



City of Lawndale

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May 27, 2010

Randy Lamm
Metro
One Gateway Plaza
Mail Stop 99-22-3
Los Angeles, CA 90012

Re: Proposed South Bay Metro Green Line Extension

Dear Mr. Lamm:

On behalf of the City Council of the City of Lawndale I would like to take this opportunity to provide comments and express concerns on the proposed South Bay Metro Green Line Extension as Metro prepares the Draft Environmental Impact Statement/Report (EIS/EIR) for the project.

Of any city in the South Bay to be affected by the proposed South Bay Metro Green Line Extension, the City of Lawndale has the most to lose and the least to gain. As you must be aware, the Light Rail Alternative and the Freight Track Alternative both have the potential of severing the City, seriously disrupting automobile and pedestrian traffic circulation, creating significant noise and vibration impacts for property owners adjacent to the proposed rail lines, and negatively effecting property values along the rail corridor. As a representative of the Lawndale community, I must speak out against these impacts.

With regard to the Freight Track Alternative, the disruption of traffic that would be caused at the Inglewood Avenue crossing and at the Manhattan Beach Boulevard crossing due to the heavy volumes of vehicular traffic along these streets versus the proposed frequency of Metro trains at the at-grade crossings, should be enough of an impact to eliminate this alternative. These traffic impacts would not just be local to Lawndale, but would affect every municipality adjacent to Lawndale, and as such, this alternative seems incredibly shortsighted.

The Light Rail Alternative proposes elevated crossings at Inglewood Avenue and Manhattan Beach Boulevard, which is the responsible thing to do, but the Light Rail then descends into the existing rail corridor with potential at-grade crossings at 159th Street, 160th Street, 161st Street, 162nd Street and 170th Street. Furthermore, I understand that Metro is inclined to reduce the number of at-grade crossings because of their inherent danger by actually creating new cul-de-sacs at some of these through streets. The at-grade crossings alone would create significant traffic impacts, but cutting of any of these through streets would effectively sever the neighborhood west of the rail corridor from the City proper since that neighborhood is already hampered by limited east/west through streets. This would be ruinous to those families living west of the rail corridor as they would be cut off from neighborhood schools, parks and other amenities. At a minimum, the Draft EIS/EIR should study the impact on the delivery of emergency services to this neighborhood in the scenario that it is cut-off from the City.

With either the Light Rail Alternative or the Freight Track Alternative the residents living along the rail corridor will be subjected to significant noise and vibration impacts. I understand that the noise from the Metro trains spreading across Lawndale's residential neighborhoods would be reduced by keeping the trains at-grade behind a sound barrier (as opposed to elevated tracks); however, the noise emanating from the at-grade rail crossings (e.g. train whistles, gates) is likely to be more penetrating to the wider neighborhood. As well, due to the increased volume of rail traffic that is proposed, along with the plan to add railway tracks within the existing rail corridor, there is a strong likelihood that homes and other buildings adjacent to the rail corridor could be structurally impacted by the vibrations caused by Metro trains. Does Metro have a plan to compensate these homeowners and business owners in the event of structural damage? Or better, does Metro have a plan to assist these homeowners and business owners in advance of any Green Line Extension construction with building improvements to mitigate against noise and vibration?

Overall, should the Light Rail Alternative or the Freight Track Alternative be selected as currently proposed, Lawndale homeowners south of Manhattan Beach Boulevard and within a given distance from the rail corridor can expect their property values to plummet. Yes, the rail corridor currently exists, but with the frequency of BNSF trains at only 2-4 per day the impacts on the City are minimal. With Metro trains running at 4-6 per hour the negative impacts will be hugely significant. How does Metro intend to compensate property owners in the City for declines in assessed property values?

Although the City of Lawndale is completely opposed to the Light Rail Alternative or the Freight Track Alternative, a thorough environmental analysis of these alternatives should include the Light Rail elevated throughout the City with no at-grade crossings and a sound barrier running the length of the track. The analysis must include an assessment of the visual blight that would be created by the elevated tracks and an examination of how speed reduction would reduce noise.

Historically, Lawndale and its residents have given more than their fair share to regional transportation as evidenced by the 405 Freeway that bisected the City. To that end, Metro needs to study alternatives other than those presented at the public scoping meetings. For example, a more efficient deployment of Metro buses throughout the South Bay might be a more cost-effective approach. In fact, was there a needs assessment that was performed to demonstrate that there was a demand for the Green Line Extension? What econometrics does Metro have to justify the capital expenditure and the disruption to municipalities? The Draft EIS/EIR should give full consideration to a bus alternative.

Metro also seems very focused on utilizing the Harbor Subdivision to service the South Bay. However, an alternative route that should be considered could utilize part of the existing Alameda Corridor before branching west towards the City of Torrance. It is imperative that this alternative be thoroughly studied.

As a final alternative to the ideas presented to Lawndale thus far, one solution that makes sense and mitigates against most of the impacts described above is to put the Metro rail lines underground as they pass through the most sensitive areas of Lawndale (the neighborhoods south

of Manhattan Beach Boulevard). Since Metro already owns the rail corridor, the undergrounding could be achieved by simply trenching along the corridor and then backfilling, with no need to do a directional drill. With this alternative, Metro would avoid the negative impacts of severing the City, seriously disrupting automobile and pedestrian traffic circulation, and creating significant noise and vibration impacts. Furthermore, Metro would create an improved situation whereby current cul-de-sac streets could be opened to through traffic or a long, linear park could be created on top of the rail corridor. This is the only acceptable alternative should a final decision by the MTA Board of Directors include Metro trains coming through Lawndale.

In addition, since Lawndale would receive a disproportionately large number of negative impacts and few of the rewards from the South Bay Metro Green Line Extension, the City must have access to the Metro trains by way of a transfer station in the vicinity of Inglewood Avenue and Manhattan Beach Boulevard. It is important not to displace some of the City's most important businesses by locating a transfer station in this area. The City would strongly encourage Metro to incorporate the transfer station into a larger TOD, or transportation oriented development.

The alternative approaches to improving public transportation that are described above certainly do not represent a complete list, but are demonstrative of the fact that other alternatives exist. The members of the Lawndale City Council would like to make it clear that the City is opposed to the Light Rail and Freight Track Alternatives presented by Metro. Furthermore, we encourage Metro to work with Lawndale and its neighboring cities to arrive at a solution that is a benefit, rather than a burden, to the entire South Bay.

Sincerely,


Harold E. Hofmann
Mayor

Cc: Members of the Lawndale City Council
South Bay Cities Council of Governments
MTA Board of Directors