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December 24, 2019

Michael Allen  
Current Planning Manager  
Planning Division  
City of Culver City  
9770 Culver Boulevard  
Culver City, CA 90232

Subject: California Environmental Quality Act Class 32 Categorical Exemption Support Letter for the Proposed Culver City Senior Assisted Living Facility Project

Dear Mr. Allen:

LSA is pleased to submit this letter to the City of Culver City (City) in support of a Class 32 Categorical Exemption (CE) under the California Environmental Quality Act (CEQA) for the proposed Culver City Senior Assisted Living Facility Project (project). The proposed project site is at 11141 Washington Boulevard in Culver City, California and would involve construction of an infill senior assisted living facility within the project site.

As supported in the analysis below, the project is determined not to have a significant effect on the environment and, therefore, is exempt from the provisions of CEQA pursuant to a Class 32 CE under Section 15332 of the *State CEQA Guidelines*. Section 15332 (In-fill Development Projects) categorically exempts those projects characterized as in-fill development that meet certain requirements. The following discussion summarizes the project and discusses the applicability of Section 15332.

## PROJECT DESCRIPTION

### Existing Project Site

The 0.88-acre project site is on Assessor's Parcel Numbers 4213-015-015, 4213-015-016, 4213-015-017, 4213-015-019, and 4213-015-021 at 11141 Washington Boulevard in Culver City. The project site is currently developed with four commercial structures and contains a limited amount of vegetation in the form of ornamental shrubs and palm trees.

As shown on Figure 1, Project Location (all figures are provided as Attachment A), the project site is bounded to the north by commercial uses, to the east by Washington Boulevard and retail uses, to the south by a commercial use with Sepulveda Boulevard beyond, and to the west by commercial uses. Regional access to the project site is provided by Washington Boulevard, which borders the project site and Interstate 405, 0.1 mile west of the project site.

### Proposed Project

The proposed project involves the development of a five-story, 134-unit assisted living facility with 154 beds on a 0.88-acre project site in Culver City. As shown on Figure 1, the project site is at 11141

Washington Boulevard. Apart from its residential component, the project would also have a 420-square-foot salon along its frontage on Washington Boulevard and an enclosed underground parking structure. Figures 2a and 2b depict the project's proposed site plan and typical upper level floorplans. Levels 2–5 would provide studio, one-bedroom, and two-bedroom units for a total of 134 units and 154 beds. All floor plans in the assisted-living facility would feature fully equipped kitchens and a living and dining space. Level 1 would include the main entrance, lobby, medical facilities, memory care units, a physical therapy center, two outdoor courtyards, a bistro, a kitchen, a library, a theater, an activity room, and a common-area space.

Office spaces for facility employees would also be on Level 1 and would include a reception area, a mailroom, a conference room, and a break room. Primary access to the facility would be provided at the main entrance, which is on the alley that borders the project site to the west. A passenger drop-off zone would be in front of the main entrance. Pedestrian access would be provided by existing sidewalks along Washington Boulevard. The project would include a subterranean parking garage with 85 parking spaces; 4 short-term, metered parking stalls on the eastern perimeter of the project site; and 12 short-term bicycle parking spaces in the eastern, outdoor courtyard.

Development of the project would involve demolition of the existing buildings on the project site, excavation to reach appropriate depths for project features, construction of the new building, installation of new wet and dry utilities, and landscaping. Construction is expected to start in 2020 and conclude in 2021. The proposed project would incorporate photovoltaic solar panels and solar thermal water heating on the roof and would be built to an as-yet undecided third-party green building certification, such as the GreenPoint Rated program, LEED rating system, or Living Building Challenge. Development of the project would involve demolition of the existing buildings on the project site, excavation to reach appropriate depths for project features, construction of the new building, installation of new wet and dry utilities, and landscaping. Figures 2a and 2b, Conceptual Site Plan, show the project's site plan.

Construction would include demolition of the existing on-site buildings, vegetation removal, grading, building construction, and the installation of landscaping and irrigation, lighting, stormwater and storm drain facilities, and underground utilities. It is assumed that construction would use standard construction equipment and techniques, and that no specialized construction equipment would be necessary to construct the proposed project.

Construction and operation activities that would be undertaken as part of the project would be characterized as in-fill development, which, when certain conditions are met, are considered to be exempt under *State CEQA Guidelines* Section 15332 (discussed in detail below).

### **CEQA, SECTION 15332, CLASS 32 IN-FILL DEVELOPMENT EXEMPTION**

Under *State CEQA Guidelines* Section 15332, a project characterized as in-fill development qualifies for an exemption under CEQA if the project: (1) is consistent with the general plan and zoning ordinance; (2) occurs within city limits on a project site of no more than 5 acres substantially surrounded by urban uses; (3) is located on a site that does not have value as habitat for endangered, rare, or threatened species; (4) would not result in any significant impacts relating to

traffic, noise, air quality, or water quality; and (5) is adequately served by all required utilities and services.

The following provides an analysis of the project's consistency with these conditions:

**1. The proposed project is consistent with the General Plan and Zoning Ordinance.**

The project site currently has a General Plan Land Use Designation of Commercial (General Corridor), which allows for a range of small- to medium-scale commercial uses, and limited medium- density housing opportunities compatible with adjacent residential neighborhoods.<sup>1</sup> The project would not require a General Plan Amendment.

The project site is within the Commercial General Zoning District, which designates areas along major corridors appropriate for small- to medium-scale commercial uses. The Commercial General Zoning District also accommodates mixed-use and live/work developments. The Commercial General Zoning District is considered consistent with the General Corridor General Plan Land Use Designation. Although the project Applicant is requesting deviations from some of the City's setback requirements along Washington Boulevard as allowed by the City's Municipal Code, the project would not require a zoning change. The project is consistent with the current General Plan and zoning designations, and is anticipated to be consistent with applicable General Plan policies and zoning regulations.

**2. The proposed project would occur within City limits on a project site of no more than 5 acres and would be substantially surrounded by urban uses.**

The project site is within the Culver City limits at 11141 Washington Boulevard. According to the current Site Plan, the project site is 0.88 acre and is surrounded by commercial uses. As stated previously, the project site is in the Washington Boulevard Corridor, which is heavily urbanized and developed with commercial uses. Therefore, as the project site is not larger than 5 acres and is substantially surrounded by urban uses, the project meets this requirement.

**3. The proposed project would be on a site that does not have value as habitat for endangered, rare, or threatened species.**

As shown on Figure 1, the project site is currently developed with four commercial structures and associated parking lot and contains a limited amount of vegetation in the form of ornamental shrubs and palm trees. There is no on-site vegetation. The project site has no value as habitat for endangered, rare, or threatened species.

**4. The proposed project would not result in any significant impacts relating to traffic, noise, air quality, or water quality.**

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<sup>1</sup> City of Culver City. 2000. Land Use Element. Website: <https://www.culvercity.org/home/showdocument?id=786> (accessed September 17, 2019).

The proposed project would not result in significant impacts related to traffic, noise, air quality, or water quality.

**Traffic.** A Focused Traffic Analysis (LSA 2019)<sup>1</sup> (provided in Attachment B) was prepared to identify any potential traffic impacts resulting from the development of the proposed project. According to the Focused Traffic Analysis, no potentially significant traffic impacts have been identified. As shown in Attachment B, the project would generate 406 daily trips and would not generate 50 or more peak-hour trips. The City requires a traffic study if a project is estimated to add 500 or more new daily trips or 50 or more trips during the a.m. or p.m. peak periods.

**Noise.** A Noise and Vibration Impact Analysis (LSA 2019) was prepared to evaluate the potential noise impacts associated with the proposed project and is provided as Attachment C. The primary existing noise sources in the project area are transportation facilities, including Washington and Sepulveda Boulevards. In addition, operational noise from adjacent commercial uses are occasionally audible on the project site.

Construction would generate short-term noise. Compliance with the standard condition outlined in Attachment C, which includes adherence to construction hours specified in the City's Noise Ordinance, would address construction noise impacts.

As documented in Attachment C, the proposed project is expected to result in an increase of 0.1 dBA CNEL (Community Noise Equivalent Level measured in A-weighted decibels). A noise level increase of less than 1 dBA would not be perceptible to the human ear.

Additionally, the proposed project would have the potential to generate noise impacts from sources such as parking activities, loading and unloading activities, and mechanical equipment. The proposed subterranean parking would be entirely underground and would also contain spaces for deliveries. Because the parking lot and loading zone would be underground, noise impacts to surrounding uses would be negligible.

The operation of mechanical equipment, such as air conditioning, may generate audible noise. However, mechanical equipment would be shielded from nearby noise-sensitive uses to attenuate noise and avoid conflicts with adjacent uses. In addition, the proposed project's mechanical equipment would be required to comply with the City's General Plan Noise Element, including Policy 2.A pertaining to stationary noise sources, which establishes maximum permitted noise levels from mechanical equipment. Project compliance with the City's noise standards would ensure that operational noise impacts of the proposed project are minimal.

An Environmental Noise Study was prepared to assess potential noise levels that would need to be addressed in the project's structural design to meet the exterior noise standard and is provided in Attachment D. Based on this analysis, it was determined that the project would require upgraded windows ranging from Sound Transmission Class (STC) 34 to STC 37 at specific floor heights and façades. For all other locations, a double-pane window with STC 30 is

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<sup>1</sup> LSA Associates, Inc. 2019. *11141 Washington Boulevard Focused Traffic Analysis*. June 23.

recommended. With the above recommendations incorporated into the project design, the proposed project would comply with the City's interior noise level standard of 45 dBA CNEL.

**Air Quality.** The proposed project would not conflict with or obstruct implementation of the applicable air quality management plan. The applicable air quality plan for the project area is the *2016 Air Quality Management Plan*, adopted in March 2017, which is designed to satisfy the planning requirements of both the federal and State Clean Air Acts. The proposed project is consistent with the City's General Plan and the Southern California Association of Governments' 2040 population growth forecast by 2040. Furthermore, as discussed below, project-generated emissions would be below emissions thresholds established in the South Coast Air Quality Management District's (SCAQMD) thresholds, and would not result in significant air quality impacts. Therefore, the proposed project would not conflict with or obstruct implementation of the Air Quality Management Plan.

As documented in the Air Quality and Greenhouse Gas Analysis (LSA 2019) (Attachment E), emissions of criteria pollutants during construction period would not exceed any of the SCAQMD construction daily emissions thresholds or the Local Significance Thresholds. The proposed project would be required to comply with SCAQMD Rules 402 and 403 which requires implementation of dust palliative measures during construction.

Also documented in Attachment E, the long-term operational emission of criteria pollutants would not exceed the corresponding SCAQMD daily emission thresholds or Local Significance Thresholds. Attachment E also evaluated potential greenhouse gas emissions (GHG) and determined that emissions associated with the proposed project would not exceed the SCAQMD thresholds for GHGs.

**Water Quality.** The project would comply with all applicable National Pollutant Discharge Elimination System (NPDES) permit requirements, which require implementation of best management practices (BMPs) to reduce impacts to water quality. Although the project would disturb less than 1 acre of soil and would, therefore, not be subject to the requirements of the State Water Resources Control Board (SWRCB) Construction General Permit, the project would be subject to the requirements of the Municipal Separate Storm Sewer System (MS4) Permit (Order No. R4-2012-0175, as amended by the State Water Board Order WQ 2015-0075 and the Los Angeles Water Board Order R4-2012-0175-A01; NPDES No. CAS004001) and Chapter 5.05 of the Culver City Municipal Code. The MS4 Permit and the Culver City Municipal Code require the preparation of an Erosion Control and Sediment Control Plan for all projects, regardless of the amount of soil they would disturb. The project would be required to implement construction BMPs detailed in the Erosion Control and Sediment Control Plan during construction activities. Construction BMPs would include, but would not be limited to, Erosion Control and Sediment Control BMPs designed to minimize erosion and retain sediment on site, and Good Housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters.

Project operation would be subject to the requirements of the County of Los Angeles Stormwater Program, the Standard Urban Stormwater Mitigation Plan (SUSMP) and the County

of Los Angeles Low Impact Development Standards (Title 12, Section 12.84.430). Because the project involves the replacement of more than 5,000 square feet of impervious surface, the project is considered a “redevelopment project” under the MS4 Permit; therefore, a Hydrology/LID/SUSMP Report must be prepared in compliance with the permit requirements. As documented in the Hydrology/LID/SUSMP Report (Attachment F), the proposed project includes Source Control and Low Impact Development (LID) BMPs. The identified BMPs target pollutants of concern to reduce impacts to water quality. With compliance with the applicable NPDES permit requirements and the implementation of BMPs, project impacts to water quality would be less than significant. Therefore, project compliance with the above requirements would ensure that project implementation would not result in any significant impacts related to water quality.

**5. The project site is adequately served by all required utilities and services.**

The proposed project is an infill development in an already established and fully developed area and, therefore, would have access to existing public services and utilities. The proposed project would connect to the existing utilities along Washington Boulevard. The applicant has contacted the various utility companies to obtain will serve letters and will continue to work with these utility companies throughout the development process.

## **CEQA CATEGORICAL EXEMPTIONS – EXCEPTIONS**

*State CEQA Guidelines* Section 15300.2 provides exceptions that apply to specific types of projects and/or projects where substantial evidence exists that the proposed project involves unusual circumstances. The following explains the exceptions to the categorical exemptions pursuant to Section 15300.2 of the *State CEQA Guidelines*.

- 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 an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

This exception is only applicable to Classes 3, 4, 5, 6, and 11 and not to the Class 32 exemption applicable to this 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 an infill development project in an urban area. There are no known successive projects of the same type and in the same place that would take place concurrent with the proposed project. The proposed project involves a multifamily residential development in an area characterized primarily by residential uses. The proposed project would rely on and can be accommodated by the existing road system, public services, and utilities. All air quality, noise, traffic, and water quality impacts would be less than significant. Therefore, there are no project

impacts that would be cumulatively considerable in connection with the effects of past projects, the effects of other current projects, or the effects of probable future projects. Thus, contributions to potential cumulative impacts would not be cumulatively considerable.

- 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.

No unusual circumstances have been identified in or around the project site that would result in significant environmental impacts. In addition, no impacts to biological resources would occur, as the project site is already developed with an existing church building and parking lot, is within an existing urban setting, and has no value as habitat for endangered, rare, or threatened species. Given the urban nature of the project site and the compatibility of the proposed project with the character of the surrounding residential uses, there is no evidence to indicate that the proposed project would have a significant effect on the environment due to unusual circumstances. For additional information, refer to the Focused Traffic Analysis (Attachment B), the Noise and Vibration Impact Analysis (Attachment C), Environmental Noise Study (Attachment D) and the Air Quality and Greenhouse Gas Analysis (LSA 2019) (Attachment E).

- 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 Environmental Impact Report.

The California Scenic Highway Mapping System does not include any eligible or officially designated scenic highways in the project vicinity.<sup>1</sup> Due to intervening land uses, the project site is not visible from any local highways. Therefore, the project would not result in damage to a scenic resource within a highway officially designated as a State Scenic Highway.

- 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.

As reported in the Phase I Environmental Site Assessments (Odic Environmental 2017 and included as Attachments G and H), the project site is not listed on the Department of Toxic Substances Control Hazardous Waste and Substances Site List (Cortese List, compiled pursuant to Section 65962.5 of the Government Code), federal Superfund site, State response site, voluntary cleanup site, school cleanup site, corrective action site, or tiered permit site. The project site is not on a list of solid waste disposal sites identified by the SWRCB with waste constituents above hazardous waste levels outside the waste management unit or active

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<sup>1</sup> California Department of Transportation. Scenic Highways. Website: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways> (accessed November 14, 2019).



cease-and-desist orders and cleanup and abatement orders. All use, storage, transport and disposal of hazardous materials (including any hazardous wastes) during construction activities will be performed in accordance with existing local, State, and federal hazardous materials regulations.

- 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.**

As described in the Cultural Resources Record Search Memorandum (Attachment I), the record search results for this project indicate that no previously recorded cultural resources are present within the project area. As documented in the Historic Resources Assessment (Attachment J), all four existing structures on the project site are more than 45 years old and were evaluated for their potential to be classified as a historical resources pursuant to CEQA. None of the historic-period buildings on the project site appears to be eligible for listing in the California Register of Historical Resources or for designation under the local ordinance. Therefore, the proposed project would not cause a substantial adverse change in the significance of a historical resource.

## CONCLUSION

In summary, the project would be exempt from further CEQA review pursuant to Section 15332 of the *State CEQA Guidelines* and would not meet any of the exceptions listed in Section 15300.2 of the *State CEQA Guidelines* that would disqualify the project from the Class 32 Categorical Exemption.

This letter is intended to explain how the proposed project would be exempt from the requirements of CEQA under a Class 32 CE. LSA is available to discuss the contents of this letter with City staff. If you have any questions, please contact me at (949) 553-0666 or [ryan.bensley@lsa.net](mailto:ryan.bensley@lsa.net).

Sincerely,

**LSA Associates, Inc.**



Ryan Bensley, AICP  
Associate

- Attachments:
- A: Figures
  - B: Focused Traffic Analysis (LSA 2019)
  - C: Noise and Vibration Memorandum (LSA 2019)
  - D: Environmental Noise Study (A<sup>3</sup> Acoustics 2019)
  - E: Air Quality and Greenhouse Gas Analysis (LSA 2019)
  - F: Hydrology/LID/SUSMP Report (Fusco 2019)
  - G: Phase I Environmental Site Assessment–11137 Washington Boulevard (Odic Environmental 2017)
  - H: Phase I Environmental Site Assessment–11159 Washington Boulevard (Odic Environmental 2017)



- I: Cultural Resources Record Search Memorandum (LSA 2019)
- J: Historic Resources Assessment (LSA 2019)

## **ATTACHMENT A**

### **FIGURES**

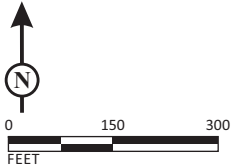




FIGURE 1

LSA

LEGEND  
 Project Site





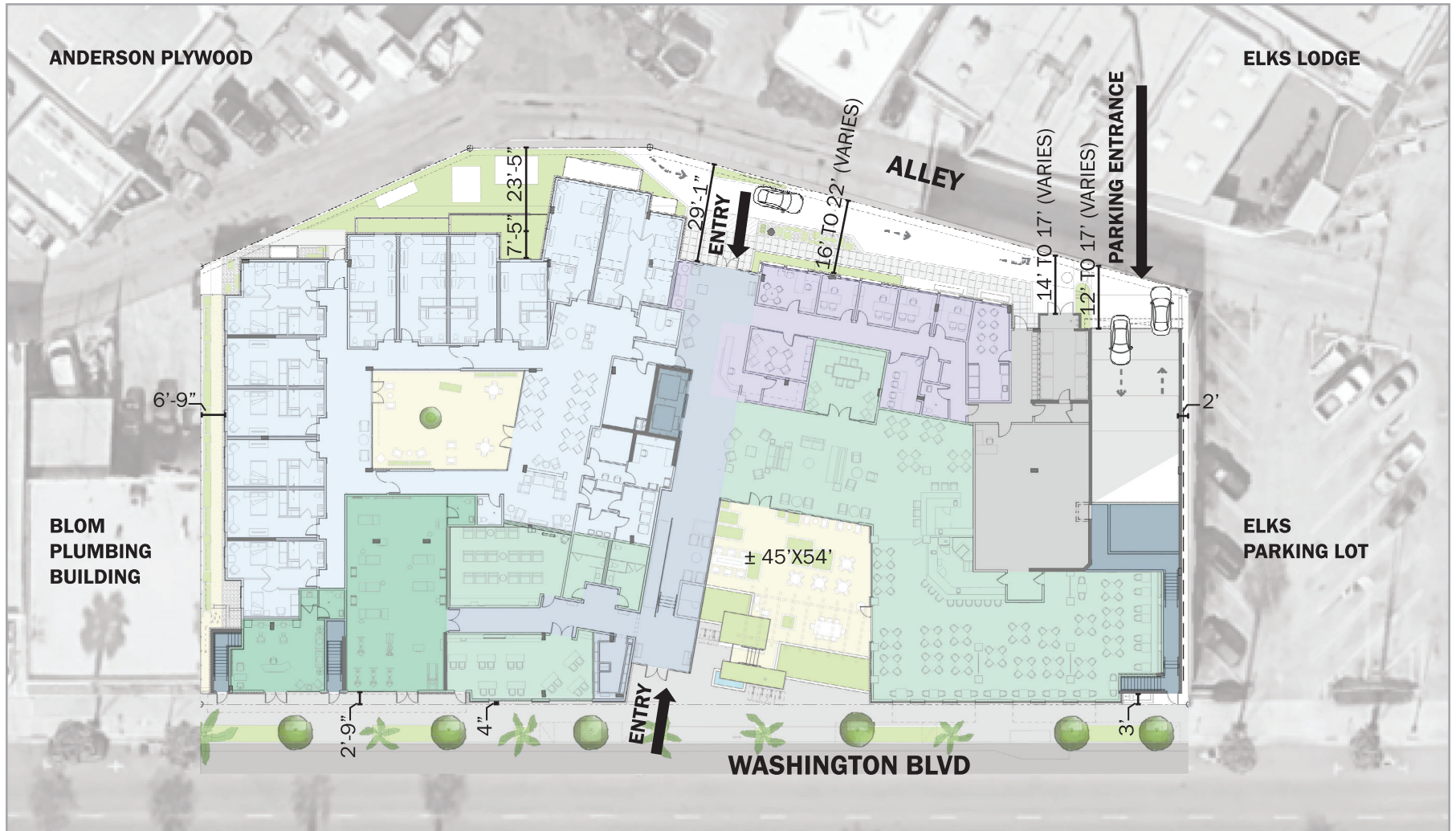
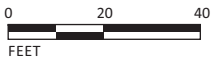


FIGURE 2a

LSA



Culver City Senior Assisted Living Facility  
Ground Level Site Plan



FIGURE 2b

## **Attachments B – J**

<https://www.culvercity.org/city-hall/city-government/city-departments/community-development/current-planning-division/current-projects/-folder-729>