

California Department of Transportation

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October 16, 2026

Oscar Martinez
Planning Division
City of Torrance
3031 Torrance Blvd.
Torrance, CA 90503

RE: Torrance Focused General Plan Amendment
for Land Use, Safety, and Community
Resource Element Updates
SCH # 2026091266
Vic. LA-01, LA-405 Citywide
GTS # LA-2026-05151-ND

Dear Oscar Martinez:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced ND. The City of Torrance proposes a focused General Plan amendment to address consistency with the 2022 Housing Element and compliance with recent State legislation. The focused amendment consists of updates to three General plan elements: Land Use Element, Safety Element, and Community Resources Element. The revisions range from text revisions to discussion sections, updates to maps, tables, and photographs, and the introduction of new objectives and policies.

As the state agency responsible for the safety, operations, and structural integrity of the State Highway System (SHS), Caltrans commends the City of Torrance for its proactive steps to achieve horizontal consistency with the 2022 Housing Element and accommodate its Regional Housing Needs Assessment (RHNA) allocation of 4,939 units.

As noted in the project description, Torrance is an established, highly successful, and almost entirely built-out community. The implementation of these 4,939 units over the planning horizon represents an essential evolutionary phase toward the City's ultimate buildout year. In furtherance of our shared goal to protect the public's best interest, manage infrastructure sustainably, and ensure regional transport stability, Caltrans offers the following comments to strengthen the programmatic framework of the General Plan Amendment for the City's consideration:

1. Long-Range Consistency and Modernizing the Transportation Baseline

Caltrans notes that the baseline environmental analysis for the City's comprehensive transportation network relies primarily on the 2010 City of Torrance General Plan Update Environmental Impact Report (GPU EIR). While that document served as a robust foundation for the City's growth, it is now 16 years old. Over the past decade and a half, regional travel patterns, localized peak-hour volumes, and vehicle distributions across southwestern Los Angeles County have evolved significantly.

With the Focused General Plan Amendment updating land use maps and introducing new density ranges to accommodate full programmatic buildout, it is vital to ensure that State highway facilities, specifically State freeway interchanges situated near or adjacent to the City's boundaries, are structurally and operationally equipped to handle incremental volume shifts safely.

2. Safeguarding Safety and Managing Off-Ramp Queuing

While Senate Bill 743 successfully modernized traffic analysis by establishing Vehicle Miles Traveled (VMT) as the primary CEQA metric for greenhouse gas reductions, a Lead Agency retains its core obligation under CEQA Guidelines Appendix G to evaluate and protect localized transportation safety.

For state facilities, the primary physical safety risk associated with high-density development is mainline off-ramp queuing spillover. If traffic volumes at an interchange exceed local capacity, queues can back up directly into high-speed freeway lanes, creating severe speed-differential conflicts and collision hazards. Because Torrance is bounded and transected by vital regional corridors such as Interstate 405 (I-405) and Interstate 110 (I-110), managing the operational interface at boundary interchanges is a shared priority for both Caltrans and the City.

3. Recommended Multi-Benefit, Programmatic Solutions

To ensure a resilient transportation system without imposing immediate or restrictive municipal capital costs on the City, Caltrans suggests incorporating a few collaborative, low-cost policy mechanisms directly into the final text of the updated Land Use or Safety Elements:

- **Establish a Cooperative State Highway Safety Monitoring Program:** Rather than requiring the City to execute immediate, predictive macroscopic traffic models, Caltrans suggests establishing an ongoing operational tracking program. This policy would allow Caltrans and City engineers to track real-world traffic absorption and queue lengths at state freeway interchanges near the City's boundaries incrementally, as housing sites are steadily developed over time.

- **Implement an Applicant-Funded State Facilities Fee Overlay Program:** To protect the City's general fund, Caltrans recommends a policy mechanism enabling the City to collect fair-share infrastructure contributions from future private developers. If future project-level applications exceed a specific size threshold (e.g., 50 or more residential units), those applicants would fund targeted queuing assessments during their standard local entitlement process and contribute to a localized account dedicated to operational safety improvements (such as ramp signal timing optimization or intersection lane adjustments).

4. State Resource Links

As a reminder, future development would be subject to site plan review and approval during entitlement review and/or building permit applications. Caltrans promotes a safe, reliable, and environmentally responsible transportation network. Under Senate Bill 743, CEQA uses Vehicle Miles Traveled (VMT) as the primary metric for evaluating transportation impacts. When preparing environmental document for a specific project, please refer to the Governor's Office of Land Use and Climate Innovation (LCI).

<https://lci.ca.gov/ceqa/#guidelines-updates>

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 supports complete streets and pedestrian safety measures, including traffic-calming strategies where appropriate. Future project-level environmental evaluations should ensure that planning and development activities consider multiple travel modes, reduce single-occupancy vehicle trips, minimize VMT, and enhance overall accessibility and safety.

Additionally, Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and the Local Development Review (LDR) Safety Review Practitioner's Guidance, prepared in February 2024. You can review the SB 743 Implementation Resource at the following link:

<https://dot.ca.gov/programs/sustainability/sb-743/resources>

By integrating these adaptive monitoring and tracking tools into the General Plan policy framework, the City can secure its long-range administrative record, bulletproof its environmental documentation against third-party challenges, and ensure that infrastructure improvements are entirely developer-funded as growth occurs. Most importantly, it creates a tri-party success: the City achieves its housing goals on time, Caltrans preserves the safety of the state highway system, and the public interest is fully protected.

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We look forward to collaborating with your team. If you have any questions please contact our office. Please contact Mr. Alan Lin, the project coordinator, at (213) 269-1124 and reference GTS # LA-2026-05151-ND.

Sincerely,

Alan Lin for

FRANCES DUONG
LDR Branch Chief

cc: Governor's Office of Land Use and Climate Innovation (LCI)