

**DEPARTMENT OF TRANSPORTATION**

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June 8, 2022

Oscar Martinez  
Torrance Community Development Department  
3031 Torrance Boulevard  
Torrance CA 90503

RE: 190<sup>th</sup> Street and Western  
Avenue Commercial Center Project  
– Mitigated Negative Declaration  
(MND)  
SCH # 2022050187  
GTS # 07-LA-2022-03940  
Vic. LA-405/PM: 14.507

Dear Oscar Martinez:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced Mitigated Negative Declaration (MND). The Project proposes the development of a new commercial center composed of five one-story commercial buildings for retail and restaurant use, including three restaurant buildings with drive-thru lanes, all situated on a 5.28-acre site. The project would rearrange and consolidate the site, which currently has six parcels, into four parcels. The combined building floor area would total 22,939 square feet (sf) and the outdoor patio areas would total 3,064 sf, resulting in a 0.10 Floor Area Ratio (FAR). The parking area would provide 249 parking spaces. The project will require a Conditional Use Permit to allow the construction of the commercial buildings, and a Division of Lot to rearrange and consolidate six existing parcels into four parcels. The City of Torrance is the Lead Agency under the California Environmental Quality Act (CEQA).

The Project site is located in the Northwest corner of 190th Street and Western Avenue at 1805, 1875 190th Street and 18925, 18999 Western Avenue. The Project includes a pylon sign that would measure 75' in height and would be situated at the northeast corner of the project site adjacent to Interstate 405 (I-405). Access to the project site is proposed from two new driveways and pedestrian pathways on 190th Street and one new driveway and pedestrian pathway on Western Avenue.

According to the Initial Study, the proposed project would be exempt from a Transportation Impact Analysis (TIA)/ Vehicle Miles Traveled (VMT) Analysis because the proposed project would meet the City's local-serving retail screening criteria threshold of 50,000 square feet; it would be consistent with the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS); and would not have an impact on the transit system, bicycle network, or pedestrian network. The request for a TIA

exemption was submitted to and approved by the City's Traffic Engineer. Thus, a VMT analysis would not be required for the proposed project and the proposed project would not result in significant transportation impacts. Therefore, the proposed project would not conflict with CEQA Guidelines Section 15064.3(b). Impacts would be less than significant, and no mitigation measures would be required.

However, The City requires a Traffic Circulation Analysis (TCA) to be prepared for projects that generate more than 500 new vehicle trips daily. The proposed project would generate 4,740 net trips daily, of which 267 trips would occur during the AM peak hour, 740 trips would occur during the midday peak hour, and 360 trips would occur during the PM peak hour. The TCA determined that buildout of the proposed project would not worsen Level of Service (LOS) along public rights-of-ways and the proposed drive-through lanes on the project site would be contained within the project site and would not adversely affect circulation of public rights-of-way.

To further improve operations at the study intersections, we have the following comments:

Implement signal timing coordination along 190th Street and Western Avenue and synchronize the traffic signal at 190th Street/Western Avenue with the Caltrans traffic signal at 190th Street/I-405 Southbound ramps during all peak periods. Additionally, we recommend the full ingress/egress access at the West Project Driveway on 190th Street be converted to right-in/right-out access only (No Left Turn). Left turning vehicles on the proposed full ingress/egress access at the West Project Driveway on 190th Street create delays during the midday and PM peak hours.

We encourage the Lead Agency to evaluate the potential of additional Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For TDM strategies, 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>

Caltrans also encourages the Lead Agency to promote alternative transportation. This will increase accessibility and decrease Greenhouse Gas Emissions, which supports Caltrans' mission to provide a safe and reliable transportation network that serves all people and respects the environment. For additional strategies that will promote equity and environmental preservation, please 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>

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. Caltrans recommends that the Project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause issues on any State facilities, including I-405 and SR-213, please submit a construction traffic control plan detailing these issues for Caltrans' review.

Finally, any work completed on or near Caltrans' right of way may require an encroachment permit. However, the final determination on this will be made by Caltrans' Office of Permits. This work would require additional review and may be subject to additional requirements to ensure current design standards and access management elements are addressed. For more information on encroachment permits, see: <https://dot.ca.gov/programs/traffic-operations/ep>.

If you have any questions regarding these comments, please contact Ronnie Escobar, the project coordinator, at [Ronnie.Escobar@dot.ca.gov](mailto:Ronnie.Escobar@dot.ca.gov), and refer to GTS # 07-LA-2022-03940.

Sincerely,

*Miya Edmonson*

MIYA EDMONSON  
LDR/CEQA Branch Chief

cc: State Clearinghouse