



July 7, 2017

The Los Angeles County Regional Planning Commission
Doug Smith, Chair
David W. Louie, Vice Chair
Laura Shell, Commissioner
Elvin W. Moon, Commissioner
Pat Modugno, Commissioner

Re: **Project No. R2015-01232-(2) – “The View” 88-Unit New Condo Development**

Honorable Commissioners:

On behalf of United Homeowners’ Association II (“UHA II”), which represents the 11,000+ residents of the unincorporated communities of Windsor Hills, View Park & View Heights, we wish to thank you for allowing several of our members to provide testimony at the May 31, 2017 hearing regarding the above-captioned project (the “Project”). As noted during our testimony that day, UHA II opposes the Project for a variety of reasons, including but not limited to the following:

- The Project exceeds the 35-foot height limit for the C-1 zone by more than 30 feet, and all other nearby structures are lower than the 35-foot height limit.
- The Project would exacerbate existing hazardous traffic conditions along Overhill Drive south of the Stocker/Overhill/La Brea intersection, which was designed to serve free-flow, high speed regional traffic.
- The developer’s traffic study calls for the installation of a two-way left turn lane on Overhill Drive to provide full access to the Project’s driveways, but these road improvements are not required as part of the Project’s off-site improvements.
- The Project is too dense to be compatible with the single-family neighborhood it abuts, and several nearby homes will experience a significant loss in property value as a direct result of the Project dominating the hillside and blocking backyard views that include the Hollywood sign, Griffith Park and the Getty Museum.
- Most of the 352 daily estimated vehicle trips will exit the Project and either turn left onto Northridge Drive, a local road that goes thru the heart of View Park/Windsor Hills, or turn onto Slauson Avenue, which is already heavily congested.
- Considering the Project’s location within an earthquake fault hazard zone, a geologic fault investigation must be done to analyze the possibility of a surface fault rupture that could result in substantial property damage and put the new residents of the Project and other nearby residents at risk in the event of a major earthquake.

Zoning & Land Use History

UHA II would like to share some additional details on the Project's history that may not appear in the Initial Study or other documents submitted as part of the staff report and recommendations. Although UHA II is a relatively new nonprofit corporation, our predecessor organization United Homeowners' Association ("UHA") opposed a nearly identical proposal in 2004 by the same developer to build 72 condos and 17,000 square feet of office space on the same site, ultimately resulting in the developer withdrawing its application (see Project No. 03-189 for more information). The developer's initial entitlement request for the Project included a zone change from CPD/Low Density Residential (1 to 6 du/acre density) to R-4 (see Attachment 1), but both the zoning and land use designation were modified by the County as part of the General Plan Update to C-1/General Commercial (0 to 50 du/acre density) and the developer subsequently dropped the zone change from their entitlements. This occurred around the time UHA was dissolved and prior to the formation of UHA II, thus we are very concerned about the fact that such a substantial land use change was approved by the County as part of the General Plan Update apparently without any public input or discussion about how this change would impact the developer's application that was pending at the same time.

Both the target site at 5101 Overhill (the "Site") and UHA are referenced in DRP's November 1999 Stocker Street Zoning Study (see Attachment 2), which alludes to the "constant onslaught of development proposals for the subject properties that are incompatible with the neighborhood character of the View Park community." Notably, page 10 of the Study concludes that "[c]ompatibility with the neighborhood should mean that densities should be similar to the View Park area southerly of the subject properties, which is zoned R-1," and further states that "[w]hile the General Plan designates the property as residential, the location at the intersection of several major through routes renders it undesirable for that purpose." Page 10 of the Study also notes that "the current C-3 zoning is too intense and inappropriate due to the traffic conditions and access limitations at the Stocker, Overhill, and La Brea intersection." DRP staff concluded in the Study that the Site's zoning should be changed from C-3 to CPD, a proposal that was subsequently approved. Notwithstanding the fact that DRP's staff concluded over 17 years ago that a dense, multifamily development at the Site is incompatible with the surrounding community, and updated the Site's zoning and land use designation to reflect that limitation, our community has had to respond to multiple out-of-scale, poorly planned and potentially dangerous proposals by the same developer. Now, as a direct result of the County's apparent reversal of its own clearly stated policies & conclusions reached in the Study, it appears that DRP staff is on the verge of recommending approval of the Project, which contradicts the Study's conclusion in 1999 that this type of dense development is unsuitable for the Site.

The Project Will Significantly Impact Our Community

As cited in our May 8, 2017 letter to DRP staff, there are multiple inaccuracies and inconsistencies in the Project's Initial Study. The Initial Study concludes that the Project will have a less than significant impact on the visual character of the Site and its surroundings despite the fact that the developer proposes to exceed the by-right height limit by more than 30 feet and construct a new

65-foot tall building that would reduce several neighbors' property values by completely blocking their existing views of the Hollywood sign, Getty Museum and Griffith Park among other LA landmarks. Furthermore, the huge size and scale of the Project would completely dominate the entire hillside at one of the main entrances to our neighborhood and transform the character of an historic single-family community to something totally different (Attachment 3 includes before & after renderings showing how the Project would tower over the adjacent residential street). The Initial Study claims that the Project will have less than significant impact on traffic congestion and hazards notwithstanding the fact that the developer's traffic study was completed in 2015 and fails to consider any traffic impacts from the redevelopment of the Baldwin Hills Crenshaw Mall, the development of 74 new apartments at 3831 Stocker just east of the Site, and the proposed high-rise transit-oriented developments at La Cienega & Jefferson. Critically, the developer's traffic study concludes that the installation of a two-way left turn lane on Overhill Drive "will be required in order to provide full access at both project driveways."

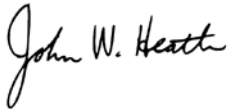
As currently conceived, the traffic study indicates that the Project will generate up to 704 vehicle trips during a typical weekday, half of which would exit the Site and travel south on Overhill to Slauson Avenue which is already heavily congested, or turn left onto Northridge Drive which will divert additional traffic onto a local road through the heart of our community which constantly battles traffic safety issues related to speeding drivers and shortcut seekers. Furthermore, Windsor Hills Magnet School which is just north of Northridge Drive generates an inordinate amount of traffic during the school year. The proposed traffic impact will also necessitate a pedestrian safety study for students walking to and from the Windsor Hills school. The high speed of vehicles traveling south on La Brea and Overhill is well documented, and we are very concerned that without proper mitigation measures the Project will cause serious accidents due to vehicles slowing to enter the Site. The Commission should require the developer to update the traffic study to properly consider current traffic conditions and at a minimum the developer should be required to complete all required work to install a two-way left turn lane installation on Overhill Drive, or the Project should be delayed until the County can complete these necessary improvements. The Commission should also require that the developer provide additional traffic safety measures to help mitigate the effects of additional vehicles that will be traveling on Northridge Drive as a direct result of the Project.

Finally, the Site is squarely located within the Newport-Inglewood Earthquake Fault Hazard Zone, and earth cracks have been identified at the Site and immediately adjacent to the Site along Overhill Drive (vehicles driving in either direction on Overhill currently encounter one of these active fault cracks that feels like a speed bump). Considering the close proximity of the Project to nearby homes and an elementary school and the fact that the developer is proposing to build such a large structure with multiple levels of subterranean parking, we urge the Commission to require the developer to undertake a more detailed geological fault investigation study and analysis prior to approving the Project to avoid unnecessary property damage and loss of life in the event of a major seismic event (Attachment 4 is a June 2015 LA Times article describing increased scrutiny of similar projects by other public agencies in the region).

Conclusion

UHA II opposes the Project because it vastly exceeds the 35-foot height limit applicable to all other structures in our community, is too dense and too large for the Site, is incompatible with our historic single-family community, and would create dangerous traffic and earthquake fault hazard conditions that could cause serious injuries or fatalities and will certainly diminish the property values of many residences along Onacrest Drive, Brea Crest Drive and Dawn View Place. Approving the Project as presented would contradict DRP staff's findings and recommendations from the 1999 Study that the Site is not suitable for this type of intense, high density development due to traffic conditions, access limitations and incompatibility with the surrounding single family residential community. On behalf of the more than 11,000 residents of our community, we strongly urge the Commission to vote against approving the Project and require the developer to implement design changes and undertake additional studies sufficient to eliminate the adverse effects on the health & welfare of nearby residents of Windsor Hills and View Park. Thank you for your attention and we look forward to seeing you again at the August 2nd hearing.

Sincerely,



John W. Heath, Esq.
President

c: Hon. Mark Ridley-Thomas, Supervisor, 2nd District
Richard Bruckner, DRP Director
Kim Szalay, DRP Land Divisions
Steven Jones, DRP Lead Planner
Baldwin Hills Estates Homeowners Association
Ladera Heights Civic Association
Park Mesa Heights Community Council
Windsor Hills Block Club
UHA II Land Use Committee
UHA II Members

Attachments