



ATTACHMENT A
BACKGROUND, PROJECT DESCRIPTION AND JUSTIFICATION FOR CEQA EXEMPTION

1.0 PROJECT LOCATION AND EXISTING CONDITIONS

1.1 Project Location

The approximately 2.28-acre project site is located in the City of West Covina in the San Gabriel Valley in eastern Los Angeles County. The project site is at 205 North Citrus Street, about 500 feet north of the Interstate 10 (I-10) freeway. Regional access to the site is from the I-10 freeway via Citrus Street. Site access is via one driveway from Garvey Avenue at the southeast corner of the site; one driveway from Citrus Street at the northeast corner of the site; and via one driveway from the northwest corner of the site extending north to Workman Avenue. Refer to **Figures 1** through **3**, which depict the project site in a regional and local scale. **Figure 4** depicts photos of the project site.

1.2 Existing Conditions Onsite

The project site is developed with one building consisting of two stories and a rooftop parking level comprising 74,913 square feet of building area on the first and second stories; and 23,649 square feet of parking on the rooftop parking level. The building houses showroom, service, and parts uses. Most of the rest of the site is developed with surface parking. Minor amounts of landscaping are present along the site periphery and in several small parking lot planters.

1.3 Surrounding Uses

The project site is surrounded by a shopping center (with a grocery anchor store) under construction to the south; single-family residential uses to the west in the City of Covina; commercial uses to the north; and commercial uses to the east opposite Citrus Street.

1.4 General Plan Land Use and Zoning

The project site has a General Plan land use designation of Commercial (C) and zoning designation of Service Commercial (S-C).



Table 1
EXISTING LAND USES ON THE PROJECT SITE AND SURROUNDING AREA

Location	General Plan Land Use	Zoning Designation	Existing Use
Project Site	Commercial (C)	Service Commercial (S-C)	Auto dealership
North	Commercial (C)	Service Commercial (S-C) and Medium Commercial (C-2)	Commercial buildings
South	Commercial (C)	Medium Commercial (C-2)	Construction site
East	Commercial (C)	Regional Commercial (R-C)	Commercial uses opposite Citrus Street
West	City of Covina	City of Covina	Single-family residential uses

Sources: City of West Covina, 2023

Figure 1
REGIONAL LOCATION MAP



Scale: 1:663,600



0 5 10 Miles

0 5.5 11 Kilometers

Legend

● Project Location

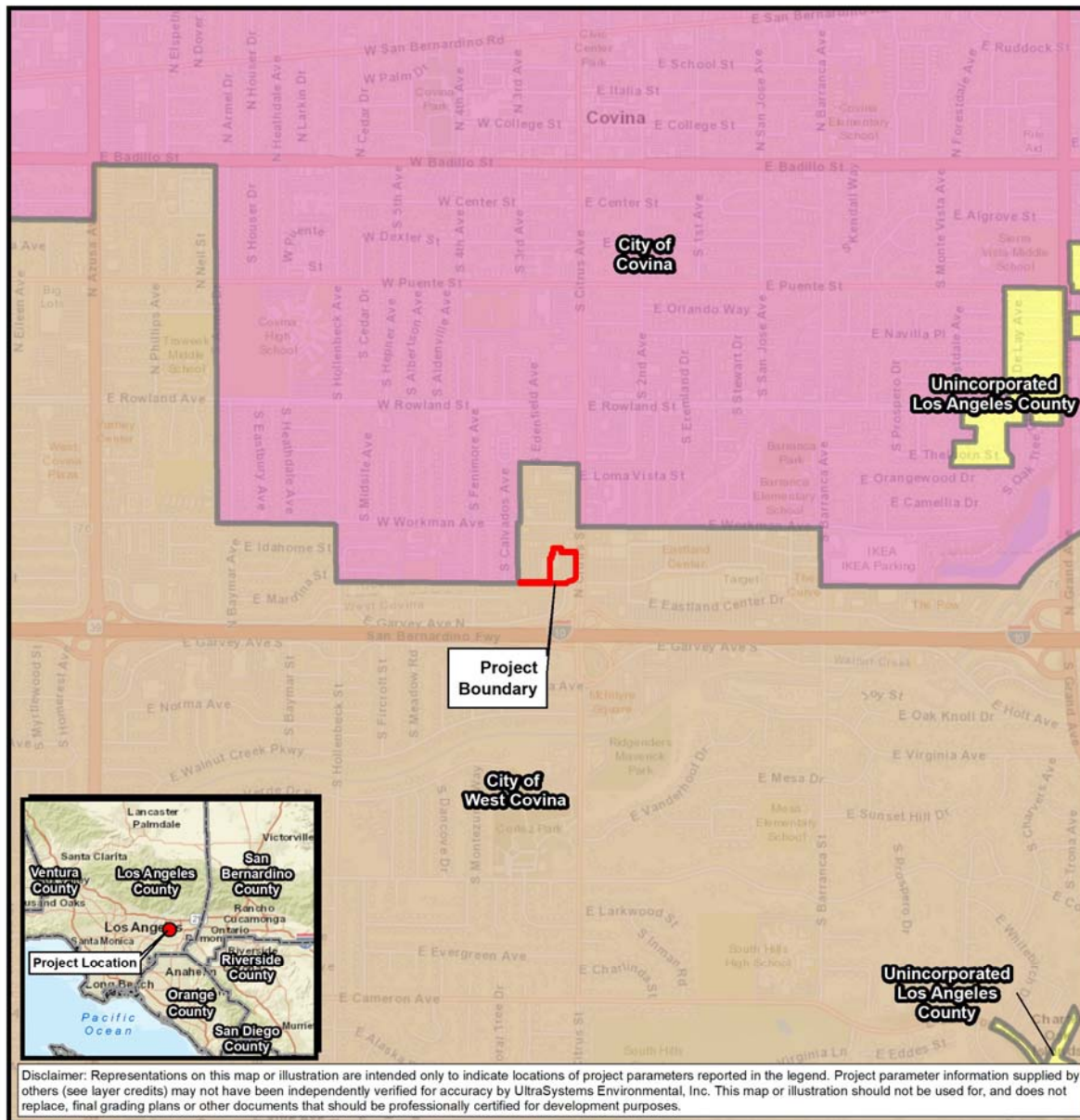
**Envision West Covina
Toyota**

Regional Location





Figure 2
PROJECT VICINITY MAP



Path: \\gis\vr\GIS\Projects\7236_EnvisionMotors_Toyota_CE_NOE\MXDs\7236_Toyota_3_0_Project_Vicinity_2023_08_31.mxd
Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community; County of Los Angeles; 2023; UltraSystems Environmental, Inc., 2023

August 31, 2023

Scale: 1:18,000



0 750 1,500 Feet

0 200 400 Meters

Legend

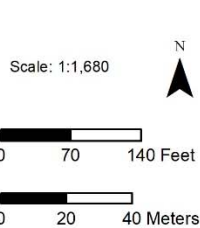
 Project Boundary

**Envision West Covina
Toyota**

Project Vicinity



Figure 3
PROJECT LOCATION MAP



Legend

 Project Boundary

**Envision West Covina
Toyota**

Project Location



Figure 4
PROJECT SITE PHOTOGRAPHS



PHOTO 1: View looking northwest across the project site from near the southeast corner of the site (location 11)



PHOTO 2: View looking southwest across the project site from near the northeast corner of the site (location 6).



PHOTO 3: View looking east across the north end of the project site from the north site boundary (location 1)



PHOTO 4: View looking northeast across the project site from near the southwest site boundary (location 4)



2.0 DESCRIPTION

The project site includes the existing three-level, 98,562-square-foot building and surface parking in the east part of the subject parcel. The surface parking within the site contains 98 parking spaces.

Table 1
EXISTING AND PROPOSED BUILDING AREA

Floor	Use	Square Feet
Existing Building		
First	Showroom	12,421
	Parts	2,697
	Service	25,500
	Subtotal	40,618
Second	Showroom	5,836
	Parts	2,449
	Parking	26,010
	Subtotal	34,295
Rooftop	Parking	23,649
Total		98,562
Proposed		
First	Showroom	11,447
	Parts	735
	Subtotal	12,182
Second	Office	207
	Parts	741
	Subtotal	948
Total		13,130
Buildout		
First Floor	Showroom, parts, service	52,800
Second Floor	Showroom, office, parts, parking	35,243
Rooftop Parking	parking	23,649
Total		111,692

¹Source: Dennis Flynn Architects, 2023

Retail Building

The project proposes an addition of 13,130 square feet to the existing building onsite; uses and square footages per floor are shown in **Table 1** above. The project site plan is shown on **Figure 5** below. Floor plans for the proposed addition on the first, second, and roof levels are shown below on **Figures 6, 7, and 8**, respectively.

2.1 Landscaping

Existing landscaping onsite spans about 0.5 acre, nearly all of which is along the site perimeter or in the parking lot in the east part of the project site. Existing landscape vegetation includes trees, shrubs, and ground covers. The project does not propose additional landscaping.



2.2 Parking

Existing parking onsite consists of 579 parking spaces including 154 vehicle inventory spaces in and on the building; 40 service stalls; and 385 surface parking spaces for customers, employees, and display parking. Project development would involve removal of approximately 26 surface parking spaces in the footprint of the building addition. Thus, parking onsite at project completion would consist of approximately 553 spaces including 154 vehicle inventory spaces in and on the building; 40 service stalls; and 359 surface parking spaces for customers, employees, and display parking. Sufficient parking would remain onsite at project completion that the project would provide adequate parking for the proposed building addition pursuant to City of West Covina Municipal Code requirements.

2.3 Demolition and Site Clearance

Trim, fixtures, and some walls and doors, will be removed from the building in preparation for remodeling on all three levels (first, second, and roof) in the east part of the building. The area to be remodeled totals 18,204 square feet on all three levels. Demolition plans for the first, second, and roof levels are shown on **figures 9, 10, and 11**, respectively.

All construction waste will be recycled or salvaged for reuse with a minimum of 65 percent of waste planned for waste diversion. Additionally, excavated soil and debris will be recycled. And, all non-hazardous materials will be recycled.

2.4 Construction

Construction phasing, and conceptual construction schedule by phase, is summarized below in **Table 2**.

Table 2
CONSTRUCTION PHASING AND CONCEPTUAL CONSTRUCTION SCHEDULE

	Start (month)	Finish (month)	Duration (months)	Equipment type	Equipment #	Employees
Demolition and site clearance	October 2023	November 2023	1.5	Bobcat & floor scrapers		6-8
Grading	March 2024	April 2024	1	Skip loader, compactor, water truck		4-6
Utility trenching and installation	March 2024	April 2024	1	Skip loader, excavator, compactor (sheep's foot)		3-4
Building construction	October 2023	May 2024	8	Forklift, Pettibone		±20/day
Paving	March 2024	April 2024	1	Skip Loader, Paving Machine, Rolling Compactor		4-6

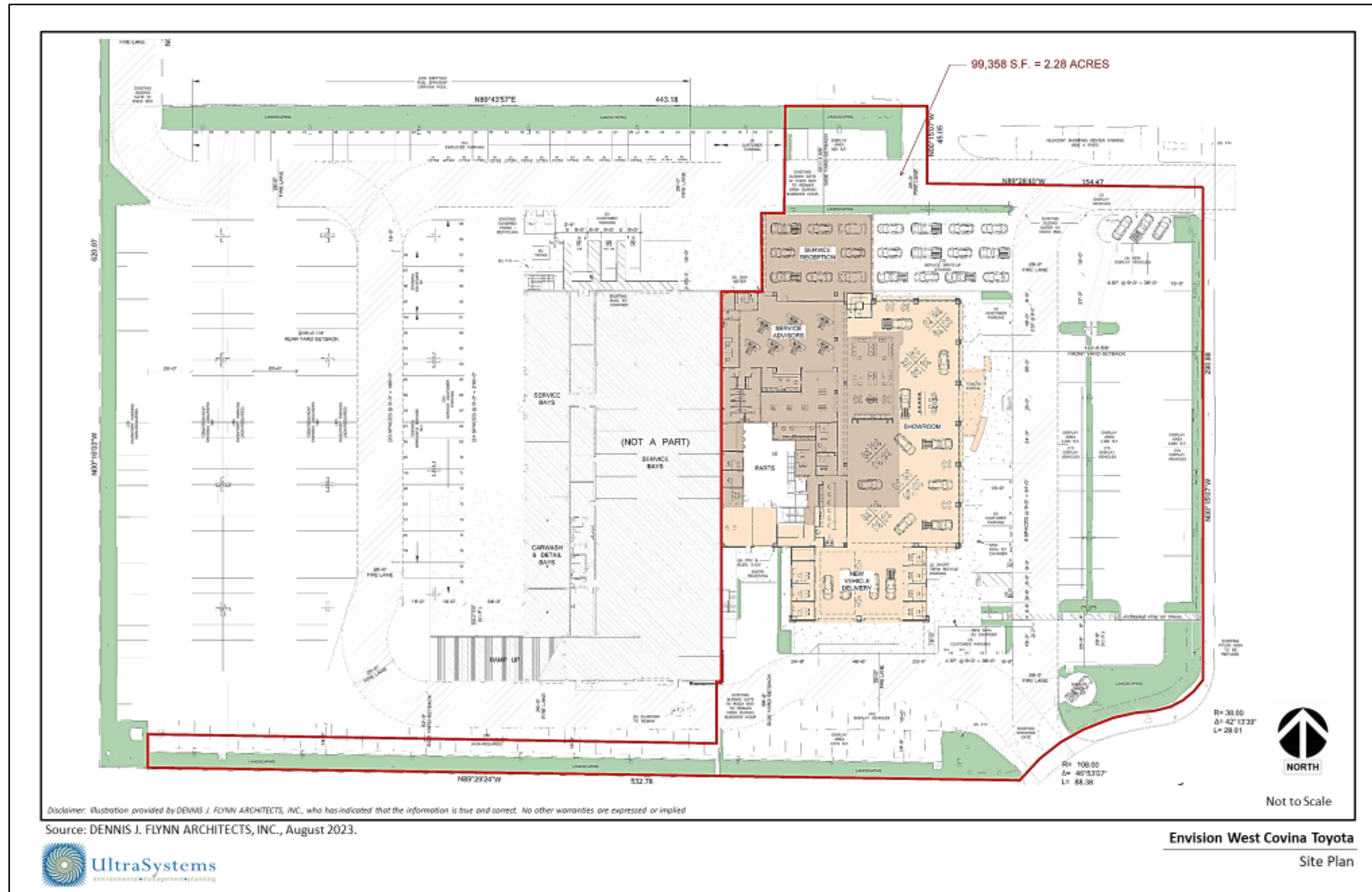


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	Start (month)	Finish (month)	Duration (months)	Equipment type	Equipment #	Employees
Landscaping	April 2024	May 2024	1	Bobcat and trench machine		3-4

¹Source: Walker 2023

Figure 5
SITE PLAN





FIRST FLOOR PLAN - CORNER SIGN ELEMENT
SCALE: 1/8" = 1'-0"

OVERALL FIRST FLOOR PLAN
SCALE: 1/16" = 1'-0"

NOT A PART

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SECOND FLOOR PLAN - CORNER SIGN ELEMENT SCALE: 1/8" = 1'-0"

OVERALL SECOND FLOOR PLAN SCALE: 1/16" = 1'-0"

North arrow pointing right.

Not to Scale

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Envision West Covina Toyota
Floor Plan: 2nd Floor

Figure 8
FLOOR PLAN, ROOF LEVEL

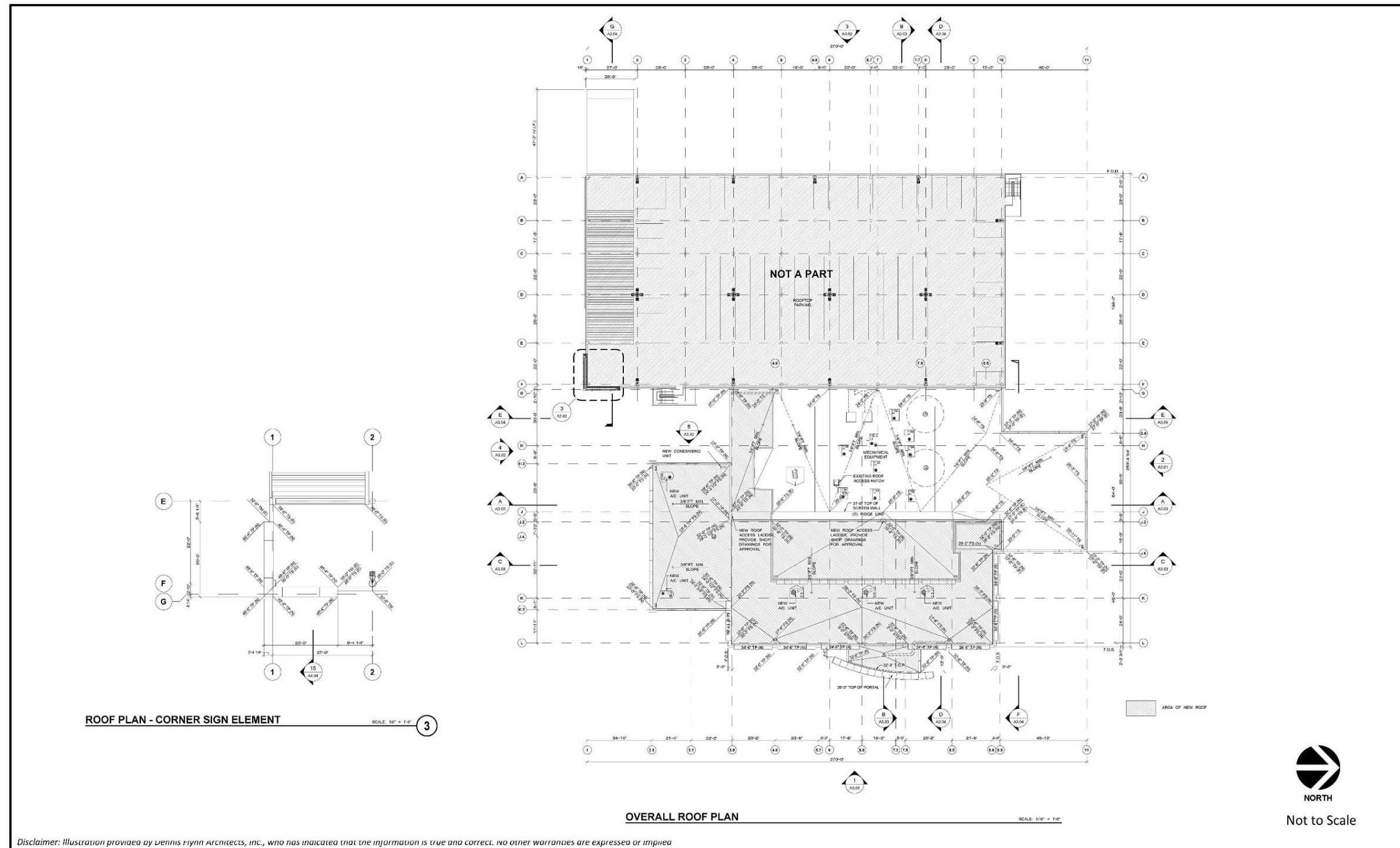


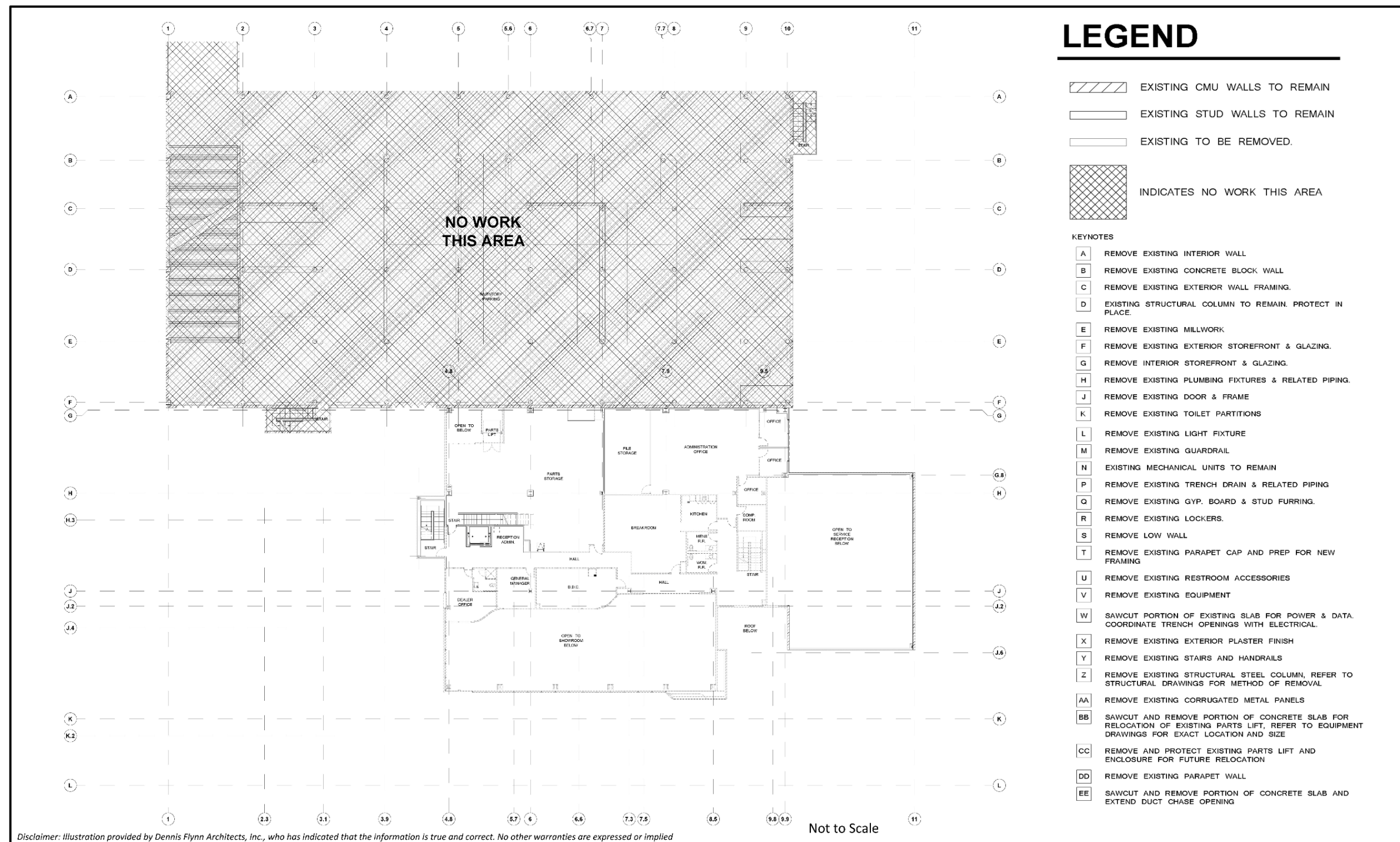


Figure 9
DEMOLITION PLAN, FIRST FLOOR





Figure 10
DEMOLITION PLAN, SECOND FLOOR



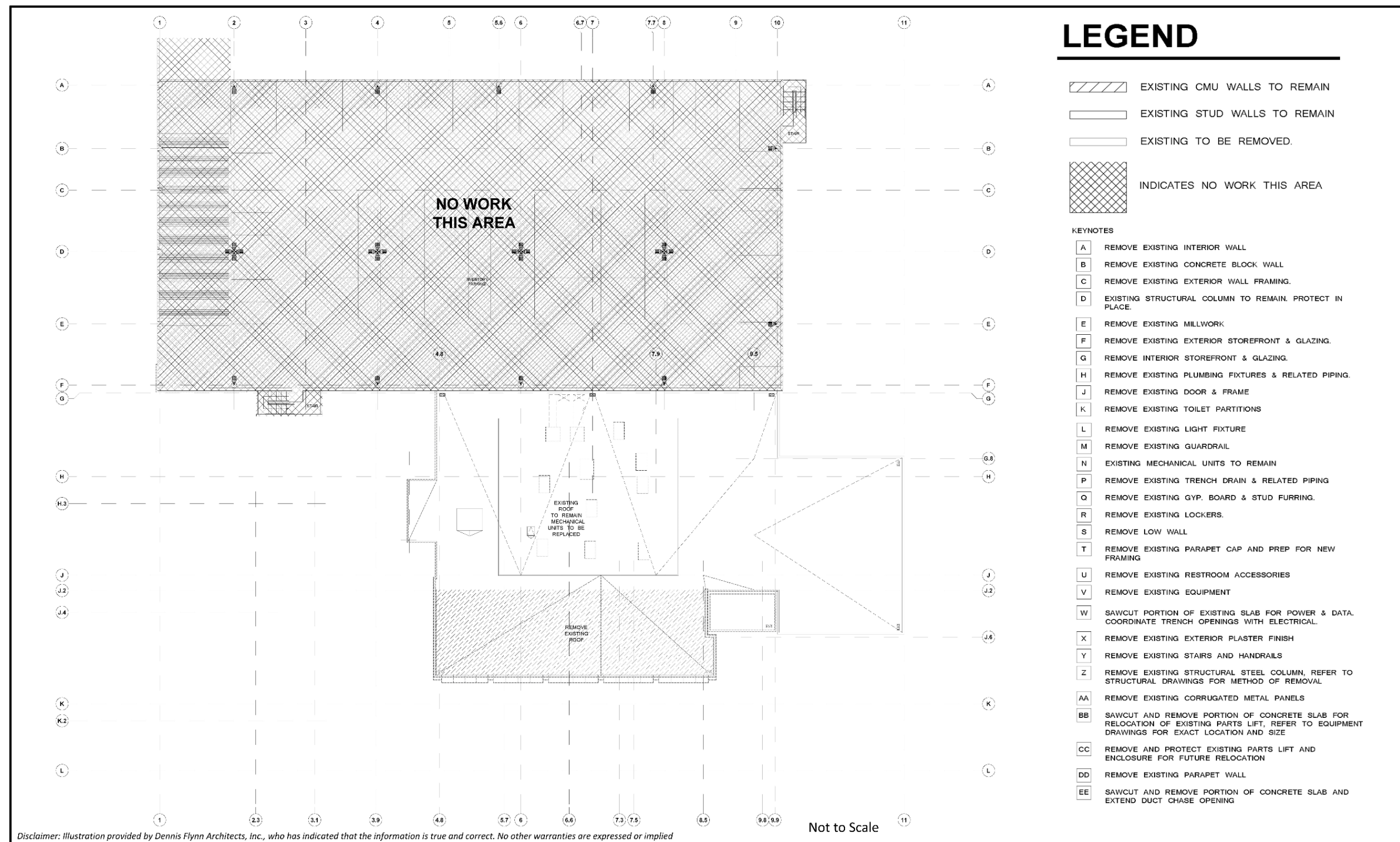
Source: Dennis Flynn Architects, Inc., 2023.



Envision West Covina Toyota
Demolition Plan: 2nd Floor



Figure 11
DEMOLITION PLAN, ROOF LEVEL



Source: Dennis Flynn Architects, Inc., 2023.



Envision West Covina Toyota
Demolition Plan: Roof



3.0 REASONS WHY THE PROJECT IS EXEMPT

3.1 Conditions Set Forth in CEQA Guidelines Section 15332

CEQA Guidelines Section 15332 sets forth five conditions projects must meet to qualify for a Class 32 (In-Fill Development Projects) categorical exemption:

- (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.
- (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.
- (c) The project site has no value, as habitat for endangered, rare or threatened species.
- (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.
- (e) The site can be adequately served by all required utilities and public services.

The following analysis addresses eligibility of the project for each of the five conditions.

(a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

The project site has a General Plan land use designation of Commercial (C) and a zoning designation of Service Commercial (SC) (City of West Covina, 2023). Auto dealerships are permitted by right in the SC zoning district (City of West Covina Municipal Code, Section 26-597, 2023). The project is consistent with the applicable General Plan designation and policies, and with applicable zoning designation and regulations. The proposed project would be reuse and a relatively minor expansion of a vacant auto dealership property. Therefore, the project meets this condition.

(b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.

The project site is 2.28 acres; and is surrounded by commercial uses to the east opposite Citrus Street to the east, and to the north; a construction site to the south; and single-family residences to the west. Therefore, the project meets this condition.

(c) The project site has no value, as habitat for endangered, rare or threatened species.

The entire project site is developed with a building and surface parking as part of an automotive dealership; and is in a built-out, urbanized setting. No habitat for endangered, rare, or threatened species is present onsite. The only vegetation onsite is in parking lot planters containing ornamental vegetation that is frequently disturbed by landscape maintenance activities including trimming and tree trimming. Approximately 13 mature palm trees are growing in planters in the footprint of the proposed building addition near the east side of the existing building. Project site clearance would involve removal of the 13 palm trees. The trees provide suitable nesting habitat for special-status bird species protected under the California Endangered Species Act (CESA). Therefore, a pre-construction nesting bird survey would be conducted as a project design feature **(PDF)-1** to ensure



that the project would not impact any unforeseen bird species. Therefore, the project meets this condition.

PDF-1 If project activities that will remove or disturb potential nest sites cannot be avoided during February 15 through August 31, a qualified biologist shall conduct a pre-construction survey for nesting birds within the limits of project disturbance within three days of the initiation of ground-disturbing activities such as excavation, grading, staging, demolition, or vegetation or substrate removal. This survey is necessary to comply with MBTA and/or the FGC (§§ 3503 and 3503.5). Project activities that will remove or disturb potential nest sites should be scheduled outside the nesting bird season, if feasible. If special-status species or nesting birds protected by the MBTA and FGC are detected during pre-construction surveys, avoidance buffers shall be established at a distance set by a qualified biologist, generally up to 300 feet for non-raptor species and up to 500 feet for raptor species, and biological monitoring shall be conducted during construction activities to avoid impacts to these resources until the nesting cycle is completed and the young are no longer dependent upon the nest and have left the area.

(d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

Traffic

The information in this Section is based on the vehicle miles traveled (VMT) screening memorandum (VMT memo) prepared by RK Engineering (RK Engineering, 2023) (refer to **Appendix B**).

CEQA Guidelines Appendix G sets forth the following questions respecting transportation impacts:

- a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
- b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?
- c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- d) Result in inadequate emergency access?

Impact Analysis

- a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

and
- b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

CEQA Guidelines section 15064.3(b) pertains to the use of Vehicle Miles Traveled (VMT) as a method of determining the significance of transportation impacts.



A vehicle miles traveled (VMT) screening memorandum (VMT memo) was prepared by RK Engineering to determine if the project would have significant traffic impacts (RK Engineering, 2023) (refer to **Appendix B**).

Project Trip Generation

The proposed 13,130-square-foot addition to the existing building is estimated to generate 366 vehicle trips per day, as shown below in **Table 3**.

Table 3
PROJECT TRIP GENERATION

Land Use	Units	Daily		AM Peak Hour		PM Peak Hour	
		Rate	Trips	Rate	Trips	Rate	Trips
Automobile sales (new): ITE Code 840	13.13 TSF	27.84	366	1.86	25	2.42	32

TSF = thousand square feet
Source: RK Engineering 2023

Vehicle Miles Traveled

The City of West Covina Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment (City TIA Guidelines), dated September 2020, provides recommendations in the form of thresholds of significance and methodology for identifying VMT-related impacts.

Per the City's guidelines, local-serving projects less than 50,000 square feet in size may be presumed to have a less than significant transportation impact absent substantial evidence to the contrary. Projects which serve the local community and have the potential to reduce VMT are not required to complete a detailed project-level VMT assessment. By adding retail uses into local communities, local-serving retail development tends to shorten trips and thus reduce VMT. Thus, lead agencies generally may presume such development creates a less than significant impact.

The project site was formerly occupied by an identical land use to what is being proposed (i.e., new car dealership). The project involves renovating the existing Nissan car dealership and expanding the showroom and parts service center by 13,130 square feet. Therefore, it is appropriate to focus this VMT analysis to only the net new square footage being proposed (i.e., 13,130 SF), which is less than 50,000 square-foot threshold for local-serving projects as identified in the City's guidelines. Furthermore, within an approximately 10-mile radius of the project site, six other existing Toyota car dealerships serve their local areas. Thus, it is concluded that the additional square footage to the showroom/parts service center will primarily serve the local community and will not be a significant regional attraction.

Therefore, the proposed project is presumed to have a less than significant VMT impact and screens out from requiring a detailed project-level VMT assessment. Thus, no further VMT analysis is required.

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



Vehicle Deliveries and Truck Turning Movements

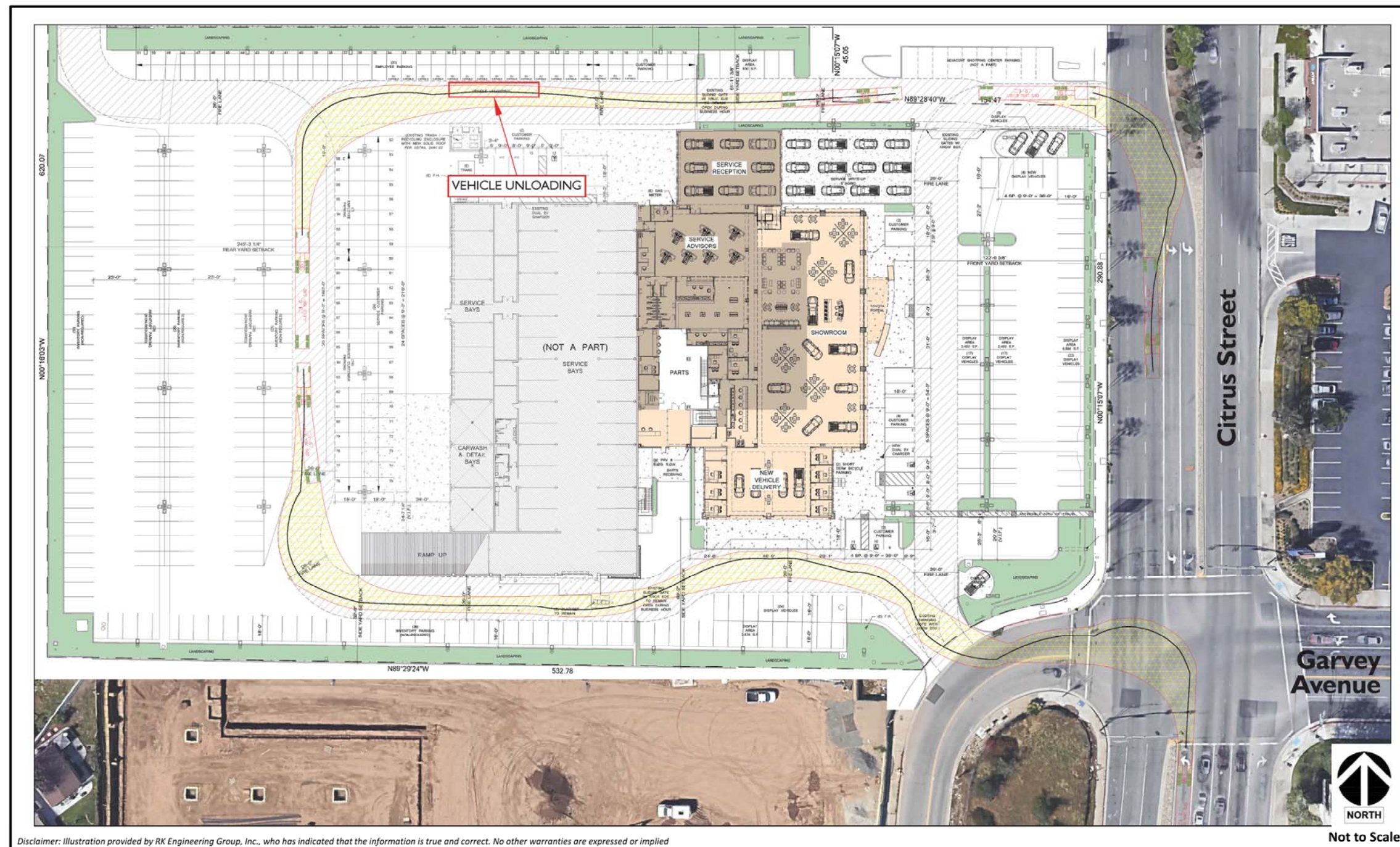
As shown on the proposed site plan, the vehicle unloading zone for vehicle deliveries is along the drive aisle north of the service bays. To help facilitate truck access to/from the unloading zone, it is recommended that trucks enter the site by making a right-turn into the E. Garvey Avenue N. driveway (from N. Citrus Street), make a left-turn once in the site and navigate through the site in a clockwise fashion to the unloading zone, and exit the site by making an eastbound right-turn out of the N. Citrus Street driveway.

These circulation recommendations are consistent with the City of West Covina truck routes. Per the truck route map, N. Citrus Street between E. Workman Avenue (i.e., City of West Covina limit) and E. Garvey Avenue S. is an identified truck route. The segment of E. Garvey Avenue S. between N. Citrus Street and the I-10 Freeway eastbound ramps is also an identified truck route. Thus, trucks traveling to the site will exit the I-10 Freeway at N. Citrus Street and proceed north toward the project site, make a northbound left-turn at E. Garvey Avenue N., and enter the site via the E. Garvey Avenue N. project driveway. Trucks leaving the site will make an eastbound right-turn out of the N. Citrus Street driveway and proceed south toward the I-10 Freeway ramps.

A turning template has been prepared, shown on **Figure 12**, to review the ingress/egress turning movements into and out of the site, as well as the turning movements while navigating the site, for a 5-axle vehicle delivery truck.

As shown on **Figure 12**, the E. Garvey Avenue N. and N. Citrus Street driveways provide adequate access into and out of the project site, respectively, for a 5-axle vehicle delivery truck. It should further be noted that this is an existing site that currently accommodates car delivery (5-axle) trucks and the proposed internal circulation will generally remain unchanged after the renovation/expansion of the showroom. Therefore, the project would have a less than significant impact in regards to traffic and the project would meet this condition.

Figure 12
TRUCK CIRCULATION ROUTE





Air Quality

The project site is located in the city of West Covina in the San Gabriel Valley in eastern Los Angeles County. It is at 205 North Citrus Street, about 500 feet north of the Interstate 10 (I-10) freeway in what the South Coast Air Quality Management District (SCAQMD) has defined as the South San Gabriel Valley Source Receptor Area (SRA 11). That part of Los Angeles County is in the South Coast Air Basin (SCAB), which comprises all of Orange County as well as portions of Los Angeles, Riverside and San Bernardino counties. **Table 4** shows the SCAB's attainment status for ambient air quality standards set by the U.S. Environmental Protection Agency (USEPA) and the State of California. The SCAB is nonattainment for ozone and fine particulate matter (PM_{2.5}).

Some people, such as individuals with respiratory illnesses or impaired lung function because of other illnesses, persons over 65 years of age, and children under 14, are particularly sensitive to certain pollutants. Facilities and structures where these sensitive people live or spend considerable amounts of time are known as sensitive receptors. For the purposes of a CEQA analysis, the SCAQMD considers a sensitive receptor to be a receptor such as a residence, hospital, or convalescent facility where it is possible that an individual could remain for 24 hours.¹ The nearest sensitive receptors are single-family houses, adjacent to the west side of the project site.²

Air pollutants for which ambient air quality standards have been set are called "criteria pollutants." Some criteria pollutants, such as carbon monoxide, are emitted directly to the atmosphere. Others, such as ozone (O₃), form in the atmosphere, while yet others react in the atmosphere to form ones for which standards have been set. The emitted pollutants of interest for CEQA analyses in Southern California include reactive organic gases (ROG), nitrogen oxides (NO_x), carbon monoxide (CO), respirable particulate matter (PM₁₀) and fine particulate matter (PM_{2.5}).³

Table 4
FEDERAL AND STATE ATTAINMENT STATUS

Pollutants	Federal Classification ⁴	State Classification ⁵
Ozone (O ₃)	Nonattainment (Extreme)	Nonattainment
Particulate Matter (PM ₁₀)	Maintenance (Serious)	Nonattainment
Fine Particulate Matter (PM _{2.5})	Nonattainment (Serious)	Nonattainment
Carbon Monoxide (CO)	Maintenance (Serious)	Attainment
Nitrogen Dioxide (NO ₂)	Maintenance (Primary)	Attainment
Sulfur Dioxide (SO ₂)	Unclassified	Attainment

¹ Chico and Koizumi, 2008. Final Localized Significance Threshold Methodology. Accessed online at <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf>, on September 4, 2023.

² Google Earth Pro, 2023.

³ Sulfur dioxide is a criteria pollutant but it or its precursors are rarely emitted in projects of the type analyzed here.

⁴ CARB, 2023. Maps of State and Federal Area Designations. Accessed online at <https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations>, on September 4, 2023.

⁵ USEPA, 2023. Nonattainment Areas for Criteria Pollutants (Green Book). Accessed online at <https://www.epa.gov/green-book>, on September 4, 2023.



Pollutants	Federal Classification ⁴	State Classification ⁵
Sulfates	Unclassified	Attainment
Lead (Pb)	Nonattainment	Attainment
Hydrogen Sulfide (H ₂ S)		Unclassified
Visibility Reducing Particles		

Appendix G to the CEQA Guidelines contains the following thresholds for significance under CEQA:

Would the project:

- Conflict with or obstruct implementation of the applicable air quality plan?
- 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?
- Expose sensitive receptors to substantial pollutant concentrations?
- Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?

The proposed project was evaluated against these thresholds.

Regional Emissions Thresholds

The SCAQMD has developed criteria in the form of emissions thresholds for determining whether emissions from a project are regionally significant. They are useful for estimating whether a project is likely to result in a violation of the NAAQS and/or whether the project is in conformity with plans to achieve attainment. SCAQMD's significance thresholds for criteria pollutant emissions during construction activities and project operation are summarized in **Table 5**. A project is considered to have a regional air quality impact if emissions from its construction and/or operational activities exceed any of the corresponding SCAQMD significance thresholds.



Table 5
SCAQMD EMISSIONS THRESHOLDS FOR SIGNIFICANT REGIONAL IMPACTS

Pollutant	Mass Daily Thresholds (Pounds/Day) ⁶	
	Construction	Operation
Nitrogen Oxides (NO _x)	100	55
Volatile Organic Compounds (VOC)	75	55
Respirable Particulate Matter (PM ₁₀)	150	150
Fine Particulate Matter (PM _{2.5})	55	55
Sulfur Oxides (SO _x)	150	150
Carbon Monoxide (CO)	550	550
Lead	3	3

Localized Significance Thresholds

The SCAQMD has developed emission thresholds for evaluating local effects of short-term criteria pollutant emissions. These are presented in **Section 2.3.2** of this memorandum.

Emission Calculations

Methods and Assumptions

Information on project construction and operations was obtained via emails from the client. The client estimated that the construction would run from October 2023 through May 2024. There would be seven partially overlapping construction phases:

- Demolition.
- Site Preparation.
- Grading.
- Utility Trenching and Installation.
- Building construction.
- Paving.
- Architectural Coating.

Criteria pollutant emissions from the project's onsite and offsite project activities were estimated using the California Emissions Estimator Model (CalEEMod), Version 2022.1.1.18. CalEEMod is a planning tool for estimating emissions related to land use projects.⁷ Model-predicted project emissions are compared with applicable thresholds to assess regional air quality impacts. As some construction plans have not been finalized, CalEEMod defaults were used for construction trips and vehicle miles traveled. **Table 6** lists the construction equipment assumptions for this analysis.

⁶ SCAQMD, 2019. South Coast AQMD Air Quality Significance Threshold. Accessed online at <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>, on September 4, 2023.

⁷ CAPCOA, 2023. User's Guide for CalEEMod Version 2022.1.1.18. Accessed online at , on September 4, 2023.



Table 6
CONSTRUCTION EQUIPMENT

Phase	Equipment Type	No.	Hours/ Day	HP	Load Factor
Demolition	Rubber Tired Loaders	1	8	150	0.36
Site Preparation	Scrapers	1	8	148	0.41
Grading	Rollers	1	6	367	0.4
	Off-Highway Trucks	1	8	376	0.38
	Tractors/Loaders/Backhoes	1	7	84	0.37
Utility Trenching and Installation	Tractors/Loaders/Backhoes	1	7	84	0.37
	Excavators	1	7	36	0.38
	Rollers	1	8	36	0.38
	Trenchers	1	8	40	0.5
	Rubber Tired Loaders	1	8	150	0.36
Building Construction	Forklifts	2	6	82	0.2
	Rough Terrain Forklifts	2	8	84	0.37
Paving	Paving Equipment	1	7	81	0.42
	Rollers	1	7	36	0.38
	Tractors/Loaders/Backhoes	1	7	84	0.37
Architectural Coating	Air Compressors	1	6	37	0.48

Estimated Emissions

Table 7 and **Table 8** show the results of the CalEEMod calculations of construction and operational emissions, respectively. The operational emissions are increments over the baseline, since the project is for expansion of the facility. For both construction years the maximum daily emissions of each pollutant would be below the pollutant's regional significance thresholds.

Table 7
MAXIMUM DAILY REGIONAL CONSTRUCTION EMISSIONS

Construction Activity	Maximum Emissions (pounds/day) ⁸				
	ROG	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum Emissions, 2023	0.71	7.16	9.68	0.94	0.39
Maximum Emissions, 2024	2.41	19.5	27.6	1.33	0.86

⁸ Calculated by UltraSystems with CalEEMod (2022.1.1.18)



Construction Activity	Maximum Emissions (pounds/day) ⁸				
	ROG	NO _x	CO	PM ₁₀	PM _{2.5}
SCAQMD Significance Thresholds	75	100	550	150	55
Significant? (Yes or No)	No	No	No	No	No

Table 8
MAXIMUM DAILY PROJECT OPERATIONAL EMISSIONS

Emission Source	Pollutant (pounds/day) ⁹				
	ROG	NO _x	CO	PM ₁₀	PM _{2.5}
Area Source Emissions	0.97	0.01	1.36	< 0.005	< 0.005
Energy Sources	0.01	0.21	0.18	0.02	0.02
Mobile Sources	1.10	0.85	9.53	1.87	0.48
Total Operational Emissions	2.08	1.07	11.07	1.89	0.50
SCAQMD Significance Thresholds	55	55	550	150	55
Significant? (Yes or No)	No	No	No	No	No

Following SCAQMD guidance, only onsite construction emissions were considered in the localized significance analysis.¹⁰ According to SCAQMD guidance, project boundaries closer than 25 meters to the nearest receptor uses the LSTs for receptors at 25 meters.¹¹ The nearest sensitive receptors are single-family houses, adjacent to the west side of the project site.¹² Localized significance thresholds for projects in SRA 11 were obtained from tables in Appendix C of the SCAQMD's Final Localized Significance Threshold Methodology using interpolation.¹³ **Table 9** shows the results of the localized significance analysis for the proposed project. None of the significance thresholds was exceeded.

Table 9
RESULTS OF LOCALIZED SIGNIFICANCE ANALYSIS

Nearest Sensitive Receptor	Maximum Onsite Emissions (pounds/day) ¹⁴			
	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum daily emissions	7.0	8.2	0.6	0.3
SCAQMD LST for 2.28 acres @ 25 meters	126.7	1,104.08	7.65	5.37

⁹ Ibid.

¹⁰ Chico and Koizumi, 2008. Final Localized Significance Threshold Methodology. Accessed online at <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf>, on September 5, 2023.

¹¹ Ibid.

¹² Google Earth Pro, 2023.

¹³ Ibid.

¹⁴ Chico and Koizumi, 2008, Appendix C. Thresholds for 2.28 acres were determined by interpolation.



Significant (Yes or No)	No	No	No	No
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The following is a brief evaluation of the project's air quality impacts against the thresholds listed above.

Would the project:

(a) *Conflict with or obstruct implementation of the applicable air quality plan?*

The SCAQMD is required to produce plans to show how air quality will be improved in the region. The California Clean Air Act requires that these plans be updated triennially to incorporate the most recent available technical information. A multi-level partnership of governmental agencies at the federal, state, regional, and local levels implements the programs contained in these plans. Agencies involved include the U.S. Environmental Protection Agency (USEPA), The California Air Resources Board (ARB), local governments, the Southern California Association of Governments (SCAG), and the SCAQMD. The SCAQMD and the SCAG are responsible for formulating and implementing the AQMP for the SCAB. The SCAQMD updates its Air Quality Management Plan (AQMP) every three years.

The 2022 AQMP was adopted by the SCAQMD Board on December 2, 2022.¹⁵ It focuses on reducing ozone by limiting the emissions of NO_x, which is a key reactant in ozone formation. The NO_x reductions are through extensive use of zero emission technologies across all stationary and mobile sources categories. The majority of NO_x emissions are from heavy-duty trucks, ships and other state and federally regulated mobile sources that are mostly beyond the SCAQMD's control. The SCAQMD's primary authority is over stationary sources, which account for approximately 20 percent of the SCAB's NO_x emissions.

The AQMP incorporates updated emission inventory methodologies for various source categories and incorporates the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by SCAG (2020). The 2020-2045 RTP/SCS was determined to conform to the federally mandated State Implementation Plan for the attainment and maintenance of the NAAQS. county and city general plans.

The emission thresholds in **Table 8** were designed to ensure that new emission sources would not increase regional emissions enough to put the success of the AQMP in jeopardy. Since project emissions will not exceed the thresholds, the project will not conflict with or obstruct implementation of the AQMP. Its emissions are therefore less than significant under CEQA.

b) *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?*

Since the SCAB is currently in nonattainment for ozone and PM_{2.5}, related projects may exceed an air quality standard or contribute to an existing or projected air quality exceedance. The SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess

¹⁵ SCAQMD, 2022. 2022 Air Quality Management Plan. Accessed online at <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=16>, on September 5, 2023.



the cumulative emissions generated by multiple cumulative projects. Instead, the District recommends that a project's potential contribution to cumulative impacts be assessed utilizing the same significance criteria as those for project-specific impacts. Furthermore, the SCAQMD states that if an individual development project generates less-than-significant construction or operational emissions impacts, then the development project would not contribute to a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

As discussed above, the mass daily construction emissions generated by the project would not exceed any of the SCAQMD's significance thresholds and, as discussed below, the localized emissions generated by the project would not exceed the SCAQMD's Localized Significance Thresholds (LSTs). In addition, operational emissions of all criteria pollutants would be less than significant. Therefore, cumulative air quality impacts associated with the project would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

The localized significance analysis in **Section 2.3.2** determined that the project would not expose sensitive receptors to substantial pollutant concentrations. Therefore, impacts would be less than significant.

d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?)

According to the SCAQMD CEQA Air Quality Handbook, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding.¹⁶ Potential sources that may emit odors during construction activities include equipment exhaust. Odors from these sources would be localized and generally confined to the immediate area surrounding the project. The project would use typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. However, the project site is surrounded by a vacant construction site to the south; single-family residential uses to the west in the City of Covina; commercial uses to the north; and commercial uses to the east opposite Citrus Street. The specific use under construction south of the project site is unknown; however, the General Plan land use designation on the construction site is Commercial (C) and the zoning is Medium Commercial (C-2).

The project would not generate substantial objectionable odor impact during construction or operation.

Noise

The project is located in the City of West Covina adjacent to commercial (north and east), residential (west), institutional (southwest), and religious (northwest) land uses. There are commercial uses directly north of the project site and to the east across North Citrus Street; single-family residences directly west along South Calvados Avenue; Discovery Montessori Preschool to the southwest and a shopping center (with grocery anchor store) under construction directly south of the project along East Garvey Avenue North.

¹⁶ SCAQMD, 1993. CEQA Air Quality Handbook. Diamond Bar, CA., Accessed online at [http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)), on September 5, 2023.



UltraSystems Environmental Inc. (UltraSystems) conducted ambient noise sampling around the project area. Five sampling locations, as shown in **Figure 13** and **Table 10**, were chosen to represent noise-sensitive land uses (residential, religious, and institutional). For each location, a 15-minute measurement was taken between the hours of 11 a.m. and 3 p.m. on August 24, 2023. The 15-minute L_{eq} values¹⁷ ranged from 52.6 dBA to 67.5 dBA. The lowest recorded value was measured at point 3, which is the Sacred Heart Catholic Church, and the highest value recorded was at point 1, which is the Discovery Montessori Preschool close to the project site and near a freeway. The results of the measurements are summarized in **Table 10**.

¹⁷ L_{eq} , the equivalent noise level, is an average of sound level over a defined time period (such as 1 minute, 15 minutes, 1 hour or 24 hours).

Figure 13
NOISE SAMPLING LOCATIONS



Path: \\gis\GIS\Projects\7236_EnvisionMotors_Toyota_CE_NOE\MXD\7236_Toyota_4_13_Noise_Sampling_2023_09_01.mxd
 Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community, Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community UltraSystems Environmental, Inc., 2023

September 01, 2023

Scale: 1:3,000

Legend

Project Boundary

Noise Sampling Location

**Envision West Covina
Toyota**

Ambient Noise
Measurement Locations



Table 10
AMBIENT NOISE SAMPLING LOCATIONS AND RESULTS

Point	Sampling Location	Measurement Results (dBA) ^a		
		15-Minute L _{eq}	L _{max}	L ₉₀
1	Discovery Montessori Preschool 2451 East Garvey Avenue North	67.5	80.3	64.2
2	Single-family residential 866 South Calvados Avenue	53.2	70.3	50.2
3	Sacred Heart Catholic Church 344 West Workman Street	52.6	68.8	49.1
4	Single-Family residential 760 South Calvados Avenue	57.8	81.4	48.1
5	Single-Family Residential, Commercial, 205 North Citrus Street	54.4	70.9	52

Source: UltraSystems, with Google Earth, 2023.

^aDefinitions of noise metrics:

dBA = decibels, with frequency weighting to approximate human perception of noise.

L_{eq} = time weighted average noise exposure.

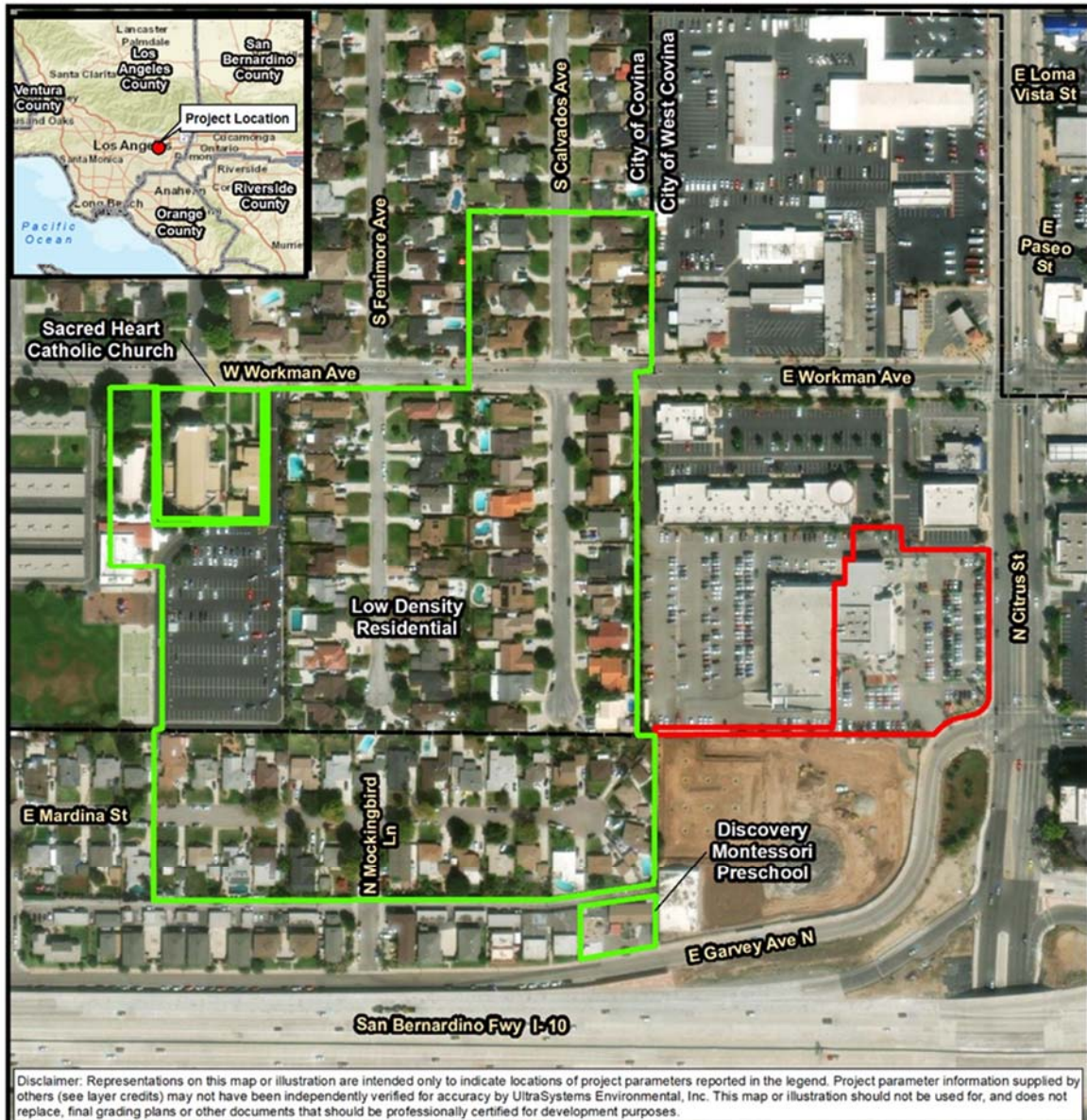
L_{max} = maximum noise level during the measurement period.

L₉₀ = a noise level that is exceeded more than 90% of the time; may be used to represent background noise.

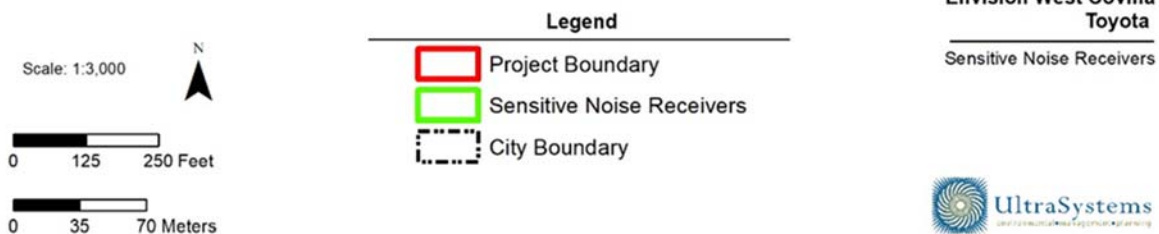
The City of West Covina General Plan Noise Element identifies noise-sensitive land uses and noise sources, and defines areas of noise impact for the purpose of developing policies to ensure that its residents are protected from excessive noise intrusion.¹⁸ Sensitive land uses are generally defined as locations where people reside or where the presence of noise could adversely affect the use of the land. They include, but are not limited to, schools, hospitals, residences, libraries, and recreation areas. **Figure 14** shows sensitive receivers in the project area. The nearest sensitive receivers are the single-family residences to the west.

¹⁸ Final Environmental Impact Report. City of West Covina 2016 General Plan Update and Downtown Plan and Code. City of West Covina. December 2016, pg. 201-216. Internet: <https://www.westcovina.org/home/showpublisheddocument/18142/637232598667300000> . Accessed September 1, 2023.

Figure 14
SENSITIVE RECEIVERS IN THE PROJECT AREA



Path: I:\GIS\Projects\7236_EnvisionMotors_Toyota_CE_NOE\MXD\7236_Toyota_4_13_Sensitive_Receivers_2023_09_05.mxd
Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community. Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community UltraSystems Environmental, Inc., 2023





NOISE STANDARDS

City of West Covina General Plan Noise Element

According to the City's General Plan EIR, noise-sensitive land uses, such as residential, schools, churches, hospitals and nursing homes are normally acceptable with exterior noise levels at or below 60 dBA CNEL, and conditionally acceptable at or below 70 dBA CNEL.^{19,20}

Municipal Code

The City of West Covina Municipal Code § Ord. No. 1826, § 2, 11-13-89, establishes noise limits on nighttime construction activities that apply to all zones within the city. Unless permitted or in an emergency, construction activity is prohibited between 8 pm and 7 am (6 am regarding loading and unloading activities). The Municipal Code does not establish limits on daytime construction noise.

NOISE IMPACT ANALYSIS

Construction Noise

Noise impacts from construction activities are a function of the noise generated by the operation of construction equipment and on-road delivery and worker commuter vehicles, the location of equipment, and the timing and duration of the noise-generating activities. The types and numbers of pieces of equipment anticipated in each phase of construction and development were estimated by running the California Emissions Estimator Model (CalEEMod), Version 2022.1.1, and having the model generate land use-based default values. The CalEEMod equipment default values are based on a construction survey performed by the SCAQMD.²¹ **Table 15** lists the equipment expected to be used. For each equipment type, the table shows an average noise emission level (in dB at 50 feet, unless otherwise specified) and a "usage factor," which is an estimated fraction of operating time that the equipment would be producing noise at the stated level.^{22,23} Equipment use was matched to phases of the construction schedule.

For all sensitive receivers, the greatest exposures would occur during paving. The highest total short-term noise exposure (ambient plus construction-related) would be 68.1 dBA Leq, at Discovery Montessori Preschool. **Table 16** lists noise exposures at sensitive receivers.

¹⁹ West Covina General Plan, p. 103.

²⁰ CNEL = community noise equivalent level, which is a 24-hour weighted average noise level, with weights of 4.77 dBA in evening hours (7 p.m. to 10 p.m.) and 10 dBA in nighttime hours (10 p.m. to 7 a.m.).

²¹ California Emissions Estimator Model. Appendix D. Technical Source Documentation for Emissions Calculations. CalEEMod Version 2022.1.1, September 2023. Internet: https://www.caleemod.com/documents/user-guide/05_Appendix%20D.pdf.

²² Equipment noise emissions and usage factors are from Knauer, H. et al., 2006. *FHWA Highway Construction Noise Handbook*. U.S. Department of Transportation, Research and Innovative Technology, Administration, Cambridge, Massachusetts, FHWA-HEP-06-015 (August 2006), except where otherwise noted.

²³ Roller and paving equipment noise emissions data from County of Ventura, Construction Noise Threshold Criteria and Control Plan. Amended July 2010.



Table 15
CONSTRUCTION EQUIPMENT NOISE CHARACTERISTICS

Construction Phase	Equipment Type	Number of Pieces	Maximum Sound Level (dBA @ 50 feet)	Usage Factor	Composite Noise (dBA @ 50 feet)
Demolition	Rubber Tired Loaders	1	79	0.4	75.02
Site Preparation	Scrapers	1	88	0.14	79.46
Grading	Off-Highway Trucks	1	75	0.4	81.21
	Rollers	1	74	0.1	
	Tractors/Loaders/Backhoes	1	85	0.37	
Building Construction	Forklift	4	67	0.3	67.79
Paving	Roller	1	74	0.1	84.43
	Paving Equipment	1	85	0.5	
	Tractors/Loaders/Backhoes	1	85	0.37	
Architectural Coating	Air Compressors	1	81	0.48	77.81

Source: FTA, 2018, unless otherwise specified.

Table 16
SENSITIVE RECEIVER NOISE EXPOSURE

Receiver	Noisiest Construction Phase	Ambient Noise dBA Leq	Construction Noise dBA Leq	Total Exposure ^a dBA Leq	Change dBA Leq
1	Paving	67.5	59.3	68.1	0.6
2	Paving	53.2	58.9	59.9	6.7
3	Paving	52.6	47.3	53.7	1.1
4	Paving	57.8	50.0	58.5	0.7
5	Paving	54.4	55.8	58.2	3.8

Operational Noise

Noise Control at the Source

Onsite noise sources from the proposed project would include operation of mechanical equipment such as air conditioners, lawnmowers, leaf blowers, building maintenance equipment; and motor vehicles accessing, and driving adjacent to the project site. Noise levels associated with operation of the project are expected to be comparable to those of nearby residential and commercial areas. Additionally, the land use of the project site will not change, so noise sources and noise levels are not expected to change significantly. Noise from onsite sources would be less than significant.



Traffic Noise

It has been well established that in order for a change in traffic noise to be perceived, traffic has to double. A transportation assessment²⁴ for the project estimates that the increase in trips per day will be 366. This increase will be a tiny fraction of existing and future traffic on local streets. Therefore, traffic noise impacts in regards to the proposed project would be less than significant.

Vibration

Construction activities for the project have the potential to generate low levels of groundborne vibration. The operation of construction equipment generates vibrations that propagate through the ground and diminish in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels. The construction activities associated with the project could have an adverse impact on both sensitive structures (i.e., building damage) and populations (i.e., annoyance). The construction vibration analysis used formulas published by the Federal Transit Administration (FTA).²⁵

The FTA has published standard vibration levels for construction equipment operations, at a distance of 25 feet.²⁶ **Table 17** shows an analysis of construction vibration impacts at the nearest sensitive receiver, which is about 418 feet from the project boundary. As shown in **Table 17**, the vibration level of construction equipment at the nearest sensitive receiver is at most 0.0040 inch per second, which is less than the FTA damage threshold of 0.12 inch per second PPV for fragile historic buildings, and 50 VdB, which is less than the FTA threshold for human annoyance of 80 VdB. Construction vibration impacts would therefore be less than significant.

Table 17
VIBRATION LEVELS OF CONSTRUCTION EQUIPMENT

Equipment	PPV at 25 feet (in/sec)	Vibration Decibels at 25 feet (VdB)	PPV at 135 feet (in/sec)	Vibration Decibels at 135 feet (VdB)
Loaded trucks	0.076	86	0.0034	49
Jack hammer	0.035	79	0.0016	42
Small bulldozer	0.003	58	0.0001	21
Large bulldozer	0.089	87	0.0040	50

Source: FTA, 2018 and UltraSystems, 2022.

The project involves the operation of commercial uses and would not involve the use of stationary equipment that would result in high vibration levels, which are more typical for large manufacturing

²⁴ Envision Toyota Dealership and Service Center Project Trip Generation and VMT Screening Memorandum, City of West Covina, CA. Letter Report from Justin Tucker and Elias Bandek, RK Engineering Group, Inc. to Betsy Lindsay, UltraSystems Environmental Inc. September 1, 2023.

²⁵ Transit Noise and Vibration Impact Assessment Manual. FTA Report No. 0123. September 2018. Internet: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf, p. 185

²⁶ Ibid., p. 184.



and industrial projects. Groundborne vibration at the project site and immediate vicinity currently result from heavy-duty vehicular travel (e.g., trucks and transit buses) on the nearby local roadways, and the project would not result in a substantial increase of these heavy-duty vehicles on the public roadways. Therefore, vibration impacts associated with operation of the project would be less than significant.

CEQA EVALUATION

The following is a brief evaluation of the project's noise impacts against the thresholds listed above.

Would the project result in:

- a) *Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

As shown in **Section 3.1** and **Section 3.2**, the project will not generate a substantial permanent increase in ambient noise levels, and future users of the project will not be exposed to excessive noise. However, short-term construction activities will expose only the nearest sensitive receivers to noise levels exceeding 65 dBA (68.1 dBA L_{eq}). However, the increased noise level would be temporary and intermittent, and would occur during hours when most people would likely not be at home. Construction would adhere to the city's permitted construction hours of 7 a.m. to 8 p.m.. The noise would be typical of life in an urban area. Therefore, the onsite construction impacts would be less than significant.

- b) *Generation of excessive groundborne vibration or groundborne noise levels?*

As discussed in **Section 3.3**, both the project and offsite sensitive receivers are too distant to experience adverse levels of vibration.

- c) *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

The project is not located within the vicinity of any private airstrip or within two miles of a public airport or private use airport. The nearest airport to the project site is 5.6 miles to the northwest, RC Airplane Airport at Santa Fe Dam in Irwindale, California.

In conclusion, the project's noise and vibration impacts would not be of a nature that would preclude the adoption of a categorical exemption under CEQA.

Water Quality

Construction

The project is greater than one acre and would be required to comply with the Statewide General Construction Stormwater Permit issued by the State Water Quality Control Board. Projects would obtain coverage by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) estimating sediment risk from construction activities to receiving waters and specifying Best



Management Practices (BMPs) that would be used by the project to minimize pollution of stormwater. Categories of BMPs used in SWPPPs are described below in **Table 18**.

Table 18
CONSTRUCTION BEST MANAGEMENT PRACTICES

Category	Purpose	Examples
Erosion Controls	prevent detachment of soil particles from soil surface by covering soil or adding binders to soil.	Scheduling; preservation of existing vegetation; soil covers such as geotextiles, mats, wood mulch, and compost blankets; soil binders; and BMPs—such as earth dikes, drainage swales, slope drains, and streambank stabilization—that divert stormwater away from construction sites and toward sediment basins or traps
Sediment Controls	Filter out soil particles that have been detached and transported in water.	Silt fence, sediment basin, sediment trap, check dam, fiber rolls, gravel bag berm, sandbag barrier, straw bale barrier, storm drain inlet protection, street sweeping
Wind Erosion Controls	prevent or minimize dust nuisance.	Watering; other BMPs similar to erosion controls
Tracking Controls	Minimize the tracking of soil offsite by vehicles	Stabilized construction roadways and construction entrances/exits, and entrance/outlet tire wash.
Non-Storm Water Management Controls	Prohibit discharge of materials other than stormwater, such as discharges from the cleaning, maintenance, and fueling of vehicles and equipment. Conduct operations in ways that minimize non-stormwater discharges and contamination of any such discharges.	Water conservation practices, temporary stream crossings, clear water diversions, potable and irrigation water management; and the proper management of operations including paving and grinding, dewatering, vehicle and equipment cleaning, fueling and maintenance, pile driving, concrete curing, concrete finishing
Waste Management and Controls (i.e., good housekeeping practices)	Management of materials and wastes to avoid contamination of stormwater.	Stockpile management, spill prevention and control, solid waste management, hazardous waste management, contaminated soil management, concrete waste management, sanitary/septic waste management, liquid waste management, and management of material delivery storage and use.

Source: CASQA, 2023

Project Design and Project Operation

The City would minimize contamination of stormwater during project operation through compliance with the Los Angeles County Public Works Low-Impact Development Manual.



Low-Impact Development (LID) is a decentralized approach to stormwater management that works to mimic the natural hydrology of the site by retaining precipitation on-site to the maximum extent practicable. Stormwater quality control measures that incorporate LID principles are placed throughout the site in small, discrete units and distributed near the source of impacts. LID strategies are designed to protect surface and groundwater quality, maintain the integrity of ecosystems, and preserve the physical integrity of receiving waters by managing stormwater runoff at or close to the source. LID strategies include use of bioretention/infiltration landscape areas, disconnected hydrologic flow paths, reduced impervious areas, functional landscaping, and grading to maintain natural hydrologic functions that existed prior to development (LACPW).

The LID manual prescribes BMPs in three categories: (1) site assessment, (2) site design, and (3) source control; described below.

- **Site Assessment.** The design of the proposed project drainage system and water quality components is based on an assessment of site layout, geotechnical conditions, local groundwater conditions, and existing drainage.
- **Site Design.** Site design BMPs reduce or eliminate post-project runoff. Site design BMPs include protecting and restoring natural areas; minimizing land disturbance and minimizing impervious area.
- **Source Control BMPs.** Source control BMPs reduce the potential for pollutants to enter runoff. Source control BMPs are classified in two categories:
- **Structural source control measures:** examples include roof runoff controls, protection of slopes and channels, efficient irrigation, and storm drain system signage. Source Control BMPs selected for the proposed project include grav bags; a stabilized construction exit; a sand trap outlet at the west end of the project site; and temporary construction fence with wind screen (Brandow & Johnston, 2022).
- **Nonstructural source control measures:** reduce the potential for pollutants resulting from activities onsite to enter runoff. Examples include education of owners and employees; activity restrictions, such as requiring that trash can lids be closed at all times and prohibiting outdoor cooking; and periodic inspections of water quality features such as catch basins and filters.

The project would implement BMPs in accordance with the LID Manual, and project operational water quality impacts would be less than significant. The project would meet this condition.

(e) The site can be adequately served by all required utilities and public services.

The proposed project consists of construction and operation of an expansion to an existing vacant building on an automotive dealership property. All utilities and public services are available onsite. Therefore, the project meets this condition.

3.2 Exclusions to Categorical Exemptions Set Forth in CEQA Guidelines Section 15300.2.

The following analysis addresses six exceptions to categorical exemptions set forth in CEQA Guidelines Section 15300.2.



(a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located -a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

The project site is located within an urban portion of the city with urban development surrounding the project site in all directions. The project site is developed with a car dealership; consisting of a two-story building, surface parking, and minor amounts of landscaping. Therefore, this exception does not apply to the proposed project.

(b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

The project is not part of a proposed series of projects in the same place over time. The nearest other project for which environmental documents are listed on the City of West Covina Planning Division's website a commercial project at 2539 Garvey Road North, abutting the south side of the proposed project site. That project was planned to be completed by late 2021. A Google Earth Pro satellite photo dated May 2023 shows the exterior envelopes of both buildings comprising the 2539 Garvey project completed (Google Earth Pro, 2023). Therefore, the 2539 Garvey project is anticipated to be completed before construction of the proposed project would start. Thus, construction impacts of the proposed project would not combine with those of the 2539 Garvey project to cause significant cumulative impacts. Considering the small scale of the proposed project—13,130 square feet of building area and 62 parking spaces; and the built-out, urbanized character of the project site and nearby areas—it is unlikely that operational impacts of the proposed project and the 2539 Garvey project would combine to cause significant operational impacts. Therefore, this exception does not apply to the proposed project.

(c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

As substantiated in Section 3.2(a), no unusual circumstances are present onsite that would give rise to significant environmental impacts due to project development. The project site is developed as part of an automotive dealership in a built-out, urbanized area. Neither existing conditions on the project site, nor the proposed project, involve unusual circumstances that could result in significant impacts arising from project development. This exception does not apply to this project.

(d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

The nearest designated state scenic highway to the project site is State Route (SR)-2, the Angeles Crest Highway, approximately 15.5 miles to the northwest (Caltrans, 2023). The site is not visible from SR-2 due to distance and intervening topography. Project development would not damage scenic resources along SR-2 and the scenic highways exception would not apply to the proposed project.



(e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

The following hazardous materials sites databases were searched on August 20, 2023 for hazardous materials sites on the project site.

- GeoTracker, State Water Resources Control Board (SWRCB, 2023)
- EnviroStor, Department of Toxic Substances Control (DTSC, 2023)
- RCRAInfo, US Environmental Protection Agency (Accessed via *Environmental Radius Report* by National Environmental Title Research, LLC dated August 24, 2023) (NETROnline, 2023).

The project site is listed as a small quantity generator of hazardous wastes (SQG) on the RCRAInfo database under the name of the former business onsite, West Covina Nissan.²⁷ This listed hazardous materials site is not considered to be an environmental concern for the proposed project site, as it is known to the USEPA; and it does not document known or likely releases of hazardous materials to the environment. Therefore, this exception does not apply to the proposed project.

(f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

A cultural resources records search was completed at the South Central Coastal Information Center (SCCIC) at California University Fullerton, which is the local California Historic Resources Information System (CHRIS) facility. The project site Area of Potential Effect (APE), which includes the project boundary is included in the half-mile search radius for archival studies. The records search was conducted to identify previously recorded cultural resources (prehistoric and historic archaeological sites/isolates, historic buildings, structures, objects, or districts) and to also determine previous cultural resource surveys within the project area. These records included a review of previously recorded prehistoric and historic archaeological resources and of listed cultural resource survey reports within that same geographical area. The cultural resources record search was conducted on August 23, 2023 by Megan Doukakis, M.A, Assistant Project Archaeologist.

Based on the SCCIC cultural resources records search, it was determined that there are no prehistoric or historic archaeological resources recorded within the project APE or within the one-half mile buffer zone.

There have been seven previous cultural resources studies within the one-half-mile buffer of the project area (**Table 19**). None of these occur within the project boundary.

Three of these surveys included Archaeological and Historic Properties Survey Reports conducted along Interstate 10 to the south of the project boundary (Wlodarski and Larson, 1993; Whitney-Desautels and Bonner, 1993; Harbert, 2002). A fourth cultural resources records search and survey report was conducted along the Reclaimed Water Backbone Transmission Project directly to the east of the project boundary along Citrus Avenue (Peterson, 2002). On the south side of Interstate 10, the

²⁷ small quantity generators of hazardous wastes generate more than 100 kilograms (220.5 pounds) and less than 1,000 kilograms (2,205 pounds) of hazardous wastes per month.



three remaining archaeological monitoring and records search projects were conducted at individual telecommunication facilities (Demcak, 1997; Brechbiel, 1998; Bonner and Taniguchi, 2004).

Table 19
KNOWN CULTURAL RESOURCE STUDIES WITHIN A HALF-MILE RADIUS OF THE PROJECT BOUNDARY

Report Number	Author(s)	Date	Title	Resources
LA-02872	Wlodarski, Robert J. and Dan Larson	1993	Department of Transportation Negative Archaeological Survey Report Dpd-ep-25 (revised 2/83) Interstate 10 (I-10) Between Puente Avenue in the City of Baldwin Park on the West, and the Interchange Between I-10 and State Routes 57 (SR 71/Interstate 210	N/A
LA-03306	Whitney-Desautels, Nancy A. and Wayne H. Bonner	1993	Historic Property Survey Report Interstate 10 HOV Widening Los Angeles County, California Caltrans District 7	19-192856
LA-03687	Demcak, Carol R.	1997	Report of Archaeological Monitoring for L.A. Cellular Site # 158, 2640 E. Garvey Street S., West Covina, Los Angeles County	N/A
LA-04114	Brechbiel, Brant A.	1998	Cultural Resources Records Search and Literature Review Report for a Pacific Bell Mobile Services Telecommunications Facility: La 081-11 in the City of West Covina, California	N/A
LA-07238	Bonner, Wayne H. and Taniguchi, Christeen	2004	Records Search Results and Site Visit for Sprint Telecommunications Facility Candidate La60xc001b (Villa Tapeyac) 2200 East Garvey Avenue South, West Covina, Los Angeles County, California	N/A
LA-08249	Peterson, Patricia A.	2002	Cultural Resources Records Search and Survey Report for the Reclaimed Water Backbone Transmission Project, Los Angeles County, California	19-000179, 19-001044, 19-001045, 19-001046, 19-002805, 19-120031, 19-186112
LA-10190	Harbert, Claudia	2002	Supplemental Historic Property Survey Report for the I-10 HOV Lane Between I-605 and the SR-57/SR-71/I-210 Interchange in the Cities of Los Angeles, Baldwin Park, West	19-188913, 19-188914, 19-188915, 19-188916, 19-188917, 19-188918, 19-188919, 19-188920, 19-188921, 19-188922, 19-188923, 19-188924, 19-188925, 19-188926,



Report Number	Author(s)	Date	Title	Resources
			Covina, Covina, San Dimas, and Pomona in Los Angeles County, CA	19-188927, 19-188928, 19-188929, 19-188930, 19-188931, 19-188932, 19-188933, 19-188934, 19-188935, 19-188936, 19-188937, 19-188938, 19-188939, 19-188940, 19-188941, 19-188942, 19-188943, 19-188944, 19-188945, 19-188946, 19-188947, 19-188948, 19-188949, 19-188950, 19-188951, 19-188952, 19-188953, 19-188954, 19-188955, 19-188956, 19-188957, 19-188958, 19-188959, 19-188960, 19-188961, 19-188962, 19-188963, 19-188964, 19-188965, 19-188966, 19-188967, 19-188968, 19-188969, 19-188970, 19-188971, 19-188972, 19-188973, 19-188974, 19-188975, 19-188976, 19-188977, 19-188978, 19-188979, 19-188980, 19-188981, 19-188982

A search of the Built Environmental Resource Directory listing National Register of Historic Properties was reviewed to determine if there are any buildings on the project site or in the immediate area had been evaluated for the Register and listed. This was conducted by Megan Doukakis on August 31, 2023. It was determined that the project boundary does not have any resources present that have been evaluated under the National Register (Built Environmental Resource Directory). Fourteen properties are located in the half-mile radius of the project area, listed in **Table 20** below. All of these properties are single family residences constructed between 1950 and 1955 and were determined ineligible for the National Register by consensus through Section 106 process (6Y).

Table 20
NATIONAL REGISTER OF HISTORIC PROPERTIES WITHIN A HALF-MILE RADIUS OF THE PROJECT BOUNDARY

Property Number	Address	Construction Age
168212	2200 E Garvey Ave	1954
168360	2111 E Garvey Ave N	1953
168361	2117 E Garvey Ave N	1953
168363	2123 E Garvey Ave N	1953
168217	2451 E Garvey Ave N	1955
168214	2330 E Garvey Ave S	1950



Property Number	Address	Construction Age
168216	2346 E Garvey Ave S	1955
168367	2443 E James Ave	1954
168368	2449 E James Ave	1954
168369	2507 E James Ave	1954
168371	2521 E James Ave	1954
168372	2535 E James Ave	1954
168374	2536 E James Ave	1954
168375	115 S Calvados Ave	1954

The single-story commercial building on the project site, located at 205 N. Citrus Street, was developed in 2007; the building is 16 years old and does not meet the threshold of being a historic resource. In addition, the building does not demonstrate a unique or particularly close association with the pattern of events with any other established themes in local and regional history. No persons or specific events or recognized historic significance have been identified with this building. Additionally, the building does not display any significant architectural or aesthetic merits.

Between 1964 and 2005 a previous building existed in the project boundary. Between 2005 and 2007, this building was demolished and replaced with the current building (Historicaerials.com, n.d.).

PDF-2 The following conditions must be implemented as part of the project:

- If prehistoric and/or historic items are observed during subsurface activities, work should be stopped in that area and a qualified archaeologist and Native American monitor should be contacted to assess the findings and develop a recovery plan to retrieve the material.
- If human remains are encountered during excavations associated with this Project, work will halt and the Los Angeles County Coroner will be notified (§ 5097.98 of the Public Resources Code). The Coroner will determine whether the remains are of recent human origin or older Native American ancestry. If the coroner, with the aid of the supervising archaeologist, determines that the remains are prehistoric, they will contact the Native American Heritage Commission (NAHC). The NAHC will be responsible for designating the most likely descendant (MLD), who will be responsible for the ultimate disposition of the remains, as required by § 7050.5 of the California Health and Safety Code. The MLD will make recommendations within 24 hours of his or her notification by the NAHC. These recommendations may include scientific removal and nondestructive analysis of human remains and items associated with Native American burials (§ 7050.5 of the Health and Safety Code).

3.3 Conclusion

Section 3.1 above demonstrates that the proposed project meets all five conditions set forth in CEQA Guidelines Section 15332. As detailed in **Section 3.2** above, no exceptions to categorical exemptions set forth in CEQA Guidelines Section 15300.2 apply to the proposed project. Therefore, the Class 32 (In-Fill Development Projects) categorical exemption applies to the proposed project.



4.0 REFERENCES

- Caltrans, 2023. California Road System. Accessed online at: <https://www.arcgis.com/apps/webappviewer/index.html?id=026e830c914c495797c969a3e5668538>, on August 20, 2023.
- California Stormwater Quality Association (CASQA). 2023, August. California Construction Best Management Practices Handbook.
- City of West Covina. 2023. Zoning Map. Accessed online at: <https://westcovina.maps.arcgis.com/apps/webappviewer/index.html?id=eab40ffbe9b944dfa9195f75342d4986>, on August 24, 2023.
- Dennis Flynn Architects. 2023. Bid Set. Toyota of West Covina. 205 N Citrus Street, West Covina, CA 91791. Prepared for Envision Motors.
- DTSC (Department of Toxic Substances Control). 2023. EnviroStor. Accessed online at: <http://www.envirostor.dtsc.ca.gov/public/>, on August 29, 2023.
- Google Earth Pro. 2023. Version 7.3.6 (August 30, 2023).
- Los Angeles County Department of Public Works (LACPW). 2014. Low Impact Development Standards Manual. Accessed online at: <http://dpw.lacounty.gov/ldd/lib/fp/Hydrology/Low%20Impact%20Development%20Standards%20Manual.pdf>, on August 27, 2023.
- National Environmental Title Research, LLC. (NETROnline). 2023. Environmental Radius Report. Generated August 24, 2023.
- SWRCB (State Water Resources Control Board). 2023. GeoTracker. Accessed online at: <http://geotracker.waterboards.ca.gov/>, on August 29, 2023.
- Walker, Gary (Project Manager). 2023. Email dated August 25, 2023.

APPENDIX A

AIR QUALITY MEMO



MEMO

TO: City of West Covina

FROM: Isha Shah, M.S., UltraSystems Environmental Inc.

DATE: Tuesday, September 05, 2023

PROJECT #: 7236

RE: Air Quality Analysis for Envision Motors - Toyota, West Covina, CA

1.0 INTRODUCTION

The purpose of this memorandum is to demonstrate that the project's air quality impacts are less than significant without mitigation, and therefore do not impair its ability to qualify for a categorical exemption under the California Environmental Quality Act (CEQA).

The project site is located in the city of West Covina in the San Gabriel Valley in eastern Los Angeles County. It is at 205 North Citrus Street, about 500 feet north of the Interstate 10 (I-10) freeway in what the South Coast Air Quality Management District (SCAQMD) has defined as the South San Gabriel Valley Source Receptor Area (SRA 11). That part of Los Angeles County is in the South Coast Air Basin (SCAB), which comprises all of Orange County as well as portions of Los Angeles, Riverside and San Bernardino counties. **Table 1** shows the SCAB's attainment status for ambient air quality standards set by the U.S. Environmental Protection Agency (USEPA) and the State of California. The SCAB is nonattainment for ozone and fine particulate matter (PM_{2.5}).

Some people, such as individuals with respiratory illnesses or impaired lung function because of other illnesses, persons over 65 years of age, and children under 14, are particularly sensitive to certain pollutants. Facilities and structures where these sensitive people live or spend considerable amounts of time are known as sensitive receptors. For the purposes of a CEQA analysis, the SCAQMD considers a sensitive receptor to be a receptor such as a residence, hospital, or convalescent facility where it is possible that an individual could remain for 24 hours.¹ The nearest sensitive receptors are single-family houses, adjacent to the west side of the project site.²

2.0 CRITERIA POLLUTANT ANALYSIS

Air pollutants for which ambient air quality standards have been set are called "criteria pollutants." Some criteria pollutants, such as carbon monoxide, are emitted directly to the atmosphere. Others,

1 Chico and Koizumi, 2008. Final Localized Significance Threshold Methodology. Accessed online at <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf>, on September 4, 2023.

2 Google Earth Pro, 2023.

such as ozone (O₃), form in the atmosphere, while yet others react in the atmosphere to form ones for which standards have been set. The emitted pollutants of interest for CEQA analyses in Southern California include reactive organic gases (ROG), nitrogen oxides (NO_x), carbon monoxide (CO), respirable particulate matter (PM₁₀) and fine particulate matter (PM_{2.5}).³

Table 1
FEDERAL AND STATE ATTAINMENT STATUS

Pollutants	Federal Classification ⁴	State Classification ⁵
Ozone (O ₃)	Nonattainment (Extreme)	Nonattainment
Particulate Matter (PM ₁₀)	Maintenance (Serious)	Nonattainment
Fine Particulate Matter (PM _{2.5})	Nonattainment (Serious)	Nonattainment
Carbon Monoxide (CO)	Maintenance (Serious)	Attainment
Nitrogen Dioxide (NO ₂)	Maintenance (Primary)	Attainment
Sulfur Dioxide (SO ₂)	Unclassified	Attainment
Sulfates	Unclassified	Attainment
Lead (Pb)	Nonattainment	Attainment
Hydrogen Sulfide (H ₂ S)	Unclassified	
Visibility Reducing Particles		

Appendix G to the CEQA Guidelines contains the following thresholds for significance under CEQA:

Would the project:

- a) Conflict with or obstruct implementation of the applicable air quality plan?
- b) 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?
- c) Expose sensitive receptors to substantial pollutant concentrations?
- d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?

The proposed project was evaluated against these thresholds. (See **Section 2.4**)

³ Sulfur dioxide is a criteria pollutant but it or its precursors are rarely emitted in projects of the type analyzed here.

⁴ CARB, 2023. Maps of State and Federal Area Designations. Accessed online at <https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations>, on September 4, 2023.

⁵ USEPA, 2023. Nonattainment Areas for Criteria Pollutants (Green Book). Accessed online at <https://www.epa.gov/green-book>, on September 4, 2023.

2.1 Regional Emissions Thresholds

The SCAQMD has developed criteria in the form of emissions thresholds for determining whether emissions from a project are regionally significant. They are useful for estimating whether a project is likely to result in a violation of the NAAQS and/or whether the project is in conformity with plans to achieve attainment. SCAQMD's significance thresholds for criteria pollutant emissions during construction activities and project operation are summarized in **Table 2**. A project is considered to have a regional air quality impact if emissions from its construction and/or operational activities exceed any of the corresponding SCAQMD significance thresholds.

Table 2
SCAQMD EMISSIONS THRESHOLDS FOR SIGNIFICANT REGIONAL IMPACTS

Pollutant	Mass Daily Thresholds (Pounds/Day) ⁶	
	Construction	Operation
Nitrogen Oxides (NO _x)	100	55
Volatile Organic Compounds (VOC)	75	55
Respirable Particulate Matter (PM ₁₀)	150	150
Fine Particulate Matter (PM _{2.5})	55	55
Sulfur Oxides (SO _x)	150	150
Carbon Monoxide (CO)	550	550
Lead	3	3

2.2 Localized Significance Thresholds

The SCAQMD has developed emission thresholds for evaluating local effects of short-term criteria pollutant emissions. These are presented in **Section 2.3.2** of this memorandum.

2.3 Emission Calculations

2.3.1 Methods and Assumptions

Information on project construction and operations was obtained via emails from the client. The client estimated that the construction would run from October 2023 through May 2024. There would be seven partially overlapping construction phases:

- Demolition.
- Site Preparation.
- Grading.
- Utility Trenching and Installation.

6 SCAQMD, 2019. South Coast AQMD Air Quality Significance Threshold. Accessed online at <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>, on September 4, 2023.

- Building construction.
- Paving.
- Architectural Coating.

Criteria pollutant emissions from the project's onsite and offsite project activities were estimated using the California Emissions Estimator Model (CalEEMod), Version 2022.1.1.18. CalEEMod is a planning tool for estimating emissions related to land use projects.⁷ Model-predicted project emissions are compared with applicable thresholds to assess regional air quality impacts. As some construction plans have not been finalized, CalEEMod defaults were used for construction trips and vehicle miles traveled. **Table 3** lists the construction equipment assumptions for this analysis.

Table 3
CONSTRUCTION EQUIPMENT

Phase	Equipment Type	No.	Hours/ Day	HP	Load Factor
Demolition	Rubber Tired Loaders	1	8	150	0.36
Site Preparation	Scrapers	1	8	148	0.41
Grading	Rollers	1	6	367	0.4
	Off-Highway Trucks	1	8	376	0.38
	Tractors/Loaders/Backhoes	1	7	84	0.37
Utility Trenching and Installation	Tractors/Loaders/Backhoes	1	7	84	0.37
	Excavators	1	7	36	0.38
	Rollers	1	8	36	0.38
	Trenchers	1	8	40	0.5
	Rubber Tired Loaders	1	8	150	0.36
Building Construction	Forklifts	2	6	82	0.2
	Rough Terrain Forklifts	2	8	84	0.37
Paving	Paving Equipment	1	7	81	0.42
	Rollers	1	7	36	0.38
	Tractors/Loaders/Backhoes	1	7	84	0.37
Architectural Coating	Air Compressors	1	6	37	0.48

2.3.2 Estimated Emissions

Table 4 and **Table 5** show the results of the CalEEMod calculations of construction and operational emissions, respectively. The operational emissions are increments over the baseline, since the

⁷ CAPCOA, 2023. User's Guide for CalEEMod Version 2022.1.1.18. Accessed online at , on September 4, 2023.

project is for expansion of the facility. For both construction years the maximum daily emissions of each pollutant would be below the pollutant's regional significance thresholds.

Table 4
MAXIMUM DAILY REGIONAL CONSTRUCTION EMISSIONS

Construction Activity	Maximum Emissions (pounds/day) ⁸				
	ROG	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum Emissions, 2023	0.71	7.16	9.68	0.94	0.39
Maximum Emissions, 2024	2.41	19.5	27.6	1.33	0.86
SCAQMD Significance Thresholds	75	100	550	150	55
Significant? (Yes or No)	No	No	No	No	No

Table 5
MAXIMUM DAILY PROJECT OPERATIONAL EMISSIONS

Emission Source	Pollutant (pounds/day) ⁹				
	ROG	NO _x	CO	PM ₁₀	PM _{2.5}
Area Source Emissions	0.97	0.01	1.36	< 0.005	< 0.005
Energy Sources	0.01	0.21	0.18	0.02	0.02
Mobile Sources	1.10	0.85	9.53	1.87	0.48
Total Operational Emissions	2.08	1.07	11.07	1.89	0.50
SCAQMD Significance Thresholds	55	55	550	150	55
Significant? (Yes or No)	No	No	No	No	No

Following SCAQMD guidance, only onsite construction emissions were considered in the localized significance analysis.¹⁰ According to SCAQMD guidance, project boundaries closer than 25 meters to the nearest receptor uses the LSTs for receptors at 25 meters.¹¹ The nearest sensitive receptors are single-family houses, adjacent to the west side of the project site.¹² Localized significance thresholds for projects in SRA 11 were obtained from tables in Appendix C of the SCAQMD's Final Localized Significance Threshold Methodology using interpolation.¹³ **Table 6** shows the results of the localized significance analysis for the proposed project. None of the significance thresholds was exceeded.

⁸ Calculated by UltraSystems with CalEEMod (2022.1.1.18)

⁹ Ibid.

¹⁰ Chico and Koizumi, 2008. Final Localized Significance Threshold Methodology. Accessed online at <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf>, on September 5, 2023.

¹¹ Ibid.

¹² Google Earth Pro, 2023.

¹³ Ibid.

Table 6
RESULTS OF LOCALIZED SIGNIFICANCE ANALYSIS

Nearest Sensitive Receptor	Maximum Onsite Emissions (pounds/day) ¹⁴			
	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum daily emissions	7.0	8.2	0.6	0.3
SCAQMD LST for 2.28 acres @ 25 meters	126.7	1,104.08	7.65	5.37
Significant (Yes or No)	No	No	No	No

2.03.0 CEQA EVALUATION

The following is a brief evaluation of the project's air quality impacts against the thresholds listed in **Section 2.0**.

Would the project:

a) *Conflict with or obstruct implementation of the applicable air quality plan?*

The SCAQMD is required to produce plans to show how air quality will be improved in the region. The California Clean Air Act requires that these plans be updated triennially to incorporate the most recent available technical information. A multi-level partnership of governmental agencies at the federal, state, regional, and local levels implements the programs contained in these plans. Agencies involved include the U.S. Environmental Protection Agency (USEPA), The California Air Resources Board (ARB), local governments, the Southern California Association of Governments (SCAG), and the SCAQMD. The SCAQMD and the SCAG are responsible for formulating and implementing the AQMP for the SCAB. The SCAQMD updates its Air Quality Management Plan (AQMP) every three years.

The 2022 AQMP was adopted by the SCAQMD Board on December 2, 2022.¹⁵ It focuses on reducing ozone by limiting the emissions of NO_x, which is a key reactant in ozone formation. The NO_x reductions are through extensive use of zero emission technologies across all stationary and mobile sources categories. The majority of NO_x emissions are from heavy-duty trucks, ships and other state and federally regulated mobile sources that are mostly beyond the SCAQMD's control. The SCAQMD's primary authority is over stationary sources, which account for approximately 20 percent of the SCAB's NO_x emissions.

The AQMP incorporates updated emission inventory methodologies for various source categories and incorporates the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by SCAG (2020). The 2020-2045 RTP/SCS was determined to conform to the

¹⁴ Chico and Koizumi, 2008, Appendix C. Thresholds for 2.28 acres were determined by interpolation.

¹⁵ SCAQMD, 2022. 2022 Air Quality Management Plan. Accessed online at <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=16>, on September 5, 2023.

federally mandated State Implementation Plan for the attainment and maintenance of the NAAQS. county and city general plans.

The emission thresholds in **Table 2** were designed to ensure that new emission sources would not increase regional emissions enough to put the success of the AQMP in jeopardy. Since project emissions will not exceed the thresholds, the project will not conflict with or obstruct implementation of the AQMP. Its emissions are therefore less than significant under CEQA.

- b) *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?*

Since the SCAB is currently in nonattainment for ozone and PM_{2.5}, related projects may exceed an air quality standard or contribute to an existing or projected air quality exceedance. The SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the District recommends that a project's potential contribution to cumulative impacts be assessed utilizing the same significance criteria as those for project-specific impacts. Furthermore, the SCAQMD states that if an individual development project generates less-than-significant construction or operational emissions impacts, then the development project would not contribute to a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

As discussed above, the mass daily construction emissions generated by the project would not exceed any of the SCAQMD's significance thresholds and, as discussed below, the localized emissions generated by the project would not exceed the SCAQMD's Localized Significance Thresholds (LSTs). In addition, operational emissions of all criteria pollutants would be less than significant. Therefore, cumulative air quality impacts associated with the project would be less than significant.

- c) *Expose sensitive receptors to substantial pollutant concentrations?*

The localized significance analysis in **Section 2.3.2** determined that the project would not expose sensitive receptors to substantial pollutant concentrations. Therefore, impacts would be less than significant.

- d) *Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?*

According to the SCAQMD CEQA Air Quality Handbook, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding.¹⁶ Potential sources that may emit odors during construction activities include equipment exhaust. Odors from these sources would be localized and generally confined to the immediate area surrounding the project. The project would use typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. However, the project site is surrounded by a vacant construction site to the south; single-family residential uses to the west in

¹⁶ SCAQMD, 1993. CEQA Air Quality Handbook. Diamond Bar, CA., Accessed online at [http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\).](http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993).), on September 5, 2023.

the City of Covina; commercial uses to the north; and commercial uses to the east opposite Citrus Street. The specific use under construction south of the project site is unknown; however, the General Plan land use designation on the construction site is Commercial (C) and the zoning is Medium Commercial (C-2).

The project would not generate substantial objectionable odor impact during construction or operation.

APPENDIX B

NOISE MEMO

MEMO

TO: City of West Covina

FROM: Patricia Haigh, Michael Rogozen and Amir Ayati, UltraSystems Environmental Inc.

DATE: Tuesday, September 05, 2023

PROJECT #: 7236

RE: Noise Analysis for Envision Motors Toyota

1.0 INTRODUCTION

The purpose of this memorandum is to demonstrate that the project's noise impacts are less than significant without mitigation, and therefore do not impair its ability to qualify for a Class 32 categorical exemption under the California Environmental Quality Act (CEQA).

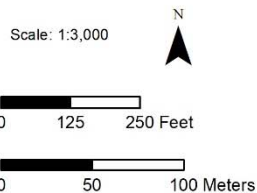
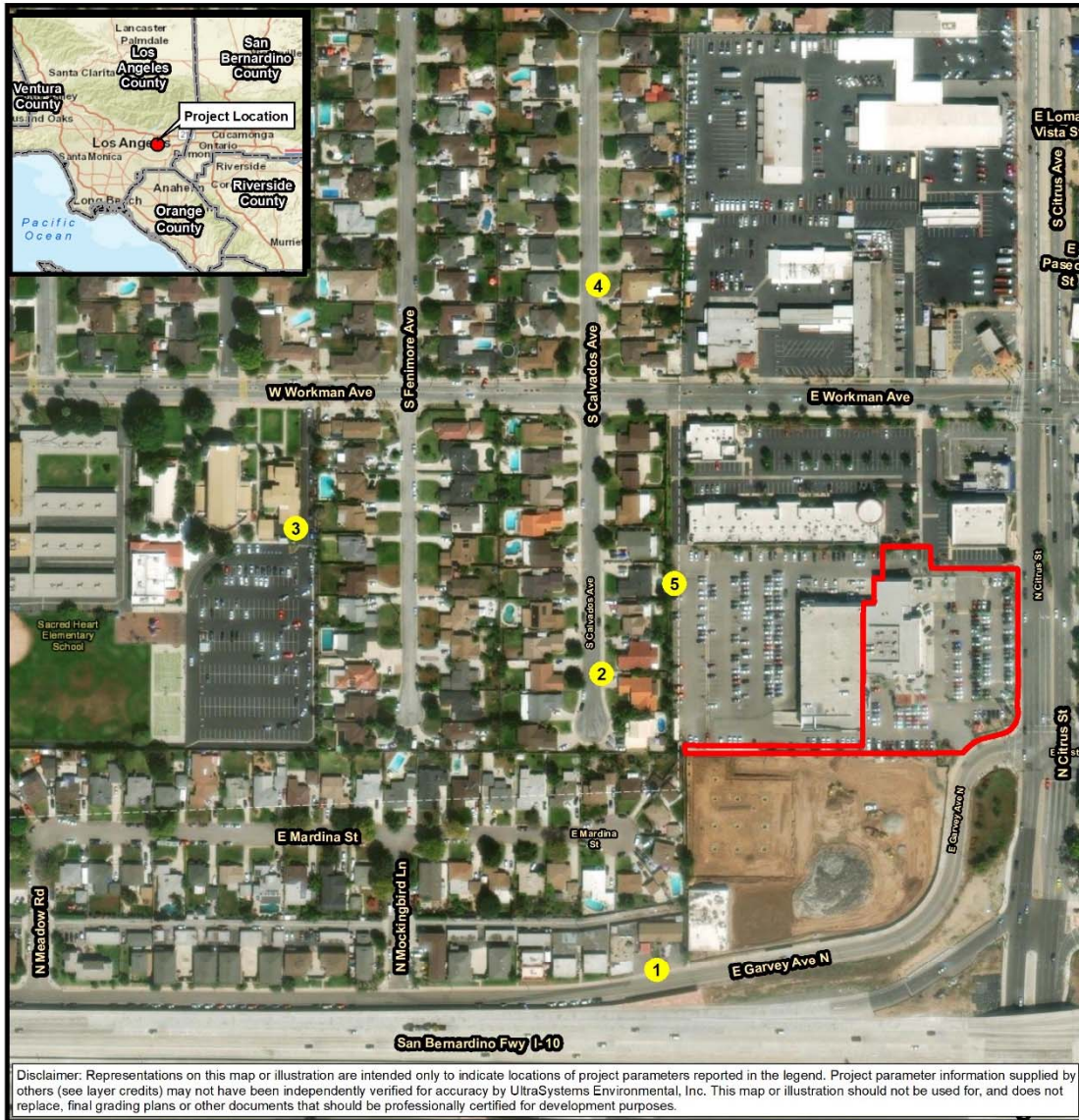
1.1 Noise Setting

The project is located in the City of West Covina adjacent to commercial (north and east), residential (west), institutional (southwest), and religious (northwest) land uses. There are commercial uses directly north of the project site and to the east across North Citrus Street; single-family residences directly west along South Calvados Avenue; Discovery Montessori Preschool to the southwest and a construction site directly south of the project along East Garvey Avenue North.

UltraSystems Environmental Inc. (UltraSystems) conducted ambient noise sampling around the project area. Five sampling locations, as shown in **Figure 1** and **Table 1**, were chosen to represent noise-sensitive land uses (residential, religious, and institutional). For each location, a 15-minute measurement was taken between the hours of 11 a.m. and 3 p.m. on August 24, 2023. The 15-minute L_{eq} values¹ ranged from 52.6 dBA to 67.5 dBA. The lowest recorded value was measured at point 3, which is the Sacred Heart Catholic Church, and the highest value recorded was at point 1, which is the Discovery Montessori Preschool close to the project site and near a freeway. The results of the measurements are summarized in **Table 1**.

1 L_{eq} , the equivalent noise level, is an average of sound level over a defined time period (such as 1 minute, 15 minutes, 1 hour or 24 hours).

Figure 1
NOISE SAMPLING LOCATIONS



Legend

- Project Boundary
- Noise Sampling Location

**Envision West Covina
Toyota**

Ambient Noise
Measurement Locations

Table 1
AMBIENT NOISE SAMPLING LOCATIONS AND RESULTS

Point	Sampling Location	Measurement Results (dBA) ^a		
		15-Minute L _{eq}	L _{max}	L ₉₀
1	Discovery Montessori Preschool 2451 East Garvey Avenue North	67.5	80.3	64.2
2	Single-family residential 866 South Calvados Avenue	53.2	70.3	50.2
3	Sacred Heart Catholic Church 344 West Workman Street	52.6	68.8	49.1
4	Single-Family residential 760 South Calvados Avenue	57.8	81.4	48.1
5	Single-Family Residential, Commercial, 205 North Citrus Street	54.4	70.9	52

Source: UltraSystems, with Google Earth, 2023.

^aDefinitions of noise metrics:

dBA = decibels, with frequency weighting to approximate human perception of noise.

L_{eq} = time weighted average noise exposure.

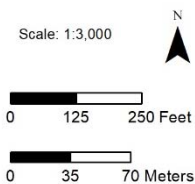
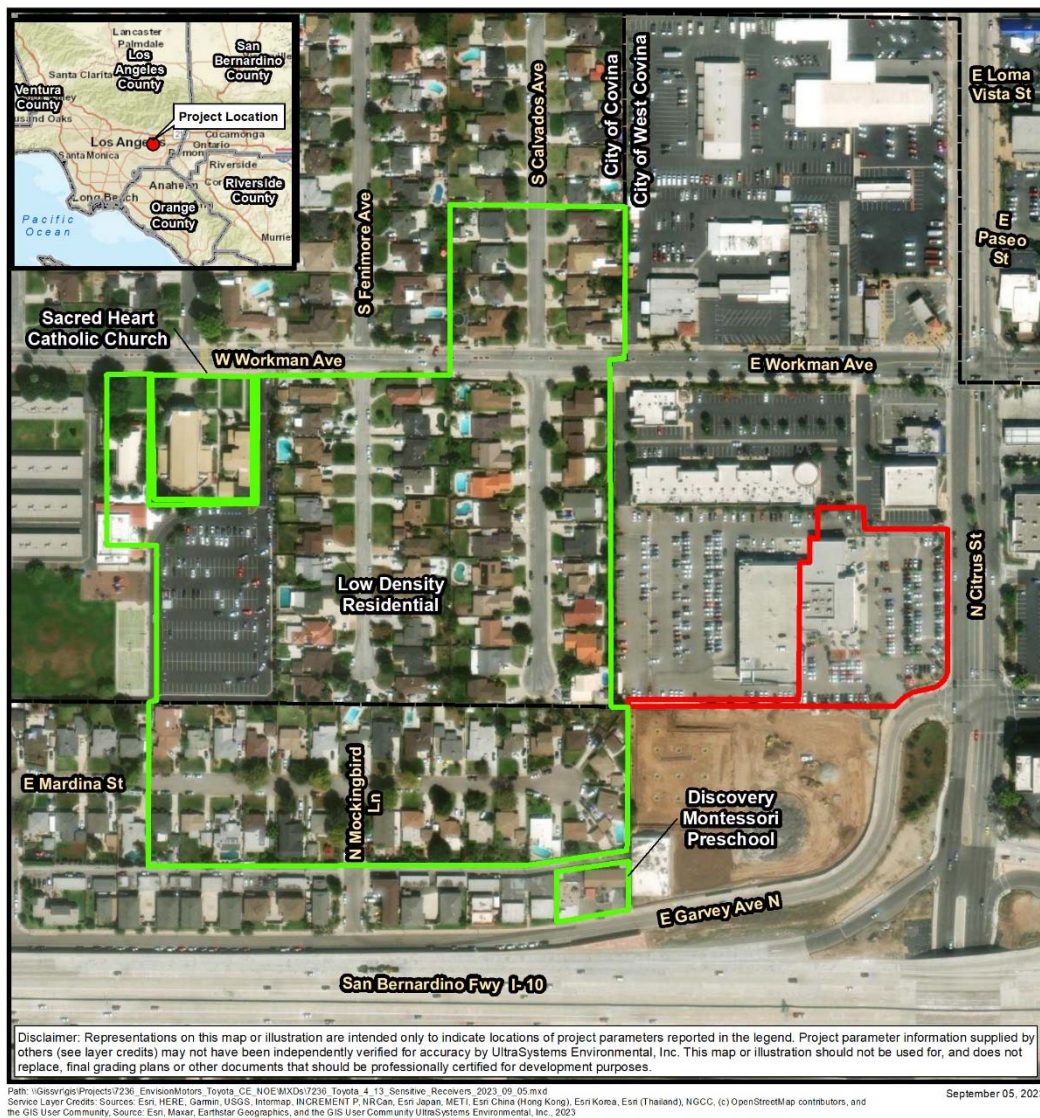
L_{max} = maximum noise level during the measurement period.

L₉₀ = a noise level that is exceeded more than 90% of the time; may be used to represent background noise.

The City of West Covina General Plan Noise Element identifies noise-sensitive land uses and noise sources, and defines areas of noise impact for the purpose of developing policies to ensure that its residents are protected from excessive noise intrusion.² Sensitive land uses are generally defined as locations where people reside or where the presence of noise could adversely affect the use of the land. They include, but are not limited to, schools, hospitals, residences, libraries, and recreation areas. **Figure 2** shows sensitive receivers in the project area. The nearest sensitive receivers are the single-family residences to the west.

2 Final Environmental Impact Report. City of West Covina 2016 General Plan Update and Downtown Plan and Code. City of West Covina. December 2016, pg. 201-216. Internet: <https://www.westcovina.org/home/showpublisheddocument/18142/637232598667300000>. Accessed September 1, 2023.

Figure 2
SENSITIVE RECEIVERS IN THE PROJECT AREA



Legend

-  Project Boundary
-  Sensitive Noise Receivers
-  City Boundary

**Envision West Covina
Toyota**
Sensitive Noise Receivers



1.2 CEQA Evaluation Criteria

Appendix G to the CEQA Guidelines contains the following thresholds for significance under CEQA:

Would the project result in:

- a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- b) Generation of excessive groundborne vibration or groundborne noise levels?
- c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The proposed project was evaluated against these thresholds. (See **Section 4.0**).



2.0 NOISE STANDARDS

2.1 City of West Covina General Plan Noise Element

According to the City's General Plan EIR, noise-sensitive land uses, such as residential, schools, churches, hospitals and nursing homes are normally acceptable with exterior noise levels at or below 60 dBA CNEL, and conditionally acceptable at or below 70 dBA CNEL.^{3,4}

2.2 Municipal Code

The City of West Covina Municipal Code § Ord. No. 1826, § 2, 11-13-89, establishes noise limits on nighttime construction activities that apply to all zones within the city. Unless permitted or in an emergency, construction activity is prohibited between 8 pm and 7 am (6 am regarding loading and unloading activities). The Municipal Code does not establish limits on daytime construction noise.

3.0 NOISE IMPACT ANALYSIS

3.1 Construction Noise

Noise impacts from construction activities are a function of the noise generated by the operation of construction equipment and on-road delivery and worker commuter vehicles, the location of equipment, and the timing and duration of the noise-generating activities. The types and numbers of pieces of equipment anticipated in each phase of construction and development were estimated by running the California Emissions Estimator Model (CalEEMod), Version 2022.1.1, and having the model generate land use-based default values. The CalEEMod equipment default values are based on a construction survey performed by the SCAQMD.⁵ **Table 3** lists the equipment expected to be used. For each equipment type, the table shows an average noise emission level (in dB at 50 feet, unless otherwise specified) and a "usage factor," which is an estimated fraction of operating time that the equipment would be producing noise at the stated level.^{6,7} Equipment use was matched to phases of the construction schedule.

For all sensitive receivers, the greatest exposures would occur during paving. The highest total short-term noise exposure (ambient plus construction-related) would be 68.1 dBA Leq, at Discovery Montessori Preschool.

3 West Covina General Plan, p. 103.

4 CNEL = community noise equivalent level, which is a 24-hour weighted average noise level, with weights of 4.77 dBA in evening hours (7 p.m. to 10 p.m.) and 10 dBA in nighttime hours (10 p.m. to 7 a.m.).

5 California Emissions Estimator Model. Appendix D. Technical Source Documentation for Emissions Calculations. CalEEMod Version 2022.1.1, September 2023. Internet: https://www.caleemod.com/documents/user-guide/05_Appendix%20D.pdf.

6 Equipment noise emissions and usage factors are from Knauer, H. et al., 2006. *FHWA Highway Construction Noise Handbook*. U.S. Department of Transportation, Research and Innovative Technology, Administration, Cambridge, Massachusetts, FHWA-HEP-06-015 (August 2006), except where otherwise noted.

7 Roller and paving equipment noise emissions data from County of Ventura, Construction Noise Threshold Criteria and Control Plan. Amended July 2010.

Table 3
CONSTRUCTION EQUIPMENT NOISE CHARACTERISTICS

Construction Phase	Equipment Type	Number of Pieces	Maximum Sound Level (dBA @ 50 feet)	Usage Factor	Composite Noise (dBA @ 50 feet)
Demolition	Rubber Tired Loaders	1	79	0.4	75.02
Site Preparation	Scrapers	1	88	0.14	79.46
Grading	Off-Highway Trucks	1	75	0.4	81.21
	Rollers	1	74	0.1	
	Tractors/Loaders/Backhoes	1	85	0.37	
Building Construction	Forklift	4	67	0.3	67.79
Paving	Roller	1	74	0.1	84.43
	Paving Equipment	1	85	0.5	
	Tractors/Loaders/Backhoes	1	85	0.37	
Architectural Coating	Air Compressors	1	81	0.48	77.81

Source: FTA, 2018, unless otherwise specified.

Table 4
SENSITIVE RECEIVER NOISE EXPOSURE

Receiver	Noisiest Construction Phase	Ambient Noise dBA Leq	Construction Noise dBA Leq	Total Exposure ^a dBA Leq	Change dBA Leq
1	Paving	67.5	59.3	68.1	0.6
2	Paving	53.2	58.9	59.9	6.7
3	Paving	52.6	47.3	53.7	1.1
4	Paving	57.8	50.0	58.5	0.7
5	Paving	54.4	55.8	58.2	3.8

3.2 Operational Noise

3.2.1 Noise Control at the Source

Onsite noise sources from the proposed project would include operation of mechanical equipment such as air conditioners, lawnmowers, leaf blowers, building maintenance equipment; and motor vehicles accessing, and driving adjacent to the project site. Noise levels associated with operation of the project are expected to be comparable to those of nearby residential and commercial areas. Additionally, the land use of the project site will not change, so noise sources and noise levels are not expected to change significantly. Noise from onsite sources would be less than significant.

3.2.2 Traffic Noise

It has been well established that in order for a change in traffic noise to be perceived, traffic has to double. A transportation assessment⁸ for the project estimates that the increase in trips per day will be 366. This increase will be a tiny fraction of existing and future traffic on local streets. Therefore, traffic noise impacts in regards to the proposed project would be less than significant.

3.3 Vibration

Construction activities for the project have the potential to generate low levels of groundborne vibration. The operation of construction equipment generates vibrations that propagate through the ground and diminish in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels. The construction activities associated with the project could have an adverse impact on both sensitive structures (i.e., building

⁸ Envision Toyota Dealership and Service Center Project Trip Generation and VMT Screening Memorandum, City of West Covina, CA. Letter Report from Justin Tucker and Elias Bandek, RK Engineering Group, Inc. to Betsy Lindsay, UltraSystems Environmental Inc. September 1, 2023.

damage) and populations (i.e., annoyance). The construction vibration analysis used formulas published by the Federal Transit Administration (FTA).⁹

The FTA has published standard vibration levels for construction equipment operations, at a distance of 25 feet.¹⁰ **Table 5** shows an analysis of construction vibration impacts at the nearest sensitive receiver, which is about 418 feet from the project boundary. As shown in **Table 5**, the vibration level of construction equipment at the nearest sensitive receiver is at most 0.0040 inch per second, which is less than the FTA damage threshold of 0.12 inch per second PPV for fragile historic buildings, and 50 VdB, which is less than the FTA threshold for human annoyance of 80 VdB. Construction vibration impacts would therefore be less than significant.

Table 5
VIBRATION LEVELS OF CONSTRUCTION EQUIPMENT

Equipment	PPV at 25 feet (in/sec)	Vibration Decibels at 25 feet (VdB)	PPV at 135 feet (in/sec)	Vibration Decibels at 135 feet (VdB)
Loaded trucks	0.076	86	0.0034	49
Jack hammer	0.035	79	0.0016	42
Small bulldozer	0.003	58	0.0001	21
Large bulldozer	0.089	87	0.0040	50

Source: FTA, 2018 and UltraSystems, 2022.

The project involves the operation of commercial uses and would not involve the use of stationary equipment that would result in high vibration levels, which are more typical for large manufacturing and industrial projects. Groundborne vibration at the project site and immediate vicinity currently result from heavy-duty vehicular travel (e.g., trucks and transit buses) on the nearby local roadways, and the project would not result in a substantial increase of these heavy-duty vehicles on the public roadways. Therefore, vibration impacts associated with operation of the project would be less than significant.

4.0 CEQA EVALUATION

The following is a brief evaluation of the project's noise impacts against the thresholds listed in **Section 1.2**.

Would the project result in:

- a) *Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

9 Transit Noise and Vibration Impact Assessment Manual. FTA Report No. 0123. September 2018. Internet: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf, p. 185

10 Ibid., p. 184.

As shown in **Section 3.1** and **Section 3.2**, the project will not generate a substantial permanent increase in ambient noise levels, and future users of the project will not be exposed to excessive noise. However, short-term construction activities will expose only the nearest sensitive receivers to noise levels exceeding 65 dBA (68.1 dBA L_{eq}). However, the increased noise level would be temporary and intermittent, and would occur during hours when most people would likely not be at home. Construction would adhere to the city's permitted construction hours of 7 a.m. to 8 p.m.. The noise would be typical of life in an urban area. Therefore, the onsite construction impacts would be less than significant.

b) Generation of excessive groundborne vibration or groundborne noise levels?

As discussed in **Section 3.3**, both the project and offsite sensitive receivers are too distant to experience adverse levels of vibration.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The project is not located within the vicinity of any private airstrip or within two miles of a public airport or private use airport. The nearest airport to the project site is 5.6 miles to the northwest, RC Airplane Airport at Santa Fe Dam in Irwindale, California.

In conclusion, the project's noise and vibration impacts would not be of a nature that would preclude the adoption of a categorical exemption under CEQA.

APPENDIX D

VMT SCREENING MEMO

September 1, 2023

Ms. Betsy Lindsay
ULTRASYSTEMS ENVIRONMENTAL
16431 Scientific Way
Irvine, CA 92618

Subject: Envision Toyota Dealership and Service Center Project Trip Generation and VMT Screening Memorandum, City of West Covina, CA

Dear Ms. Lindsay:

A. Introduction

RK ENGINEERING GROUP, INC. (RK) is pleased to provide this Trip Generation and Vehicle Miles Traveled (VMT) Screening Analysis for the proposed Envision Toyota Dealership and Service Center project.

The purpose of this study is to utilize the *City of West Covina Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (City TIA Guidelines), dated September 2020, which establishes uniform analysis methodologies and thresholds of significance, to determine if the proposed project will require a detailed level of service (LOS) analysis and/or a detailed VMT modeling analysis.

B. Project Description

The proposed project is located at 205 N. Citrus Street, on the southwest corner of E. Workman Avenue and N. Citrus Street, in the City of West Covina. The project site is currently occupied by an existing Nissan car dealership and is currently zoned as Commercial in the City of West Covina General Plan.

The proposed project consists of remodeling the existing Nissan car dealership and adding approximately 13,130 square feet (SF) to the existing show room and parts service center.

Access to the project site will remain as existing via the following:

- One (1) right-in/right-out unsignalized driveway (main driveway) located along N. Citrus Street;

- One (1) right-in/right-out/left-in unsignalized gated driveway located along E. Garvey Avenue N. This driveway should restrict left-turns out due to the distance/proximity to the N. Citrus Street intersection and future retail center driveway to the southwest.;
- One (1) full-access unsignalized driveway through the north side opposite the retail center to the north to ultimately exit onto E. Workman Avenue; and
- One (1) full-access unsignalized gated driveway at the far northwest end of the parcel that has access behind the retail center to the north to ultimately exit onto E. Workman Avenue.

Exhibit A shows a location map of the proposed project. **Exhibit B** shows the proposed project site plan.

C. Project Trip Generation

Trip generation represents the amount of traffic that is attracted and produced by a development. Trip generation is typically estimated based on the trip generation rates from the latest *Institute of Transportation Engineers (ITE) Trip Generation Manual*. The latest and most recent version (11th Edition, 2021) of the ITE Manual has been utilized for this trip generation analysis. This publication provides a comprehensive evaluation of trip generation rates for a variety of land uses.

Since the project site is currently occupied by an existing Nissan car dealership and the proposed project is expected to operate similar to how the former use operates, the project trip generation is based on the net increase of 13,130 SF of car dealership use. The trip generation rates for ITE Land Use 840: Automobile Sales (New) have been utilized for the trip generation analysis, and are shown in **Table 1**.

Table 1
ITE Trip Generation Rates¹

Land Use	ITE Code	Units ²	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Automobile Sales (New)	840	TSF	1.36	0.50	1.86	0.97	1.45	2.42	27.84

1. Source: ITE Trip Generation Manual (11th Edition, 2021).

2. TSF = Thousand Square Feet.

Utilizing the trip generation rates from **Table 1**, **Table 2** shows the trip generation for the proposed project.

Table 2
Project Net Trip Generation

Land Use	Quantity	Units ¹	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Envision Toyota Dealership and Service Center	13.130	TSF	18	7	25	13	19	32	366

1. TSF = Thousand Square Feet.

As shown in **Table 2**, the proposed project is forecast to generate approximately 366 net additional weekday daily trips which include approximately 25 net additional AM peak hour trips and approximately 32 net additional PM peak hour trips.

As specified in the City TIA Guidelines, projects generating 50 or less AM or PM peak hour trips may generally be exempt from requiring a detailed level of service (LOS) analysis, since such projects typically do not affect LOS significantly once distributed to the local roadway network. As such, a trip generation memorandum will be considered sufficient for traffic analysis purposes.

Based on the project trip generation (i.e., 25 AM peak hour trips and 32 PM peak hour trips), the proposed project is not required to prepare a detailed LOS analysis and is not expected to result in any significant adverse impacts on the operations of the roadway network and intersections.

D. CEQA Vehicle Miles Traveled (VMT) Screening Analysis

The *City of West Covina Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (City TIA Guidelines), dated September 2020, provides recommendations in the form of thresholds of significance and methodology for identifying VMT related impacts. The proposed project is subject to a VMT analysis and will adhere to the recommendations and practices described in the City's guidelines.

Project type, size and location are some characteristics that may be considered in determining whether or not a project is expected to have a less than significant impact on the environment without conducting a detailed project-level VMT assessment. The proposed project is evaluated for VMT screening based on its project characteristics.

Per the City's guidelines, local-serving projects less than 50,000 SF in size may be presumed to have a less than significant transportation impact absent substantial evidence to the contrary. Projects which serve the local community and have the potential to reduce VMT are not required to complete a detailed project-level VMT assessment. By adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT. Thus, lead agencies generally may presume such development creates a less than significant impact.

As previously mentioned, the project site was formerly occupied by an identical land use to what is being proposed (i.e., new car dealership). The project involves renovating the existing Nissan car dealership and expanding the showroom and parts service center by 13,130 SF. As such, it is appropriate to focus this VMT analysis to only the net new square footage being proposed (i.e. 13,130 SF), which is less than 50,000 SF threshold for local-serving projects as identified in the City's guidelines. Furthermore, within an approximately 10-mile radius of the project site, there are 6 other existing Toyota car dealerships serving their individual service areas. As such, it is concluded that the additional square footage to the showroom/parts service center will primarily serve the local community and will not have a significant regional attraction.

Based on these considerations, the proposed project may be presumed to have a less than significant VMT impact and is expected to screen out from requiring a detailed project-level VMT assessment. Therefore, no further VMT analysis is required.

E. On-Site and Off-Site Parking

As shown on the proposed site plan, the project will provide thirty-eight (38) employee parking spaces, including seventeen (17) electric vehicle (EV) capable spaces, on-site. Almost all employee parking spaces are located along the northern boundary of the site, with a few located west of the service bays. Placing employee parking near the back of the site is ideal as it allows customers to park near the building entrances and display vehicles, reducing internal congestion.

As also shown on the site plan, the project will provide twenty-one (21) customer parking spaces, including five (5) ADA spaces and six (6) EV charging spaces (EVCS), on-site. The customer parking spaces are located along the perimeter of the building for easy access to the entrances, with the exception of a few ADA spaces which are located on the north side of the service bays. Placing customer parking near the main frontage of the site and building entrances is desirable for customers who wish to view the display vehicles around the building and enter the building for any inquiries and assistance they may need.

Additionally, the project will provide forty (40) parking spaces for service customers which are located west of the service bays.

There is no on-street parking permitted on the roadways along the project site frontage (i.e., N. Citrus Street and E. Garvey Avenue N.).

F. Vehicle Deliveries and Truck Turning Movements

As shown on the proposed site plan, the vehicle unloading zone for vehicle deliveries is located along the drive aisle north of the service bays. To help facilitate truck access to/from the unloading zone, it is recommended that trucks enter the site by making a right-turn into the E. Garvey Avenue N. driveway (from N. Citrus Street), make a left-turn once in the site and navigate through the site in a clockwise fashion to the unloading zone, and exit the site by making an eastbound right-turn out of the N. Citrus Street driveway.

These circulation recommendations are consistent with the City of West Covina truck routes. Per the truck route map, N. Citrus Street between E. Workman Avenue (i.e., City of West Covina limit) and E. Garvey Avenue S. is an identified truck route. The segment of E. Garvey Avenue S. between N. Citrus Street and the I-10 Freeway eastbound ramps is also an identified truck route. As such, trucks traveling to the site will exit the I-10 Freeway at N. Citrus Street and proceed north toward the project site, make a northbound left-turn at E. Garvey Avenue N., and enter the site via the E. Garvey Avenue N. project driveway. Trucks leaving the site will make an eastbound right-turn out of the N. Citrus Street driveway and proceed south toward the I-10 Freeway ramps.

A turning template has been prepared, shown on **Exhibit C**, to review the ingress/egress turning movements into and out of the site, as well as the turning movements while navigating the site, for a 5-axle vehicle delivery truck. A WB-67 truck has been utilized for the turning template.

As shown on **Exhibit C**, the E. Garvey Avenue N. and N. Citrus Street driveways provide adequate access into and out of the project site, respectively, for a 5-axle vehicle delivery truck. It should further be noted that this is an existing site that currently accommodates car delivery (5-axle) trucks and the proposed internal circulation will generally remain unchanged after the renovation/expansion of the showroom.

G. Conclusion

RK ENGINEERING GROUP, INC. (RK) has completed this Trip Generation and Vehicle Miles Traveled (VMT) Screening Analysis for the proposed Envision Toyota Dealership and Service Center Project.

As specified in the City TIA Guidelines, projects generating 50 or less AM or PM peak hour trips may generally be exempt from requiring a detailed level of service (LOS) analysis, since such projects typically do not affect LOS significantly once distributed to the local roadway network. As such, a trip generation memorandum will be considered sufficient for traffic analysis purposes. Based on the project trip generation (i.e., 25 AM peak hour trips and 32 PM peak hour trips), the proposed project is not required to prepare a detailed LOS analysis and is not expected to result in any significant adverse impacts on the operations of the roadway network and intersections.

the project site was formerly occupied by an identical land use to what is being proposed (i.e., new car dealership). The project involves renovating the existing Nissan car dealership and expanding the showroom and parts service center by 13,130 SF. As such, it is appropriate to focus this VMT analysis to only the net new square footage being proposed (i.e. 13,130 SF), which is less than 50,000 SF threshold for local-serving projects as identified in the City's guidelines. Furthermore, within an approximately 10-mile radius of the project site, there are 6 other existing Toyota car dealerships serving their individual service areas. As such, it is concluded that the additional square footage to the showroom/parts service center will primarily serve the local community and will not have a significant regional attraction. Based on these considerations, the proposed project may be presumed to have a less than significant VMT impact and is expected to screen out from requiring a detailed project-level VMT assessment. Therefore, no further VMT analysis is required.

RK appreciates this opportunity to work with ULTRASYSTEMS ENVIRONMENTAL on this project. If you have any questions regarding this study, please do not hesitate to contact us at (949) 474-0809.

Respectfully submitted,
RK ENGINEERING GROUP, INC.



Justin Tucker, P.E.
Principal Engineer



Elias Bandek, EIT
Engineer II

Exhibits



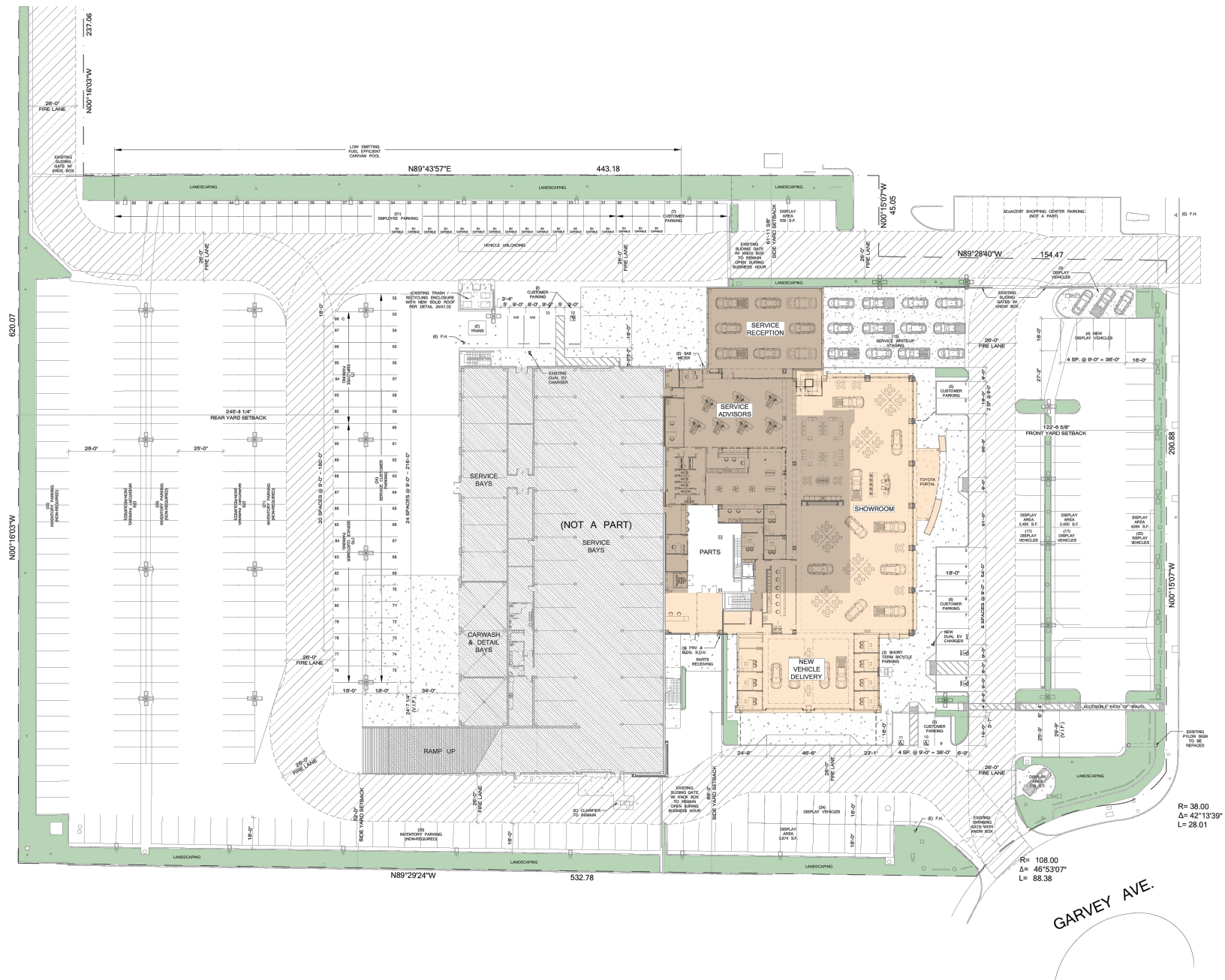
Legend:

- = Project Site Boundary
- ✱ = Project Site



Exhibit B

Site Plan



5-Axle Vehicle Delivery Truck Turning Template

