

Yvette Hall

From: Erica Harbison
Sent: Monday, March 20, 2023 12:36 PM
To: Yvette Hall; Vanesa Alvarez
Subject: Fw: Metro DEIR Comments

From: Mark Nelson (Home Gmail) <[REDACTED]>
Sent: Sunday, March 19, 2023 7:45 PM
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Subject: Metro DEIR Comments

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CEQA COMMENTS ON METRO'S DEFECTIVE DRAFT EIR FOR GREEN LINE EXTENSION

The following comments demonstrate that there is substantial evidence (CEQA guidelines section 15384a) of damages and regulatory noncompliance by Metro in the Green Line extension using the freight right-of-way. This conclusion is based on Redondo Beach Municipal Code (RBMC), evidence from Beach Cities Health District's multimillion dollar investment in Blue Zones and other peer-reviewed studies as cited by the National Institutes of Health (NIH) research findings.

1. Project alternatives that use the existing freight right-of-way violate RBMC 10-2.2502 (Planning Design)
2. Project alternatives that use the existing freight right-of-way violate RBMC 4-24.301 (Noise)
3. Project alternatives that use the existing freight right-of-way create health damages
4. Project alternatives that use the existing freight right-of-way damage child development

These comments and damages that are demonstrated with substantial evidence must be included in the Final EIR, adjustments must be made to project, and no use of the freight right-of-way can be selected by Metro without non-compliance with RBMC and damages to both adults and generations of children.

[1] GREEN LINE ALTERNATIVE ALONG THE RIGHT-OF-WAY VIOLATES RBMC 10-2.2502

There is substantial evidence that the proposed Green Line preferred option in the existing freight right-of-way, coupled with planned 24/7/365 intermittent operation violates Redondo Beach Municipal Code (RBMC) 10-2.2502 Planning Commission Design Review (PCDR). The RBMC PCDR states that its purposes include: "protect property values" and "ensure compatibility" with the existing neighborhoods. Clearly, 24/7/365 rail operations are not consistent with the existing residential neighborhoods. Peer-reviewed research has found that rail damages surrounding property values, thereby failing compliance with RBMC.

Peer-reviewed research demonstrates that train noise can also damage property values. This should come as no surprise and can also be seen from property value analysis.

Vehicular Noise Pollution: Its Environmental Implications and Strategic Control

DOI: 10.5772/intechopen.85707

"All types of noise altogether affect the same irrespective of the sources and cause headache to the high blood pressure and other heart diseases. Some noise types like aircraft and train noise also have negative effects on property prices."

[2] GREEN LINE ALTERNATIVE ALONG THE FREIGHT RIGHT-OF-WAY VIOLATES RBMC 4-24.301

There is substantial evidence that the proposed Green Line preferred option in the existing freight right-of-way, coupled with planned 24/7/365 operation violates Redondo Beach Municipal Code for noise generation. The noise receiving zoning from the proposed alternative in Redondo Beach would be predominantly residential, with a maximum, not to exceed nighttime noise limit of 65dBA and daytime limit of 70dBA (presumed ambient level plus 20 dBA).

4-24.301 Maximum permissible sound levels by land use categories

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

[3] GREEN LINE ALTERNATIVE ALONG THE FREIGHT RIGHT-OF-WAY VIOLATES DAMAGES HEALTH

There is substantial evidence that the proposed Green Line preferred option in the existing freight right-of-way, coupled with planned 24/7/365 intermittent operation will increase the risk of death and illness of nearby residents from chronic stress according to the Beach Cities Health District's multimillion dollar Blue Zones project research, findings, and other peer-reviewed studies and publications.

Lessons from the Blue Zones

<https://www.ncbi.nlm.nih.gov/books/NBK298903/>

"... widen its main street and raise the speed limit, which, Buettner [Blue Zones CEO] said, creates stress, danger, noise pollution, and air pollution." Obviously 24/7/365 train activity exceeds a widened main street's negative health impacts as stated by Blue Zones.

How Stress Makes Us Sick

<https://www.bluezones.com/2019/05/how-stress-makes-us-sick-and-affects-immunity-inflammation-digestion/>

"...this stress can be chronic, due to a specific situation ... exposure to stress in early life can alter the normal development ... resulting in increased sensitivity to stress and lifelong health risks in offspring."

Stress is Often Referred to as the "Silent Killer"

<https://www.bluezones.com/2012/03/maximize-health-and-longevity-using-these-stress-management-strategies/>

"... causes many harmful, often overlooked effects ... pain and strain ... sleep habits ... physical suffering ... headache, upset stomach, or back pain ... stress can reduce the ability of your immune system"

Even the Metro Threat to Build in the Freight R-O-W Shortens Lives of Residents

<https://www.bluezones.com/2020/10/fighting-chronic-stress-from-current-events-you-are-not-alone/>

"Although people often underestimate the influence of the mind on the body, a growing catalog of research shows that high levels of stress over an extended time can drastically alter physical function and affect nearly every organ system."

Metro Will Destroy the Blue Zones Solution of Home Sanctuary for Generations

<https://www.bluezones.com/2012/05/create-a-sanctuary-in-your-home/>

Blue Zones recommends creating a quiet calm home sanctuary which cannot be accomplished with 24/7/365 noise that creates stress and violates RBMC.

How living near a railroad can harm your health: From chronic stress to an increased risk of cancer, scientists say that constant exposure to trains takes a toll on the human body

<https://www.nationalgeographic.com/science/article/health-risks-living-near-railroads-east-palestine-trains>

National Geographic discusses how rail creates noise and increased risks that create chronic stress and health damages.

Effects of Exposure to Road, Railway, Airport and Recreational Noise on Blood Pressure and Hypertension

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8431620/>

Transportation noise can induce annoyance, sleep disturbance with awakening, cognitive impairment, physiological stress reactions, endocrine imbalance and cardiovascular disorders

The Effect of Aircraft, Road, and Railway Traffic Noise on Stroke – Results of a Case–Control Study Based on Secondary Data

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6122263/>

For railway noise, there was a positive linear exposure–risk relation: Per 10 dB the stroke risk increased by 1.8% for railway traffic noise. The maximum risk increase of 18% for railway traffic noise was found in the exposure category ≥65 to <70 dB. NOTE 65-70 dB is modest for rail, along with accompanying vibration.

Transportation Noise and Risk

<https://ehp.niehs.nih.gov/doi/10.1289/EHP11248>

Transportation noise exposure is believed to be detrimental to human health through stress reactions with activation of the hypothalamic–pituitary–adrenal axis, followed by increased levels of stress hormones. In addition, nighttime noise exposure can impact sleep quality and duration, which are crucial for physiological and mental restoration.

A study of self-reported health problems of the people living near railway:

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7114011/>

Noise ... can cause both auditory and nonauditory health effects. Nonauditory effects of noise can cause tinnitus, headache, auricular plenitude, dizziness, and gastric, visual, sleep, and mood disorders, endocrine imbalance, and cardiovascular disorders.

[4] GREEN LINE ALTERNATIVE ALONG THE FREIGHT RIGHT-OF-WAY DAMAGES CHILD DEVELOPMENT

There is **substantial evidence** that the proposed Green Line preferred option in the existing freight right-of-way, coupled with planned 24/7/365 intermittent operation will damage the development of residents' children from chronic stress according to the Beach Cities Health District's multimillion dollar Blue Zones projects research and findings.

How Stress Makes Us Sick

<https://www.bluezones.com/2019/05/how-stress-makes-us-sick-and-affects-immunity-inflammation-digestion/>

"...this stress can be chronic, due to a specific situation ... exposure to stress in early life can alter the normal development ... resulting in increased sensitivity to stress and lifelong health risks..."

Cc: Lawndale, Redondo Beach, and Torrance Councils and Planning Commissions as a Public Comment