

CITY OF TORRANCE

Inter-Office Communication

TO: Members of the Planning Commission

FROM: General Plan & Redevelopment Division

DATE: October 28, 2009

SUBJECT: Public Hearing on Draft General Plan/Final Environmental Impact Report

BACKGROUND AND ANALYSIS:

The comprehensive General Plan update represents a complete updating of the City's 1992 General Plan, including the Housing Element, which was last updated and certified by the State in 2001. The Draft General Plan represents the Community's vision for the City over the next 15 to 20 years and includes goals for how this vision will be realized. The Draft General Plan is the culmination of 20 Planning Commission public workshops and, focused interviews/meetings with the Traffic Commission, Commission on Aging, Environmental Quality & Energy Conservation Commission, Parks & Recreation Commission, Cultural Arts Commission, Water Commission, homeowners' coalitions & associations, and community leaders that served to define the issues, evaluate alternative land use scenarios, refine draft City policy, and, thoroughly review and analyze the 7 State-mandated draft elements. The Planning Commission commenced its last public workshop on both the Draft General Plan and EIR on October 14, 2009. Attachment A includes staff's responses to the questions raised by the Commission and community members at that workshop.

In making its recommendation to the City Council, the Planning Commission is tasked with reviewing the information provided within the Final Environmental Impact Report (F-EIR) to determine its adequacy and objectivity. As you are aware, the D-EIR and F-EIR conclude that the proposed general plan update will have environmental impacts that are less than significant, potentially significant that can be mitigated, and significant and unavoidable. A detailed summary of these impacts is presented in the Executive Summary of the D-EIR on Page 1-9 thru 1-20. The impact classifications are as follows:

Less than Significant:

- Agricultural resources

Potentially Significant Adverse Impacts:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology & Soils
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology & Water Quality
- Land Use & Planning
- Mineral Resources
- Noise
- Population & Housing
- Public Services

- Recreation
- Transportation & Traffic
- Utilities & Service Systems

Unavoidable Significant Adverse Impacts:

- Air Quality
- Noise

In light of the Unavoidable Significant Adverse Impacts associated with the General Plan update, Findings of Fact and a Statement of Overriding Considerations have been prepared in accordance with §15093 of the California Environmental Quality Act (CEQA), which mandates that the Lead Agency make written findings for each of the unavoidable significant effects. These findings are to be supported by substantial evidence in the record and must be included as part of the Lead Agency's certification of the F-EIR prior to project approval. The *Findings of Fact and Statement of Overriding Considerations (SOC)* along with the F-EIR and Mitigation Monitoring Program (MMP) were included in the Commission's packet at your October 14, 2009 workshop. CEQA requires that the Lead Agency balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable." The SOC concludes that the public benefits (environmental, economic, and social) outweigh the unavoidable adverse environmental impacts associated with the proposed General Plan update. This conclusion is based on implementation of the proposed general plan policies and climate plan, which would serve to improve local air quality and greenhouse gas emission impacts; enhance open space, recreational, ecological, and pedestrian environments; and reduce adverse traffic congestion impacts.

GENERAL PLAN:

The General Plan remains as presented at our last meeting with two notable exceptions. Additions have been made to the Historic Preservation section of the Community Resources Element, both under Policies and Implementation Programs; these changes are detailed in the matrix attachment responding to questions raised at the previous meeting and include such items as consideration of historic Building Codes and Historic Overlays. The second area is the Housing Element, which is explained in greater detail below.

HOUSING ELEMENT UPDATE:

The City continues to work with the State Department of Housing and Community Development (HCD) to satisfy their requirements in order to obtain a certified Housing Element. While the City has demonstrated that we have properties that could be used to satisfy the requirements of provision of low- and moderate-income housing, HCD is asking for additional information on the non-vacant sites, such as, what improvements currently exist on the properties as well as by-right zoning requirements that must be considered if HCD determines that we have not identified a sufficient number of appropriate sites. (We do not anticipate that this issue will remain on the table, but we have not cleared it with HCD as yet.). In addition, HCD is asking for clarifying language with regard to how covered parking for multi-family residential is not a constraint. Our staff will continue to work with HCD with the goal of obtaining their approval prior to submission of the Draft General Plan to the City Council.

PUBLIC NOTIFICATION/OUTREACH:

For the October 28th hearing, a large display ad was published twice in the Daily Breeze and notification was posted on the City's General Plan website. Mailing notices were sent to all affected property owners, all workshop attendees, all HOA representatives, the Development Impact Fee

(DIF) mailing lists, interested agencies and special interest organizations, and surrounding cities. A CitiCABLE TV message board ad has also been broadcast. Additionally, email notification was sent to previous workshop attendees and HOA representatives who provided email addresses. A list of general plan workshops and public outreach meetings (Attachment B) has been included in the attachments to this report, as well as all correspondence received since the last workshop (Attachments C-F).

RECOMMENDATION:

The Community Development Department recommends that the Planning Commission conduct a public hearing tonight and take public testimony, identify any recommended changes to the proposed land use plan, and, review and determine the adequacy of the F-EIR in making its recommendation to the City Council. If after considering the evidence presented in the record, the Planning Commission determines that the F-EIR is adequate and that it fully complies with the California Environmental Quality Act, the appropriate action would be to recommend that the City Council adopt and certify the F-EIR, SOC, and MMP. The Planning Commission may recommend that the City Council adopt by Resolution either the proposed land use plan that was presented at the September 23, 2009 workshop or a revised land use plan as determined by the Commission. If a revised land use plan is recommended, the Commission will need to provide alternative direction for staff so that we may clearly communicate your intent to the City Council. The Planning Commission must reach a consensus amongst its members and communicate a unified recommendation to Council. As a side note, Staff requests permission to fix any typos and do any other non-substantive editing. The Planning Commission's recommendation will be submitted to the City Council for their consideration at a public hearing on the Draft General Plan and F-EIR at their November 10, 2009 meeting.

Respectfully submitted,



Ted Semaan, Manager
General Plan & Redevelopment Division

Attachments:

- A. Response to October 14, 2009 Comments Matrix
- B. List of General Plan Workshops and Public Outreach Meetings
- C. Letter from Shelter Partnership, dated October 14, 2009
- D. Letter from the Tormed Buildings, dated October 13, 2009
- E. Letter from Caltrans, dated October 15, 2009
- F. Letter from Kaji & Associates, dated October 16, 2009

Exhibits/Documents Provided to the Planning Commission:

- 1. Draft General Plan (previously distributed at 9-23-09 workshop)
- 2. Draft EIR (previously distributed at 9-23-09 workshop)
- 3. Response to Comments/F-EIR (previously distributed at 10-14-09 workshop)
- 4. Draft Findings of Fact, Statement of Overriding Considerations, and Mitigation Monitoring Program (previously distributed at 10-14-09 workshop)

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TORRANCE GENERAL PLAN UPDATE

Responses to Questions from October 14, 2009
 Planning Commission Workshop

Question or Comment	Response
<p><i>Land Use Element</i></p> <p>1. In addition to replacing the photo on page LU-70, please replace the caption.</p>	<p>This will be done.</p>
<p>2. How will the land use changes affect industrial property owners who are losing their Industrial land use designations (and subsequently zoning designations)? If a business space in the City is vacant for more than 90 days, City staff has indicated that the nonconforming status is lost. This is unfair.</p> <p>The City should host a workshop for property owners affected by rezoning to help them understand the implications and their rights.</p>	<p>Article 22 of the Torrance Municipal Code (92.22.1 – 92.22.6) contains provisions that address non-conforming uses. Section 92.22.3 (a) provides for the continuation of non-conforming uses as long as they have not been interrupted for 90 days. Staff is able to track the continuation of a use through the Business License system. Non-conforming uses may continue, may be sold and transferred as long as they are not interrupted for 90 days.</p> <p>A separate portion of the code deals with non-conforming buildings. Buildings are considered non-conforming when they do not meet development standards such as height, setback, parking, etc. If a non-conforming building is damaged less than 50%, it may be repaired or reconstructed. If it is damaged more than 50%, then it would have to be rebuilt to current development standards.</p> <p>As part of the planned zoning code update to follow the General Plan, staff will investigate alternatives to the 90-day requirement.</p> <p>As a follow up to the General Plan update staff envisions that a zoning code update will occur. At such time as the Zoning Code is reviewed and potential zone changes are discussed we envision a series of workshops which will include discussion regarding non-conforming</p>

	uses. As each property is unique, we do encourage individual property owners with specific questions about their property to contact staff to discuss their concerns.
3. Sites within the Crenshaw/Amsler focus area are subject to flooding and could be contaminated, making them unsuitable for housing.	FEMA and City regulations will require that any flooding issues be adequately addressed prior to any new development activity. Also, regulations will require remediation of any adverse soils conditions, if they are found to exist.
4. The focus area discussion should indicate that the sites were selected to meet RHNA requirements.	The process to select the focus areas did not involve consideration of the City's need to satisfy housing requirements relative to the RHNA. The process involved working with the Planning Commission during GPAC workshops to identify areas of Torrance that would benefit from reinvestment and reuse. Decisions were made regarding the focus areas well in advance of the release of the RHNA numbers. Thus, there is no need to modify the text.
<i>Circulation and Infrastructure Element</i>	
1. For Objective CI.5.2, which addresses the need to re-examine parking standards, please consider the option of preparing parking demand studies in lieu of meeting stated parking requirements in the zoning code.	As a follow up to the General Plan update, staff will update the zoning code and will consider changes to the parking standards.
2. A map should be included showing currently abandoned rail lines, lines to be abandoned, and abandoned lines purchased by the City and private parties.	As the General Plan addresses future, not current conditions, staff recommends against including such a map, as it would become quickly outdated as conditions change. Instead, staff recommends including a new policy in the General Plan to provide guidance on use of abandoned rail lines.
<i>Community Resources Element</i>	
1. As expressed at the September 23 workshop, the treatment of historic resources in the General Plan is woefully inadequate. A letter was submitted with some recommended language to include to adequately address historic resources.	A new policy and several new and revised implementation programs have been added; see additions/changes to the Historic Preservation Section listed below. Regarding the requests to specifically name SHOT in the General Plan, the Historical Society is named because they are a well-established, longstanding organization sponsored by the City. It is not our practice

	to name non-affiliated groups in the General Plan, for two reasons: this is a twenty-year plan and there is no guarantee that groups will still be in existence if they are not part of the City; and, there are too many worthy groups throughout the City to reasonably be included. The naming of specific groups does not generally add to the purpose and intent of the General Plan, nor is it the purpose of the General Plan to provide public acknowledgement of such groups.
Safety Element	
No comments were made regarding the Safety Element.	
Noise Element	
1. The commenter continues to be concerned about traffic noise and impacts on residences along or just behind arterial roadways.	<p>The Implementation Program, beginning on page A-62, includes several measures the City will pursue over the long term to address community noise. Traffic noise is a difficult issue, although it should be noted that Torrance's land use patterns have long been established, with residential neighborhoods near arterial roadways and residents aware of this proximity. Nonetheless, programs in the Plan include:</p> <ul style="list-style-type: none"> ▪ The City providing information to homeowners regarding methods to retrofit homes to reduce interior noise levels ▪ Re-assessing truck routes over time and re-designating as needed to minimize noise impacts on residential neighborhoods ▪ Establishing a priority list of noise mitigation projects
Housing Element	
The comments made regarding Housing Element issues were responded to orally during the workshop and are included in the minutes.	
General Comments	

Historical Preservation Changes:

Policy CR.12.4: Work toward the establishment of a City-wide Historic policy and programs for recognition of historical assets within the City.

Implementation program
3-10 Historic Preservation

Promote, enhance and expand voluntary architectural design guidelines for Downtown Torrance and other historical areas.

Increase access to information on the benefits of voluntary historic preservation programs through means such as web site presence.

Continue to investigate methods for the preservation of local historical sites such as an Historic Preservation Program and/or Ordinance, California historic Building Codes, Historic Overlay Zone and others.

Focus on implementation of goals and sub-goals related to historic preservation found in the Torrance Strategic Plan, such as identification and awareness of historical sites, restoration and rehabilitation of historical sites and programs celebrating the community's heritage.

Continue to recognize Historic Preservation Month with Council Proclamation and community outreach.

General Plan Update Workshops and Public Outreach Efforts

18 to workshops held to date, between February 2005 to August 2008

- Workshop 1: Introducing the General Plan **February 23, 2005**
- Workshop 2: Defining the Issues (Residential Subcommittee) **March 9, 2005**
- Workshop 3: Defining the Issues (Commercial Subcommittee) **March 23, 2005**
- Workshop 4: Defining the Issues (Historic Preservation-Environmental Quality and Energy Conservation Commission) **April 7, 2005**
- Workshop 5: Defining the Issues (Circulation Issues) **April 13, 2005**
- Workshop 6: Defining the Issues (Industrial Subcommittee) **April 27, 2005**
- Workshop 7: Evaluating Alternatives **July 27, 2005**
- Workshop 8: Evaluating Alternatives **August 24, 2005**
- Workshop 9: Evaluating Alternatives **September 14, 2005**
- Workshop 10: Data Review **February 22, 2006**
- Workshop 11: Data Review **March 8, 2006**
- Workshop 12: Goals and Policies **March 22, 2006**
- Workshop 13: Goals and Policies **April 26, 2006**
- Workshop 14: Goals and Policies **May 10, 2006**
- Workshop 15: Draft General Plan **January 30, 2008** Community Resources and Safety Elements
- Workshop 16: Draft General Plan **April 23, 2008** Noise and Circulation Elements
- Workshop 17: Draft General Plan **July 9, 2008** Land Use Element
- Workshop 18: Draft Housing Element **August 27, 2008** Housing Element

Public outreach efforts

Notification by mail (330) sent to:

- 28 active homeowners associations
- League of Women Voters
- Save Historic Old Torrance
- Commission on Aging
- Traffic Commission
- Environmental Quality & Energy Conservation Commission
- Parks & Recreation Commission
- Cultural Arts Commission
- Water Commission
- Planning Commission
- Water Commission
- General Plan workshop attendees and interested parties
- Development Impact Fee (DIF) notification list

Publications

- Notification e-mail 120+ individuals

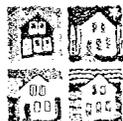
- General Plan Update website <http://www.torrnet.com/8691.htm>
- CitiCable 3 advertisements
- Daily Breeze legal advertisements
- Torrance Seasons articles
- Water Bill Notification
- General Plan Update Newsletter

Meetings, interviews, and community events

- June 4, 2005 Community Open House at the City Yard
- Neighborhood meetings with homeowner association groups:
 - March 28, 2007 Homeowners Coalition
 - November 7, 2007 Seaside HOA, Riviera HOA, Hillside HOA
 - November 8, 2007 North Torrance
 - November 14, 2007 Old Torrance Neighborhood Association, Madrona HOA
 - November 26, 2007 Southeast Torrance HOA, Southwood Riviera HOA, Southwood Sunray HOA
 - November 27, 2007 West Torrance HOA and Southwood HOA
- In 2005, the consultant interviewed the City Council, city executives staff, homeowners coalition representative (Tom Brewer), school district official (Dr. Steven Fish), various members of the business community, League of Women Voters (Gladys Mead, Lola Ungar)

Commission outreach efforts in addition to Planning Commission Workshops

- Environmental Quality and Energy Conservation Commission 12/6/07, 8/7/08
- Traffic Commission 12/5/05, 2/6/06, 3/6/06, 4/3/06, 12/3/07, 3/3/08
- Community Services Commission
- Library Commission 12/10/07
- Youth Council 1/16/08
- Commission on Aging 1/8/08
- Parks and Recreation Commission 12/12/07
- Cultural Arts Commissions 11/19/07
- Water Commission
- Disaster Council 2/27/08



Shelter Partnership

www.shelterpartnership.org

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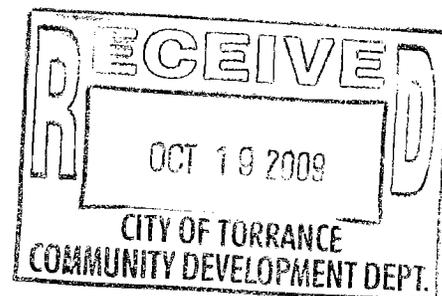
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October 14, 2009

Jeffrey Gibson
Community Development Director
City of Torrance
3031 Torrance Boulevard
Torrance, CA 90503



**Re: Comments on City of Torrance Housing Element, 2008-2014,
August 2009 Draft**

Dear Mr. Gibson:

Thank you for the opportunity to comment again on the City of Torrance's most recent housing element draft. Shelter Partnership provided comments on an earlier draft of the housing element in a letter to the City dated November 21, 2008 (see attached). We are pleased to see that, pursuant to SB 2, the City has identified a zone in which emergency shelters will be allowed to site by right. However, there remain a number of outstanding issues related to the City's treatment of housing for people with disabilities.

Housing for People with Disabilities

In Shelter Partnership's November 21, 2008 letter to the City of Torrance, numerous concerns were raised regarding the City's incomplete analysis of constraints to the development of housing for people with disabilities. The letter specified land use and zoning controls that significantly restrict, citywide, a full range of housing opportunities for people with disabilities in violation of federal and state fair housing laws and California law. Unfortunately, the City appears to have ignored those legitimate concerns and merely indicates in its revised draft housing element that it will prepare a matrix of permitted and conditionally permitted residential uses, failing to address substantively actual constraints to housing opportunities for people with disabilities (Program 6 at p. H-106).

Definition of "Family"

The City accurately characterizes its current definition of "family" as acting as a potential constraint to the development of housing. The City proposes eliminating the definition, but does not commit to replacing it. Because City

Planning staff rely on the zoning regulations to determine use, a legal definition of “family” is necessary to provide clarity for the City, housing providers and the larger Torrance community. Without such a definition, there is a significant likelihood that many living arrangements for people with disabilities, such as congregate or group settings, would be mischaracterized and subject to a conditional use permit. We therefore encourage the City to revise its Program 12 (p. H-111- 112) to include the establishment of a lawful, inclusive definition of “family.”

Single Use Definition – Residential Care Facilities

The City of Torrance relies on a single definition, “residential care facility,” when addressing housing for people with disabilities (Torrance Municipal Code, Division 9, Section 91.2.141). This definition fails to recognize that there are a full range of housing opportunities for people with disabilities and not all are legally subject to licensure. The City appears confused about this point as it refers to both transitional housing and supportive housing as possibly being residential care facilities (pp. H-56, H-59). As discussed in the supportive housing section, below, such an approach conflicts with California law. According to state law, a “residential care facility” is any group care facility or similar facility that provides 24-hour non-medical care to people in need of supervision or assistance essential for sustaining activities of daily living (Health & Safety Code § 1502(a)(1)). The City’s failure to correctly address housing that is not subject to licensure is an impediment to meeting the housing needs of people with disabilities.

As indicated in our first letter to the City of Torrance, housing for people with disabilities is further constrained by the City’s restriction on the siting of residential care facilities. The City acknowledges in its housing element narrative that state licensed residences for six or fewer may site by right in any residential zone, pursuant to state law (p. H-56); however, its use matrix contradicts this statement, restricting identically both small and large homes to R-4 zones by right and R-P zones with Planning Commission review (p. H-54, Table 32). The City’s municipal land use regulations in identifying permitted uses fail to indicate that residential care facilities for six or fewer residents are permitted in all residential zones, a position that violates the state pre-emption statute, Health & Safety Code § 1566.3. Citywide, residential care facilities, regardless of size, are restricted to two residential zones.

The City has proposed Program 6 to “[a]mend the Land Use Code to accurately reflect the residential uses that are permitted by right and conditionally permitted in all zones” but the revised draft housing element does not indicate how the City intends to do so. The City must do much more than what is vaguely described in Program 6. In order to comply with housing element law, Torrance must identify and eliminate constraints to housing for people with disabilities and this will require the City to amend its code to permit increased siting opportunities for housing for people with disabilities, i.e., “residential care facilities.” This, along with including a legal definition of “family” and revising its definition of “residential care facilities” will go a long way toward increasing the housing opportunities for people with disabilities.

Supportive Housing and Transitional Housing

The housing element sections addressing supportive housing, as well as any municipal regulations attempting to restrict supportive housing, must be revised to conform to Health & Safety Code § 1504.5, the state law which pre-empts independent living arrangements from licensure. According to recent state law clarifications, transitional and supportive housing are both residential uses and must be regulated as other residential uses of the same type in the same zone in which they are located (Gov't Code § 65583(a)(5)). This law would also prohibit Torrance from regulating supportive and transitional housing as "residential care facilities," as described in the housing element (pp. H-56, H-59).

Hospitals

In its review of the first draft Housing Element, Shelter Partnership advised the City that its distinction between types of hospitals based on who is treated and, also, the distinction between hospitals and treatment programs for people with disabilities is illegal. In its enumeration of uses requiring conditional use permits, the following regulations apply to "medical institutions":

- a) Hospitals, sanitariums and mental hospitals conditionally permitted in R-3, R-R-3, R-4, C-1 and C-2 zones; no such permit is required in C-3, C-4 and C-5 zones;
- b) Rest homes and convalescent homes facilities for the aged conditionally permitted in R-3 and R-R-3 zones; no such permit is required in R-4, R-P, C-1 and C-2 zones;
- c) Institutions for the treatment of alcoholics, mental hygiene homes conditionally permitted in R-4, R-P, C-1, C-3, C-4 and C-5 zones;
- d) Nursing homes, specialized homes for geriatrics and convalescent hospitals conditionally permitted in R-3, R-R-3, R-4, C-1, C-2 and C-3 zones; no such permit is required in C-4 and C-5 zones;

Torrance Municipal Code, Division 9, Section 95.3.9.
(subsection (e) related to foster homes excluded)

The above distinctions, which single out "mental hospitals" and alcohol treatment, and regulate them differently than other medical services uses violate federal and state fair housing laws when applied to residential programs or the ADA when applied to non-residential programs. Additionally, the differential treatment based on who is served, people with disabilities, violates Welfare & Institutions Code 5120 which pre-empts local governments from regulating mental health treatment programs differently than hospitals and nursing homes.

*Mr. Jeffrey Gibson
October 14, 2009
Page 4 of 4*

We look forward to working with you to ensure that your housing element appropriately plans for housing for all residents of Torrance. Please feel free to contact me at rschwartz@shelterpartnership.org or 213-943-4580 or Senior Project Manager, Nicky Viola, at nviola@shelterpartnership.org or 213-943-4584 if you would like to discuss these issues further.

Sincerely,

A handwritten signature in black ink, appearing to read "Ruth Schwartz". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Ruth Schwartz
Executive Director

cc: Cathy Creswell, California Department of Housing and Community Development

Encl.

THE TORMED BUILDINGS

October 13, 2009

Planning Commission
City of Torrance
3031 Torrance Blvd.
Torrance, CA 90503

Re: General Plan Final Draft

Dear Commissioners:

I spoke at the September 23, 2009 Public Workshop and expressed my concern regarding the proposed Hospital/Medical (HM) zoning. Since I will be out of the country when you have your public hearing on October 28th, I want to formally express my concerns.

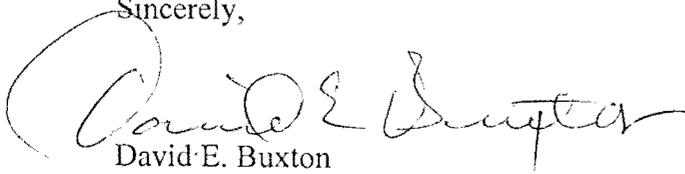
Your description of the new Hospital/Medical zoning states in part "The Hospital /Medical designation is intended to encourage the concentration of established and proposed health care facilities and their related uses in a manner that will provide for an orderly growth of healthcare facilities." However, the maximum FAR for medical office buildings continues to be 0.6 and it states "The expected FAR for hospital development is closer to 1.0 FAR....." and this would be subject to approval to the Planning Commission and City Council.

The 0.6 FAR for medical buildings has been in place for many years and yet there has been no new development on the currently zoned HMD property adjacent to Torrance Memorial Medical Center since all of these parcels were built out almost thirty years ago and a higher FAR is necessary to justify further development. Obviously, the most logical place for medical-related uses is adjacent to Torrance Memorial Medical Center. Our two properties total 7.5 acres and would allow the construction of an additional 185,000 square feet of medical space plus necessary parking structures with a 1.0 FAR. However, such development would have to be done in phases. To go through the very expensive entitlement process on a multi-phase development without knowing going in what the allowable FAR would be would not encourage the type of development which this new HM designation is designed to encourage.

Planning Commission
October 13, 2009
Page Two

I strongly urge the Planning Commission to approve the same 1.0 FAR for the properties with Hospital/Medical designation that will be allowed for Commercial Center and Mixed Use projects.

Sincerely,

A handwritten signature in cursive script, appearing to read "David E. Buxton". The signature is written in dark ink and is positioned above the printed name.

David E. Buxton
Owner

Cc: William Beverly, Esq.

DEPARTMENT OF TRANSPORTATION
 DISTRICT 7, REGIONAL PLANNING
 IGR/CEQA BRANCH
 100 MAIN STREET
 LOS ANGELES, CA 90012-3606
 PHONE (213) 897-6696
 FAX (213) 897-1337



*Flex your power!
 Be energy efficient!*

October 15, 2009

Ted Semaan - Plan and Redevelopment Manager
 Torrance Community Development Department
 3031 Torrance Boulevard, Torrance, CA 90503

City of Torrance General Plan update
 Final Environmental Impact Report
 LOS / 110 / 3.26-9.87 405 / 12.97-18.23
 SCH No. 2008111046 IGR No. 090738/EK

Dear Ted Semaan:

We have received the Final Environmental Impact Report (FEIR) record for the City of Torrance General Plan update project. The record file on the computer disk that we received included a set of responses to our letter of September 3. For the California State Department of Transportation (Department), we have the following comments.

We appreciate the attention given to recording and mitigation planning due to cumulative traffic impacts, for some road segments within City of Torrance boundaries.

In our September 3 letter, we expressed our concern generally about locations outside of those boundaries, however. Even if mitigation would be infeasible for such locations, we would have appreciated having some estimate of cumulative impacts on such locations, just as impacts were estimated for locations within those boundaries.

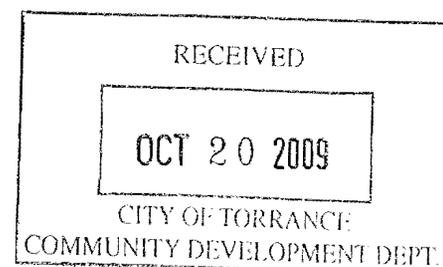
We welcome the indicated willingness to coordinate with the Department on specific projects, even if according to the limited County CMP criteria of minimum significant impact. We also note, however, that cumulative impact of various and many smaller development projects over time could be as or more significant than the impacts from a single large project. Some cumulative impacts to State facilities would not be addressed.

If you have any questions regarding our comments in this letter, please refer to our internal Record Number 090738/EK. Please do not hesitate to contact our review coordinator Edwin Kampmann at (213) 897-1346 or to contact me at (213) 897-6696. Our E-mail addresses are edwin_kampman@dot.ca.gov and elmer_alvarez@dot.ca.gov.

Sincerely,

Elmer Alvarez
 IGR/CEQA Program Manager

cc: Scott Morgan, State Clearinghouse

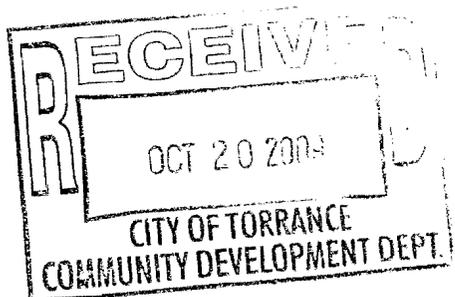


"Caltrans improves mobility across California"

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October 16, 2009

Mr. Jeffrey W. Gibson
Director
Community Development Department
3031 Torrance Blvd.
Torrance, CA 90503

Subject: General Plan Update
Chapter 2: Circulation and Infrastructure Element, Policy CI.5.2

Dear Mr. Gibson:

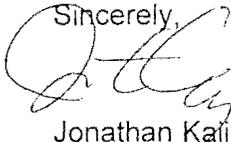
This letter is a follow-up to my testimony given at the public hearing before the Planning Commission on October 14, 2009.

At present, commercial properties are subject to the parking ordinance which establishes parking requirements based on type of commercial use.

It has been our experience in managing our properties in other municipalities that the use of parking demand studies has helped to "fine-tune" the use of particular properties based upon a number of factors, including the peak demand use of parking by specific tenant uses.

We believe that during this recessionary period with commercial vacancies on the increase, adding parking demand studies to the parking ordinance will allow both property owners and the City added flexibility in maintaining full-occupancy, property values and sales tax revenue generation.

Thank you for your consideration in this matter.

Sincerely,

Jonathan Kaji
President