 dB(A) for any period of time. In addition, any noise that exceeds the interior noise standards established for residential uses: 1) for a cumulative period of more than five minutes in any hour; 2) plus five dB(A) for a cumulative period of more than one minute in any hour; or 3) plus 10 dB(A) for any period of time, is unlawful.

Table B-3

Orange County Residential Noise Standards

Zone	Noise Level	Time Period
1 (residential)	55 dB(A)	7:00 a.m. -- 10:00 p.m.
	50 dB(A)	10:00 p.m. -- 7:00 a.m.

Source: Noise Element (County of Orange Code of Ordinances, 2003.)

The City of Aliso Viejo [Aliso Viejo Municipal Code (AVMC), Chapter 15.94] has adopted the County of Orange noise standards. Noise limits for construction activities are specified in the County of Orange Municipal Code (COMC), Division 6 – Noise Control. Several of these requirements, provided below, are applicable to the project.

(ii) Sec. 4-6-7. Special provisions – Construction [also Sec 4-6-7, (AVMC)]

Only those subsections applicable to the proposed project are described below.

(e) Noise sources associated with construction, repair, remodeling, or grading of any real property, provided said activities do not take place between the hours of 8:00 p.m. and 7:00 a.m. on weekdays, including Saturday, or at any time on Sunday or a Federal holiday.

(i) Noise sources associated with the maintenance of real property, provided said activities take place between 7:00 a.m. and 8:00 p.m. on any day except Sunday or a Federal holiday, or between the hours of 9:00 a.m. and 8:00 p.m. on Sunday or a Federal holiday.

That is, construction activities occurring between the hours of 7:00 a.m. and 8:00 p.m. on weekdays and Saturdays are exempted from the County's exterior noise standards (as provided in **Table B-3** above).

Significance Thresholds

The following thresholds of significance were developed based on industry standards, the County of Orange standards and guidelines described above.

Construction Noise

As stated above, the County of Orange Noise Standards and Regulations do not provide qualitative standards or significance thresholds for construction noise. The threshold for construction hours is the most restrictive provision by *Section 4-6-7 of the AVMC*. Therefore, the proposed Project would have a significant impact on noise levels, during construction if:

- *Construction activities would occur outside the hours of 7:00 a.m. to 8:00 p.m. on weekdays, including Saturday, or at any time on Sunday or a Federal holiday*.

Operation Noise

For noise sensitive receptors, based on the County of Orange Noise Standards and Regulations as described above, the Project would have a significant noise impact if:

- *Project-related stationary noise exceeds the ambient noise levels indicated in* **Table B-3** *at off-site residences.*

Existing Conditions

The project site is owned and occupied by the CUSD and is currently improved with the District's Transportation Center. The closest sensitive receptors during construction of the project would be the religious center facility located approximately 260 feet to the west and the multi-family residential located approximately 780 feet east of the project site. The senior housing project proposed to be developed on the undeveloped lot to the west is not anticipated to be occupied during construction of the proposed project.

Traffic along Aliso Viejo Parkway and Aliso Creek Road is the predominate source of existing noise environment in the vicinity of the project site. Additional noise sources within the area include nearby commercial and retail activities. To quantify the existing noise environment, long-term (24-hour)

measurements were conducted at two locations, identified as R1 and R2 on **Figure B-1**, *Noise Monitoring Locations*. The ambient noise measurements were made in accordance with the County's standards.[12] The long-term ambient sound measurements were conducted from Thursday, September 24, through Monday, September 27, 2009, as described below:

- Measurement Location R1: The sound measuring device (sound level meter) was placed on the western boundary of the Transportation Center at the property line of the undeveloped lot proposed for senior housing. The measurement location represents the nearest off-site noise-sensitive receptor.

- Measurement Location R2: The sound measuring device (sound level meter) was placed on the eastern boundary of the Project site near multi-family residential uses along Aliso Creek Road.

The ambient noise measurements were conducted using a Larson-Davis 820 Precision Integrated Sound Level Meter (SLM). The Larson-Davis 820 SLM is a Type 1 standard instrument as defined in the American National Standard Institute (ANSI) S1.4. Measurement instruments were calibrated and operated according to manufacturer specifications. The microphone was placed at a height of five (5) feet above the local grade.

These locations provide a representative characterization of the existing noise conditions within the project vicinity. The results of the ambient sound measurement data are summarized in **Table B-4**, *Summary of Ambient Noise Measurements*. As shown in **Table B-4**, the measured Hourly L_{eq} levels at Location R1 ranged from 43 dBA, L_{eq} to 54 dBA during daytime and from 37 dBA to 53 dBA during nighttime. The measured levels at Location R2 ranged from 58 dBA to 74 dBA during daytime and from 49 dBA to 64 dBA during nighttime. The lowest measured existing ambient noise levels at location R1 are below the County's presumed daytime and nighttime noise standards of 55 dBA (L_{eq}) and 50 dBA (L_{eq}), respectively. However, the measured ambient noise levels exceed the County's presumed daytime and nighttime noise standards at location R2.

Short-Term Construction Noise

Construction noise is a temporary event, and for the proposed project construction would occur over an approximate three week period during daytime hours; 7:00 A.M. to 8:00 P.M. While the County does not have an established significance threshold for construction noise, compliance with the County's Municipal Code Section 4-6-7 (limiting construction activities to the daytime hours of 7:00 A.M. and 8:00 P.M. on weekdays and Saturdays) is considered to result in a less than significant impact.

Noise levels from construction equipment that would be used for the project (i.e., excavator, concrete saw, paver, and concrete and mortar mixer) would range from approximately 79 to 90 dBA (L_{max}) at a 50 foot distance, based on measured noise data conducted by the Federal Highway Administration (FHWA Roadway Construction Noise Model User's Guide, 2006). These maximum noise levels would occur when equipment is operating under full power conditions. To more accurately characterize construction noise levels, the average noise level is calculated based on the quantity, type, and usage factors for each type of equipment that would be used. Sound generated by a point source, such as construction equipment, attenuates at rate

[12] *County of Orange, Noise Ordinance, accessed 4/14/2008.*

PCR

N

0 400 Feet

Noise Monitoring Locations and Existing Noise Sensitive Locations

CUSD - CNG Fueling Dispenser Project

Source: ESRI, 2009; PCR Services Corporation, 2009.

FIGURE

B-1

Table B-4

Summary of Ambient Noise Measurements

Measurement Location and Date/ Day of Week	Measured Ambient Noise Levels (dBA) [a] Daytime (7 A.M. to 10 P.M.) Hourly L_{eq}	Nighttime (10 P.M. to 7 A.M.) Hourly L_{eq}	24-Hour Average, CNEL
R1			
9/24/09 (partial 9 hours)/ Thursday	47 – 51	41 – 46	N/A
9/25/09 (full 24 hours)/ Friday	47 – 52	37 – 53	54
9/26/09 (full 24 hours)/ Saturday	43 – 54	42 – 48	53
R2			
9/24/09 (partial 9 hours)/ Thursday	66 – 74	62 – 64	N/A
9/25/09 (full 24 hours)/ Friday	62 – 67	49 – 63	67
9/26/09 (full 24 hours)/ Saturday	58 – 65	52 – 62	67

[a] *Detailed measured noise data, including hourly L_{eq} levels, are included in Appendix B of this MND.*

Source: PCR Services Corporation, 2009.

of approximately 6 dB per doubling of distance.[13] That is, a noise level of 90 dBA at 50 feet would attenuate to 84 at 100 feet distance. In addition, an approximately 8-foot tall cement block wall is located along the perimeter of the project site. Therefore, barrier-insertion loss (minimum 10 dBA insertion loss) for a block wall is accounted for in the construction noise calculations.

During construction, the project would generate noise levels from the use of heavy equipment for site grading, CNG fueling dispenser construction, and paving. Noise levels generated by the project construction activity would range from 59 dBA to 62 dBA (hourly L_{eq}) at the adjacent religious center facility. These noise levels would be up to approximately 4 to 7 dBA above the allowable 55 dBA daytime noise standard. At the R2 location, project construction noise would range from 50 dBA to 52 dBA (hourly L_{eq}), which would be below the 55 dBA daytime noise standard. While construction noise levels would exceed allowable daytime noise standards, such noise would be short-term and would occur only on an intermittent basis during project construction. Further construction activities would comply with the hour limits (during daytime hours only) as allowed by *Section 4-6-7 of the AVMC*. Based on these considerations, construction-related noise impacts are concluded to be less than significant.

Operational Noise

The existing noise environment in the project vicinity is dominated by traffic noise from nearby roadways, as well as nearby commercial and residential activities. Long-term operation of the project would have a minimal effect on the noise environment in proximity to the project site. The CNG fueling facility would be placed on the southwest part of the site, west of the existing bus service building. The dispenser would consist of seven CNG fill posts, supported by three compressors. The compressors would be located within a

[13] *Caltrans, Technical Noise Supplement (TeNS), Section N-2140, 1998.*

U-shaped, concrete-block wall enclosure and concrete slab. Noise generated by the project would result primarily from the three compressors supporting seven CNG fill posts.

Off-Site Traffic Noise

Existing traffic conditions would be unaffected by the proposed project as there would be no increase in the number of buses arriving or departing from the yard, and no increase in personnel to service, maintain, or monitor the CNG equipment or attend to the pumps during fueling. Therefore, no impacts would occur regarding off-site traffic noise.

On-Site Operational Noise

The operation of three compressors would generate noise levels that have a potential to adversely impact adjacent land uses. Based on a noise survey that was conducted at a CNG fueling dispenser on September 21st, 2009 that is similar to the fueling dispenser proposed, the operation of three compressors would generate noise levels of approximately 88 dBA L_{eq} at a reference distance of 5 feet from the compressors. According to the vendor, the newer compressor model slated to be installed in the proposed CNG fueling dispenser would have lower noise levels. Therefore, the use of noise measurement data from the existing CNG fueling dispenser provides a conservative analysis.

With regards to the noise sensitive receptor location at the multi-family residential uses on Aliso Creek Road (R2), the existing Transportation Center buildings would fully block the line-of-sight between the proposed CNG fueling dispenser and the R2 location. Based on a noise level source strength of 88 dBA at a reference distance of 5 feet, and accounting for barrier-insertion loss (minimum 10 dBA insertion loss) and distance attenuation (minimum 44 dBA loss), the CNG fueling dispenser noise would be 34 dBA and would not exceed the County's noise limits (**Table B-3**) at the multi-family residential uses (R2). Therefore, impacts from the project noise would be less than significant at the multi-family residential uses along Aliso Creek Road (R2).

Residential uses are proposed for the undeveloped land located approximately 130 feet west of the proposed CNG fueling dispenser. Similarly the noise level source strength of 88 dBA at a reference distance of 5 feet, and accounting for barrier-insertion loss for U-shaped enclosure (approximately 3 dBA insertion loss), distance attenuation (minimum 28 dBA loss), and noise level increase due to sound reflection from building (up to 3 dBA increase), fueling dispenser noise levels would be 60 dBA and would exceed the County's daytime and nighttime noise limits presented in **Table B-3** at the R1 future noise-sensitive location by 5 dBA and 10 dBA, respectively. This is considered to be a potentially significant noise impact. However, with implementation of Mitigation Measure NOISE-1, this impact would be reduced to a less than significant level.

Mitigation Measures

NOISE-1 The District shall retain the services of a qualified acoustical engineer with expertise in design of sound isolations to ensure the U-shaped enclosure is designed (i.e., installation of roof) so as to meet the County's exterior noise limits at the property line of the vacant lot to the west of the site.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Project construction would employ conventional construction techniques and equipment which would not cause excessive ground-borne vibration or noise. The equipment proposed for project construction would include standard earth moving equipment (i.e., excavator), which could generate limited ground-borne vibration. However, project construction would be short-term and would not result in excessive, long-term impacts to sensitive receptors. Project operation would include three compressors installed approximately 130 feet from the nearest adjacent property line. The compressors would generate limited vibration. However, the ground-borne vibration would dissipate below the perception threshold at the project site's property line. Therefore, neither construction nor operation of the proposed project would generate significant levels of ground-borne vibration or ground-borne noise. Impacts would be less than significant and no mitigation measures are required.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact With Mitigation Incorporated. As discussed in Response No. XI.a, operational noise would be generated from the proposed CNG fueling dispenser. The noise from the three compressors at the site of the proposed residential uses to the west would be approximately 10 dBA above the County's nighttime noise limit of 50 dBA. Mitigation Measure NOISE-1 is recommended to reduce noise from the compressors to a level consistent with the County's Noise Standards. Therefore, upon implementation of Mitigation Measure NOISE-1, potential impacts regarding a substantial permanent increase in ambient noise levels in the area would be reduced to a less than significant level. No additional mitigation measures are required.

Mitigation Measures

Refer to Mitigation Measure NOISE-1. No additional mitigation measures are necessary.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact. The project would result in a temporary increase in ambient noise near the project site during the construction period. Construction noise impacts are discussed in Response No. XI.a. As described therein, construction noise would result in a less than significant impact.

e) For a project 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, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The project site is not located within an airport land use plan area or within two miles of a public airport or public use airport. Therefore, construction or operation of the project would not expose people to excessive airport related noise levels. No impact would occur in this regard.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The project site is not located within the vicinity of a private airstrip. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels from such uses. No impact would occur in this regard.

XII. POPULATION AND HOUSING

Would the project:

a. 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)?

No Impact. The scope of the project is limited to the installation of a CNG fueling dispenser within the District's existing Transportation Center. It would not generate any population growth. Furthermore, the project would support existing on-site transportation-related uses and would not include major infrastructure that would induce indirect population growth. As such, no impacts regarding population growth would occur.

b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

and

c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact (b-c). The project site is currently developed with the District's Transportation Center. No housing exists on the project site. The project would not displace substantial numbers of existing housing or people that would necessitate the construction of replacement housing elsewhere. Thus, no impacts in this regard would occur.

XIII. PUBLIC SERVICES

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

i. Fire protection?

Less Than Significant Impact. The proposed CNG Fueling dispenser would require fire inspection services both during construction and during operation. However, since the fire department currently conducts inspection of the site, no new manpower or facilities are anticipated to be required. Thus, less than significant impacts regarding fire protection services would occur.

ii. Police protection?

No Impact. The scope of the project is limited to the installation of a CNG fueling dispenser within the District's existing Transportation Center. The project is not anticipated to place any additional demands on the police protection services in the area. Thus, no impact to police protection services would occur**.**

iii. Schools?

No Impact. Development of the project would not generate new students and does not have the capability to increase the demand on the local school system. As such, no impact to schools would occur.

iv. Parks?

No Impact. The project would not introduce any new population that would create additional demands on existing or planned park facilities. Furthermore, the project would not displace or directly impact any parks or recreational facilities. Thus, no impact to park facilities would occur.

v. Other public facilities?

No Impact. The project would not introduce any new population and would not create an increase in the need for additional government public facilities such as libraries in the area. Thus, no impact would occur in this regard.

XIV. RECREATION

a. Would the project 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?

No Impact. The project would not introduce any new population that would create additional demands on existing or planned park facilities. Thus, no impact to park facilities would occur.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. The project would not introduce any new population that would create additional demands on existing or planned park facilities. Nor would the project displace or directly impact any parks or recreational facilities. In addition, no recreational facilities are proposed as part of the project. Thus, no impact to park facilities would occur.

XV. TRANSPORTATION AND CIRCULATION.

The following discussion of traffic impacts is based on the *Assessment of Potential Traffic Impacts Associated With Installing CNG Fueling Pumps at CUSD's Transportation Center, in the City of Aliso Viejo, California* letter prepared by KHR Associates, dated October 16, 2009. This letter is provided in Appendix C of this document.

Would the project:

a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?

Less Than Significant Impact. The traffic associated with construction of the CNG fueling dispenser would be limited over the course of approximately three weeks. These trips would represent a nominal increase in traffic beyond existing conditions and would be temporary throughout the course of the construction activities. No road closures would be required during construction of the project. Construction traffic, including worker trips, would generally occur outside of peak traffic hours. Regardless, the number of construction-related vehicular trips would not cause a substantial increase to traffic in relation to the existing traffic load and capacity of the street system. Thus, less than significant impacts during construction of the project would occur.

No long-term traffic impacts would occur with project implementation as there would be no increase in the number of buses arriving or departing from the Transportation Center, and no increase in personnel to service, maintain, or monitor the CNG equipment or attend to the pumps during fueling. Further, eliminating the need for the District's CNG buses (approximately 15 buses daily) to travel 24 miles round trip to Irvine to re-fuel would decrease total vehicle mileage by over 73,000 miles, annually. Therefore, there would be a beneficial traffic impact with project implementation.

b. Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?

No Impact. Traffic generated during construction would be limited and would not generate a long-term source of traffic. As these trips would represent a nominal increase in traffic beyond existing conditions and

would be temporary throughout the course of the construction activities, they would not contribute to a level of service deficiency established by the county congestion management agency for designated roads or highways.

In addition, as stated above in Response No. XV.a, no long-term traffic impacts would occur with project implementation, rather there would be a beneficial traffic impact as the project would eliminate the need for the District's CNG buses (approximately 15 buses daily) to travel 24 miles round trip to Irvine to re-fuel would decrease total vehicle mileage by over 73,000 miles, annually. Therefore, no impact would occur in this regard.

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. The scope of the project is limited to the installation of a CNG fueling dispenser within the District's existing Transportation Center. The project would not result in the disruption or change of air traffic patterns in the area. Therefore, no impacts regarding air traffic patterns would occur.

d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. The project does not include any design features (i.e., sharp turns, dangerous intersections) or propose any uses (e.g., farming equipment) that would create hazardous traffic conditions. Site ingress and egress access to the project site from Liberty and internal circulation would remain similar to existing conditions. Thus, no impact would occur in this regard.

e. Result in inadequate emergency access?

No Impact. Construction activities would take place for approximately three weeks. No heavy equipment would be parked on adjacent streets and no road closures would occur during construction that would affect emergency access. The installation of the proposed CNG fueling dispenser would not alter existing traffic patterns on Liberty or emergency access to the project site during operation of the project. Thus, no impact would occur in this regard.

f. Result in inadequate parking capacity?

No Impact. As part of the proposed CNG fueling dispenser, a total of 20 pumps would be installed to fill a maximum of 20 buses simultaneously. The 20 parking spaces for these pumps are presently delineated and being used to park buses. Thus, no new parking spaces or changes to the configuration of the existing parking spaces with the Transportation Center would be required for the proposed project. No impact would occur in regards to parking capacity.

g. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

No Impact. As the project is proposing a new CNG fueling dispenser to serve existing and future CNG buses, it is supporting the use of alternative transportation. Thus, no impact would occur regarding the project's potential to conflict with any adopted policies, plans, or programs supporting alternative transportation.

XVI. UTILITIES AND SERVICE SYSTEMS.

Would the project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

No Impact. The proposed CNG fueling dispenser would not generate wastewater. Thus, no impact would occur in this regard.

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

No Impact. The proposed CNG fueling dispenser would not require new water or wastewater treatment facilities since there would not be any change in wastewater generation or water use at the District's Transportation Center. Thus, no impact would occur in this regard.

c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

No Impact. Under existing conditions, the location of the proposed CNG fueling dispenser within the District's Transportation Center is already improved with paved, impervious surfaces (i.e., concrete and asphalt). Installation of the proposed CNG dispenser would not change the amount of impervious surface within the project site or alter the drainage pattern of the site. Thus, no new storm water drainage facilities would be required with project implementation. No impact would occur in this regard.

d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

No Impact. No new or expanded water entitlements would be necessary with project implementation as there would be no increase in water use beyond existing conditions. Thus, no impact would occur in this regard.

e. 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?

No Impact. The proposed CNG fueling dispenser would not generate wastewater. Thus, no impact regarding the adequacy of wastewater conveyance and treatment facilities serving the project would occur.

f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

No Impact. The scope of the project is limited to the installation of a CNG fueling dispenser within the District's existing Transportation Center. Project implementation would not generate solid waste. Thus, no impact would occur in this regard.

g. Comply with federal, state, and local statutes and regulations related to solid waste?

No Impact. As stated above, project implementation would not generate solid waste. Thus, no impact would occur in this regard.

XVII. MANDATORY FINDINGS OF SIGNIFICANCE

a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact. The preceding analysis does not reveal any significant unmitigable impacts to the environment. Based on these findings, the project is not expected to degrade the quality of the environment. As discussed Section IV, Biological Resources, the site does not support sensitive plant or animal species and no impacts to biological resources would occur with project implementation. As discussed above in Section V, project implementation would no impact on cultural resources. Therefore, impacts in this regard are concluded to be less than significant.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact. The potential for cumulative impacts occurs when the independent impacts of the project are combined with the impacts of related projects in proximity to the project site such that impacts occur that are greater than the impacts of the project alone. As discussed in the preceding analysis, for the majority of the environmental topics covered in this Initial Study it has been determined that the project would have no impact or less than significant impacts. With respect to Noise, implementation of the prescribed mitigation measure would ensure that the potential noise impact of the project would be reduced to a less than significant level. Because the mitigation measure for this topic is project-specific and would reduce the project's potential impact to a less than significant level, no cumulative noise impact would occur. Furthermore, any similar impacts from development of related projects also would implement similar mitigation such that noise impacts would not be cumulatively considerable. Further, the proposed project would itself not result in an increase in area population, employment or new infrastructure that would be growth inducing. Overall, the issues relevant to the project are localized and confined to the immediate vicinity of the site. Further, it is acknowledged that the project has a beneficial impact of improving air quality and reducing traffic along local roadways and the freeway system as buses would no longer have to travel to re-fuel at the Irvine dispenser. Thus, no significant cumulatively considerable impacts would occur with project implementation.

c. Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?

Less Than Significant Impact. Based on the documentation provided above, project implementation would not cause long-term environmental impacts to the environment. Further, the District is proposing to replace existing operational diesel-fueled buses with CNG-fueled buses in accordance with SCAQMD Clean Fleet Vehicle Rule 1195 regarding "Clean On-Road School Buses" and the State of California ARB Lower-Emission School Bus Program that provides funding for new and replacement school buses fueled by CNG. These programs have been implemented to replace diesel-fueled school buses with CNG-fueled buses in a statewide effort to reduce air pollution and specifically, toxic air contaminates emitted from diesel-fueled buses. The proposed CNG fueling dispenser would contribute to this effort by providing a net environmental air quality benefit to the region by reducing daily vehicle miles traveled (VMT) by existing and future CNG buses at the Transportation Center, as well as promoting the use of more sustainable fuels. Therefore, the project would support long-term environmental goals.

d. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. Based on the documentation provided above, project implementation would not cause environmental effects that cause substantial direct or indirect adverse effects on human beings.

Appendix A: Air Quality Data

Appendix A-1

- Construction Emissions

10/12/2009 01:57:33 PM

Urbemis 2007 Version 9.2.4

Combined Summer Emissions Reports (Pounds/Day)

File Name: V:\ACTIVE PROJECTS\Capistrano CNG\Construction\Construction_emissions.urb924

Project Name: Capistrano CNG

Project Location: Orange County

On-Road Vehicle Emissions Based on: Version : Emfac2007 V2.3 Nov 1 2006

Off-Road Vehicle Emissions Based on: OFFROAD2007

Summary Report:

CONSTRUCTION EMISSION ESTIMATES

	ROG	NOx	CO	SO2	PM10 Dust	PM10 Exhaust	PM10	PM2.5 Dust	PM2.5 Exhaust	PM2.5	CO2
2010 TOTALS (lbs/day unmitigated)	1.92	16.87	7.01	0.00	1.00	0.82	1.51	0.21	0.76	0.76	1,960.82
2010 TOTALS (lbs/day mitigated)	1.92	16.87	7.01	0.00	0.45	0.82	0.96	0.10	0.76	0.76	1,960.82

Phase Assumptions

Phase: Mass Grading 1/4/2010 - 1/10/2010 - Default Mass Site Grading/Excavation Description

Total Acres Disturbed: 0.05

Maximum Daily Acreage Disturbed: 0.05

Fugitive Dust Level of Detail: Default

20 lbs per acre-day

On Road Truck Travel (VMT): 1.92

Off-Road Equipment:

1 Excavators (168 hp) operating at a 0.57 load factor for 8 hours per day

1 Other Equipment (190 hp) operating at a 0.62 load factor for 8 hours per day

Phase: Paving 1/18/2010 - 1/25/2010 - Paving

Acres to be Paved: 0.01

Off-Road Equipment:

1 Other Equipment (190 hp) operating at a 0.62 load factor for 8 hours per day

1 Pavers (100 hp) operating at a 0.62 load factor for 7 hours per day

Phase: Building Construction 1/11/2010 - 1/25/2010 - Building Construction

Off-Road Equipment:

1 Cement and Mortar Mixers (10 hp) operating at a 0.56 load factor for 8 hours per day

1 Concrete/Industrial Saws (10 hp) operating at a 0.73 load factor for 8 hours per day

1 Other Equipment (190 hp) operating at a 0.62 load factor for 8 hours per day

10/12/2009 01:57:33 PM

Construction Mitigated Detail Report:

CONSTRUCTION EMISSION ESTIMATES Summer Pounds Per Day, Mitigated

	ROG	NOx	CO	SO2	PM10 Dust	PM10 Exhaust	PM10	PM2.5 Dust	PM2.5 Exhaust	PM2.5	CO2
Time Slice 1/4/2010-1/8/2010 Active Days: 5	1.23	11.23	5.53	0.00	0.45	0.51	0.96	0.10	0.47	0.57	1,349.50
Mass Grading 01/04/2010-01/10/2010	1.23	11.23	5.53	0.00	0.45	0.51	0.96	0.10	0.47	0.57	1,349.50
Mass Grading Dust	0.00	0.00	0.00	0.00	0.45	0.00	0.45	0.09	0.00	0.09	0.00
Mass Grading Off Road Diesel	1.21	11.14	5.02	0.00	0.00	0.51	0.51	0.00	0.47	0.47	1,279.13
Mass Grading On Road Diesel	0.00	0.06	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8.15
Mass Grading Worker Trips	0.02	0.03	0.49	0.00	0.00	0.00	0.00	0.00	0.00	0.00	62.22
Time Slice 1/11/2010-1/15/2010 Active Days: 5	0.61	6.39	2.23	0.00	0.00	0.22	0.22	0.00	0.20	0.21	826.90
Building 01/11/2010-01/25/2010	0.61	6.39	2.23	0.00	0.00	0.22	0.22	0.00	0.20	0.21	826.90
Building Off Road Diesel	0.60	6.37	2.16	0.00	0.00	0.22	0.22	0.00	0.20	0.20	816.89
Building Vendor Trips	0.00	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.05
Building Worker Trips	0.00	0.00	0.06	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7.96
Time Slice 1/18/2010-1/25/2010 Active Days: 6	**1.92**	**16.87**	**7.01**	**0.00**	0.00	**0.82**	0.83	0.00	**0.76**	**0.76**	**1,960.82**
Asphalt 01/18/2010-01/25/2010	1.31	10.48	4.79	0.00	0.00	0.60	0.60	0.00	0.55	0.55	1,133.92
Paving Off-Gas	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paving Off Road Diesel	1.29	10.43	4.29	0.00	0.00	0.60	0.60	0.00	0.55	0.55	1,069.17
Paving On Road Diesel	0.00	0.02	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.54
Paving Worker Trips	0.02	0.03	0.49	0.00	0.00	0.00	0.00	0.00	0.00	0.00	62.22
Building 01/11/2010-01/25/2010	0.61	6.39	2.23	0.00	0.00	0.22	0.22	0.00	0.20	0.21	826.90
Building Off Road Diesel	0.60	6.37	2.16	0.00	0.00	0.22	0.22	0.00	0.20	0.20	816.89
Building Vendor Trips	0.00	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.05
Building Worker Trips	0.00	0.00	0.06	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7.96

Construction Related Mitigation Measures

The following mitigation measures apply to Phase: Mass Grading 1/4/2010 - 1/10/2010 - Default Mass Site Grading/Excavation Description

For Soil Stablizing Measures, the Water exposed surfaces 2x daily watering mitigation reduces emissions by:

PM10: 55% PM25: 55%

For Unpaved Roads Measures, the Manage haul road dust 2x daily watering mitigation reduces emissions by:

PM10: 55% PM25: 55%

Appendix A–2

- SCAQMD Rule 403 (Fugitive Dust) Control Requirements

(Adopted May 7, 1976) (Amended November 6, 1992)
(Amended July 9, 1993) (Amended February 14, 1997)
(Amended December 11, 1998)(Amended April 2, 2004)
(Amended June 3, 2005)

RULE 403. FUGITIVE DUST

(a) Purpose

The purpose of this Rule is to reduce the amount of particulate matter entrained in the ambient air as a result of anthropogenic (man-made) fugitive dust sources by requiring actions to prevent, reduce or mitigate fugitive dust emissions.

(b) Applicability

The provisions of this Rule shall apply to any activity or man-made condition capable of generating fugitive dust.

(c) Definitions

(1) ACTIVE OPERATIONS means any source capable of generating fugitive dust, including, but not limited to, earth-moving activities, construction/demolition activities, disturbed surface area, or heavy- and light-duty vehicular movement.

(2) AGGREGATE-RELATED PLANTS are defined as facilities that produce and / or mix sand and gravel and crushed stone.

(3) AGRICULTURAL HANDBOOK means the region-specific guidance document that has been approved by the Governing Board or hereafter approved by the Executive Officer and the U.S. EPA. For the South Coast Air Basin, the Board-approved region-specific guidance document is the Rule 403 Agricultural Handbook dated December 1998. For the Coachella Valley, the Board-approved region-specific guidance document is the Rule 403 Coachella Valley Agricultural Handbook dated April 2, 2004.

(4) ANEMOMETERS are devices used to measure wind speed and direction in accordance with the performance standards, and maintenance and calibration criteria as contained in the most recent Rule 403 Implementation Handbook.

(5) BEST AVAILABLE CONTROL MEASURES means fugitive dust control actions that are set forth in Table 1 of this Rule.

(6) BULK MATERIAL is sand, gravel, soil, aggregate material less than two inches in length or diameter, and other organic or inorganic particulate matter.

(7) CEMENT MANUFACTURING FACILITY is any facility that has a cement kiln at the facility.

(8) CHEMICAL STABILIZERS are any non-toxic chemical dust suppressant which must not be used if prohibited for use by the Regional Water Quality Control Boards, the California Air Resources Board, the U.S. Environmental Protection Agency (U.S. EPA), or any applicable law, rule or regulation. The chemical stabilizers shall meet any specifications, criteria, or tests required by any federal, state, or local water agency. Unless otherwise indicated, the use of a non-toxic chemical stabilizer shall be of sufficient concentration and application frequency to maintain a stabilized surface.

(9) COMMERCIAL POULTRY RANCH means any building, structure, enclosure, or premises where more than 100 fowl are kept or maintained for the primary purpose of producing eggs or meat for sale or other distribution.

(10) CONFINED ANIMAL FACILITY means a source or group of sources of air pollution at an agricultural source for the raising of 3,360 or more fowl or 50 or more animals, including but not limited to, any structure, building, installation, farm, corral, coop, feed storage area, milking parlor, or system for the collection, storage, or distribution of solid and liquid manure; if domesticated animals, including horses, sheep, goats, swine, beef cattle, rabbits, chickens, turkeys, or ducks are corralled, penned, or otherwise caused to remain in restricted areas for commercial agricultural purposes and feeding is by means other than grazing.

(11) CONSTRUCTION/DEMOLITION ACTIVITIES means any on-site mechanical activities conducted in preparation of, or related to, the building, alteration, rehabilitation, demolition or improvement of property, including, but not limited to the following activities: grading, excavation, loading, crushing, cutting, planing, shaping or ground breaking.

(12) CONTRACTOR means any person who has a contractual arrangement to conduct an active operation for another person.

(13) DAIRY FARM is an operation on a property, or set of properties that are contiguous or separated only by a public right-of-way, that raises cows or

produces milk from cows for the purpose of making a profit or for a livelihood. Heifer and calf farms are dairy farms.

(14) DISTURBED SURFACE AREA means a portion of the earth's surface which has been physically moved, uncovered, destabilized, or otherwise modified from its undisturbed natural soil condition, thereby increasing the potential for emission of fugitive dust. This definition excludes those areas which have:

(A) been restored to a natural state, such that the vegetative ground cover and soil characteristics are similar to adjacent or nearby natural conditions;

(B) been paved or otherwise covered by a permanent structure; or

(C) sustained a vegetative ground cover of at least 70 percent of the native cover for a particular area for at least 30 days.

(15) DUST SUPPRESSANTS are water, hygroscopic materials, or non-toxic chemical stabilizers used as a treatment material to reduce fugitive dust emissions.

(16) EARTH-MOVING ACTIVITIES means the use of any equipment for any activity where soil is being moved or uncovered, and shall include, but not be limited to the following: grading, earth cutting and filling operations, loading or unloading of dirt or bulk materials, adding to or removing from open storage piles of bulk materials, landfill operations, weed abatement through disking, and soil mulching.

(17) DUST CONTROL SUPERVISOR means a person with the authority to expeditiously employ sufficient dust mitigation measures to ensure compliance with all Rule 403 requirements at an active operation.

(18) FUGITIVE DUST means any solid particulate matter that becomes airborne, other than that emitted from an exhaust stack, directly or indirectly as a result of the activities of any person.

(19) HIGH WIND CONDITIONS means that instantaneous wind speeds exceed 25 miles per hour.

(20) INACTIVE DISTURBED SURFACE AREA means any disturbed surface area upon which active operations have not occurred or are not expected to occur for a period of 20 consecutive days.

(21) LARGE OPERATIONS means any active operations on property which contains 50 or more acres of disturbed surface area; or any earth-moving operation with a daily earth-moving or throughput volume of 3,850 cubic

meters (5,000 cubic yards) or more three times during the most recent 365-day period.

(22) OPEN STORAGE PILE is any accumulation of bulk material, which is not fully enclosed, covered or chemically stabilized, and which attains a height of three feet or more and a total surface area of 150 or more square feet.

(23) PARTICULATE MATTER means any material, except uncombined water, which exists in a finely divided form as a liquid or solid at standard conditions.

(24) PAVED ROAD means a public or private improved street, highway, alley, public way, or easement that is covered by typical roadway materials, but excluding access roadways that connect a facility with a public paved roadway and are not open to through traffic. Public paved roads are those open to public access and that are owned by any federal, state, county, municipal or any other governmental or quasi-governmental agencies. Private paved roads are any paved roads not defined as public.

(25) PM_{10} means particulate matter with an aerodynamic diameter smaller than or equal to 10 microns as measured by the applicable State and Federal reference test methods.

(26) PROPERTY LINE means the boundaries of an area in which either a person causing the emission or a person allowing the emission has the legal use or possession of the property. Where such property is divided into one or more sub-tenancies, the property line(s) shall refer to the boundaries dividing the areas of all sub-tenancies.

(27) RULE 403 IMPLEMENTATION HANDBOOK means a guidance document that has been approved by the Governing Board on April 2, 2004 or hereafter approved by the Executive Officer and the U.S. EPA.

(28) SERVICE ROADS are paved or unpaved roads that are used by one or more public agencies for inspection or maintenance of infrastructure and which are not typically used for construction-related activity.

(29) SIMULTANEOUS SAMPLING means the operation of two PM_{10} samplers in such a manner that one sampler is started within five minutes of the other, and each sampler is operated for a consecutive period which must be not less than 290 minutes and not more than 310 minutes.

(30) SOUTH COAST AIR BASIN means the non-desert portions of Los Angeles, Riverside, and San Bernardino counties and all of Orange

County as defined in California Code of Regulations, Title 17, Section 60104. The area is bounded on the west by the Pacific Ocean, on the north and east by the San Gabriel, San Bernardino, and San Jacinto Mountains, and on the south by the San Diego county line.

(31) STABILIZED SURFACE means any previously disturbed surface area or open storage pile which, through the application of dust suppressants, shows visual or other evidence of surface crusting and is resistant to wind-driven fugitive dust and is demonstrated to be stabilized. Stabilization can be demonstrated by one or more of the applicable test methods contained in the Rule 403 Implementation Handbook.

(32) TRACK-OUT means any bulk material that adheres to and agglomerates on the exterior surface of motor vehicles, haul trucks, and equipment (including tires) that have been released onto a paved road and can be removed by a vacuum sweeper or a broom sweeper under normal operating conditions.

(33) TYPICAL ROADWAY MATERIALS means concrete, asphaltic concrete, recycled asphalt, asphalt, or any other material of equivalent performance as determined by the Executive Officer, and the U.S. EPA.

(34) UNPAVED ROADS means any unsealed or unpaved roads, equipment paths, or travel ways that are not covered by typical roadway materials. Public unpaved roads are any unpaved roadway owned by federal, state, county, municipal or other governmental or quasi-governmental agencies. Private unpaved roads are all other unpaved roadways not defined as public.

(35) VISIBLE ROADWAY DUST means any sand, soil, dirt, or other solid particulate matter which is visible upon paved road surfaces and which can be removed by a vacuum sweeper or a broom sweeper under normal operating conditions.

(36) WIND-DRIVEN FUGITIVE DUST means visible emissions from any disturbed surface area which is generated by wind action alone.

(37) WIND GUST is the maximum instantaneous wind speed as measured by an anemometer.

(d) Requirements

(1) No person shall cause or allow the emissions of fugitive dust from any active operation, open storage pile, or disturbed surface area such that:

(A) the dust remains visible in the atmosphere beyond the property line of the emission source; or

(B) the dust emission exceeds 20 percent opacity (as determined by the appropriate test method included in the Rule 403 Implementation Handbook), if the dust emission is the result of movement of a motorized vehicle.

(2) No person shall conduct active operations without utilizing the applicable best available control measures included in Table 1 of this Rule to minimize fugitive dust emissions from each fugitive dust source type within the active operation.

(3) No person shall cause or allow PM_{10} levels to exceed 50 micrograms per cubic meter when determined, by simultaneous sampling, as the difference between upwind and downwind samples collected on high-volume particulate matter samplers or other U.S. EPA-approved equivalent method for PM_{10} monitoring. If sampling is conducted, samplers shall be:

(A) Operated, maintained, and calibrated in accordance with 40 Code of Federal Regulations (CFR), Part 50, Appendix J, or appropriate U.S. EPA-published documents for U.S. EPA-approved equivalent method(s) for PM_{10}.

(B) Reasonably placed upwind and downwind of key activity areas and as close to the property line as feasible, such that other sources of fugitive dust between the sampler and the property line are minimized.

(4) No person shall allow track-out to extend 25 feet or more in cumulative length from the point of origin from an active operation. Notwithstanding the preceding, all track-out from an active operation shall be removed at the conclusion of each workday or evening shift.

(5) No person shall conduct an active operation with a disturbed surface area of five or more acres, or with a daily import or export of 100 cubic yards or more of bulk material without utilizing at least one of the measures listed in subparagraphs (d)(5)(A) through (d)(5)(E) at each vehicle egress from the site to a paved public road.

(A) Install a pad consisting of washed gravel (minimum-size: one inch) maintained in a clean condition to a depth of at least six inches and extending at least 30 feet wide and at least 50 feet long.

(B) Pave the surface extending at least 100 feet and at least 20 feet wide.

(C) Utilize a wheel shaker/wheel spreading device consisting of raised dividers (rails, pipe, or grates) at least 24 feet long and 10 feet wide to remove bulk material from tires and vehicle undercarriages before vehicles exit the site.

(D) Install and utilize a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the site.

(E) Any other control measures approved by the Executive Officer and the U.S. EPA as equivalent to the actions specified in subparagraphs (d)(5)(A) through (d)(5)(D).

(6) Beginning January 1, 2006, any person who operates or authorizes the operation of a confined animal facility subject to this Rule shall implement the applicable conservation management practices specified in Table 4 of this Rule.

(e) Additional Requirements for Large Operations

(1) Any person who conducts or authorizes the conducting of a large operation subject to this Rule shall implement the applicable actions specified in Table 2 of this Rule at all times and shall implement the applicable actions specified in Table 3 of this Rule when the applicable performance standards can not be met through use of Table 2 actions; and shall:

(A) submit a fully executed Large Operation Notification (Form 403 N) to the Executive Officer within 7 days of qualifying as a large operation;

(B) include, as part of the notification, the name(s), address(es), and phone number(s) of the person(s) responsible for the submittal, and a description of the operation(s), including a map depicting the location of the site;

(C) maintain daily records to document the specific dust control actions taken, maintain such records for a period of not less than three years; and make such records available to the Executive Officer upon request;

(D) install and maintain project signage with project contact signage that meets the minimum standards of the Rule 403 Implementation Handbook, prior to initiating any earthmoving activities;

(E) identify a dust control supervisor that:

(i) is employed by or contracted with the property owner or developer;

(ii) is on the site or available on-site within 30 minutes during working hours;

(iii) has the authority to expeditiously employ sufficient dust mitigation measures to ensure compliance with all Rule requirements;

(iv) has completed the AQMD Fugitive Dust Control Class and has been issued a valid Certificate of Completion for the class; and

(F) notify the Executive Officer in writing within 30 days after the site no longer qualifies as a large operation as defined by paragraph (c)(18).

(2) Any Large Operation Notification submitted to the Executive Officer or AQMD-approved dust control plan shall be valid for a period of one year from the date of written acceptance by the Executive Officer. Any Large Operation Notification accepted pursuant to paragraph (e)(1), excluding those submitted by aggregate-related plants and cement manufacturing facilities must be resubmitted annually by the person who conducts or authorizes the conducting of a large operation, at least 30 days prior to the expiration date, or the submittal shall no longer be valid as of the expiration date. If all fugitive dust sources and corresponding control measures or special circumstances remain identical to those identified in the previously accepted submittal or in an AQMD-approved dust control plan, the resubmittal may be a simple statement of no-change (Form 403NC).

(f) Compliance Schedule

The newly amended provisions of this Rule shall become effective upon adoption. Pursuant to subdivision (e), any existing site that qualifies as a large operation will have 60 days from the date of Rule adoption to comply with the notification and recordkeeping requirements for large operations. Any Large Operation

Notification or AQMD-approved dust control plan which has been accepted prior to the date of adoption of these amendments shall remain in effect and the Large Operation Notification or AQMD-approved dust control plan annual resubmittal date shall be one year from adoption of this Rule amendment.

(g) Exemptions

(1) The provisions of this Rule shall not apply to:

(A) Dairy farms.

(B) Confined animal facilities provided that the combined disturbed surface area within one continuous property line is one acre or less.

(C) Agricultural vegetative crop operations provided that the combined disturbed surface area within one continuous property line and not separated by a paved public road is 10 acres or less.

(D) Agricultural vegetative crop operations within the South Coast Air Basin, whose combined disturbed surface area includes more than 10 acres provided that the person responsible for such operations:

(i) voluntarily implements the conservation management practices contained in the Rule 403 Agricultural Handbook;

(ii) completes and maintains the self-monitoring form documenting sufficient conservation management practices, as described in the Rule 403 Agricultural Handbook; and

(iii) makes the completed self-monitoring form available to the Executive Officer upon request.

(E) Agricultural vegetative crop operations outside the South Coast Air Basin whose combined disturbed surface area includes more than 10 acres provided that the person responsible for such operations:

(i) voluntarily implements the conservation management practices contained in the Rule 403 Coachella Valley Agricultural Handbook; and

(ii) completes and maintains the self-monitoring form documenting sufficient conservation management practices, as described in the Rule 403 Coachella Valley Agricultural Handbook; and

(iii) makes the completed self-monitoring form available to the Executive Officer upon request.

(F) Active operations conducted during emergency life-threatening situations, or in conjunction with any officially declared disaster or state of emergency.

(G) Active operations conducted by essential service utilities to provide electricity, natural gas, telephone, water and sewer during periods of service outages and emergency disruptions.

(H) Any contractor subsequent to the time the contract ends, provided that such contractor implemented the required control measures during the contractual period.

(I) Any grading contractor, for a phase of active operations, subsequent to the contractual completion of that phase of earth-moving activities, provided that the required control measures have been implemented during the entire phase of earth-moving activities, through and including five days after the final grading inspection.

(J) Weed abatement operations ordered by a county agricultural commissioner or any state, county, or municipal fire department, provided that:

(i) mowing, cutting or other similar process is used which maintains weed stubble at least three inches above the soil; and

(ii) any discing or similar operation which cuts into and disturbs the soil, where watering is used prior to initiation of these activities, and a determination is made by the agency issuing the weed abatement order that, due to fire hazard conditions, rocks, or other physical obstructions, it is not practical to meet the conditions specified in clause (g)(1)(H)(i). The provisions this clause shall not exempt the owner of any property from stabilizing, in accordance with paragraph (d)(2), disturbed surface areas which have been created as a result of the weed abatement actions.

(K) sandblasting operations.

(2) The provisions of paragraphs (d)(1) and (d)(3) shall not apply:

(A) When wind gusts exceed 25 miles per hour, provided that:

(i) The required Table 3 contingency measures in this Rule are implemented for each applicable fugitive dust source type, and;

(ii) records are maintained in accordance with subparagraph (e)(1)(C).

(B) To unpaved roads, provided such roads:

(i) are used solely for the maintenance of wind-generating equipment; or

(ii) are unpaved public alleys as defined in Rule 1186; or

(iii) are service roads that meet all of the following criteria:

(a) are less than 50 feet in width at all points along the road;

(b) are within 25 feet of the property line; and

(c) have a traffic volume less than 20 vehicle-trips per day.

(C) To any active operation, open storage pile, or disturbed surface area for which necessary fugitive dust preventive or mitigative actions are in conflict with the federal Endangered Species Act, as determined in writing by the State or federal agency responsible for making such determinations.

(3) The provisions of (d)(2) shall not apply to any aggregate-related plant or cement manufacturing facility that implements the applicable actions specified in Table 2 of this Rule at all times and shall implement the applicable actions specified in Table 3 of this Rule when the applicable performance standards of paragraphs (d)(1) and (d)(3) can not be met through use of Table 2 actions.

(4) The provisions of paragraphs (d)(1), (d)(2), and (d)(3) shall not apply to:

(A) Blasting operations which have been permitted by the California Division of Industrial Safety; and

(B) Motion picture, television, and video production activities when dust emissions are required for visual effects. In order to obtain this exemption, the Executive Officer must receive notification in writing at least 72 hours in advance of any such activity and no nuisance results from such activity.

(5) The provisions of paragraph (d)(3) shall not apply if the dust control actions, as specified in Table 2, are implemented on a routine basis for

each applicable fugitive dust source type. To qualify for this exemption, a person must maintain records in accordance with subparagraph (e)(1)(C).

(6) The provisions of paragraph (d)(4) shall not apply to earth coverings of public paved roadways where such coverings are approved by a local government agency for the protection of the roadway, and where such coverings are used as roadway crossings for haul vehicles provided that such roadway is closed to through traffic and visible roadway dust is removed within one day following the cessation of activities.

(7) The provisions of subdivision (e) shall not apply to:

(A) officially-designated public parks and recreational areas, including national parks, national monuments, national forests, state parks, state recreational areas, and county regional parks.

(B) any large operation which is required to submit a dust control plan to any city or county government which has adopted a District-approved dust control ordinance.

(C) any large operation subject to Rule 1158, which has an approved dust control plan pursuant to Rule 1158, provided that all sources of fugitive dust are included in the Rule 1158 plan.

(8) The provisions of subparagraph (e)(1)(A) through (e)(1)(C) shall not apply to any large operation with an AQMD-approved fugitive dust control plan provided that there is no change to the sources and controls as identified in the AQMD-approved fugitive dust control plan.

(h) Fees

Any person conducting active operations for which the Executive Officer conducts upwind/downwind monitoring for PM_{10} pursuant to paragraph (d)(3) shall be assessed applicable Ambient Air Analysis Fees pursuant to Rule 304.1. Applicable fees shall be waived for any facility which is exempted from paragraph (d)(3) or meets the requirements of paragraph (d)(3).

TABLE 1
BEST AVAILABLE CONTROL MEASURES
(Applicable to All Construction Activity Sources)

Source Category	Control Measure	Guidance
Backfilling	01-1 Stabilize backfill material when not actively handling; and 01-2 Stabilize backfill material during handling; and 01-3 Stabilize soil at completion of activity.	✓ Mix backfill soil with water prior to moving ✓ Dedicate water truck or high capacity hose to backfilling equipment ✓ Empty loader bucket slowly so that no dust plumes are generated ✓ Minimize drop height from loader bucket
Clearing and grubbing	02-1 Maintain stability of soil through pre-watering of site prior to clearing and grubbing; and 02-2 Stabilize soil during clearing and grubbing activities; and 02-3 Stabilize soil immediately after clearing and grubbing activities.	✓ Maintain live perennial vegetation where possible ✓ Apply water in sufficient quantity to prevent generation of dust plumes
Clearing forms	03-1 Use water spray to clear forms; or 03-2 Use sweeping and water spray to clear forms; or 03-3 Use vacuum system to clear forms.	✓ Use of high pressure air to clear forms may cause exceedance of Rule requirements
Crushing	04-1 Stabilize surface soils prior to operation of support equipment; and 04-2 Stabilize material after crushing.	✓ Follow permit conditions for crushing equipment ✓ Pre-water material prior to loading into crusher ✓ Monitor crusher emissions opacity ✓ Apply water to crushed material to prevent dust plumes

TABLE 1
BEST AVAILABLE CONTROL MEASURES
(Applicable to All Construction Activity Sources)

Source Category	Control Measure	Guidance
Cut and fill	05-1 Pre-water soils prior to cut and fill activities; and 05-2 Stabilize soil during and after cut and fill activities.	✓ For large sites, pre-water with sprinklers or water trucks and allow time for penetration ✓ Use water trucks/pulls to water soils to depth of cut prior to subsequent cuts
Demolition – mechanical/manual	06-1 Stabilize wind erodible surfaces to reduce dust; and 06-2 Stabilize surface soil where support equipment and vehicles will operate; and 06-3 Stabilize loose soil and demolition debris; and 06-4 Comply with AQMD Rule 1403.	✓ Apply water in sufficient quantities to prevent the generation of visible dust plumes
Disturbed soil	07-1 Stabilize disturbed soil throughout the construction site; and 07-2 Stabilize disturbed soil between structures	✓ Limit vehicular traffic and disturbances on soils where possible ✓ If interior block walls are planned, install as early as possible ✓ Apply water or a stabilizing agent in sufficient quantities to prevent the generation of visible dust plumes
Earth-moving activities	08-1 Pre-apply water to depth of proposed cuts; and 08-2 Re-apply water as necessary to maintain soils in a damp condition and to ensure that visible emissions do not exceed 100 feet in any direction; and 08-3 Stabilize soils once earth-moving activities are complete.	✓ Grade each project phase separately, timed to coincide with construction phase ✓ Upwind fencing can prevent material movement on site ✓ Apply water or a stabilizing agent in sufficient quantities to prevent the generation of visible dust plumes

TABLE 1
BEST AVAILABLE CONTROL MEASURES
(Applicable to All Construction Activity Sources)

Source Category	Control Measure	Guidance
Importing/exporting of bulk materials	09-1 Stabilize material while loading to reduce fugitive dust emissions; and 09-2 Maintain at least six inches of freeboard on haul vehicles; and 09-3 Stabilize material while transporting to reduce fugitive dust emissions; and 09-4 Stabilize material while unloading to reduce fugitive dust emissions; and 09-5 Comply with Vehicle Code Section 23114.	✓ Use tarps or other suitable enclosures on haul trucks ✓ Check belly-dump truck seals regularly and remove any trapped rocks to prevent spillage ✓ Comply with track-out prevention/mitigation requirements ✓ Provide water while loading and unloading to reduce visible dust plumes
Landscaping	10-1 Stabilize soils, materials, slopes	✓ Apply water to materials to stabilize ✓ Maintain materials in a crusted condition ✓ Maintain effective cover over materials ✓ Stabilize sloping surfaces using soil binders until vegetation or ground cover can effectively stabilize the slopes ✓ Hydroseed prior to rain season
Road shoulder maintenance	11-1 Apply water to unpaved shoulders prior to clearing; and 11-2 Apply chemical dust suppressants and/or washed gravel to maintain a stabilized surface after completing road shoulder maintenance.	✓ Installation of curbing and/or paving of road shoulders can reduce recurring maintenance costs ✓ Use of chemical dust suppressants can inhibit vegetation growth and reduce future road shoulder maintenance costs

TABLE 1
BEST AVAILABLE CONTROL MEASURES
(Applicable to All Construction Activity Sources)

Source Category	Control Measure	Guidance
Screening	12-1 Pre-water material prior to screening; and 12-2 Limit fugitive dust emissions to opacity and plume length standards; and 12-3 Stabilize material immediately after screening.	✓ Dedicate water truck or high capacity hose to screening operation ✓ Drop material through the screen slowly and minimize drop height ✓ Install wind barrier with a porosity of no more than 50% upwind of screen to the height of the drop point
Staging areas	13-1 Stabilize staging areas during use; and 13-2 Stabilize staging area soils at project completion.	✓ Limit size of staging area ✓ Limit vehicle speeds to 15 miles per hour ✓ Limit number and size of staging area entrances/exists
Stockpiles/ Bulk Material Handling	14-1 Stabilize stockpiled materials. 14-2 Stockpiles within 100 yards of off-site occupied buildings must not be greater than eight feet in height; or must have a road bladed to the top to allow water truck access or must have an operational water irrigation system that is capable of complete stockpile coverage.	✓ Add or remove material from the downwind portion of the storage pile ✓ Maintain storage piles to avoid steep sides or faces

TABLE 1
BEST AVAILABLE CONTROL MEASURES
(Applicable to All Construction Activity Sources)

Source Category	Control Measure	Guidance
Traffic areas for construction activities	15-1 Stabilize all off-road traffic and parking areas; and 15-2 Stabilize all haul routes; and 15-3 Direct construction traffic over established haul routes.	✓ Apply gravel/paving to all haul routes as soon as possible to all future roadway areas ✓ Barriers can be used to ensure vehicles are only used on established parking areas/haul routes
Trenching	16-1 Stabilize surface soils where trencher or excavator and support equipment will operate; and 16-2 Stabilize soils at the completion of trenching activities.	✓ Pre-watering of soils prior to trenching is an effective preventive measure. For deep trenching activities, pre-trench to 18 inches soak soils via the pre-trench and resuming trenching ✓ Washing mud and soils from equipment at the conclusion of trenching activities can prevent crusting and drying of soil on equipment
Truck loading	17-1 Pre-water material prior to loading; and 17-2 Ensure that freeboard exceeds six inches (CVC 23114)	✓ Empty loader bucket such that no visible dust plumes are created ✓ Ensure that the loader bucket is close to the truck to minimize drop height while loading
Turf Overseeding	18-1 Apply sufficient water immediately prior to conducting turf vacuuming activities to meet opacity and plume length standards; and 18-2 Cover haul vehicles prior to exiting the site.	✓ Haul waste material immediately off-site

TABLE 1
BEST AVAILABLE CONTROL MEASURES
(Applicable to All Construction Activity Sources)

Source Category	Control Measure	Guidance
Unpaved roads/parking lots	19-1 Stabilize soils to meet the applicable performance standards; and 19-2 Limit vehicular travel to established unpaved roads (haul routes) and unpaved parking lots.	✓ Restricting vehicular access to established unpaved travel paths and parking lots can reduce stabilization requirements
Vacant land	20-1 In instances where vacant lots are 0.10 acre or larger and have a cumulative area of 500 square feet or more that are driven over and/or used by motor vehicles and/or off-road vehicles, prevent motor vehicle and/or off-road vehicle trespassing, parking and/or access by installing barriers, curbs, fences, gates, posts, signs, shrubs, trees or other effective control measures.	

Table 2
DUST CONTROL MEASURES FOR LARGE OPERATIONS

FUGITIVE DUST SOURCE CATEGORY		CONTROL ACTIONS
Earth-moving (except construction cutting and filling areas, and mining operations)	(1a)	Maintain soil moisture content at a minimum of 12 percent, as determined by ASTM method D-2216, or other equivalent method approved by the Executive Officer, the California Air Resources Board, and the U.S. EPA. Two soil moisture evaluations must be conducted during the first three hours of active operations during a calendar day, and two such evaluations each subsequent four-hour period of active operations; OR
	(1a-1)	For any earth-moving which is more than 100 feet from all property lines, conduct watering as necessary to prevent visible dust emissions from exceeding 100 feet in length in any direction.
Earth-moving: Construction fill areas:	(1b)	Maintain soil moisture content at a minimum of 12 percent, as determined by ASTM method D-2216, or other equivalent method approved by the Executive Officer, the California Air Resources Board, and the U.S. EPA. For areas which have an optimum moisture content for compaction of less than 12 percent, as determined by ASTM Method 1557 or other equivalent method approved by the Executive Officer and the California Air Resources Board and the U.S. EPA, complete the compaction process as expeditiously as possible after achieving at least 70 percent of the optimum soil moisture content. Two soil moisture evaluations must be conducted during the first three hours of active operations during a calendar day, and two such evaluations during each subsequent four-hour period of active operations.

Table 2 (Continued)

FUGITIVE DUST SOURCE CATEGORY	CONTROL ACTIONS	
Earth-moving: Construction cut areas and mining operations:	(1c)	Conduct watering as necessary to prevent visible emissions from extending more than 100 feet beyond the active cut or mining area unless the area is inaccessible to watering vehicles due to slope conditions or other safety factors.
Disturbed surface areas (except completed grading areas)	(2a/b)	Apply dust suppression in sufficient quantity and frequency to maintain a stabilized surface. Any areas which cannot be stabilized, as evidenced by wind driven fugitive dust must have an application of water at least twice per day to at least 80 percent of the unstabilized area.
Disturbed surface areas: Completed grading areas	(2c)	Apply chemical stabilizers within five working days of grading completion; OR
	(2d)	Take actions (3a) or (3c) specified for inactive disturbed surface areas.
Inactive disturbed surface areas	(3a)	Apply water to at least 80 percent of all inactive disturbed surface areas on a daily basis when there is evidence of wind driven fugitive dust, excluding any areas which are inaccessible to watering vehicles due to excessive slope or other safety conditions; OR
	(3b)	Apply dust suppressants in sufficient quantity and frequency to maintain a stabilized surface; OR
	(3c)	Establish a vegetative ground cover within 21 days after active operations have ceased. Ground cover must be of sufficient density to expose less than 30 percent of unstabilized ground within 90 days of planting, and at all times thereafter; OR
	(3d)	Utilize any combination of control actions (3a), (3b), and (3c) such that, in total, these actions apply to all inactive disturbed surface areas.

Table 2 (Continued)

FUGITIVE DUST SOURCE CATEGORY	CONTROL ACTIONS	
Unpaved Roads	(4a)	Water all roads used for any vehicular traffic at least once per every two hours of active operations [3 times per normal 8 hour work day]; OR
	(4b)	Water all roads used for any vehicular traffic once daily and restrict vehicle speeds to 15 miles per hour; OR
	(4c)	Apply a chemical stabilizer to all unpaved road surfaces in sufficient quantity and frequency to maintain a stabilized surface.
Open storage piles	(5a)	Apply chemical stabilizers; OR
	(5b)	Apply water to at least 80 percent of the surface area of all open storage piles on a daily basis when there is evidence of wind driven fugitive dust; OR
	(5c)	Install temporary coverings; OR
	(5d)	Install a three-sided enclosure with walls with no more than 50 percent porosity which extend, at a minimum, to the top of the pile. This option may only be used at aggregate-related plants or at cement manufacturing facilities.
All Categories	(6a)	Any other control measures approved by the Executive Officer and the U.S. EPA as equivalent to the methods specified in Table 2 may be used.

TABLE 3
CONTINGENCY CONTROL MEASURES FOR LARGE OPERATIONS

FUGITIVE DUST SOURCE CATEGORY	CONTROL MEASURES
Earth-moving	(1A) Cease all active operations; OR (2A) Apply water to soil not more than 15 minutes prior to moving such soil.
Disturbed surface areas	(0B) On the last day of active operations prior to a weekend, holiday, or any other period when active operations will not occur for not more than four consecutive days: apply water with a mixture of chemical stabilizer diluted to not less than 1/20 of the concentration required to maintain a stabilized surface for a period of six months; OR (1B) Apply chemical stabilizers prior to wind event; OR (2B) Apply water to all unstabilized disturbed areas 3 times per day. If there is any evidence of wind driven fugitive dust, watering frequency is increased to a minimum of four times per day; OR (3B) Take the actions specified in Table 2, Item (3c); OR (4B) Utilize any combination of control actions (1B), (2B), and (3B) such that, in total, these actions apply to all disturbed surface areas.
Unpaved roads	(1C) Apply chemical stabilizers prior to wind event; OR (2C) Apply water twice per hour during active operation; OR (3C) Stop all vehicular traffic.
Open storage piles	(1D) Apply water twice per hour; OR (2D) Install temporary coverings.
Paved road track-out	(1E) Cover all haul vehicles; OR (2E) Comply with the vehicle freeboard requirements of Section 23114 of the California Vehicle Code for both public and private roads.
All Categories	(1F) Any other control measures approved by the Executive Officer and the U.S. EPA as equivalent to the methods specified in Table 3 may be used.

Table 4
(Conservation Management Practices for Confined Animal Facilities)

SOURCE CATEGORY	CONSERVATION MANAGEMENT PRACTICES
Manure Handling **(Only applicable to Commercial Poultry Ranches)**	(1a) Cover manure prior to removing material off-site; AND (1b) Spread the manure before 11:00 AM and when wind conditions are less than 25 miles per hour; AND (1c) Utilize coning and drying manure management by removing manure at laying hen houses at least twice per year and maintain a base of no less than 6 inches of dry manure after clean out; or in lieu of complying with conservation management practice (1c), comply with conservation management practice (1d). (1d) Utilize frequent manure removal by removing the manure from laying hen houses at least every seven days and immediately thin bed dry the material.
Feedstock Handling	(2a) Utilize a sock or boot on the feed truck auger when filling feed storage bins.
Disturbed Surfaces	(3a) Maintain at least 70 percent vegetative cover on vacant portions of the facility; OR (3b) Utilize conservation tillage practices to manage the amount, orientation and distribution of crop and other plant residues on the soil surface year-round, while growing crops (if applicable) in narrow slots or tilled strips; OR (3c) Apply dust suppressants in sufficient concentrations and frequencies to maintain a stabilized surface.
Unpaved Roads	(4a) Restrict access to private unpaved roads either through signage or physical access restrictions and control vehicular speeds to no more than 15 miles per hour through worker notifications, signage, or any other necessary means; OR (4b) Cover frequently traveled unpaved roads with low silt content material (i.e., asphalt, concrete, recycled road base, or gravel to a minimum depth of four inches); OR (4c) Treat unpaved roads with water, mulch, chemical dust suppressants or other cover to maintain a stabilized surface.
Equipment Parking Areas	(5a) Apply dust suppressants in sufficient quantity and frequency to maintain a stabilized surface; OR (5b) Apply material with low silt content (i.e., asphalt, concrete, recycled road base, or gravel to a depth of four inches).

Appendix A–3

- Operation Emissions Inventory
    - Criteria Pollutants and Greenhouse Gasses

CNG Daily Environmental Benefit Analysis

Assumptions:
1) A maximum of 15 busses would refuel per day
2) Each bus travels 24 miles round trip with a daily VMT savings of 360 miles
3) Number of days the transportation depot is in service is 204 days/year

Emission Factors Grams/Mile

	Pollutants						
Range	CO	NOx	PM_{10}	$PM_{2.5}$	CO_2	CH_4	N_20
Minimum	0.040	3.790	0.004	0.001	755.100	-	-
Maximum	13.480	22.570	0.090	0.019	1,573.200	1.966	0.175

Emission Saving Grams/Day

	Pollutants						
Range	CO	NOx	PM_{10}	$PM_{2.5}$	CO_2	CH_4	N_20
Minimum	14.40	1,364.40	1.44	0.30	271,836.00	-	-
Maximum	4,852.80	8,125.20	32.40	6.80	566,352.00	707.76	63.00

Emission Saving Grams/Year

	Pollutants						
Range	CO	NOx	PM_{10}	$PM_{2.5}$	CO_2	CH_4	N_20
Minimum	2,937.60	278,337.60	293.76	61.69	55,454,544.00	-	-
Maximum	989,971.20	1,657,540.80	6,609.60	1,388.02	115,535,808.00	144,383.04	12,852.00

Emission Savings Pounds/Day

	Pollutants						
Range	CO	NOx	PM_{10}	$PM_{2.5}$	CO_2	CH_4	N_20
Minimum	0.03	3.01	0.00	0.00	599.30	-	-
Maximum	10.70	17.91	0.07	0.02	1,248.59	1.56	0.14

Emission Savings Pounds/Year

	Pollutants						
Range	CO	NOx	PM_{10}	$PM_{2.5}$	CO_2	CH_4	N_20
Minimum	6.48	613.63	0.65	0.14	122,256.34	-	-
Maximum	2,182.51	3,654.25	14.57	3.06	254,712.86	318.31	28.33

Emission Savings Tons/Day

	Pollutants						
Range	CO	NOx	PM_{10}	$PM_{2.5}$	CO_2	CH_4	N_20
Minimum	0.00	0.00	0.00	0.00	0.30	-	-
Maximum	0.01	0.01	0.00	0.00	0.62	0.00	0.00

Emission Savings Tons/Year

	Pollutants						
Range	CO	NOx	PM_{10}	$PM_{2.5}$	CO_2 (metric tons)	CH_4	N_20
Minimum	0.00	0.31	0.00	0.00	55.45	-	-
Maximum	1.09	1.83	0.01	0.00	115.54	0.14	0.01

CO_2e (metric tons)
-
122.55

Appendix B: Noise Data

CNG Fueling Station Project
MND

Noise Worksheets

Provided by PCR Services Corporation

October 2009

Appendix B-1

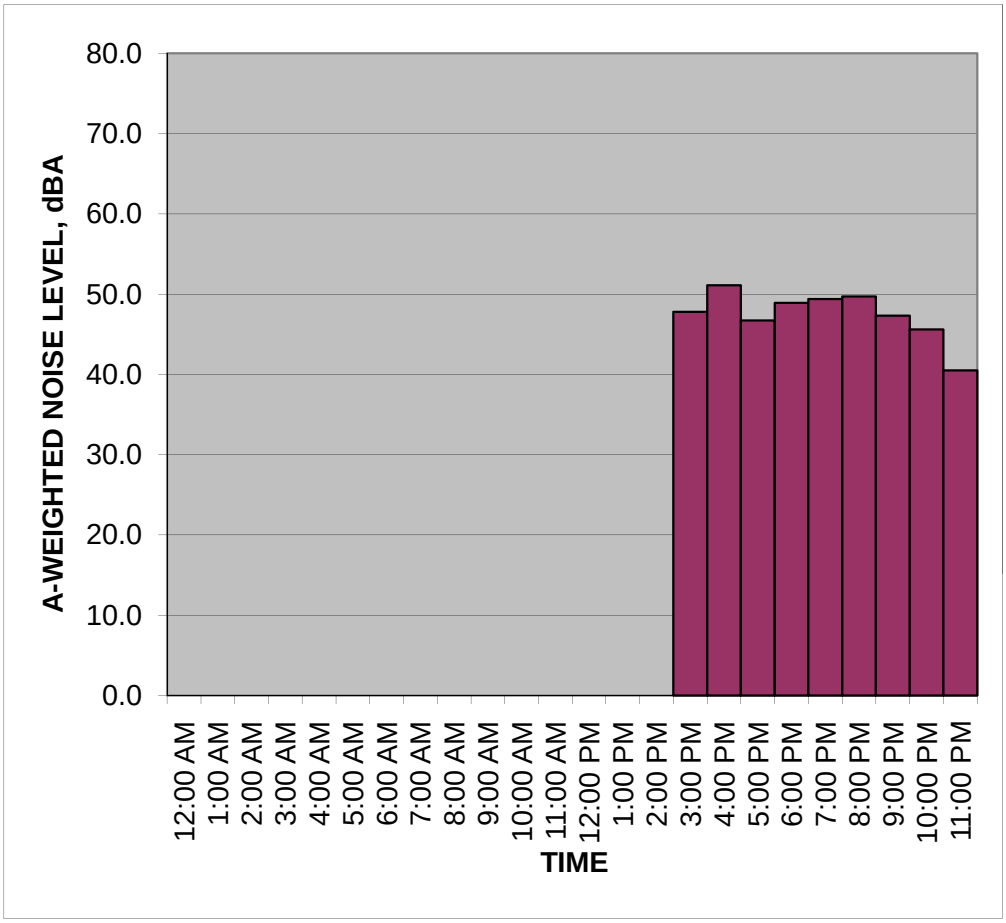
- Ambient Noise Data

Measured Ambient Noise Levels

Project: CNG Fueling Station Project
Location: R1 - North Property Line
Sources: Ambient

Date: September 24, 2009

TIME	HNL, dB(A)
12:00 AM	0.0
1:00 AM	0.0
2:00 AM	0.0
3:00 AM	0.0
4:00 AM	0.0
5:00 AM	0.0
6:00 AM	0.0
7:00 AM	0.0
8:00 AM	0.0
9:00 AM	0.0
10:00 AM	0.0
11:00 AM	0.0
12:00 PM	0.0
1:00 PM	0.0
2:00 PM	0.0
3:00 PM	47.8
4:00 PM	51.1
5:00 PM	46.7
6:00 PM	48.9
7:00 PM	49.4
8:00 PM	49.7
9:00 PM	47.3
10:00 PM	45.6
11:00 PM	40.5
CNEL, dB(A):	**52.3**



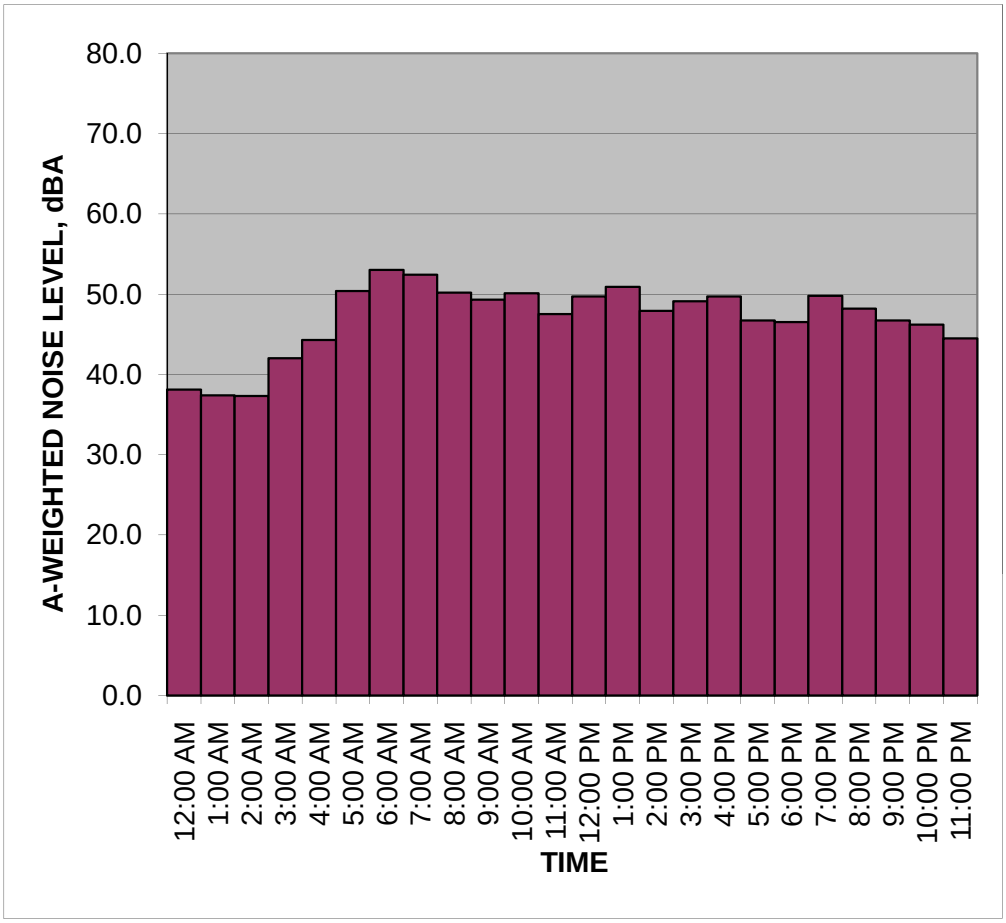
NOTES:

Measured Ambient Noise Levels

Project: CNG Fueling Station Project
Location: R1 - North Property Line
Sources: Ambient

Date: September 25, 2009

TIME	HNL, dB(A)
12:00 AM	38.1
1:00 AM	37.4
2:00 AM	37.3
3:00 AM	42.0
4:00 AM	44.3
5:00 AM	50.4
6:00 AM	53.0
7:00 AM	52.4
8:00 AM	50.2
9:00 AM	49.3
10:00 AM	50.1
11:00 AM	47.5
12:00 PM	49.7
1:00 PM	50.9
2:00 PM	47.9
3:00 PM	49.1
4:00 PM	49.7
5:00 PM	46.7
6:00 PM	46.5
7:00 PM	49.8
8:00 PM	48.2
9:00 PM	46.7
10:00 PM	46.2
11:00 PM	44.5
CNEL, dB(A):	**54.1**



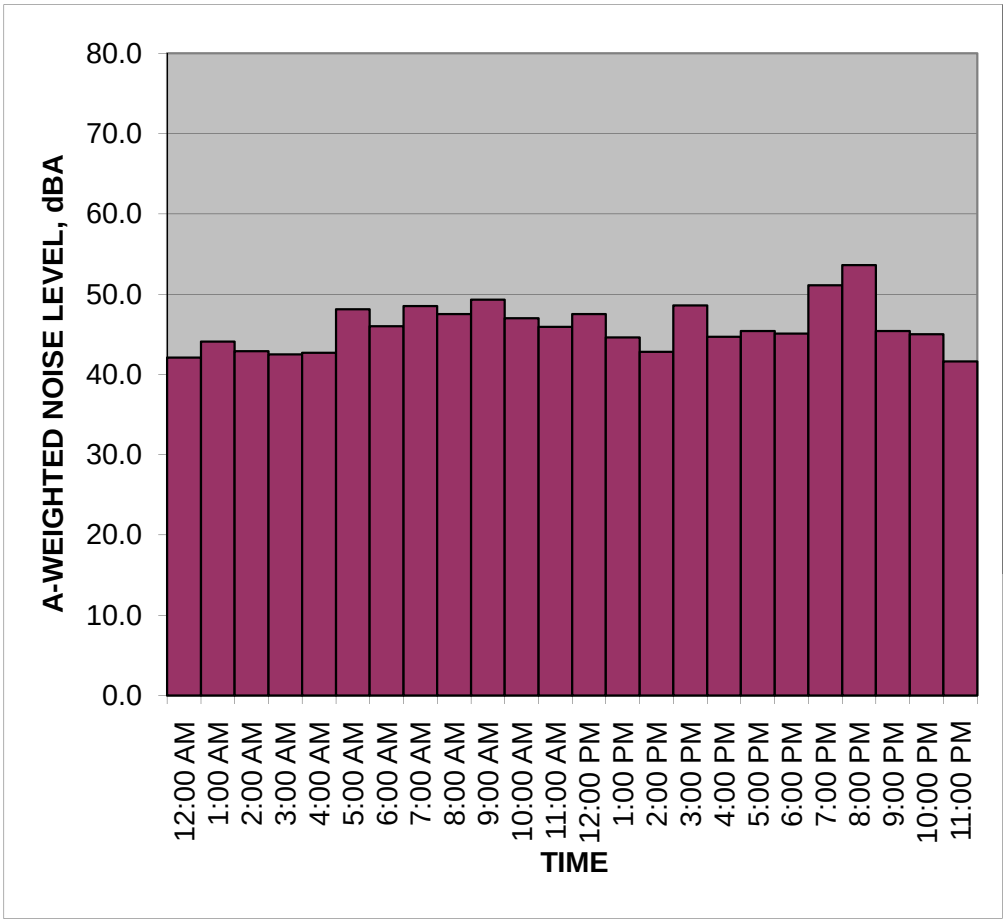
NOTES:

Measured Ambient Noise Levels

Project: CNG Fueling Station Project
Location: R1 - North Property Line
Sources: Ambient

Date: September 26, 2009

TIME	HNL, dB(A)
12:00 AM	42.1
1:00 AM	44.1
2:00 AM	42.9
3:00 AM	42.5
4:00 AM	42.7
5:00 AM	48.1
6:00 AM	46.0
7:00 AM	48.5
8:00 AM	47.5
9:00 AM	49.3
10:00 AM	47.0
11:00 AM	45.9
12:00 PM	47.5
1:00 PM	44.6
2:00 PM	42.8
3:00 PM	48.6
4:00 PM	44.7
5:00 PM	45.4
6:00 PM	45.1
7:00 PM	51.1
8:00 PM	53.6
9:00 PM	45.4
10:00 PM	45.0
11:00 PM	41.6
CNEL, dB(A):	**52.5**



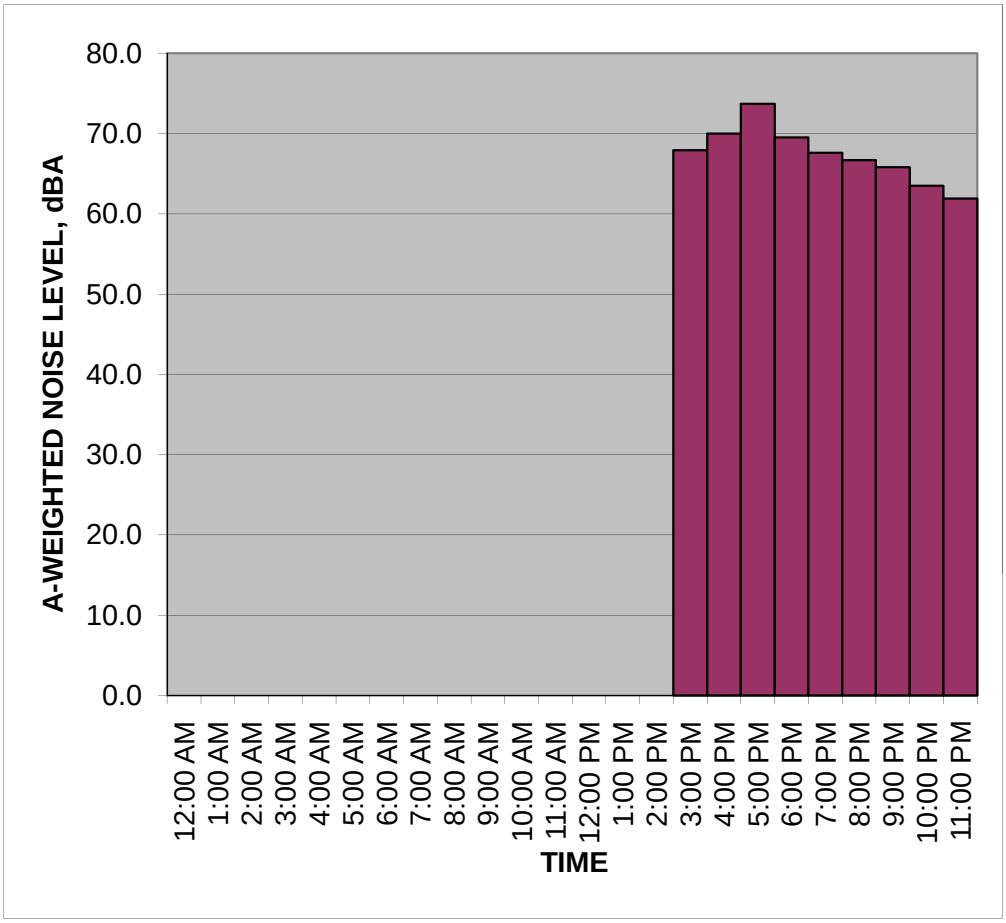
NOTES:

Measured Ambient Noise Levels

Project: CNG Fueling Station Project
Location: R2 - Project Site South
Sources: Ambient

Date: September 24, 2009

TIME	HNL, dB(A)
12:00 AM	0.0
1:00 AM	0.0
2:00 AM	0.0
3:00 AM	0.0
4:00 AM	0.0
5:00 AM	0.0
6:00 AM	0.0
7:00 AM	0.0
8:00 AM	0.0
9:00 AM	0.0
10:00 AM	0.0
11:00 AM	0.0
12:00 PM	0.0
1:00 PM	0.0
2:00 PM	0.0
3:00 PM	67.9
4:00 PM	70.0
5:00 PM	73.7
6:00 PM	69.5
7:00 PM	67.6
8:00 PM	66.7
9:00 PM	65.8
10:00 PM	63.5
11:00 PM	61.9
CNEL, dB(A):	**71.6**



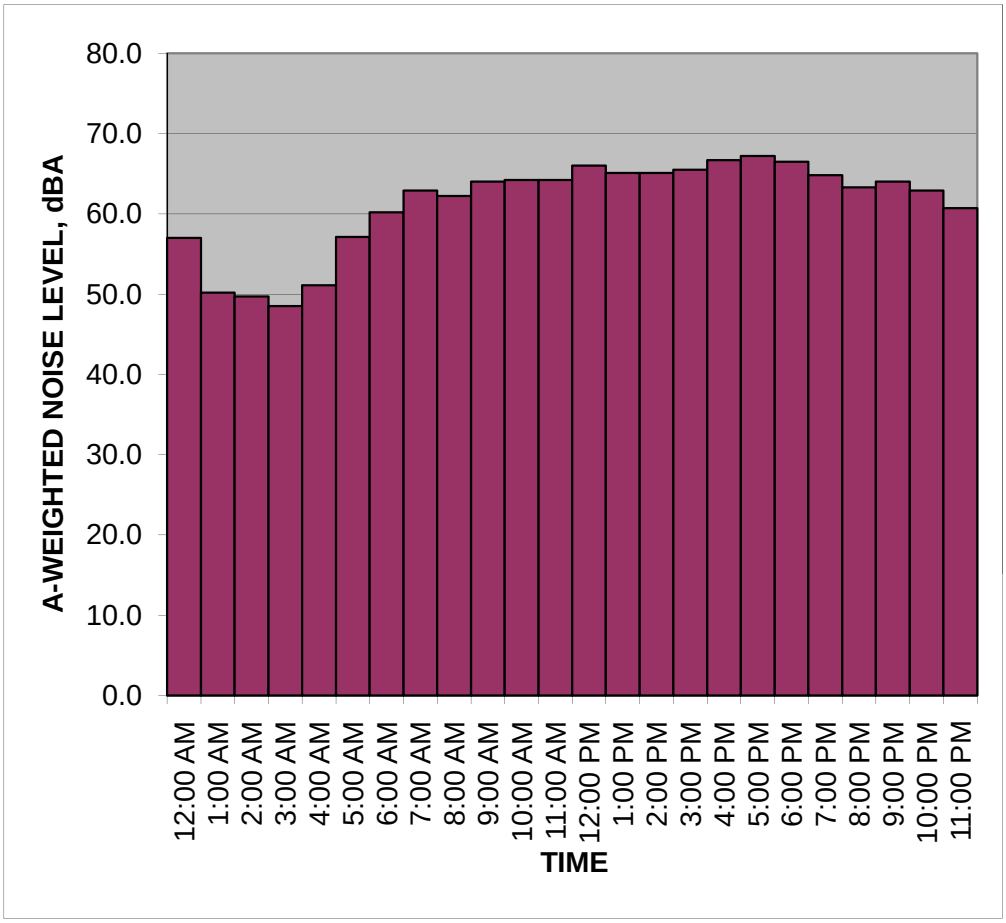
NOTES:

Measured Ambient Noise Levels

Project: CNG Fueling Station Project
Location: R2 - Project Site South
Sources: Ambient

Date: September 25, 2009

TIME	HNL, dB(A)
12:00 AM	57.0
1:00 AM	50.2
2:00 AM	49.7
3:00 AM	48.5
4:00 AM	51.1
5:00 AM	57.1
6:00 AM	60.2
7:00 AM	62.9
8:00 AM	62.2
9:00 AM	64.0
10:00 AM	64.2
11:00 AM	64.2
12:00 PM	66.0
1:00 PM	65.1
2:00 PM	65.1
3:00 PM	65.5
4:00 PM	66.7
5:00 PM	67.2
6:00 PM	66.5
7:00 PM	64.8
8:00 PM	63.3
9:00 PM	64.0
10:00 PM	62.9
11:00 PM	60.7
CNEL, dB(A):	**67.0**



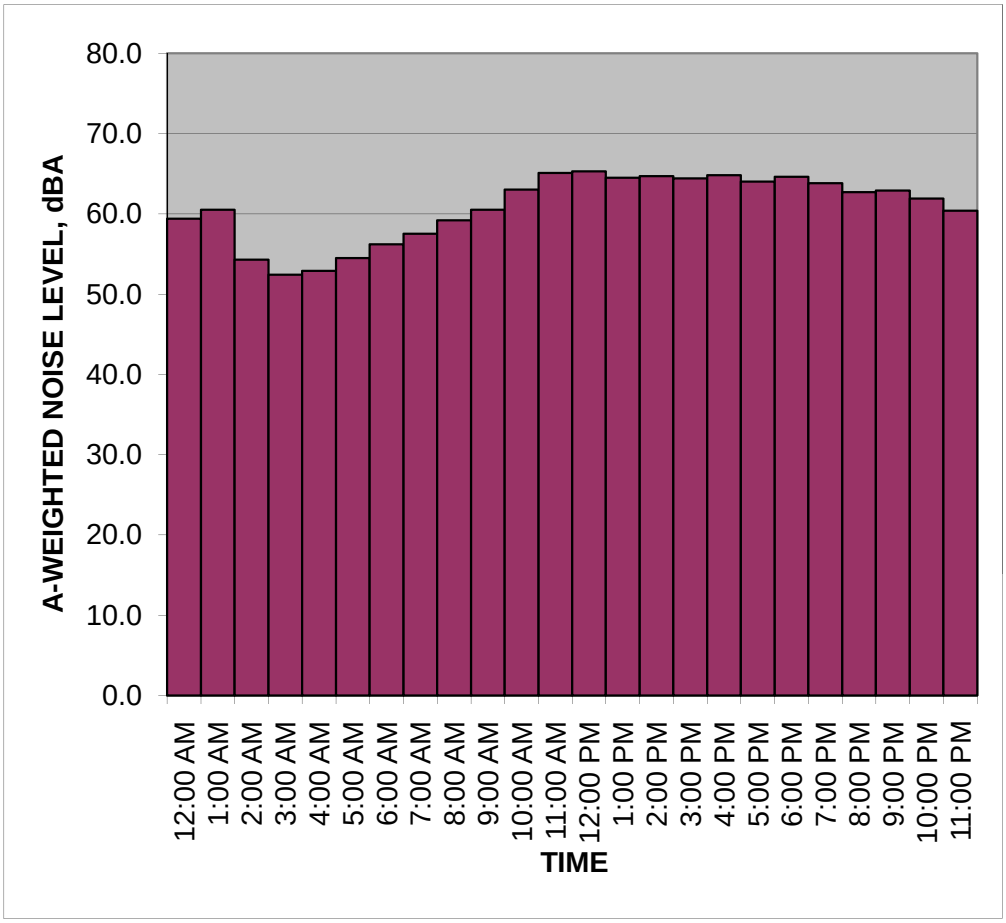
NOTES:

Measured Ambient Noise Levels

Project: CNG Fueling Station Project
Location: R2 - Project Site South
Sources: Ambient

Date: September 26, 2009

TIME	HNL, dB(A)
12:00 AM	59.4
1:00 AM	60.5
2:00 AM	54.3
3:00 AM	52.4
4:00 AM	52.9
5:00 AM	54.5
6:00 AM	56.2
7:00 AM	57.5
8:00 AM	59.2
9:00 AM	60.5
10:00 AM	63.0
11:00 AM	65.1
12:00 PM	65.3
1:00 PM	64.5
2:00 PM	64.7
3:00 PM	64.4
4:00 PM	64.8
5:00 PM	64.0
6:00 PM	64.6
7:00 PM	63.8
8:00 PM	62.7
9:00 PM	62.9
10:00 PM	61.9
11:00 PM	60.4
CNEL, dB(A):	**66.5**



NOTES:

Appendix B-2

- Construction Noise Calculations

Project: CNG Fueling Station Project

Construction Phase: ***Site Preparation***

Equipment

Description	No. of Equip.	Reference Noise Level at 50ft, Lmax	Acoustical Usage Factor	Distance to Receptor, ft	Estimated Noise Shielding, dBA
Other Equipment	1	85	50%	260	10
Excavator	1	81	40%	260	10
Paver	1	77	50%	260	10

Receptor: ***R1***

Results:

Hourly Leq: **59**

Source for Ref. Noise Levels: FHWA, RCNM 2005

Project: CNG Fueling Station Project

Construction Phase: ***Site Preparation***

Equipment

Description	No. of Equip.	Reference Noise Level at 50ft, Lmax	Acoustical Usage Factor	Distance to Receptor, ft	Estimated Noise Shielding, dBA
Other Equipment	1	85	50%	780	10
Excavator	1	81	40%	780	10
Paver	1	77	50%	780	10

Receptor: ***R2***

Results:

Hourly Leq: **50**

Source for Ref. Noise Levels: FHWA, RCNM 2005

Project: CNG Fueling Station Project

Construction Phase: ***Fueling System Construction***

Equipment

Description	No. of Equip.	Reference Noise Level at 50ft, Lmax	Acoustical Usage Factor	Distance to Receptor, ft	Estimated Noise Shielding, dBA
Concrete Saw	1	90	20%	260	10
Other Equipment	1	85	50%	260	10
Concrete Mixer Trucks	1	79	40%	260	10

Receptor: ***R1***

Results:

Hourly Leq: **62**

Source for Ref. Noise Levels: FHWA, RCNM 2005

Project: CNG Fueling Station Project

Construction Phase: ***Fueling System Construction***

Equipment

Description	No. of Equip.	Reference Noise Level at 50ft, Lmax	Acoustical Usage Factor	Distance to Receptor, ft	Estimated Noise Shielding, dBA
Concrete Saw	1	90	20%	780	10
Other Equipment	1	85	50%	780	10
Concrete Mixer Trucks	1	79	40%	780	10

Receptor: ***R2***

Results:

Hourly Leq: **52**

Source for Ref. Noise Levels: FHWA, RCNM 2005

Appendix C: Traffic Analysis

KHR ASSOCIATES
CONSULTING ENGINEERS/SURVEYORS/PLANNERS

October 16, 2009

Mr. Mike Harden, Principal Planner
PCR
One Venture, Suite 150
Irvine, California 92618

SUBJECT: ASSESSMENT OF POTENTIAL TRAFFIC IMPACTS ASSOCIATED WITH INSTALLING CNG FUELING PUMPS AT CUSD'S TRANSPORTATION CENTER, IN THE CITY OF ALISO VIEJO, CALIFORNIA (SENT VIA E-MAIL)

Dear Mr. Harden:

Transmitted herein is a professional assessment by **KHR Associates**, Newport Beach, California, of potential traffic impacts associated with the installation of new compressed natural gas (CNG) fueling pumps on the grounds of the Capistrano Unified School District's (District) Support Facility (a.k.a., Transportation Center), located at 2B Liberty, in the City of Aliso Viejo, California. The findings and conclusions presented in this traffic impact assessment were independently derived by **KHR Associates**, and are not necessarily shared by PCR, the District, the City of Aliso Viejo, or any other interested parties.

I. Project Background

The District's fleet of 138 school buses includes 20 CNG-powered special education buses. Due to the lack of CNG fueling pumps at the Transportation Center, on an average 15 of these buses must be driven daily to the City of Irvine's Operational Support Facility, at 6427 Oak Canyon, some 12 miles away (or 24 miles round trip). The total time taken for these refueling trips is approximately one hour for travel and wait time while refueling. It should be noted that Irvine's CNG is stored in a compressed state in underground tanks for "fast fill" delivery to vehicles.

Annually, CNG buses are driven 180 days during regular school session and 24 days during the summer session. With 15 buses on average requiring refueling, 360 vehicles miles are driven daily. With 204 days of service per year, over 73,000 miles are currently driven and 3,060 man-hours are expended, annually, just to refuel the CNG buses.

Although there are no plans to increase the size of the school bus fleet, replacement buses will be fueled by CNG, in accordance with South Coast Air Quality Management District (SCAQMD) Clean Fleet Vehicle Rule 1195 regarding "Clean On-Road School Buses" and the State of California Air Resources Board (ARB) *Lower-Emission School*

4100 Newport Place Drive – Suite 200 (949) 756-6440
Newport Beach, California 92660 Fax (949) 756-6444

Bus Program that provides funding for new and replacement school buses fueled by CNG. This means that, if CNG buses continue to be refueled in Irvine, the vehicles miles driven and man-hours expended will grow in future years as the fleet of CNG buses grows.

In order to eliminate the costly need to drive to Irvine just for CNG, the District proposes to install CNG fueling pumps at the Transportation Center.

II. Proposed Project

Unlike the underground storage tanks used at the Irvine CNG facility, the District's proposed CNG fueling system involves a "slow fill" process in which natural gas is drawn from the domestic gas main in Liberty, and compressed directly into the bus fuel tanks. A total of 20 pumps and 3 compressors will be installed to fill 20 buses simultaneously and overnight (i.e., drivers will not have to wait while buses are being refueled). A small (370 square foot) room will be constructed to house the compressors and other equipment. The pumps will be connected to the compressors via hoses that are mounted onto pre-fabricated concrete barriers. The 20 parking spaces for these pumps are presently delineated and being used to park buses. No compressed gas is stored on-site other than in the bus fuel tanks.

The proposed project will be constructed within the limits of the District's existing Transportation Center. There will be no expansion or major alterations to accommodate the proposed project. In fact, other than constructing the equipment room and installing a gas supply line from the gas main in Liberty, most of the on-site work consists of installing equipment.

III. Project Site

The District's Transportation Center houses the Transportation Department staff, vehicle service facilities, and fleet of school buses. On site, there is an existing office building; garages for servicing and maintaining school vehicles; gasoline and diesel fueling facilities; and a large yard for storing buses and other vehicles, when not in use. There are currently 123 employees at the Transportation Center, including 97 bus drivers and 11 shop mechanics. The 15-person office staff hours are from 7:00 A.M. to 4:00 P.M. The bus drivers' and mechanics' hours vary with the school schedules and the distances from the Transportation Center. The earliest drivers arrive by 5:00 A.M. and the last drivers arrive by 7:00 A.M. There are 284 parking spaces on-site for employees, visitors, and buses.

The Transportation Center is accessed by a single driveway onto Liberty. While the 10.1 acre site is relatively flat, the surrounding terrain is hilly, and Liberty features both vertical and horizontal curves as it runs generally in a north-south alignment between Aliso Viejo Parkway and Aliso Creek Road - a distance of less than 1 mile. In addition to the Transportation Center, existing development along Liberty consists of industrial

uses, business parks, religious centers, and youth facilities. There are also several vacant parcels, including the site of the once proposed United States Postal Service (USPS) Incoming Mail Facility (IMF). The IMF site is adjacent to the District's Transportation Center. Another vacant site adjacent to the Transportation Center is proposed for a senior housing project, and is currently owned by the District.

Although the rear yards of some residential developments are adjacent to, and overlook Liberty, none have direct street access. Pursuit is the only cross street between Aliso Viejo Parkway and Aliso Creek Road that provides access to residences, including the *Soleil* condominiums and single-family residences in the *Cozumel* development.

In 1995, the Transportation Center was originally proposed by the District to accommodate a total of 159 buses and staff and visitor parking for 111 vehicles. As part of an "Expanded Initial Study and Addendum" for the Transportation Center project, a "Site Specific Traffic Study" was conducted, in which it was concluded that no traffic circulation impacts would result.[1,2] Therefore, the Transportation Center's current school bus fleet of 138 buses is 21 less than originally proposed, while the current staff size is 12 more than originally proposed, including visitors.

IV. Existing Traffic Conditions

Existing traffic conditions were well documented in the Environmental Impact Statement (EIS) for the IMF.[3] Although this project was halted by the USPS earlier in the year, traffic data from the EIS is still relevant.

As part of a traffic and transportation study for the EIS, traffic counts were taken in June 2007 during the weekday A.M. and P.M. peak hours of travel.[4] The intersections of Aliso Viejo Parkway and Liberty, and Aliso Creek Road and Liberty were two of several study intersections. Based on these traffic counts, the existing levels of service (LOS) during both the A.M. and P.M. peak hours were calculated to be “A” (based on a qualitative grading system where "A" denotes the best of traffic conditions and "F" denotes unacceptable traffic conditions).

Aliso Viejo Parkway is classified by the City of Aliso Viejo's *Circulation Element* as a primary arterial between Aliso Creek Road and Pacific Park Drive, and is delineated for 2 lanes of travel in each direction, plus a bike lane, and a median to accommodate for left turns at intersecting streets. Aliso Creek Road is classified as a major arterial

[1] Expanded Initial Study and Addendum by Culbertson, Adams & Associates, Inc., Aliso Viejo, California, March 1995.

[2] Traffic Study by Robert Kahn, John Kain & Associates, Newport Beach, California, March 1995.

[3] “Final Environmental Impact Statement for Construction and Operation of an Incoming Mail Facility in Aliso Viejo, California,” December 2008, Tetra Tech, Inc., San Francisco, California.

[4] Transportation & Traffic Study by Dowling Associates, Oakland, California, November 2008.

between Alicia Parkway and the San Joaquin Transportation Corridor, and is delineated for 3 lanes of travel in each direction, plus a bike lane, with a median to accommodate for left turns at intersecting streets. The intersections of Aliso Viejo Parkway and Liberty, and Aliso Creek Road and Liberty are signalized for 3 phases and 5 phases of traffic movement, respectively.

Liberty is classified as a local street, with a varying width of 50 to 60 feet. The number of striped traffic lanes on Liberty also varies, with two through lanes in each direction for approximately the southerly half, and one through lane in each direction for the northerly half.

III. Future Traffic Conditions

Future traffic on Liberty may be greatly affected by the development that occurs on currently undeveloped parcels of land. If the United States Postal Service (USPS) plans to build an Incoming Mail Facility (IMF) and a proposed senior apartment project on the District's vacant parcel come to fruition, additional traffic will be generated onto Liberty, and could affect the LOS at the intersections of Aliso Viejo Parkway and Liberty, and Aliso Creek Road and Liberty.

The EIS included an analysis of the traffic impacts associated with the IMF and found the LOS during both the A.M. and P.M. peak hours were calculated to remain at “A.” The EIS also included an analysis of the traffic impacts associated with the cumulative build out of remaining land uses in the area and found the LOS during both the A.M. and P.M. peak hours were calculated to remain at “A.”

IV. Assessment Findings

Based on the information presented herein, the following findings are made:

1) The intersections of Aliso Viejo Parkway and Liberty, and Aliso Creek Road and Liberty currently operate at an acceptable LOS "A" during both the A.M. and P.M. peak hours of weekday traffic.

2) Existing traffic conditions will be unaffected by the proposed project as there will be no increase in the number of buses arriving or departing from the yard, and no increase in personnel to service, maintain, or monitor the CNG equipment or attend to the pumps during fueling.

3) The future LOS at the intersections of Aliso Viejo Parkway and Liberty, and Aliso Creek Road and Liberty are projected to remain at "A" during both the A.M. and P.M. peak hours of weekday traffic, with construction of the IMF and/or with cumulative build out of the area.

4) Since the proposed project mostly involves the installation of equipment, and only minor construction, construction-related traffic impacts will be minimal and temporal in nature. If necessary, some equipment deliveries can be scheduled for off-hours.

V. Conclusions

Based on the findings presented in this assessment, in is concluded that the District's proposed installation of CNG fueling pumps at the District's transportation yard will not result in any immediate or long-term traffic impacts. In addition, eliminating the need for the District's CNG buses to travel 24 miles round trip to Irvine just to fuel will reduce costs and decrease total vehicle mileage by over 73,000 miles, annually.

VI. In Closing

In closing, **i**f there are any questions regarding this traffic impact assessment, please contact me at your convenience at (949) 756-6440.

Sincerely yours,

KHR Associates

James H. Kawamura, P.E.
President/CEO

Appendix D: Mitigation Monitoring and Reporting Program

APPENDIX D - MITIGATION MONITORING AND REPORTING PROGRAM

Pursuant to Section 21081.6 of the Public Resources Code and the *California Environmental Quality Act (CEQA) Guidelines* Section 15097, public agencies are required to adopt a monitoring or reporting program to assure that the mitigation measures and revisions identified in the Mitigated Negative Declaration (MND) are implemented. As stated in Section 21081.6 of the Public Resources Code:

> *"…the public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment."*

Pursuant to Section 21081(a) of the Public Resources Code, findings must be adopted by the decisionmaker coincidental to certification of the MND. The Mitigation Monitoring and Reporting Program (MMRP) must be adopted when making the findings (at the time of approval of the project).

As defined in the *CEQA Guidelines*, Section 15097, "reporting" is suited to projects that have readily measurable or quantitative measures or which already involve regular review. "Monitoring" is suited to projects with complex mitigation measures, such as wetland restoration or archaeological protection, which may exceed the expertise of the local agency to oversee, are expected to be implemented over a period of time, or require careful implementation to assure compliance.

The Initial Study/Mitigated Negative Declaration prepared for the Compressed Natural Gas (CNG) Fueling Dispenser at Aliso Viejo Transportation Project provided an analysis of the environmental effects resulting from construction and operation of the project. A thorough evaluation of the project was undertaken in compliance with CEQA, including the identification of a mitigation measure designed to avoid or substantially reduce the potential adverse noise effects of the project.

To sufficiently track and document the status of the proposed mitigation measure a mitigation matrix has been prepared and includes the following components:

- Mitigation measure number
- Mitigation measure (text)
- Implementation Action
- Monitoring Method
- Responsible Monitoring Party
- Monitoring Phase
- Verification/Approval Party
- Mitigation Measure Implemented? (Y/N, and date)
- Documentation Location (Monitoring Record)

The mitigation matrix is included in Table D-1.

Table D-1

Mitigation Monitoring and Reporting Program

No.	Mitigation Measure	Implementation Action	Monitoring Method	Responsible Monitoring Party	Monitoring Phase	Verification/ Approval Party	Mitigation Measure Implemented? (Y/N) & Date	Documentation Location (monitoring Record)
NOISE								
MM NOISE-1	The District shall retain the services of a qualified acoustical engineer with expertise in design of sound isolations to ensure the U-shaped enclosure is designed (i.e., installation of roof) so as to meet the County's exterior noise limits at the property line of the vacant lot to the west of the site.	CUSD shall to retain an acoustical engineer to review final design plans and technical specifications of CNG dispenser to ensure compliance with applicable noise standards.	Review of the final site plans and technical specifications of CNG dispenser.	Acoustical Engineer		CUSD Facilities Director City of Aliso Viejo Building and Safety Official	_____	_____

Appendix E: Responses to Comments

APPENDIX E - RESPONSES TO COMMENTS

This section includes the comment letter received on the Draft Initial Study/Mitigated Negative Declaration (IS/MND) and the CUSD's responses. The presentation of the comments and responses starts on the following page.

CITY OF ALISO VIEJO
INCORPORATED JULY 1, 2001

12 JOURNEY • SUITE 100
ALISO VIEJO
CALIFORNIA 92656-5335
WWW.CITYOFALISOVIEJO.COM

PHONE
949. 425.2500
FAX
949. 425.3899

Comment Letter No. 1

December 21, 2009

Mr. Cary Brockman
Director of Facilities Planning
Capistrano Unified School District
36122 Valle Road
San Juan Capistrano, CA 92675

Re: Draft Initial Study / Mitigated Negative Declaration for the proposed compressed natural gas station at 2B Liberty in Aliso Viejo, CA

Dear Mr. Brockman,

The City of Aliso Viejo has reviewed the Draft Initial Study and Mitigated Negative Declaration for Conditional Use Permit UPAV08-12, an application made by Capistrano Unified School District (CUSD or District) for a proposed compressed natural gas (CNG) station at the CUSD transportation center located at 2B Liberty in Aliso Viejo, CA (property or site). The City offers the following comments on the Mitigated Negative Declaration. 1

1. Environmental Check List Form

Page 2: Environmental Factors Potentially Affected. Noise is checked as a "Potentially Significant Impact." However, this is inconsistent with the checklist on page 9. Under Section XI (Noise) no boxes are checked under "Potentially Significant Impact" in the Environmental Checklist Form. 2

2. Project Location and Surrounding Uses

a. Page A-1. First paragraph identifies access to the project site occurs from Liberty. Access to the site is from an access road off Liberty. Liberty in conjunction with this access road provides access to the site.

b. Page A-1. Second paragraph describes land uses surrounding the property. The document does not provide any details about uses at Temple Beth El, located at 2A Liberty. 3

3. Purpose and Need of the Project

a. Page A-2. Second paragraph of this section states "The CNG fueling dispenser would serve as a fueling site for additional CNG buses as the remaining diesel buses are retired." The document does not address ultimate uses 4

intended for the CNG facility. The document is inconsistent in several sections. In the project description of Environmental Checklist, the CNG facility is described as serving the District's existing 20 CNG buses. The second paragraph of this section states 15 of 20 CNG buses refuel in Irvine. No information is provided about where the other five CNG buses refuel. 4 (cont.)

4. Description of Proposed Project

a. A complete site plan clearly depicting location of the proposed CNG facility and natural gas lines serving the facility are not provided in the CEQA document. The site plan provided (Figure A-4) does not provide sufficient detail. The site plan should include, but not be limited to the following: 5

   i. North arrow
   ii. Scale of plans
   iii. All property lines
   iv. Proposed setback lines
   v. Location of existing and proposed structures, additions, utilities, driveways, walks, and open spaces
   vi. Locations, names, dimensions, and descriptions of all existing and proposed right of way lines, dedications, and easements
   vii. Any structures to be relocated, removed, or demolished
   viii. Locations, heights, and materials of existing and proposed walls and fences
   ix. Locations, dimensions, and descriptions of parking areas

b. Project description lacks detail and does not address ultimate intended uses of the CNG facility. Based on proposed hours of operation (9:00 a.m. to 1:00 pm and 5:00 p.m. to 1:00 a.m.), the CNG facility could serve more than 20 buses per day. 6

c. The CEQA document does not address buses located at the Capistrano Beach (Doheny) bus yard traveling to Aliso Viejo for CNG fueling. Nor does the document indicate whether or not the District would allow the facility to be used by the public or other public agencies (i.e., water districts, police, utility companies, etc.). 7

d. The project description does not address modifications to the transportation center (e.g., reconfiguration of parking layout, expansion of the center, etc.) to accommodate additional buses as the fleet is converted over time. 8

5. Aesthetics

a. This section does not adequately describe existing and proposed uses in the area, specifically regarding analysis of proposed CNG facility visibility to those uses. Temple Beth El views to the site are described as being 9

screened by an 8'0" wall along the property line and numerous 25'0" trees. However, Temple Beth El is a two-story building and currently has a direct view to the CNG facility. Views are not limited to the undeveloped vacant land (potentially a senior apartment development – Liberty Senior Apartments) at 2C Liberty. Additionally, the document does not address views from the proposed Liberty Senior Apartments (four-stories in height) nor the two-story single family residences on the west side of Liberty toward the project site. 9 (cont.)

b. Page B-1, Item C. The document identifies the CNG facility will be screened by a 7'0" high masonry cinder block wall (Figure A-4 shows the wall as 20'0" in length) but does not identify if landscaping will be placed around the enclosure to soften appearance of the block wall enclosure. 10

6. Air Quality

a. This section needs to address ultimate use of the CNG facility serving the CUSD fleet beyond the 20 existing CNG buses. The hours of operation can accommodate more than 20 buses. Additionally, the CEQA document does not address the potential increase in size of the facility to accommodate the converted fleet of CUSD buses over time. The air quality section does not address whether CUSD buses from Capistrano Beach CUSD transportation center will be travelling to the Aliso Viejo site for CNG fueling or any other type of services at any time in the future. 11

b. Odors. The document correctly states natural gas is non-toxic and odorless. However, this odorless state occurs when gas is in its natural form. The natural gas in the lines provided by the Gas Company has additives as a safety precaution. Therefore, a gas leak is detectible by odor. The document states natural gas supplied to the CNG operation would be contained in a manner that would prevent any substantial venting into the ambient atmosphere; therefore, no impact related to odors would occur. The CEQA analysis does not provide any details and/or information supporting this conclusion. 12

7. Geology and Soils

Page B-14, Strong seismic ground shaking. The CEQA document states CNG has a narrow flammability range and only presents a risk of explosion at specific concentrations difficult to achieve. This statement does not reference any supporting data for this conclusion. Explosions are known to occur at CNG facilities (e.g., City of Corona, 2008). 13

8. Hazards and Hazardous Materials

a. Item (a) – Hazards to the Public or Environment Through Route Use. The document should provide details about potential hazards of operational characteristics of the CNG facility and risk to the public. Temple Beth El and planned senior apartments are in proximity to the CNG facility. However, the CEQA document fails to provide details about 14

the safety precautions that will be implemented to ensure safety of people and property. The document mentions some features that may be included, but does not clearly identify what the District intends to implement with this specific CNG Facility. Details about safety and security measures should be provided in the document. **14 (cont.)**

b. In relation to other existing CNG facilities, how close are CNG fueling areas to schools, senior living, residences, and businesses? **15**

c. Item (c) – Proximity to Schools. The analysis identifies a school (Van Damme Academy) is approximately 260 feet from the project site. Farm School, which also occurs during the week at Temple Beth El should be addressed in this section. The analysis does not address potential risk to the public in the event there is an emergency situation (e.g., explosion, fire, etc.) from the CNG Facility. **16**

d. Item (g) – Emergency Response/Evacuation Plan. See comments presented under item (a) above. The CEQA document does not address (or include as a mitigation) an emergency plan (What is the response plan? What is the evacuation plan?). **17**

9. Land Use and Planning

a. Item (b) – the CEQA analysis does not adequately address the ultimate intended use of the proposed project. The analysis focuses on the CNG facility serving 20 existing CNG buses; however, it does not address ultimate use of the facility nor how the facility will serve the fleet of buses converted over time. This section also does not address compatibility of the use with existing and planned land uses in the immediate area. The CEQA document does not provide detail or supporting information to demonstrate the existing transportation and/or proposed CNG facility complies with the City of Aliso Viejo General Plan and Zoning Code. **18**

b. The CEQA document does not address the District's intentions for the adjacent site owned by CUSD. This site is proposed for senior community apartment project. The document does not discuss future closure of the Capistrano Beach CUSD transportation center and how this will impact the Aliso Viejo facility (e.g., relocation of the buses to another site once the property is sold). **19**

10. Noise

a. Since proposed hours of operation are able to serve more than 20 buses and the document makes reference to the District's intent to replace retired buses with CNG buses, the noise analysis does not address total potential use of the CNG facility. **20**

b. Page B-24, Applicable Noise Regulations. The CEQA document refers to the County of Orange noise standards adopted by the City of Aliso Viejo in 2001. The CEQA document should correctly reference noise **21**

standards and requirements adopted after 2001 [Noise Element of the General Plan and Aliso Viejo Municipal Code (AVMC), Chapter 15.94]. **21 (cont.)**

c. Item (a) – Construction noise threshold information presented on page B-25 states "Construction activities would occur outside the hours of 7:00 a.m. to 8:00 p.m. on weekdays, including Saturday, or at any time on Sunday or a Federal holiday." This statement should correctly state "would not" instead of "would." **22**

d. Section 4-6-7 of the AVMC, which exempts construction activities from noise level limits during specific hours of the day, should be referenced. Noise sources associated with construction, repair, remodeling, or grading of any real property, provided said activities take place between the hours of 7:00 a.m. and 8:00 p.m. on weekdays or 8:00 a.m. and 8:00 p.m. on Saturday and not at any time on Sunday or Federal holidays." The CEQA document should also include this as specific mitigation since the site is located in close proximity to a church, school, and residential areas **23**

e. Page B-30, Operational Noise. The CEQA analysis does not address ultimate use of a CNG facility. The noise analysis does not account for additional buses (as the bus fleet is retired and converted) travelling on Liberty, which is adjacent to residential uses, to the site for CNG fueling. **24**

f. The CEQA analysis identifies no significant impact thresholds for noise beyond compliance with applicable General Plan standards or noise ordinance limits. Although noise impacts from the project may not violate City noise standards, those impacts may adversely affect the noise environment. California environmental case law has ruled compliance with standards or ordinances alone is not sufficient for a finding of a less-than-significant impact. The noise evaluation does not include a nocturnal noise impact analysis (or nocturnal noise baseline) and does not evaluate impact significance from sleep disturbance or other noise nuisance at levels that do not necessarily violate ordinance criteria. The noise analysis does not consider potential future noise levels at complete build-out of the Aliso Viejo transportation center. The analysis does not provide noise data documented in prior environmental documents for the Draft EIR for the Liberty Senior Apartments project and the Draft EIS for the USPS facility. **25**

g. Page B-31, Mitigation Measure, Noise-1. Proposed mitigation does not meet City of Aliso Viejo requirements for noise reduction. Noise mitigation shall reference City noise standards and requirements set forth in the City's General Plan and Municipal Code. Additionally, proposed mitigation does not address interior noise levels for the proposed senior housing and other nearby residential areas. Mitigation does not demonstrate noise impacts can be mitigated to a less than significant level. The City of Aliso Viejo requests review and approval of the enclosure design and supporting documentation to verify noise levels **26**

(including a 45 dBA for interior residential land use threshold) with the design of the enclosure. **26 (cont.)**

11. Public Services: Fire Protection

The discussion primarily addresses fire inspection and does not adequately address fire protection services. The analysis does not address potential for emergencies that may occur in relation to the CNG facility (i.e. explosion, leaking gas etc.). **27**

12. Transportation and Circulation

a. Proposed hours of operation can accommodate fueling more than 20 CNG buses. The CEQA document identifies the intention of the District is to convert buses to CNG buses but analysis fails to address impacts associated with this conversion. The document does not indicate if others may be allowed to use the fueling facility (i.e., other public agencies, the public etc.). **28**

b. Appendix C: Traffic Analysis. The traffic analysis dated October 16, 2009, only addresses the fueling of 20 CNG buses. The document fails to address ultimate use of the CNG facility, including fueling additional buses travelling from the Capistrano Beach CUSD bus yard nor does it address potential relocation of buses from Capistrano Beach to the Aliso Viejo site. The traffic analysis does not address CUSD's intention for the adjacent undeveloped CUSD owned property previously proposed for senior housing. **29**

c. Emergency Access. The conclusion that no impact resulting in inadequate emergency access is not supportable. Has OCFA indicated such? The immediate access to the site is via the CUSD access road. In the event of an emergency at the transportation center (and possible blockage of the CUSD access road), how would emergency response access the site? **30**

d. Parking Capacity. The District has announced the sale of the Capistrano Beach bus yard. What are the District's plans for relocation of the buses at this yard in the event the property is purchased? Additionally, the proposed location of the CNG pumps will be placed in existing parking spaces. How does this not impact parking? How many spaces are currently provided on site? How many spaces are required? Once the closure of the Capistrano Beach Transportation Center is sold and closed, where will the rest of CUSD's fleet be accommodated? **31**

13. Utilities and Service Systems

This section and the Public Services section do not address location of natural gas lines and/or expansion (extension) of the line to serve the project. The project description and the analysis should provide information and details regarding existing natural gas line locations, and proposed actions associated with providing natural gas to the CNG facility. **32**

14. Mandatory Findings of Significance

There is an inconsistency in the CEQA Guidelines of which the preparer of the subject CEQA document may not be aware. The CEQA Guidelines Appendix G checklist currently shows three items for Mandatory Findings (just as stated in the CEQA document page B-37 and B-38). However, the Mandatory Findings of Significance CEQA Guidelines Section 15065(a)(1 through 4) clearly identifies four Findings of Significance that a Lead Agency shall make. This is an inconsistency between the actual CEQA Guidelines and the checklist. Therefore, the Draft Initial Study/Mitigated Negative Declaration needs to be corrected to include all four Mandatory Findings. 33

15. Cumulative Impacts

The CEQA analysis does not address cumulative impacts from the ultimate use of the CNG Facility and the transportation center. Analysis does not adequately address existing (e.g., Temple Beth El, Van Damme Academy, outdoor school play areas, and existing residences in the immediate area) and planned land uses in the immediate area. Although CUSD currently owns the vacant parcel adjacent to the project site; however, there is no discussion of the District's intention for the future development and use of this property. 34

A major concern for the City of Aliso Viejo is the lack of detail provided about the project provided in the CEQA analysis. The ultimate intended use of the site by CUSD is not clearly defined in the project; therefore, without this information, each section of the Draft Initial Study and Mitigated Negative Declaration for the site located at 2B Liberty is inadequate. The document does not include impacts to the Aliso Viejo transportation center once buses are retired and converted. Most importantly, the document does not address impacts to the Aliso Viejo site once the Capistrano Beach (Doheny) transportation center is closed. 35

The law is clear a lead agency may not break a project into smaller pieces for purposes of CEQA analysis. (See, e.g., *Tuolumne County Citizens for Responsible Growth v. City of Sonora* (2007) 155 Cal.App.4th 1214.) This requirement ensures the lead agency's environmental analysis takes the full impacts of a proposed project into account and discloses those impacts to the public. (See State CEQA Guidelines, § 15002(a).) For that reason, "[a] lead agency must consider the whole of an action, not simply its constituent parts, when determining whether it will have a significant environmental effect." (Cal. Code Regs., tit. 14 ["State CEQA Guidelines"], § 15003(h) [citing *Citizens Assoc. for Sensible Development of Bishop Area v. County of Inyo* (1985) 172 Cal.App.3d 151; see also Pub. Res. Code, § 21159.27.) Here, the District has failed to analyze the full impacts of its proposed project in several ways. 36

In addition, the lead agency must assess whether a cumulative effect requires an EIR and whether the effects of the project are cumulatively considerable. (State CEQA Guidelines, § 15064(h).) To determine whether effects of a project are cumulatively considerable, lead agency must consider incremental effects of the project when viewed

in connection with probable future projects. Here, the District fails to account for the ultimate use of the facility (serving a converted fleet of buses) and fails to address the District's intentions with regard to the closure of the Capistrano Beach transportation center (relocating the buses to another site once the property is sold). CEQA rejects an isolated approach to analyzing environmental impacts, instead requiring that the impacts of all related projects be assessed together, so as to avoid potentially significant impacts to the environment that may not be seen in isolation. (See *Los Angeles Unified School District v. City of Los Angeles* (1997) 58 Cal.App.4th 1019, 1025.)

The District's decision to treat this project as unrelated to the closure of the Capistrano Beach (Doheny) bus yard violates CEQA's prohibition against segmenting or piecemealing because it conceals the true impacts of the District's actions by breaking them into two smaller pieces. (See, e.g., *Tuolumne County Citizens for Responsible Growth v. City of Sonora* (2007) 155 Cal.App.4th 1214.) The requirements of CEQA "cannot be avoided by chopping up proposed projects into bite-sized pieces" which, when taken individually, may not have a significant adverse effect on the environment. (*Lake County Energy Council v. County of Lake* (1977) 70 Cal.App.3d 851, 854.)

Under CEQA a "project" includes "the whole of an action, which has the potential for resulting in either a direct physical change on the environment, or a reasonably foreseeable indirect physical change in the environment" and is supported through a public agency approval. (State CEQA Guidelines, § 15378 [emphasis added].) Once again, CEQA requires that a public agency consider and analyze the entirety of the project and refrain from breaking the project into smaller pieces which, individually, might have no significant impacts. It is because of CEQA requirement for a full and accurate accounting of environmental impacts that agencies are forbidden from "tak[ing] any action which gives impetus to a planned or foreseeable project in a manner that forecloses alternatives or mitigation measures that would ordinarily be part of CEQA review." (State CEQA Guidelines, § 15004(b)(2)(B).) Here, the District has defined the "Project" too narrowly, has ignored both the closure of the Doheny bus yard and the conversion of the fleet of buses over time and has failed to consider the totality of environmental impacts. The District states no additional buses are anticipated at the City transportation center, and therefore fails to take into account the impacts on the City resulting from the inevitable increase in buses at and trips to the City transportation center as a result of the bus yard closure. Additionally, as stated on page A-9 and inferred throughout the document, the fleet of CNG buses will grow in future years as existing operational diesel-fueled buses are replaced with CNG-fueled buses.

36 (cont.)

Please note "[t]heoretical independence [between two approvals] is not a good reason for segmenting the environmental analysis of the two matters. Doing so runs the risk some environmental impacts produced by the way the two matters combine or interact might not be analyzed in the separate environmental reviews. Furthermore, if the two matters are analyzed in sequence (which was the situation here) and the combined or interactive environmental effects are not fully recognized until the review of the second

matter, the opportunity to implement effective mitigation measures as part of the first matter may be lost. This could result in mitigation measures being adopted in the second matter that are less effective than what would have been adopted if the matters had been analyzed as a single project." (*Tuolomne County Citizens for Responsible Growth v. City of Sonora* (2007) 155 Cal.App.4th 1214, 1230.)

36 (cont.)

Please contact me at (949) 425-2527 if you have any questions.

Sincerely,

Albert Armijo
Director of Planning Services

cc: Mark A. Pulone, City Manager
John Whitman, City Engineer
Jennifer Lowe, Associate Planner
Cheryle Hodge, Hodge & Associates

LETTER NO. 1

Albert Armijo, Director of Planning Services
City of Aliso Viejo
12 Journey, Suite 100
Aliso Viejo, CA 92656-5335

December 21, 2009

COMMENT 1

Comment noted.

COMMENT 2

Page 2 of the Environmental Checklist Form correctly identifies "Noise" as a potentially significant impact. However, as indicated on Page 2 under the "Determination" heading, and as discussed in Attachment B, Explanation of Checklist Determinations, the project's potentially significant noise impacts will be reduced to a less than significant level with implementation of the prescribed mitigation measure (refer to Mitigation Measure NOISE-1). Section XI correctly identifies certain noise issues (refer to Questions A and C) as "potentially significant" impacts that are able to be reduced to a less than significant level with implementation of the prescribed mitigation measure (refer to Mitigation Measure NOISE-1). Other noise related issues, such as impacts associated with vibration (refer to Question B), and aviation noise (refer to Questions E and F), were appropriately determined as having either a less than significant impact or no impact.

COMMENT 3

The first paragraph on page A-1 of the IS/MND has been revised to clarify that access to the project site is from an access road off Liberty. The second paragraph states, "that to the immediate west of the site is undeveloped land as a well as an improved site consisting of a two-story, religious center and associated parking lot." This refers to the property located at 2A Liberty, which includes the Temple Beth El. The second paragraph further states, "The religious center is also utilized for educational and presumably childcare purposes. There is an outdoor play area on the southern side of the religious center building." Therefore, the IS/MND document does provide details of the uses at the 2A Liberty property. In addition, this property was identified and evaluated as a sensitive receptor relative to potential air quality and noise impacts. An analysis of construction-related air quality impacts to the 2A Liberty property (also referred to as the religious or educational center facility in the IS/MND) is included on pages B-5 and B-6 of the IS/MND. As stated on page B-6 of the IS/MND, the project would result in long-term beneficial air quality impacts, thus no long-term air quality impacts to the 2A Liberty property. Construction-related noise impacts to the 2A property are included on pages B-26 and B-29. With regards to operational noise impacts, a noise analysis is provided for the nearest sensitive receptor (future senior housing), which is closer to the site than the 2A Liberty facility. Accordingly, the mitigation prescribed for the nearest sensitive receptor would also mitigate any noise impacts at the 2A Liberty facility.

COMMENT 4

The second paragraph on page A-2 correctly states, "The CNG fueling dispenser would serve as a fueling site for additional CNG buses as the remaining diesel buses are retired." To confirm, this means that that the CNG fueling dispenser station would serve new CNG buses that replace existing diesel-fueled buses that are located at the District's Aliso Viejo Transportation Center. No change to the overall number of buses or capacity currently at the Transportation Center is proposed as part of this project.

Page A-2 of the document correctly states that approximately 15 of the 20 CNG buses re-fuel each day at the Irvine CNG fueling station. It is common that approximately 5 of the 20 buses do not need to be refilled every day. However, all 20 CNG buses refill at the Irvine station.

COMMENT 5

The IS/MND provides four figures in Attachment A, Project Description, which provide the context of the project setting, as well as a an illustration of the proposed site plan. Figure A-1, Regional and Vicinity Map, illustrates the project site's location in relation to the local/regional vicinity and surrounding roadway network. Figure A-2 provides an aerial photograph of the project site and illustrates the location of the proposed CNG fueling dispenser within the Transportation Center. As shown in Figure A-2, the proposed CNG fueling dispenser would be located on the west side of the existing bus servicing building, which is also illustrated in Figure A-3, Existing Site Conditions. To provide for further clarification for the commentor regarding the location of the proposed CNG fueling dispenser, Figure A-3 has been revised to illustrate the specific location of the proposed CNG fueling dispenser. Figure A-4 illustrates the site plan for the proposed project. Figure A-4 has been revised to include the names of the existing buildings (as shown in Figure A-3) to further clarify the location of the proposed CNG fueling dispenser in relationship to the existing on-site bus servicing building. Figure A-4 includes a description of the wall proposed around the CNG fueling dispenser, which encloses the primary area of improvement associated with the project, a small, 370 foot area of the site. No existing structures are proposed to be relocated as part of the project. No changes to existing right of way lines, dedications and easements are proposed as part of the project. As discussed in the Project Description, the project would require minimal construction, including re-paving of the existing asphalt after completion of saw cut work. The location of natural gas lines are not shown as no new gas lines are proposed. As stated on page A-9 in Attachment A, Project Description, the CNG fueling dispenser would be located at the terminus point of the existing natural gas line within the Transportation Center. Construction of the project is anticipated to take approximately three weeks. There are 20 existing bus parking spaces that would be utilized when fueling the CNG buses. Thus, no new parking spaces or changes to existing bus parking spaces on-site would occur as a result of the project.

COMMENT 6

The project proposed is as described in Attachment A, Project Description, of the IS/MND. Page A-9 of the Project Description states, "The CNG fueling dispenser would be able to fill a maximum of 20 buses simultaneously." Currently, only 20 CNG buses are operated out of the Transportation Center. Page A-2 of the Project Description states, "The CNG fueling dispenser would serve as a fueling site for additional CNG buses as the remaining diesel buses are retired." So, it is correct that the CNG fueling station could re-fuel more than 20 buses per day, if existing diesel-fueled buses are retired and replaced with CNG buses.

However, as indicated in the Project Description, no change to the overall number of buses (94 buses) or capacity currently at the Transportation Center is being contemplated by the District. Further, page A-9 of the Project Description states, "the anticipated hours of operation for the CNG fueling dispenser would be Monday to Friday from 9:00 AM to 1:00 PM; and 5:00 PM to 1:00 AM." The CEQA analysis contained in the IS/MND assumes that the fueling dispenser would be operated during these hours at a worse-case scenario with a maximum of 20 buses being re-fueled simultaneously at any one given time. Accordingly, while a maximum of 94 buses could ultimately be re-fueled at the CNG fueling station if additional diesel buses are converted to CNG over time, as indicated on page A-2 of the Project Description, conversion of buses to CNG would provide a net environmental air quality benefit by reducing air pollution and toxic air contaminants as well as promoting the use of more sustainable fuels.

COMMENT 7

The District currently has no plans for buses stationed at the Capistrano Beach (Doheny) bus yard to utilize the proposed CNG fueling dispenser at the Aliso Viejo Transportation Center. Further, the District has no plans to allow the proposed CNG fueling dispenser to be used by the public or other public agencies. The project being proposed is as described in Attachment A, Project Description, of the IS/MND.

COMMENT 8

Page A-9 of the Project Description states, "There are 20 existing bus parking spaces that would be utilized when fueling the CNG buses. Thus, no new parking spaces or changes to existing bus parking spaces on-site would occur as a result of the project." Even should existing diesel-fueled buses be replaced by CNG buses, the number of buses using the Transportation Center would not change, and as such no changes to the existing Transportation Center parking configuration are contemplated by the District. Further, no modifications to the existing Transportation Center would occur as part of the project beyond the minor improvements associated with installation of the CNG fueling dispenser.

COMMENT 9

This comment indicates that views of the proposed CNG fueling station may occur from the Temple Beth El facility, the proposed Liberty Senior Apartments and two-story single-family residences on the west side of Liberty. Even if such views of the site improvements being proposed were accessible, as discussed in "Response C" of the Aesthetics section, the CNG fueling dispenser and associated operations would be a visually compatible use with the existing maintenance, service and fueling activities that occur within the Transportation Center. The CNG fueling dispenser would be located adjacent to the existing bus servicing building. The compressors of the proposed CNG fueling dispenser would be screened by a 7-foot high masonry cinder block wall that would be designed to match the exterior of the existing bus servicing building. Due to the relatively small size and scale of the proposed CNG fueling dispenser [the wall-enclosure would be seven-feet high and approximately 21-feet (length) by 17-feet (long), which would total approximately 370 square feet], the visual character of the Transportation Center would not substantially change. Further, the addition of the CNG fueling dispenser would not substantially alter bus operations within the Transportation Center since no new bus parking spaces or changes to existing bus parking spaces would occur with project implementation. Thus, aesthetics impacts regarding views to the site, as well as change to the visual quality and character of the site are concluded to be less than significant.

COMMENT 10

No landscaping is proposed as part of the project. The proposed masonry cinder block wall would be designed to match the exterior of the existing bus servicing building. As indicated in the Response to Comment No. 9 above, the small size and scale of the proposed site improvements would not substantially or materially change the character of the existing Transportation Center or views to the Center.

COMMENT 11

Please refer to the Response to Comment No. 6, above, for a discussion of the ultimate use of the Aliso Viejo Transportation Center. Also, as stated in Response to Comment No. 7, above, the District currently has no plans for buses stationed at the Capistrano Beach (Doheny) bus yard to utilize the proposed CNG fueling dispenser at the Aliso Viejo Transportation Center.

COMMENT 12

The CNG fueling dispenser is anticipated to operate without any leaks. As such, no odors are anticipated to routinely affect the immediate or surrounding areas.

COMMENT 13

Natural gas is known to have a narrow flammability range and is referenced in the Safety section provided by the Natural Gas Vehicles for America website: http://www.ngvc.org/about_ngv/index.html

COMMENT 14

As stated on page B-17, of the IS/MND, while the risk of upset associated with CNG is considered minimal, the design of the proposed CNG fueling dispenser would include various features to further ensure the safety of the system. These features may include, but are not limited to: a gas (methane) detection system; explosion proof motors and breaker box; automatic discharge pressure regulation (or regulator); oil level shut-down switch; and gas inlet pressure valves. The IS/MND also indicates that project plans would require review and approval from the OCFA to ensure the proposed installation satisfies local and state fire safety requirements, including the CFC, 2007 edition, and applicable sections of the NFPA document 52, relating to the installation of CNG fueling systems. While further details regarding the CNG safety features of the project are not yet known, they will be developed prior to finalization of plans and subject to review and approval by the OCFA.

Further, it is noted that common practice and case law indicate that a CEQA-related environmental documentation need not contain a design-level description of the project; a conceptual description of the project components is sufficient as long as there is sufficient detail to enable the decision-makers and the public to understand the impacts of the project. (Dry Creek Citizens Coalition v County of Tulare, 1999). In this instance, the IS/MND analysis has indicated what CNG safety features may be incorporated into the

project, and reasonably relies on the OCFA review to confirm that final plans and the safety features employed are sufficient to avoid impacts on public safety.

COMMENT 15

This comment refers to the proximity of other CNG facilities to schools, senior living, residences and businesses. According to the vendor (SW Compressors) of the CNG fueling dispenser to be located at the Aliso Viejo Transportation Center, similar CNG fueling dispensers are routinely located in close proximity to sensitive receptors (i.e. school facilities). For example, CNG fueling dispensers that serve buses for the Colton Unified School District (USD) (installed 1998), Chino Valley USD (installed 1998), Menifee USD (installed 2004) and Moreno Valley USD (installed 2007) are all located within approximately 200 feet of existing school facilities. There have been no reported accidents at any of these facilities.

COMMENT 16

The site referenced in comment 16 has been analyzed in the IS/MND on page B-18. The risks have been identified for the receptors located at the adjacent religious center, which is the same building the students at the Farm School attend. As such, the usage and storage of materials on the project site would not pose a significant health hazard to any nearby sensitive receptor locations.

COMMENT 17

Currently, there are emergency response and evacuation plans in place at the Aliso Viejo Transportation Center. The emergency response plan includes emergency procedures to be implemented in the event of accidents associated with diesel fuel use and storage. The emergency response and evacuation plans will be updated, as necessary, to include the proposed CNG fueling dispenser. The District will consult with the OCFA, as necessary, to develop these plans. The plans will be developed in accordance with the applicable requirements of the California Accidental Release Program (CalARP), as necessary. Since the CNG fueling dispenser would not exceed the threshold quantities established by CalARP, no Risk Management Plan is required.

COMMENT 18

Please refer to Response to Comment No. 6 for a discussion regarding the ultimate end use of the project site.

Also, in response to the compatibility of the site with surrounding uses, as concluded in this Initial Study, the project would result in less than significant impacts regarding aesthetics, air quality, hazards and hazardous materials, noise and traffic. Accordingly, the project would be compatible and would not conflict with existing and planned land uses as might otherwise occur if there were significant impacts for these and other issues addressed in the IS/MND.

Also, regarding the project's consistency with the City's General Plan and Zoning Code, the project is an allowable use within the site's Community Facilities (CF) land use designation per the City's General Plan and Business Park (BP) zoning designation, although it is acknowledged that a conditional use permit (CUP) may

be required by the City of Aliso Viejo. Also, as indicated in Response to Comment Nos. 6 to 10, above, the project would not materially change the nature and function of the Transportation Center. It would provide a minor improvement involving approximately 370 square feet of area to be re-paved without changing the number of buses using the facility or the parking configuration of the facility. It would also support the conversion of buses from diesel to CNG, which would benefit the environment at the local and regional level. Further, the project would support the City's General Plan policies related to Air quality as stated in the Conservation/Open Space (COS) Element that include the following:

- Goal COS-5: Improve air quality within Aliso Viejo and the region.
    - Policy COS-5.1: Integrate air quality planning with City land use, economic development and transportation planning efforts.
    - Policy COS-5.2 Support programs that reduce air quality emissions related to vehicular travel.
    - Policy COS-5.3 Support alternative transportation modes and technologies, and develop bike- and pedestrian-friendly neighborhoods to reduce emissions associated with automobile use.

As discussed on page B-7 of the IS/MND, project implementation would provide a net environmental benefit to the region by reducing daily VMT and promoting the use of more sustainable fuels, which would make the project consistent with the above references policies.

COMMENT 19

The IS/MND does acknowledge that the vacant site to the west of the existing Transportation Center could be developed with senior housing. Page A-1 of the Project Description states, "A development plan for 164 senior housing units has been submitted to the City of Aliso Viejo for the undeveloped land to the west." Where appropriate, this proposed use is considered in the evaluation of environmental impacts associated with the project. For example, this site is considered to be the nearest sensitive receptor in the evaluation of operational air quality and noise impacts. As stated on page B-6 of the IS/MND, the project would result in long-term beneficial air quality impacts, thus no long-term air quality impacts to the future senior residential property would occur. With regards to operational noise impacts, the noise analysis on pages B-29 and B-30 identifies the future senior residential site as the nearest noise sensitive receptor. Further, the noise mitigation prescribed (Mitigation Measure NOISE-1) pertains to the future senior residential site.

The District does not currently have plans to close the Capistrano Beach CUSD transportation center. The project proposed is as described in Attachment A, Project Description, of the IS/MND.

COMMENT 20

The operational noise analysis on pages B-29 and B-30 is based on a worst case scenario that the CNG fueling dispenser fills a maximum of 20 buses simultaneously during daytime or nighttime hours of operation. The total number of buses being re-fuelled on a daily basis is not relevant as the maximum amount of noise generated by the CNG fueling dispenser would occur at the time when 20 buses are being simultaneously re-fuelled, which was analyzed in the noise analysis.

COMMENT 21

The noise analysis has been revised to reflect the Noise Element of the General Plan and Aliso Viejo Municipal Code (AVMC) in accordance with this comment.

COMMENT 22

The noise analysis in the IS/MND states, "…the proposed project would have a significant impact on noise levels, during construction if: Construction activities would occur outside the hours of 7:00 a.m. to 8:00 p.m. on weekdays, including Saturday, or at any time on Sunday or a Federal holiday." This statement is correct as written.

COMMENT 23

The construction noise analysis on pages B-26 and B-29 states that the project construction activities would comply with the hour limits (during daytime hours only) as allowed by *Section 4-6-7 of the AVMC*. The District will ensure the construction contractor is aware of the construction hour limits as allowed by the AVMC.

COMMENT 24

The District operates 92 of its fleet of 138 buses at the Aliso Viejo Transportation Center and no increase in the number of buses is being proposed at this location. Accordingly, the proposed CNG fueling dispenser project will not increase bus trips to and around the Aliso Viejo Transportation Center.

COMMENT 25

The noise analysis contained in the IS/MND concludes that project implementation would comply with the City's noise regulations with implementation of the prescribed mitigation measures. The noise analysis evaluated noise impacts at the property line of the closest noise sensitive receptor (future senior residential use) as a worse-case scenario for noise impacts. No adverse noise impacts beyond those analyzed in the IS/MND are anticipated to occur with project implementation.

Analyses of potential noise impacts on the future Liberty Senior Apartments Project from proposed nighttime operation of the CNG fueling station was performed and summarized on pages B-29 and B-30 in the On-Site Operational Noise section of the IS/MND. As further described on page B-30, existing baseline noise levels were determined by performing monitoring on September 21st, 2009, at a CNG fueling dispenser that is similar to the fueling dispenser proposed at a reference distance of 5 feet from three compressors. This information represents the best available data and is reflective of the proposed project features as compared to other noise analysis that may be contained in prior studies (i.e., Draft EIR for the Liberty Senior Apartments project and Draft EIS for the USPS facility). As concluded in the noise analysis prepared for the project, with implementation of the prescribed mitigation measure (refer to Mitigation Measure NOISE-1), impacts during nighttime hours would be less than significant.

COMMENT 26

As discussed in Mitigation Measure NOISE-1 on page B-30 of the IS/MND, the District shall retain the services of a qualified acoustical engineer with expertise in design of sound isolations to ensure the U-shaped enclosure is designed (i.e., installation of roof) so as to meet the County's exterior noise limits at the property line of the vacant lot to the west of the site. In addition, the Mitigation Monitoring and Reporting Program includes the City of Aliso Viejo Building and Safety Officials as an identified approval party to ensure the Mitigation Measure NOISE-1 is implemented.

As discussed in the City's Noise Element on page N-2, "The California Commission of Housing and Community Development officially adopted noise insulation standards in 1974. In 1988, the Building Standards Commission approved revisions to the standards (Title 24, Part 2, California Code of Regulations). As revised, Title 24 establishes an interior noise standard of 45 dB(A) for residential space (CNEL or Ldn). Acoustical studies must be prepared for residential structures to be located within noise contours of 60 dB(A) or greater (CNEL or Ldn) from freeways, major streets, thoroughfares, rail lines, rapid transit lines, or industrial noise sources. The studies must demonstrate that the building is designed to reduce interior noise to 45 dB(A) or lower (CNEL or Ldn)." Therefore, this requirement is applicable to residential building design and does not apply to the proposed CNG fueling dispenser.

It is acknowledged that as the project would be required to meet the City's nighttime exterior noise limit of 55 dB(A) per Mitigation Measure NOISE-1, it can be assumed that standard construction practices at the future senior residential site would provide noise attenuation in the interior of residences to meet the City's interior noise limit 45 dB(A) or lower (CNEL or Ldn) at the future senior residences should they be developed.

COMMENT 27

Section VII, Hazards and Hazardous Materials, in the IS/MND discusses the project's potential for emergencies. As discussed in Response Nos. VII.a-b in the IS/MND, based on the project's anticipated safety measures, the low-risk nature of CNG and compliance with applicable regulatory review, there would be minimal risk of accident associated with operation of the proposed CNG refueling system. Thus, the proposed CNG fueling dispenser would result in less than significant hazardous materials impacts. Please also refer to Response to Comments Nos. 14 to 17, above. Further, there would be no need by the Fire Department to add or expand existing fire facilities and such, there would be no impacts regarding the construction of such facilities.

COMMENT 28

Page A-9 of the Project Description states, "The CNG fueling dispenser would be able to fill a maximum of 20 buses simultaneously." Currently, only 20 CNG buses are operated out of the Transportation Center. Page A-2 of the Project Description states, "The CNG fueling dispenser would serve as a fueling site for additional CNG buses as the remaining diesel buses are retired." So, it is correct that the CNG fueling station could re-fuel more than 20 buses per day, if existing diesel-fueled buses are retired and replaced with CNG buses. However, no change to the overall number of buses or capacity currently at the Transportation Center is being contemplated by the District. Thus, as stated on pages B-34 and B-35 of the IS/MND, no long-term

traffic impacts would occur with project implementation as there would be no increase in the number of buses arriving or departing from the Transportation Center, and no increase in personnel to service, maintain, or monitor the CNG equipment or attend to the pumps during fueling. Further, eliminating the need for the District's CNG buses (approximately 15 buses daily) to travel 24 miles round trip to Irvine to re-fuel would decrease total vehicle mileage by over 73,000 miles, annually. Therefore, there would be a beneficial traffic impact with project implementation.

Also, the District has no plans to allow the proposed CNG fueling dispenser to be used by the public or other public agencies.

COMMENT 29

The District currently has no plans for buses stationed at the Capistrano Beach (Doheny) bus yard to utilize the proposed CNG fueling dispenser at the Aliso Viejo Transportation Center. No long-term traffic impacts would occur with project implementation as there would be no increase in the number of buses arriving or departing from the Transportation Center. The senior housing to the west of the Transportation Center project will be evaluated for traffic impacts through its own environmental clearance in accordance with CEQA requirements.

COMMENT 30

The proposed project does not include features that would result in alterations to the existing access of the project site. Emergency access to the site would occur in the same manner as under existing conditions.

COMMENT 31

The District currently has no plans for buses stationed at the Capistrano Beach (Doheny) bus yard to utilize the proposed CNG fueling dispenser at the Aliso Viejo Transportation Center.

There are 20 existing bus parking spaces that would be utilized when fueling the CNG buses. Thus, no new parking spaces or changes to existing bus parking spaces on-site would occur as a result of the project.

COMMENT 32

As stated on page A-9 of the Project Description in the IS/MND, the CNG fueling dispenser would be a "slow-fill" dispenser, in which natural gas is drawn from the domestic gas main in Liberty and compressed directly into the bus fuel tanks. The CNG fueling dispenser would be located at the terminus point of the existing natural gas line within the Transportation Center. No CNG storage tanks are necessary to operate the CNG fueling dispenser. The location of the fueling dispenser was determined by the District based on consultation with Sempra Utilities, which concluded that relocating the line to an alternative site location (i.e., on the eastern side of the bus servicing building) would not provide the necessary gas pressure to feasibly operate the fueling dispenser. In summary, Sempra Utilities has confirmed that the proposed location of the CNG fueling dispenser is appropriate to be served by the existing gas line within the Transportation Center.

COMMENT 33

The IS/MND has been revised to include all four Mandatory Findings per Section 15065(a)(1) of the CEQA Guidelines. The addition of this finding regarding the project's potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals highlights the long-term environmental benefits of the project. Specifically, the proposed CNG fueling dispenser would contribute to the District's effort to reduce air pollution and specifically, toxic air contaminates emitted from diesel-fueled buses by providing a net environmental air quality benefit to the region by reducing daily vehicle miles traveled (VMT) by existing and future CNG buses at the Transportation Center, as well as promoting the use of more sustainable fuels. Thus, the addition of this finding does not materially change any of the conclusions reached in the IS/MND.

COMMENT 34

The IS/MND analyzes impacts associated with the proposed project as described in Attachment A, Project Description. Please refer to the Response to Comment No. 6, above, for a discussion of the ultimate use of the Aliso Viejo Transportation Center. The analysis of environmental impacts does include impacts to surrounding uses, including sensitive receptors (i.e., future senior housing, educational, and religious uses), as necessary. Further, the IS/MND does acknowledge that the vacant site to the west of the existing Transportation Center could be developed with senior housing. Page A-1 of the Project Description states, "A development plan for 164 senior housing units has been submitted to the City of Aliso Viejo for the undeveloped land to the west." Where appropriate, this proposed use is considered in the evaluation of environmental impacts associated with the project. For example, this site is considered to be the nearest sensitive receptor in the evaluation of noise and air quality impacts, as discussed in Response to Comment No. 19, above. Also, refer to Response to Comment No. 9 for a discussion of aesthetics impacts at the future senior residential site.

Cumulative impacts are discussed in Response XVII.b of the IS/MND. Regarding cumulative impacts, for key issues such as traffic and air quality, no cumulative impacts were identified as no adverse impacts were identified. For traffic there would be no increase in bus trips to the Transportation Center and therefore no impacts on traffic and circulation would occur at the project or cumulative level. For air quality, there would be a substantial overall benefit, as indicated on page B-7 of the IS/MND. In addition, noise impacts would be limited to the immediate surrounding uses. As the IS/MND provides site-specific mitigation that would ensure noise impacts at the nearest noise sensitive receptor are less than significant, no significant cumulative noise impacts would occur.

COMMENT 35

This comment does not address a specific environmental impact/issue analyzed in the IS/MND. Nonetheless, the IS/MND analyzes impacts associated with the proposed project as described in Attachment A, Project Description. As described therein, the proposed project would not change the overall number of buses operating out of the Aliso Viejo Transportation Center or the capacity of buses at the transportation center. Further, the District does not currently have plans to close the Capistrano Beach transportation center. Although it has been stated repeatedly by the commentor that aspects of the project or related

projects have not been disclosed, the project proposed is as described in Attachment A, Project Description, of the IS/MND.

COMMENT 36

First, this comment infers that the IS/MND does not address impacts associated with the ultimate end use of the facility (serving a converted fleet of buses). However, the Project Description (Attachment A of the IS/MND) is clear that the proposed CNG fueling dispenser would be able to re-fuel 20 CNG buses simultaneously and that the CNG fueling dispenser would serve as a fueling site for additional CNG buses as the remaining diesel buses are retired. The environmental analysis contained in Attachment B, Explanation of Checklist Determinations, is reflective of the Project Description.

Second, the District does not have a foreseeable plan to close the Capistrano Beach transportation center. Thus, there has been no inappropriate segmenting of the project under CEQA and no cumulative impacts associated with the Capistrano Beach transportation center have been identified. Also, it is correct that the number of CNG buses will be increased at the Aliso Viejo transportation center, but this would only occur as diesel-fueled buses are retired. Thus, no changes to the overall number of buses and capacity at the Transportation Center are being contemplated by the District.

PCR Irvine
One Venture
Suite 150
Irvine, California 92618
TEL 949.753.7001
FAX 949.753.7002
PCRinfo@pcrnet.com

PCR Santa Monica
233 Wilshire Boulevard
Suite 130
Santa Monica, California 90401
TEL 310.451.4488
FAX 310.451.5279
PCRinfo@pcrnet.com

PCR Pasadena
55 South Lake Avenue
Suite 215
Pasadena, California 91101
TEL 626.204.6170
FAX 626.204.6171
PCRinfo@pcrnet.com