

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 269-1124  
FAX (213) 897-1337  
TTY 711  
www.dot.ca.gov



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Governor's Office of Planning & Research

**Feb 09 2022**

**STATE CLEARINGHOUSE**

Oscar Martinez  
Planning Manager  
City of Torrance  
3031 Torrance Boulevard  
Torrance, CA 90503

RE: Torrance Gateway (Phase III)  
SCH # 2022010161  
Vic. LA-405/PM 14.55, LA-213/PM 9.76  
GTS # LA-2022-03820-MND

Dear Oscar Martinez:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced environmental document. Construction of five light industrial buildings for warehouse and manufacturing use, in conjunction with a subdivision into five parcels, on a site measuring approximately 39 acres. Access to the site is proposed from driveway and pedestrian pathways on 190<sup>th</sup> Street, Western Avenue, 195<sup>th</sup> Street, and Gramercy Place. The five buildings are of concrete tilt-up construction and measure a maximum 53' in height. Construction is proposed in one phase. Parking and internal circulation is provided across the site with total 1,211 parking spaces. The floor plans for each building show similar layouts with tenant separations, ground floors, loading docks, and second story office mezzanines. Building 8 measures 138,813 square feet resulting in a 0.42 Floor Area Ratio (FAR), Building 9 measures 148,295 square feet resulting in a 0.42 FAR, Building 10 measures 148,638 square feet resulting in a 0.43 FAR, Building 11 measures 159,132 square feet resulting in a 0.46 FAR, and Building 12 measures 135,122 square feet resulting in a 0.42 FAR, all within the allowable 0.60 FAR. Combined the building floor area totals 730,000 square feet.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. You may reference the Governor's Office of Planning and Research (OPR) for more information:

<http://opr.ca.gov/ceqa/updates/guidelines/>

As a reminder, VMT is the standard transportation analysis metric in CEQA for land use projects after July 1, 2020, which is the statewide implementation date.

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, this project should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing. Overall, the environmental report should ensure all modes are served well by planning and development activities. This includes reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions.

We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). This reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

You can also refer to the 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), which is available online at:

<http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and the Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared on December 18, 2020. You can review these resources as a reference at the following links for all future projects:

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>.

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf>.

When a potential safety impact is identified, Caltrans encourages lead agencies to prepare traffic safety impact analysis at the State facilities for this development in the California Environmental Quality Act (CEQA) review process so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.

Caltrans acknowledges that “the Project would result in approximately 2,686 fewer NET daily trips which include approximately 321 fewer NET trips during the AM peak hour and approximately 315 fewer NET trips during the PM peak hour. Based on the preceding, the Project satisfies the City traffic study guidelines “Small Projects” VMT impact criteria. The Project VMT impact is therefore considered less than significant, and a detailed VMT impact analysis is not required.” However, this analysis is based on the existing general office use, 590,230 square feet still in use. Most of the buildings are vacant in the last few years. Nevertheless, to identify accurate VMT impact, we recommend the City to consider a post-development VMT analysis with all mitigation measures be prepared to implement if any traffic significant impact is identified.

Based on the traffic signal warrant analysis prepared for the unsignalized study intersections, Western Avenue (SR-213) / Project Access 2: Forecast Opening Year with Project Conditions is forecast to satisfy the California Manual on Uniform Traffic Control Devices (CA MUTCD) PM peak hour traffic volume traffic signal warrant.

“However, due to the proximity of this intersection to the existing signalized intersection of Western Avenue (SR-213) / 190th Street, installation of a traffic signal at this location might not be feasible and recommended.” Caltrans does not agree with this statement as the distance between W 190th St. and the new driveway is about 500 feet, and there are 74 PM project vehicle trips making left turn at the Intersection 12 (Western Avenue & Project Access 2), as shown on Exhibit 5-3 Project Traffic Volumes in the Traffic Analysis dated on October 8, 2021. We have potential safety concern of traffic making left turn from the new driveway onto the northbound Western Avenue if no traffic signal is installed. Please consider installing a new traffic signal to allow safe left-turn movement onto

Western Avenue or consider prohibit left turn from the new driveway onto northbound Western Avenue similar to the existing driveway configuration, the right-in right-out only option. When a new traffic signal is considered, an Intersection Control Evaluation (ICE) should be performed.

Please be reminded that any work performed within the State Right-of-way will require an Encroachment Permit from Caltrans. Any modifications to State facilities must meet all mandatory design standard and specifications.

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

If you have any questions, please feel free to contact Mr. Alan Lin, the project coordinator, at (213) 269-1124 and refer to GTS # LA-2022-03820AL-MND.

Sincerely,



MIYA EDMONSON  
IGR/CEQA Branch Chief

email: State Clearinghouse