



March 22, 2023

Georgia Sheridan
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Los Angeles County Metropolitan Transportation Authority
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Email: greenlineextension@metro.net

RE: Metro C Line Extension to Torrance Project Draft Environmental Impact Report Comments

Dear Ms. Sheridan:

On behalf of the City of Redondo Beach, California, please accept this letter as the City's official comment letter regarding the Metro C Line (Green) Extension to Torrance Project Draft Environmental Impact Report (DEIR). The City respectfully submits these comments to you, as the Metro representative accepting the DEIR comments for the project, for consideration as Metro prepares the Final EIR for this project and considers alternative alignments.

As noted in the City's May 17, 2022 letter to LA County Supervisors Mitchell and Hahn, a copy of which was sent to the LA County Metro Board, the City Council expresses unified support of an elevated Hawthorne Boulevard alignment (Hawthorne Elevated Option) for the Metro C Line (Green) Extension to Torrance Project, which would run along the historic Red Car route. The City of Redondo Beach continues to urge the LA County Metro Board not to gravitate to the Metro ROW alignment options. As we detail below, the Hawthorne Elevated Option is the most equitable, environmentally sound and the only option that promises to connect residents of Central Los Angeles County with the economic powerhouse coming to Redondo Beach along Hawthorne Blvd.

- I. Hawthorne Elevated Option is superior to the ROW Options (At-Grade and Trenched) in all regards except cost, which should not drive monumental generational investments.

As part of its decision-making process, Metro studied through the DEIR three potential alignments—the Metro railroad right-of-way (ROW) At-Grade Option, the Metro ROW Trenched, and the Hawthorne Elevated Option.

As a preliminary matter, we want you to know that L Catterton (the real-estate arm of LVMH) is in the process of investing 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 Elevated Option. Between the mall and other uses, L Catterton projects about 750 new, permanent jobs to come to the site. Only the Hawthorne Elevated Option 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 two ROW Options would deliver these residents to a residential neighborhood. If Metro 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 the Hawthorne Elevated Option, 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 Hawthorne Elevated Option 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 Elevated Option along Hawthorne Boulevard 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 Elevated Option and against the ROW Options.

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. 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.

Shell's drilling on the Metro ROW created a sinkhole in close proximity to these sites, and even caused a sinkhole on the Ruxton property. For over a year that sinkhole was fenced off; where residents of the affordable units there did not have regular access to their front doors because the conditions. 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.

The DEIR has concluded that the ROW options will have significant unavoidable noise impacts for the ongoing operations at those alignments. As well, construction of either ROW Options will have significant unavoidable impacts on residents related to both noise and vibration. Based on the multi-year timeline needed to build the light rail within feet of where many of these neighboring residents sleep nightly, the negative impact that this will have on so many lives, including our seniors', simply cannot be understated.

Below are the comments specific to the DEIR studies. With the concerns to the impacts to the quality of life and safety/security of more than 1000 residential households along the ROW Options, the City implores that Metro **not** move forward with either of the ROW Options.

III. Additional DEIR Comments.

Attached are comments from the Redondo Beach Planning Commission, the Redondo Beach Public Works & Sustainability Commission, and the public received by City Council in discussing the DEIR. The Redondo Beach City Council requests that Metro accept these as official comments to be addressed in the DEIR process. Below are additional official comments of the City of Redondo Beach.

Emergency Response Services:

- Metro should not consider the ROW At-Grade option. Life threatening delays could occur at the at-grade crossing at 182nd Street due to frequency of the light rail service stopping traffic and emergency response capabilities. In addition to police and fire, McCormick private ambulance service is located on and travels along 182nd Street regularly—this is a major corridor. The ROW At-Grade Option traffic stoppage will cause delays. The ability to get across tracks in a timely manner is critical for these life safety services.
- Regarding public services and emergency responders, the DEIR does not go deep enough to address deployment practices and the impacts of these delays.

Geology/Soils:

- The Draft EIR identifies less than significant issues with subsidence and settlement that may be in conflict with other known reports. As noted above, Shell's drilling on the Metro ROW created a sinkhole in close proximity to these sites, and even caused a sinkhole on the Ruxton property. As well, there was a prior undocumented ROW sinkhole near 190th Street.

The DEIR Section 3.8-2.1 notes that the DEIR reviewed published maps, professional publications, and technical reports pertaining to the geology, soils, and seismicity of the RSA. Significant impact would include exposing people or structures to adverse effects, including the risk of loss, injury or death, as well as when a geological unit or soil would become unstable as a result of the project and potentially result in on or off-site subsidence or collapse. The DEIR needs to

review the studies of soils in the immediate area, including the sinkhole in the vicinity of the Ruxton housing development, to ensure that the conditions and potential mitigation is adequate. This includes the study conducted by Ninyo & Moore on behalf of the Shell Pipeline Co. and the Galleria DEIR.

- There is a concern with safety with 3 sets of tracks over pipelines where there are unstable soils (including clay soils) along the ROW alignments. There are seemingly unrepairable unstable soils evidenced by a sinkhole in the area, including adjacent to the alignment and spread onto property of Ruxton Place. Evaluation needs to be done to determine where the pipelines are located throughout the corridor.
- The Hawthorne Elevated Option has the opportunity for engineering over more stable soils where Red Car had been routed for several decades. This is the preferred option to address geology and soils impacts.

At-Grade Crossing:

- Page 3.1-23 of the DEIR did not include the impacts to 182nd Street traffic. 182nd Street should be considered a major arterial since there are approvals for improvements to Galleria site and the new Transit Center has just been completed in the vicinity. The DEIR should include evaluating impacts of the additional possible high-density residential development per the Redondo Beach Housing Element sites inventory and the cumulative impacts of the ROW alignments with the increased traffic from these developments.
- Page 3.1-45 of the DEIR regarding roadways relies on the municipalities to implement measures to deter cut through traffic when 182nd Street is experiencing traffic stoppage due to the ROW at Grade option. The DEIR is undercounting cut through traffic impacts on arterials. This needs to be addressed.
- The DEIR claims no impact on bicycle safety, yet riding bicycles across rail tracks is a hazard due to tire size and uneven surfaces. At this point there is only one set of tracks to cross at 182nd Street, but the proposed ROW at-grade option would have two additional sets of tracks, compounding the safety hazard. This safety hazard needs to be addressed.
- Was there sufficient analysis of transportation impacts on Inglewood and 182nd Street as a result of the frequency of trains and resulting restriction of traffic in ROW At-Grade Option?

Noise and Vibration

- On Table 3.6-11 no ambient noise measurement was taken south of Artesia Boulevard on Ruxton Avenue and other adjacent residential roadways or south of 182nd Street on Firmona Avenue, Fisk Lane, Fisk Court, or Spreckles Court.

There are numerous residential properties in these areas. Ambient noise measurements need to be taken to accurately reflect the impacts.

- The significant unavoidable impacts of the ROW Options regarding noise will be in perpetuity for operations. Metro should not move forward with those Options. And even the Trench Option would only be LTSM if other agencies take action for Quiet Zone, relying on other agencies to do the mitigation. This doesn't guarantee that there will not be continued noise just because the Quiet Zone designation is made. The City does not believe the benefits of these ROW Options outweigh the significant unavoidable impacts.
- Noise and vibration metrics make no reference to the noise standards in residential districts per the Redondo Beach Municipal Code. The DEIR needs to respect the local municipalities' regulations.
 - For the Proposed Project (ROW At-Grade) and the Trench Option, the projected noise levels are in excess of City's noise ordinance during construction and during operation (RBMC 4-24.301)
 - For the Proposed Project (ROW At-Grade) and the Trench Option, the projected noise levels during operation occur prior to 7 AM and after 10 PM and so are in violation of City's noise ordinance (RBMC 4-24.301, 4-24.503)
 - For the Proposed Project (ROW At-Grade) and the Trench Option, the projected vibration levels listed to have significant impact violates City ordinance (RBMC 4-24.504)
- Considering there are already vibration impacts as a result of the existing freight operations, are the proposed mitigation measures for ROW options proven sufficient for the lifetime of the project?
- The DEIR utilized the FTA General Assessment method to evaluate the Vibration impacts, deferring a Detailed Assessment once final alternative and option is selected. However, if that Detailed Assessment detects Vibration impacts that are significant and cannot be mitigated to a less than significant level, it is unclear if the DEIR would need to be recirculated with this updated information and if another option would be considered after that Detailed Assessment.

Air Quality

- For the Trench Option, air quality risk is listed as significant and unavoidable.
- Particulate matter along the ROW will most certainly bring the air quality to an unlivable standard. In the case of this project, the reference to "temporary" means 5 years beginning with 101 dump trucks for 18 months and then subsequently, up to 40 pieces of heavy equipment continually disturbing the dirt and creating particulate matter, which will cause health problems at such a close proximity to human lives.

- The Hawthorne Elevated Option is most environmentally sound option and should be the option pursued if Metro is going to build the project. The Hawthorne Elevated Option is the option that does not directly impact adjacent residential uses.
- There may be concerns of the north section and south section of the Hawthorne Elevated Option impacting businesses. Modifications to those sections of the proposed route could be made and evaluated to address those concerns and minimize disruption to commercial uses. Those should be studied if the impacts to businesses would otherwise deter Metro from considering the Hawthorne Elevated Option.
- There is no level of service data or analysis. The DEIR mentions in the Land Use section that this is consistent with the local General Plans. However, the Redondo Beach Circulation Element requires this level of service analysis.
- The ridership study should be included as a part of the DEIR since “improving mobility within the South Bay and encourage mode shift” is objective of project.
- In the absence of selection of a light rail option, or if the no build option is selected, discuss how funds will remain invested into South Bay transit needs.
- If the ROW Options are not selected, has there been any analysis of how this area could be utilized for alternative forms of transportation, such as bike lanes and for pedestrians.
- How much money is BNSF investing annually to maintaining the train tracks on the ROW? (Norfolk Southern)
- What will be done to protect residents in the South Bay from second hand smoke from Fentanyl, meth, etc consumption on the Metro, irrespective of the path it goes?
- What is metro doing to prevent and reduce the crimes, including violent and sexual crimes, that it exports to communities on its mass transit?
<https://www.dailynews.com/2023/02/24/crime-skyrockets-on-la-metro-system-including-a-jump-in-drug-deaths/>
- Why doesn't moving the freight rail closer to Redondo Beach residents, without slowing down the speed of the train to 5mph or below, violate section 10.10 of our General Plan?
- How does the operation of a metro light rail for 20 hours (verify # of hours) in a day comply with Redondo Beach General Plan Policy 10.10.1, regarding the

City's operational restrictions during the early morning and late evening hours to reduce adverse noise impacts in residential areas and other noise sensitive areas?

- What will Metro be doing to protect people's indoor / outdoor cats from being struck by the Metro light rails on the ROW?
- How does the movement of the heavy freight rail closer to the high-density residential, without reducing its speed to 5 mph in Redondo Beach, comply with RBMC Section 4-24.504, which precludes the operation of any device which creates vibration which is above the vibration perception threshold of an individual at or beyond the property boundary of the source if on private property, or at 150 feet (forty-six (46) meters) from the source if on a public space or public right-of-way?
- Lighting impacts studied were primarily focused on construction lighting impacts. However, the study doesn't address the lighting on the trains themselves, along the tracks, at intersections/crossings, etc. related to the operations of the light rail. This needs to be evaluated to ensure that proper mitigation is in place.

IV. Consideration of Other Alternatives Studied in the DEIR – High Frequency Bus Alternative.

If Metro is considering pursuing one of the other Alternatives (other than the three Options), the City of Redondo Beach recommends consideration of the High Frequency Bus (HFB) Alternative. The DEIR acknowledges the HFB Alternative as the environmentally superior alternative, as it would avoid or reduce all impacts to a less than significant level. Although this alternative would not necessarily realize the same level of benefits or fully meet the objectives of the options, it would provide a mass transit service similar to light rail at what is expected to be a fraction of the cost.

The review of the HFB Alternative should be comparable in service to the options. The DEIR noted that the HFB Alternative would take 25 minutes to traverse the same 4.5-mile corridor, compared to 7 minutes for the light rail options; however, the HFB Alternative added several additional stops. To accurately compare the alternatives, the HFB Alternative should have the same bus stop frequency—only adding two stops total in Redondo Beach at the Galleria and in Torrance at the Torrance Transit Center Station.

If Metro decides to pursue one of the less costly Alternatives rather than the light rail Options, the funding that had been set aside that would no longer be used for this particular project needs to be redirected to improve transit in the South Bay area.

These comments have been reviewed and approved by the Redondo Beach City Council at their March 21, 2023 public meeting. If Metro has 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. 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

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CC: L.A. County Metro Board
Mike Witzansky, City Manager
Luke Smude, Assistant to the City Manager
Brandy Forbes, Community Development Director
L.A. County Supervisor Holly J. Mitchell
L.A. County Supervisor Janice Hahn

Attachments:

- Redondo Beach Planning Commission Recommended Comments 2/16/2023
- Redondo Beach Public Works & Sustainability Commission Recommended Comments 2/27/2023
- Public Comments received by City Council in discussion of the DEIR
- City of Redondo Beach Comments and Request Letter on Metro C Line Extension to Torrance Project May 17, 2022
- City of Redondo Beach Letter Submitting Comments on Revised and Recirculated Notice of Preparation Dated March 16, 2021
- City of Redondo Beach Support Letter Green Line Alternative 3 Signed July 18, 2018