



Bill Brand
Mayor

415 Diamond Street, P.O. BOX 270
Redondo Beach, California 90277-0270
www.redondo.org

tel 310 372-1171
ext. 2260
fax 310 374-2039

March 16, 2021

Los Angeles County Metropolitan Transportation Authority (Metro)
One Gateway Plaza
Los Angeles, CA 90012
ATTN: Dolores Roybal Saltarelli, Project Manager, Mail Stop 99-22-4

RE: Revised and Recirculated Notice of Preparation of a Draft Environmental Impact Report for the project entitled "Metro C Line (Green) Extension to Torrance Project"

Dear Ms. Roybal Saltarelli:

On behalf of the City of Redondo Beach, California, please accept this letter as the City's official written support of an elevated Hawthorne Boulevard alignment and comments in response to the Revised and Recirculated Notice of Preparation (NOP) for the Metro C Line (Green) Extension to Torrance Project. The City respectfully submits these comments to Metro, as the Lead Agency for the project, for consideration in the scope and content of the environmental analysis to be included in the Draft Environmental Impact Report (DEIR).

Metro has proposed the C Line (Green) Extension to Torrance Project, which would create a light rail transit option along a four-mile segment of the Harbor Subdivision Corridor (a freight rail line) from the existing Metro Redondo Beach Station to the under-construction Torrance Transit Park and Ride Regional Terminal (Torrance Transit Center) in Torrance, also encompassing the under-construction Redondo Beach Transit Center through two potential alignments (i.e. rail right-of-way alignment and Hawthorne Blvd. alignment). The extension will be served by the Metro C Line (Green) and future Crenshaw/LAX Transit Project. Metro's planning documents argue that this extension will provide alternatives to congestion along the I-405 corridor and will provide more transit options in the region by connecting the existing Metro Rail A (Blue) and E (Expo) Lines. Metro has proposed two alternative routes under consideration. The current alternatives are entitled Alternative 1: Metro Railroad Right-of-Way and Alternative 2: Hawthorne Boulevard.

Alternative 2: Hawthorne Boulevard

During the Alternatives Analysis study phase, the City submitted its comment letter dated July 18, 2018, to Phillip Washington, Metro's Chief Executive Officer, see attached, identifying alignment and grade preferences. In that letter, the Redondo

Beach City Council urged the Metro Board to proceed with a full EIR to study an elevated route along Hawthorne Blvd. This was a modified profile to Metro's initial Alternative 3, which was a largely at-grade route along Hawthorne Boulevard. The elevated alignment addressed many of the Redondo Beach residents' concerns regarding noise, vibration, safety, and other factors, as well as having a speedier route to the Torrance Transit center than Metro's at-grade alternative.

The Redondo Beach City Council re-affirms its recommendation of an elevated alternative along Hawthorne Blvd. Metro has now called Hawthorne Blvd Alternative 2, but the alignment is at grade. We would like to introduce the designation Alternative 2E: Hawthorne Boulevard Elevated, with the "E" signifying the revised elevated profile to be evaluated in the EIR.

Alternative 1: Metro Railroad Right-of-Way

Please be advised that the City of Redondo Beach is opposed to Alternative 1, Metro Railroad Right-of-Way at grade option, due to its devastating impacts on the 200+ Redondo Beach private homeowners whose homes are positioned directly adjacent to the ROW and will be directly impacted by the drastic changes to many environmental factors that will affect their quality of life and the value of their property.

The City's July 18, 2018 letter stated that should Metro choose to study the existing rail right-of-way, the City urged that the EIR address trenching in Redondo Beach, south of Grant Avenue, through the future Redondo Beach Transit Center, under 182nd Street until it needs to ascend back up to the elevated track crossing at Hawthorne/190th. The City continues to request that this option be considered for the Metro Railroad Right-of-Way alternative.

Environmental Impacts

Metro has identified potentially significant impacts which will be addressed in the DEIR, including Aesthetics, Agriculture/Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Transportation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire. When evaluating these environmental impacts, the City requests that Metro further consider the following implications of the proposed project:

Hazards and Hazardous Materials - The right-of-way corridor currently contains multiple Liquid Petroleum pipelines that span the entire proposed passage, particularly the Shell Pipeline. These are marked throughout this right-of-way by hundreds of warning designations that read "WARNING PETROLEUM PIPELINE", with designations of no digging, excavation, and most important "HIGH PRESSURE PIPELINE". Wikipedia identifies this substance as such; "Liquefied petroleum gas (LPG or LP gas), is a flammable mixture of hydrocarbon gases used as fuel in heating appliances, cooking equipment, and vehicles. It is a mixture of 48% propane, 50% butane, and 2% pentane." These are highly flammable substances.

The addition of added "light-rail" train lines that run frequently and utilize a high-voltage open connection for propulsion must be studied and certified as safe by all parties. Failure on this single issue can reap destruction far beyond the city's residents. Furthermore, currently there is a train that runs through this right-of-way corridor which primarily transports liquid petroleum. With the added pounding and vibration and the addition of high-voltage tresses to support train power coupled with the exposure to high-risk flammable materials both below ground and above ground, there is no room for inaccuracy or even understatement in the DEIR report.

Noise and Vibration - Noise and vibration, both during construction and operations, on the adjacent 200+ privately owned residential properties will be a significant issue to homeowners and residents throughout this corridor. The current train runs twice daily, with very few numbers of rail cars. Though loud for a minute, the daily round trip does not impact property values or quality of life. Alternative 1: Metro Railroad Right-of-Way would introduce a frequency to the corridor that would greatly impact both.

The proposed line in Alternative 1: Metro Railroad Right-of-Way would shift the current rail lines closer to residential properties in order to create space for both the light-rail and freight rail lines within the same right-of-way. Residential neighborhoods will be besieged by additional bells, dings, and loud noises from the operations of both freight and light rail through multiple crossings where there exist private residential properties. The frequency of trains has been estimated to be every 7-10 minutes.

The City of Redondo Beach requests that Metro fully evaluate the noise and vibration impacts of the project on all adjacent land uses, both during construction and in perpetuity through operations. In addition to the noise and vibration levels, the EIR should also evaluate the impact of the increase in frequency from the current baseline situation in the Metro Railroad Right-of-Way alternative. City of Redondo Beach noise ordinances should be considered as part of the EIR (see attached).

Land Use and Planning - Parking availability is a significant concern throughout Redondo Beach and the alternative locations for the light rail station to be located in the City are no exception. The City requests that Metro include evaluation of parking demand impacts to public parking near the proposed stations. The City also requests that Metro maintain all parking at the existing Redondo Green Line transit station on Marine, both during construction and after completion of the extension project.

Additionally, related to land use and planning, although safety/security was not listed as being studied for potentially significant impacts, the City requests that Metro include an evaluation of safety and security impacts to neighboring property owners along the line and near the proposed stations. This safety and security evaluation should also evaluate the impacts on additional police and fire resources necessary to address safety issues.

Public Services - The City is currently constructing a bus transit center on Kingsdale Avenue to replace the existing facility that is about one quarter mile to the north. The under-construction Redondo Beach Transit Center will serve passengers from at least four municipal bus operators. Alternative 2: Hawthorne Boulevard, a light rail station placed on the Hawthorne alignment alternative will be some distance away from the under-construction Redondo Beach Transit Center. Alternative 1: Metro Railroad Right-of-Way alignment adjacent to the under-construction Redondo Beach Transit Center would seem to address pedestrian connectivity between the two modes of travel, yet needs to address the City concerns with vertical alignment as outlined in our July 18, 2018 letter.

The City requests that Metro include evaluation of pedestrian and other forms of active transportation connectivity between the under-construction Redondo Beach Transit Center and each of the alternative station locations. These evaluations should address how the distance between the new facilities may impact ridership, the impacts on riders making transfers, and the impacts of vehicle solutions (e.g. shuttles) to area congestion. Due to its proximity, the evaluation should also consider accessibility to The Galleria for elderly and disabled riders. The City has a safety concern that project-driven by new congestion on Kingsdale and 182nd will impact the safety of the elderly and disabled trying to access shopping and dining. The City has a similar safety concern for children traveling to and from school in the project's vicinity.

Transportation - The City is an active supporter of alternative modes of transportation, including pedestrian, cycling and other forms of active transportation and is studying development of a slow vehicle network. The City requests that Metro include evaluation of opportunities to integrate and address impacts to these alternate modes of transportation along the line and near the proposed stations. However, the City is concerned parts of the ROW have insufficient width, especially when considering the utility lines (gas and petroleum) and the privacy for the many residential homeowners lining the ROW. As the City does support alternative modes of transportation, there is a significant amount of pedestrian and bicycle traffic from nearby neighborhoods to the local schools. Metro should evaluate any impediments or safety impacts that the alignments would have on these safe routes to schools.

The DEIR should also consider the construction vehicle impacts on road conditions for all types of private vehicle use.

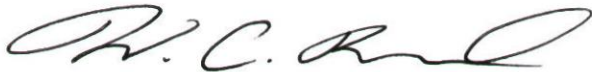
Other Issues to Address

In addition to the environmental issues listed above, the City requests that Metro consider the following aesthetic and land use/planning comments related to the project. As noted in the NOP, Metro is evaluating land use and planning impacts. Please consider the Redondo Beach public art requirements and land use regulations that may be required for the alternatives being considered. The City of Redondo Beach does have a public art requirement (1% of project cost) for projects of a certain size. Metro

should evaluate these requirements and address in the project planning as necessary. As for land use, please review the attached zoning and other regulations that may pertain to the proposed alternatives for any necessary inclusion in the DEIR.

These comments have been reviewed and approved by the Redondo Beach City Council at their March 16, 2021 public meeting. If Metro has any questions regarding this comment letter, please contact Community Development Director Brandy Forbes at (310) 318-0637 x2200 or via email at brandy.forbes@redondo.org. Thank you for the consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Brand", written in a cursive style.

Mayor William Brand

CC: City Council Members, City of Redondo Beach
Joe Hoefgen, City Manager
Brandy Forbes, Community Development Director

Attachments:

- City of Redondo Beach Support Letter Green Line Alternative 3 Signed July 18, 2018
- City of Redondo Beach Land Use and Noise Regulations Pertaining to Proposed Alternatives



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tel 310 372-1171
ext. 2260
fax 310 374-2039

July 18, 2018

Mr. Phillip A. Washington
Chief Executive Officer
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952

Dear Mr. Washington:

The Green Line extension to Torrance will bring much needed transportation infrastructure to our region. Each day thousands of commuters leave the South Bay and travel North for work or leisure, creating the congestion that consequently affects quality of life for all residing in the greater Los Angeles area.

On July 17, 2018, the Redondo Beach City Council received a report and voted unanimously supporting the submittal of this letter to your offices.

On behalf of the Redondo Beach City Council, we urge you and the Metro Board to proceed with a full project Environmental Impact Report (EIR) studying Alternative 3 in an elevated position. This would address many of our residents' concerns and allow the line to traverse a popular commercial corridor.

In the event the Metro Board chooses to study Alternatives 1 or 2, we would furthermore urge that the EIR address trenching in Redondo Beach, south of Grant Avenue, through the future RB transit center, under 182nd Street and along the existing Right of Way until it needs to ascend back up to the elevated track crossing Hawthorne/190th Street. While this is not the preferred route for our residents, we believe these suggested mitigations would be most beneficial to their quality of life and future traffic patterns along 182nd Street. Lastly, the City Council opposed and did not support further consideration of Alternative 4.

I would be happy to discuss the concerns and suggestions with you, staff and the Board Members. Thank you for your consideration.

Sincerely,

William C. Brand

ATTACHMENT: City of Redondo Beach Land Use and Noise Regulations Pertaining to Proposed Alternatives

The following discussion outlines some of the City of Redondo Beach's zoning regulations for the project alignment alternatives, as well as a discussion of the entitlement criteria for Planning Commission Design Review. To the extent that the DEIR does not address some of the Design Review criteria, Metro should be prepared to provide additional evidence as part of the project's entitlement process/applications.

Metro may also need to submit a Landscape and Irrigation Plan (RBMC 10-2.1900), as well as an application for Sign Review (RBMC § 10- 2.1800 et seq), and permits related to the Building Division and Engineering Division. Additionally, if there are improvements required in a municipality's right of way, permits may be required for that work from the Engineering Department of the respective municipality or Caltrans.

While vehicular Level of Service (LOS) was phased out from CEQA pursuant to Senate Bill 743, the City requests that Metro consider the project's effects on vehicular circulation and level of service (LOS) for any signalized intersection from at least a planning perspective to comply with the City of Redondo Beach's General Plan Circulation Element Goals and Policies. Metro should also ensure that it is able to demonstrate compliance with the City's parking standards discussed under RBMC § 10-2.1700 et seq., including providing adequate parking during all phases of the project, particularly during construction.

The City also requests that Metro condition the project approval upon preparation and implementation of a Construction Management Plan (CMP). The City of Redondo Beach traditionally requires a CMP as a standard condition of approval for larger projects similar to the Metro project. If Metro would like a sample CMP to see the various components, please reach out to the City's contact listed at the end of the letter.

Applicable Zoning Criteria of P-ROW Zone (right-of-way) and I-1B (industrial)

The Metro project alternative alignments appear to be located largely upon a property zoned P-ROW (right-of-way). Metro should be aware of the specific purposes of this zone listed in the Redondo Beach Municipal Code (RBMC) § 10-2.1100, and the Metro C Line (Green) Extension to Torrance Project should comply with the RBMC § 10-2.1111 "Specific purposes, P public and institutional zones" and RBMC § 10-2.1115 "Development standards: P-ROW right-of-way zone" as noted below:

10-2.1111 Additional land use regulations, P public and institutional zones.

(a) **Recreation and Parks Commission Review, P-PRO zone.** In the P-PRO parks, recreation, and open space zone, all applications for uses and development shall be referred to the Recreation and Parks Commission for its study and recommendations before submission to the appropriate decision-making body.

(b) **Recreational uses, P-ROW zone.** In the P-ROW right-of-way zone, recreational uses shall be limited to only passive type uses.

(c) **Accessory uses and structures.**

(1) **Development standards.** Permitted accessory uses and structures, including, but not limited to, storage sheds, maintenance buildings, lighting fixtures, view decks, rest rooms, flag poles, and concession stands, shall be subject to the height, setback, and floor area ratio standards of the zone in which it is located, except that height and setback standards may be modified subject to Planning Commission Design Review. In zones where no height standard is specified, permitted accessory uses and structures exceeding a height of thirty (30) feet shall be subject to Planning Commission Design Review, except that flag poles, lighting fixtures, and similar structures which do not contain floor area and which exceed a height of thirty (30) feet may be approved by the Community Development Director. In zones where no maximum floor area ratio is specified, any building exceeding 1,000 square feet shall be subject to Planning Commission Design Review.

10-2.1115 Development standards: P-ROW right-of-way zone.

(a) **Floor area ratio.** The floor area ratio (F.A.R.) of all buildings on a lot shall not exceed 0.1 (see definition of floor area ratio in Section 10-2.402).

(b) **Building height.** No building or structure shall exceed a height of fifteen (15) feet (see definition of building height in Section 10-2.402).

(c) **Stories.** No building shall exceed one story (see definition of story in Section 10-2.402).

(d) **Setbacks.**

(1) There shall be a minimum setback of twenty (20) feet from any property line abutting a street.

(2) There shall be a minimum setback of five (5) feet from any property line not abutting a street.

(e) **General regulations.** See Article 3 of this chapter.

(f) **Parking regulations.** See Article 5 of this chapter.

(g) **Sign regulations.** See Article 6 of this chapter.

(h) **Landscaping regulations.** See Article 7 of this chapter.

(i) **Procedures.** See Article 12 of this chapter.

Additionally, the Metro C Line (Green) Extension to Torrance Project current Alternative 2: Hawthorne Boulevard may have parcels located in the I-1B zone. For that portion of the project site located on the I-1B zoned property, Metro should be aware that railroad uses are not an allowed/permitted use in this zone.

Entitlement Criteria at Planning Commission

Redondo Beach Municipal Code § 10-2.2502 includes the requirements for review and criteria for Planning Commission Design Review, as follows:

10-2.2502 Planning Commission Design Review.

(a) **Purpose.** Planning Commission Design Review is established to ensure compatibility, originality, variety, and innovation in the architecture, design, landscaping, and site planning of developments in the community. The provisions of this section will serve to protect property values, prevent the blight and deterioration of neighborhoods, promote sound land use, encourage design excellence, and protect the overall health, safety, and welfare of the City. The Planning Commission shall review:

(1) **New construction, in all zones except for the W Waterfront and CC Catalina Corridor zones.**

a. Any new commercial, industrial, mixed use or public development of any size on a vacant site involving more than 10,000 square feet of land;

(b) **Criteria.** The following criteria shall be used in determining a project's consistency with the intent and purpose of this section:

(1) **User impact and needs.** The design of the project shall consider the impact and the needs of the user in respect to circulation, parking, traffic, utilities, public services, noise and odor, privacy, private and common open spaces, trash collection, security and crime deterrence, energy consumption, physical barriers, and other design concerns.

(2) **Relationship to physical features.** The location of buildings and structures shall respect the natural terrain of the site and shall be functionally integrated with any natural features of the landscape to include the preservation of existing trees, where feasible.

(3) **Consistency of architectural style.** The building or structure shall be harmonious and consistent within the proposed architectural style regarding roofing, materials, windows, doors, openings, textures, colors, and exterior treatment.

(4) **Balance and integration with the neighborhood.** The overall design shall be integrated and compatible with the neighborhood and shall strive to be in harmony with the scale and bulk of surrounding properties.

(5) **Building design.** The design of buildings and structures shall strive to provide innovation, variety, and creativity in the proposed design solution. All architectural elevations shall be designed to eliminate the appearance of flat façades or boxlike construction:

a. The front façade shall have vertical and horizontal offsets to add architectural interest to the exterior of the building and where possible, bay windows and similar architectural projections shall be used.

b. The roof planes of the building, as well as the building shape, shall be varied where feasible, and a visible and significant roof line shall be used to soften the vertical mass.

c. Harmonious variations in the treatment or use of wall materials shall be integrated into the architectural design.

(6) **Signs.** Signs and sign programs shall meet the criteria established in Sign Regulation Criteria, Section 10-2.1802.

(7) **Consistency with residential design guidelines.** The project shall be consistent with the intent of residential design guidelines adopted by resolution of the City Council.

(8) **Conditions of approval.** The conditions stated in the resolution or design considerations integrated into the project shall be deemed necessary to protect the public health, safety, and general welfare. Such conditions may include, but shall not be limited to:

- a. Changes to the design of buildings and structures;
- b. Additional setbacks, open spaces, and buffers;
- c. Provision of fences and walls;
- d. Street dedications and improvements, including service roads and alleys;
- e. The control of vehicular ingress, egress, and circulation;
- f. Sign requirements or a sign program, consistent with the Sign Regulations Criteria in Section 10-2.1802;
- g. Provision of landscaping and the maintenance thereof;
- h. The regulation of noise, vibration, odor and the like;
- i. Requirements for off-street loading facilities;
- j. Removal of existing billboards on the site, subject to the findings required by Section 10-2.2006(b)(7);
- k. Such other conditions as will make possible the development of the City in an orderly and efficient manner and in conformity with the intent and purposes set forth in this chapter and the General Plan.

4-24.301 Maximum permissible sound levels by land use categories.

The noise standards for the various categories of land use districts identified shall be the higher of either the presumed or actual measured ambient and shall apply to all such property within a designated category as follows:

Receiving Land Use District Category	Time Period	Presumed Ambient Level (dBA)
Low Density	10:00 p.m. to 7:00 a.m.	45
Residential R-1-A, R-1, R-2, P-D-R,	7:00 a.m. to 10:00 p.m.	50

Receiving Land Use District Category	Time Period	Presumed Ambient Level (dBA)
P-U-D Overlay		
Medium Density	10:00 p.m. to 7:00 a.m.	50
Residential R-3, R4, P-D-R, P-U-D Overlay	7:00 a.m. to 10:00 p.m.	55
High Density	10:00 p.m. to 7:00 a.m.	55
Residential R-5, R-6, P-D-R, P-U-D Overlay, C-I	7:00 a.m. to 10:00 p.m.	60
Commercial NSC,	10:00 p.m. to 7:00 a.m.	60
CSC, GC, P-D-C	7:00 a.m. to 10:00 p.m.	65
Industrial P-D-I	10:00 p.m. to 7:00 a.m.	60
	7:00 a.m. to 10:00 p.m.	65
Industrial P-I	10:00 p.m. to 7:00 a.m.	70
	7:00 a.m. to 10:00 p.m.	70

As indicated above, the presumed ambient levels in the Planned Development Residential (P-D-R) and the Planned Unit Development (P-U-D) Overlay land use districts are categorized so as to be consistent with the actual density of the development. The presumed ambient levels for the Planned Development (P-D) and the Civic Center (C-C) land use districts shall be consistent with those established for the lowest adjacent land use district.

(a) Correction for time characteristics. No person shall operate, or cause to be operated, any source of sound at any location within the City or allow the creation of any noise on property owned, leased, occupied, or otherwise controlled by such person which causes the noise level when measured on any other property to exceed:

(1) The noise standard of the receiving land use district for a cumulative period of more than thirty (30) minutes in any hour; or

(2) The noise standard of the receiving land use district plus five (5) dB for a cumulative period of more than fifteen (15) minutes in any hour; or

(3) The noise standard of the receiving land use district plus ten (10) dB for a cumulative period of more than five (5) minutes in any hour; or

(4) The noise standard of the receiving land use district plus fifteen (15) dB for a cumulative period of more than one minute in any hour; or

(5) The noise standard of the receiving land use district plus twenty (20) dB for any period of time.

(b) Levels exceeding the noise limit categories. If the measured ambient level exceeds that permissible as set forth in subsections (1), (2), (3), and (4) of subsection (a) of this section, the allowable noise exposure standard shall be increased in five (5) dB increments as appropriate to encompass or reflect such ambient noise level. In the event the ambient noise level exceeds the noise level set forth in subsection (5) of subsection (a) of this section, the maximum allowable noise level shall be increased to reflect the maximum ambient noise level.

(c) Correction for location of noise source. If the measurement location is on a boundary between two (2) different land use district categories, the noise level limit applicable to the lower land use district category, plus five (5) dB shall apply.

(d) Correction for ambient noise levels when alleged offending sources cannot be shut down. If possible, the ambient noise shall be measured at the same location along the property line utilized in subsection (a) of this section with the alleged offending noise source inoperative. If for any reason the alleged offending noise source cannot be shut down, then the ambient noise shall be estimated by performing a measurement in the same general area of the source, but at a sufficient distance such that the offending noise from the source is inaudible. If the difference between the noise levels with the noise source operating and not operating, with the utilization of either of the above-described methods of measurement, is six (6) dB or greater, then the noise measurement of the alleged source can be considered valid.

(e) Correction for character of sound. In the event the alleged offensive noise contains a steady audible tone, such as a whine, screech, or hum, or is a repetitive noise, such as hammering or riveting, the standard limits set forth in this section shall be reduced by five (5) dB. (§ 1, Ord. 2183 c.s., eff. August 11, 1976)