



May 17, 2022

Los Angeles County Supervisor  
Hon. Holly J. Mitchell  
500 West Temple Street, Ste. 866  
Los Angeles, CA 90012

Los Angeles County Supervisor  
Hon. Janice Hahn  
500 West Temple Street,  
Los Angeles, CA 90012

RE: Metro C Line (Green) Extension to Torrance Project Comments and Request

Dear Supervisor Mitchell:

On behalf of the City of Redondo Beach, please accept this letter as unified support of an elevated Hawthorne Boulevard alignment for the Metro C Line (fka Green Line) Extension to Torrance Project which would run along the historic Red Car route. We urge your honors not to gravitate to the Metro ROW alignment merely because it is the lowest cost alternative. As we detail below, the elevated Hawthorne Blvd. alignment is the most equitable, environmentally sound and the only alternative that promises to connect residents of Central Los Angeles County with the economic powerhouse coming to Redondo Beach along Hawthorne Blvd.

- I. Hawthorne Blvd alignment is the superior to the ROW alignment in all regards except as to cost, which should not drive monumental generational investments.

As part of its decision-making process, Metro is considering and studying through the DEIR, two potential alignments—the Metro railroad right-of-way (ROW) alignment, currently used by heavy rail, and the elevated Hawthorne Boulevard roadway alignment.<sup>1</sup> We hope that as Metro Board Members, you will take our feedback to heart as you render your decision on the C Line extension.

As a preliminary matter, we want you to know that L Catterton (the real-estate arm of LVMH) is about to invest nearly half a billion dollars in a mixed retail, 300-unit inclusionary apartment units, office space and a 150-room hotel at the same intersection that would serve as the Redondo Beach stop for the Hawthorne Blvd. alignment. Between the mall

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<sup>1</sup> Metro officials have told us that they are no longer considering an at-grade pathway down Hawthorne Blvd.

and other uses, L Catterton projects about 750 new, permanent jobs to come to the site. Only the elevated Hawthorne Blvd. alignment would deliver residents from the Willowbrook/Rosa Park station to all of the economic, family and medical centers along Hawthorne Blvd. by delivering them to its intersection with Artesia Blvd. The ROW alignment would deliver these residents to a residential neighborhood. If the County does not seize this monumental, once-in-a-generation opportunity to send the C Line down the most utile path, the C Line could be destined to demise for nonuse.

If located along Hawthorne Blvd., the C Line would also deliver residents from Redondo Beach, Lawndale, Torrance and Hawthorne conveniently to the Crenshaw/LAX Transit Project. If, however, the C Line is extended into our residential neighborhood along the ROW, the C Line would not serve as a central hub to move the masses efficiently to LAX. It would be a pity for government to have spent hundreds of millions of dollars improving LAX and installing a people mover, only to build a C Line extension that does not maximize ridership.

The City of Redondo Beach is united behind elevated Hawthorne Boulevard alignment since it addresses many of our residents' concerns regarding noise, vibration, resident/child safety, and other factors, as well as having an expeditious, speedy route to the Torrance Transit center which would likely bolster its usership at a time of Metro ridership decline. The Hawthorne Blvd. alignment would also revitalize local businesses through higher visibility and the creation of a vibrant destination for riders.

## II. The City is united behind the Hawthorne Blvd. alignment and against the ROW.

The City Council unanimously voted to reaffirm our recommendation of the elevated route along Hawthorne Blvd. We are very concerned for our mixed-income senior residents at the Breakwater Village. Breakwater Village was built along the Metro ROW in the early 2000's. It boasts 191 units covenanted for seniors. It includes 20 affordable units, including Section 8 housing. On May 11, 2022, we heard from elderly members of the Redondo beach community who talked about re-leveling the pictures on their wall every week due to the vibrations from the BNSF freight train that passes by Breakwater Village twice daily.

If you adopt the ROW alternative, Metro will relocate the BNSF freight train 15 feet closer to Breakwater Village. The residents are terrified about more cracks appearing on their property, the devaluation of their "nest eggs," and not being able to live out their golden years in peace and quiet. Imagine years – not months or weeks – of Metro construction within feet of your home. Peace and quiet is precisely what our seniors at Breakwater Village bargained for when they invested in their retirement homes there.

The same is true for the mixed-income residents of the Ruxton Place and Ruxton Ridge, that are home to 27 and 28 units, respectively. Metro staff declined to enter Ruxton Place. Had they done so, they would have seen firsthand the sink hole created by Shell's drilling on the Metro ROW. For over a year now that sinkhole has been fenced off; residents of the affordable units there do not have regular access to their front doors because the

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sinkhole persists.<sup>2</sup> The land subsidence that occurred at the Ruxton Place is merely symptomatic of the potential, serious hazards that could arise from heavy machinery and construction on the ROW so close to pre-existing, heavy residential developments. To date, Metro has not articulated confidence that the geology on the ROW would permit the C Line to be extended with no damaging effect on the dense residential developments adjacent to the ROW.

It's for these reasons and those stated below that we implore you to say "No" to the ROW. As noted previously in the Redondo Beach comments on the Notice of Preparation (NOP) of the Draft EIR in the March 16, 2021 letter (attached), the Metro railroad right-of-way (ROW) option is expected to have numerous devastating impacts on the 480+ Redondo Beach private homeowners who live directly adjacent to the ROW (some sharing property lines). Those adverse effects would persist whether the rail is at grade or made subterranean at certain roadways like 182nd Street (near Firmona Ave).

Based on the multi-year timeline needed to build the light rail within feet of where many of them sleep nightly, the negative impact that this will have on so many lives, including our seniors', simply cannot be understated. The City of Redondo Beach has expressed significant concerns about using the ROW for the C Line extension based on our understanding of the proposed project to date, including:

- Failure to equitably use tax dollars for the benefit of the maximum number of Angelenos from all over the County by directing the C Line extension down the alignment that would reach the greatest number of residents and garner higher ridership than implementing the ROW alternative;
- Failure to provide communities from the Willowbrook/Rosa Parks Metro stop areas to the South Bay job centers, medical offices and the economic powerhouses located along Hawthorne Blvd., including the soon to be totally revitalized South Bay Galleria, which will host about 750 new jobs, 300 new apartment units, 150 hotel rooms, office space and a modern, family-oriented mall;
- Concerns about drilling and excavating land used for numerous oil pipelines, for the construction of the partially subterranean light rail tracks;
- That there would be no time-savings associated by building the below-grade options on the ROW versus the elevated option on Hawthorne Blvd.;

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<sup>2</sup> We are thankful that staff from each of your offices have gotten to know about this issue. Jennifer LaMarque helped us get Shell's attention to the sinkhole in 2021, and Karishma Shamdasani visited the site and listened to considerably residents on May 11, 2022.

- The below grade ROW alternative would be constructed at about a 30-foot grade differential from the adjacent train track that runs heavy loads of hazardous oil down the ROW twice a day;
- Metro has not analyzed the suitability of the land on the ROW to have a heavy, hazardous-material carrying train running next to below-grade light rail. In fact, in 2020, Shell conducted drilling along the ROW near the Ruxton, that cause land subsidence in that residential development for our affordable housing residents;
- Noise and vibration from construction and operation.

On April 11, 2022, two Redondo Beach Council Members and I, Mayor Brand, met with more than 60 concerned community members as part of the *Walk with Metro* event. At that meeting, Metro presented new facts that escalated existing concerns regarding the ROW alternative, including the need to re-align the freight line (that hauls oil, cars, jet fuel, and other industrial materials) further west, closer to existing homes.<sup>3</sup>

On May 11, 2022, Council Members Obagi and Loewenstein, and Community Development Director Brandy Forbes met with two groups of over 100 residents total at Breakwater Village and the Ruxton developments, respectively. At those meetings, Metro staff attempted to assuage residents' concerns about devaluation of their homes by pointing to increased value in Culver City and other areas around the Metro stops. But, Culver City and other areas are distinguishable in that there were opportunities there and in Pasadena to build new development around the Metro stops that were designed to block out the noise and other disruptions posed by trains passing every 6 minutes.

In Redondo Beach however, the developments at Breakwater Village and Ruxton were built less than twenty years ago with no contemplation of Metro trains passing by every six minutes. Their relative young age shows that these buildings will not be replaced anytime soon. In addition, they already have sustained cracks and damages due to their proximity to the freight train that passes by only twice a day. Yet, in the ROW alignment, Metro proposes to move the fuel carrying trains closer to our residents' homes. That is not ok.

III. The City still has many questions that Metro has not answered.

The City requests that the following questions are addressed, at a minimum in the DEIR

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<sup>3</sup> Asked why they could not push the train tracks further east, one official answered that, around 182nd, that would put it too close to El Nido Park. But, putting it closer to homes should not be more ok than putting it closer to a park. On May 11, an engineer stated that pushing the freight train east would require Metro to take private property to the east of the ROW. Clearly, there are no good cost-effective options down the ROW alignment.

1. What are the standardized noise levels being used (federal or state guidelines)?
  - a. If the noise levels exceed certain levels, will Metro provide noise-proofing to surrounding homes like LAX does in El Segundo? This should be considered for both during construction and post-construction impacts.
  - b. Are the “ambient noise levels” greater for the freight train for the current position or the new position proposed after the freight rail realignment?
2. Since the freight line will be re-aligned, closer to the existing homes, what are the potential impacts of a derailment? If there is a derailment, what would the costs and impacts be to the City?
3. Are Police/Fire/EMT response times taken into account for the crossing on 182<sup>nd</sup> and the rail line, both during construction and after?
4. If the ROW alignment goes below grade at the crossing on 182<sup>nd</sup> and other intersections, how would the rail line retaining wall be structured to support the weight of the heavy freight on grade immediately next to the deep below-grade alignment (the representative on the tour mentioned needing to go as far as 30 feet or more below grade) for the Metro line to prevent soil subsidence issues we have seen elsewhere in the City?
5. Since the berms for the freight lines will be brought closer to private property, what is the plan for providing extra retaining walls, addressing sound, vibration, and accommodating proper drainage?
6. Will personal transportation improvements, including a bike path and pedestrian walkway still be implemented? And, if so, where in Redondo Beach?
7. Has the soil and or geology on the ROW been studied to determine that the ROW land could tolerate a heavy freight train carrying oil directly adjacent to a pair of 30' below-grade light rail tracks? And to tolerate the differential vibrations of both running contemporaneously adjacent to one another?

These comments have been reviewed and approved by the Redondo Beach City Council at their May 17, 2022 public meeting. If you or Metro have any questions regarding this comment letter, please contact Brandy Forbes, Community Development Director for the City of Redondo Beach at 310-318-0637 x2200 or [brandy.forbes@redondo.org](mailto:brandy.forbes@redondo.org). Thank you for your consideration of our comments.

Sincerely,

Mayor William Brand

Joined by:

Nils Nehrenheim  
Council Member, District 1

Todd Loewenstein  
Council Member, District 2

Christian Horvath  
Council Member, District 3

Zein E. Obagi, Jr.  
Council Member, District 4

Laura Emdee  
Council Member, District 5

CC: L.A. County Metro Board  
Mike Witzansky, City Manager  
Luke Smude, Assistant to the City Manager  
Brandy Forbes, Community Development Director  
Delores Roybal Saltarelli, Project Manager, LA County Metro

Attachments:

- City of Redondo Beach Support Letter Green Line Alternative 3 Signed July 18, 2018
- City of Redondo Beach Letter Submitting Comments on Revised and Recirculated Notice of Preparation Dated March 16, 2021
- City of Redondo Beach Land Use and Noise Regulations Pertaining to Proposed Alternatives