

MEMORANDUM

To:	Joshua Huntington, AICP, Supervising Planner, County of Los Angeles Department of Regional Planning Erica G. Aguirre, AICP, Principal Planner, County of Los Angeles Department of Regional Planning
From:	Michele Finneyfrock, Project Manager, Dudek Dennis Pascua, Transportation Services Manager, Dudek Amanda Meroux, TE, Traffic Engineer, Dudek
Subject:	Response to Transportation-Related Comments from the “September 10 RPC Hearing: The View Project at 5101 Overhill Drive” Comment Letter dated August 26, 2025
Date:	September 3, 2025

Introduction

This memorandum transmits a response to comments provided by Strumwasser & Woocher LLP, dated August 26, 2025, and additional traffic review by Tom Brohard, P.E., dated August 19, 2025, on behalf of United Homeowners’ Association II (UHA) for The View Residential Project (Project). The focus of this memorandum is to address the comments specifically raised by Tom Brohard, as they pertain to transportation analyses previously conducted by Dudek and presented within the Project’s Draft Environmental Impact Report (EIR) and Final EIR. This memorandum supplements and references previous environmental documentation for the Project, as listed below:

- The View Residential Project Draft EIR (November 2022)
- The View Residential Project Final EIR (April 2025)
- The View Residential Project Final EIR – Supplemental Errata (August 2025)

None of the comments raised by Tom Brohard identify deficiencies in the Draft or Final EIR analyses that would require recirculation of the EIR pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15088.5, as further demonstrated in the responses below.

Comment 1: “Proposed Project Driveways Require Further Study”

Comment: Mr. Brohard states that as the project is proposing two new access driveways only 135 feet apart on Overhill Drive, this is contrary to the County of Los Angeles (County) General Plan Mobility Element to limit access to Major Highways, and it will be difficult to discourage guests and visitors from trying to enter The View Project at the northern driveway, which is planned to be restricted to residents only. He further states that if others do enter, no turnaround has been planned or provided outside the security gate.

Response: Major Highways are defined in Table 7.1 of the County’s Mobility Element, which states that “These roads generally require four or more lanes of moving traffic, channelized medians and, to the extent

possible, access control and limits on intersection streets.”¹ As it would not be feasible for the Project site to provide access via northern, southern, or western points, access is only possible along Overhill Drive. Specific operations of a gate for the northern driveway are unknown at this time, and it is speculative to assume that drivers would accidentally or unintentionally turn into this driveway. Nevertheless, typical gate-controlled driveways include elements such as an attendant or an electronic call/help button, which would ensure that the gate may be opened if accidental ingress were to occur. Additionally, the project is expected to include on-site signage to direct vehicles on Overhill Drive to the proper locations. These standard site access practices would improve the ease of ingress at the northern project driveway but are not necessary to mitigate or reduce a significant transportation impact pursuant to CEQA, as none have been identified.

Comment: *Mr. Brohard states that the Final EIR now proposes to restrict vehicles to right turns only at the northern Project driveway, but the design of these restrictions can be easily circumnavigated. He also expresses concern that no signs are proposed for restricting northbound left turns into the northern driveway. He further states that stacking outside of the security gate at this driveway would be only 85 feet in length whereas the typical minimum vehicle stacking for driveways on a Major Highway, like Overhill Drive, should be a minimum of 100 feet in length.*

Response: The Project’s Signing and Striping Plan has been reviewed and approved by Los Angeles County Public Works and identifies numerous interventions and devices to assist with operations at the northern driveway. Specifically, the Project’s Signing and Striping Plan identifies right-turn-only signage and no-left-turn signage at the northern project driveway exit. Contrary to the assertions made in the comment letter, no-left-turn signage for vehicles traveling northbound to the northern project driveway has been identified in the Signing and Striping Plan. Additionally, flexible post delineators within the striped median are proposed. Section 3H.01 (Channelizing Devices) of the California Manual on Uniform Traffic Control Devices (MUTCD)² are defined as “flexible retroreflective devices for installation within the roadway to discourage road users from crossing a line or area of the roadway... channelizers are intended to provide additional guidance and/or restriction to traffic by supplementing pavement markings and delineation.” Additionally, per Section 3H.01(12) “If the channelizers are to remain in place as a permanent roadway feature, the post shall be white and the color of the reflector shall conform to that of the pavement markings it supplements.” As such, the proposed flexible post delineators (referred to as “channelizers” in the MUTCD), are traffic interventions that have been documented by the California Department of Transportation as devices that strengthen adherence to pavement markings. It is speculative to assume that drivers would run over or bypass the flexible post delineators.

Based on Dudek’s transportation analysis, it is anticipated that no more than 4 vehicles per hour would enter the northern driveway during peak conditions.³ As such, it is not anticipated that more than 4 vehicles would be queued simultaneously, which is expected to be accommodated by the 85-foot driveway length. Additionally, the 1972 Crommelin Entrance-Exit Design and Control for Major Parking Facilities report⁴ details typical capacity values of various gate controls. Per Table 4 of the Crommelin report, a coded-card operated gate would have an average headway of 8.9 seconds per vehicle with design hourly capacities of 340 vehicles per hour. This results in a traffic intensity of 0.01 (4 vehicles per hour/340 vehicles per hour),

¹ Los Angeles County General Plan 2035. Chapter 7, Mobility Element. Adopted October 6, 2015.

² California Department of Transportation, California Manual on Uniform Traffic Control Devices (Rev. 9 ed., 2025).

³ The View Residential Project Final EIR, Chapter 3.0, Errata, Figure 4. April 2025.

⁴ Crommelin, R. W., 1972. “Entrance-Exit Design and Control for Major Parking Facilities.” Paper presented to Los Angeles Parking Association (October), in Los Angeles.

which correlates to less than one vehicle length needed within the reservoir behind the service position (gate). As such, inbound volumes of 4 vehicles per hour would be comfortably accommodated within the proposed 85-foot driveway length. In the unlikely event that a queue were to stretch within the driveway out to Overhill Drive, vehicles would be able to continue on to the southern driveway to enter the site. For these reasons, the driveway length, as proposed, is considered adequate.

Comment: *Mr. Brohard discusses California Government Code Section 65302(g)(5), which requires the identification of residential developments within hazard areas that lack at least two evacuation routes, in the context of this project. He states that while the code does not explicitly specify the required distance between evacuation routes, the intention behind this requirement would be to ensure that if one route is compromised, an alternate route is still available, and suggests that the routes should be geographically separate enough to minimize the risk of both routes being simultaneously affected by a hazard. He also discusses California Government Code Section 65302.15, which requires updates to general plan safety elements to identify evacuation routes and evaluate their capacity, safety, and viability, and mentions OSHA regulations for proper separation between workplace exit routes.*

Response: The codes referenced by the commenter related to evacuation and exit routes do not directly pertain to the Project driveways. As described in the County's Supplemental Report to the Regional Planning Commission, dated August 27, 2025, the County has determined that the project includes two points of ingress/egress for the Project site, to the northeast and southeast along Overhill Drive, and consistent with applicable County Code and access requirements for new residential developments. As further stated in the Supplemental Report to the Regional Planning Commission, the Los Angeles County Fire Department has reviewed and cleared the Project, and the Project would be required to incorporate all conditions of approval from the Los Angeles County Fire Department.

Comment 2: "Proposed Northern Driveway Will Be Unsafe Even With Right Turns Only"

Comment: *Mr. Brohard indicates that there are various objects within the clear sight triangle for horizontal sight distance just north of the northern driveway including three signposts, a utility pole, and two trees together with a bus shelter with an advertising panel at the back of the sidewalk just to the north. He further states that the clear zones within the necessary sight triangles are not clear of sight distance obstructions as required to create a "clear" zone.*

Response: While objects have been identified within the clear sight triangle, these were not considered significant obstructions. As stated in the *Sight Distance Analysis for The View Residential Project at 5101 S. Overhill Drive*, dated August 28, 2024 (Attachment A of The View Residential Project Final EIR), utility/sign poles and small trees have diameters low enough to allow drivers to see around them without presenting as a barrier to clear lines of sight. Furthermore, as also stated in the Sight Distance Analysis, landscaping must be maintained such that foliage does not hang within a driver's line of sight, consistent with SEC 22.110.180 – Sight Distance in the County of Los Angeles Municipal Code. Although buses utilizing the LA Mero bus stop would fall within the clear sight triangle, buses are not fixed objects and would only serve as temporary obstructions. Additionally, as the bus would block through traffic in the outside southbound travel lane during passenger loading, vehicles exiting the northern driveway onto Overhill Drive could traverse onto the roadway in front of the bus during this time. The bus shelter noted in Mr. Brohard's comment is located outside of the clear sight triangle, as documented in the Sight Distance

Analysis. As such, the objects noted by the commenter have been assessed, and no significant obstructions have been identified.

Comment 3: "Overhill Drive Continues to Have An Adverse Collision History"

Comment: *Mr. Brohard discusses the collision history along Overhill Drive.*

Response: In December 2023, a Community Traffic Safety Plan (CTSP) was completed for the View Park-Windsor Hills and Ladera Heights neighborhoods. Roadway and intersection treatments outlined in the CTSP for Overhill Drive have been specifically designed to reduce vehicle speeds, increase driver awareness, and create safer areas for pedestrians. The Project's Signing and Striping Plan works to implement components of the proposed CTSP treatments along the stretch of Overhill Drive along the Project frontage. Specifically, the Project would add a two-way left turn lane to facilitate turning movements into and out of the Project site. Additionally, the Project would be conditioned to provide sidewalk improvements along extended portions of the west and east side of Overhill Drive, which is an improvement specified in the CTSP that would be expected to improve pedestrian safety and connectivity in the project area.^{5,6} While the Project area's collision history is part of the existing condition in the area, the Project would contribute to existing plans that have been set forth by the County to improve traffic safety conditions.

Comment 4: "Proposed Southern Driveway Should Include Traffic Signals"

Comment: *Mr. Brohard indicates that the northern driveway should be eliminated (and converted to emergency access only), and the southern driveway should be designed as a signalized intersection. He further states that shifting all traffic to the southern driveway would then marginally satisfy accepted traffic signal warrant criteria for high-speed roadways such as Overhill Drive. Additionally, he states that the County should implement additional measures to improve traffic safety along Collision Concentration Corridors such as Overhill Drive when opportunities arise.*

Response: Shifting all traffic to the southern driveway would result in 43 AM (i.e., morning) outbound peak hour trips and 22 PM (i.e., evening) outbound trips. These trips would be below the peak hour volumes required to meet signal warrants detailed in the MUTCD. The driveway access shown in the Project's Signing and Striping Plan has been shown to adequately accommodate Project vehicles, as demonstrated in the Final EIR; as such, the suggestion to signalize the southern Project driveway and eliminate the northern driveway is not necessary.

As noted above, several proposed treatments have been included in the CTSP for Overhill Drive to improve traffic safety, including reducing Overhill Drive from two vehicle lanes to one in each direction, establishing a two-way left turn lane in the center between Stocker Street and Slauson Avenue while adding a new sidewalk on both sides of the corridor, and installing transverse rumble strips on the north approaches to the intersections of Overhill Drive & Northridge Drive and Overhill Drive & Slauson Avenue. As further stated in the CTSP, roadway treatments such as these are specifically designed to tackle hazardous driving behaviors within a corridor, enhance overall street operations, and specifically target and prevent specific

⁵ Los Angeles County Public Works. View Park-Windsor Hills and Ladera Heights Community Traffic Safety Plan. Final. December 2023. <https://pw.lacounty.gov/projects/uploads/2024/08/2023-12-11-CTSP-5th-Submittal.pdf>.

⁶ The View Residential Project Final EIR, Chapter 3.0, Errata. April 2025.

behaviors such as speeding on arterial and residential streets, especially in proximity to sensitive areas, as well as addressing improper turns. With or without the Project, it is anticipated that the County would implement the CTSP, including recommended treatments along Overhill Drive. As stated in the Final EIR, implementation of the Project would not conflict with the CTSP, and the Project would be conditioned to implement several of the recommended improvements along Overhill Drive.

Comment 5: "Additional Mitigation Measures To Improve Traffic Safety"

a) Commenter's Suggestion to Increase/Improve Street Lighting

***Comment:** Mr. Brohard notes that existing street lighting along only the east side of Overhill Drive that is attached to the large wood transmission power poles should be reviewed to increase and improve street lighting levels. He further states that additional street lighting along the west side of Overhill Drive should be added to increase the illumination, particularly as a mitigation measure along the frontage of the Proposed Project.*

Response: Street lighting in the Project area as described by the commenter is an existing condition along Overhill Drive. The recommendation to improve street lighting may be considered by Los Angeles County Public Works to improve conditions in the area in general but is not required to reduce or avoid a significant transportation impact associated with the Project under CEQA, as none have been identified.

b) Commenter's Suggestion to Address Solo Vehicles Running Off The Roadway

***Comment:** Mr. Brohard proposes that additional reflective white banding of transmission poles should be considered, as well as a down-left arrow warning sign in front of the pole where the northbound roadway narrows and a recent collision occurred.*

Response: The transmission poles along Overhill Drive are an existing condition in the Project area. The recommendation to improve transmission poles with reflective white banding and warning signs may be considered by Los Angeles County Public Works to improve conditions in the area in general but is not required to reduce or avoid a significant transportation impact associated with the Project under CEQA, as none have been identified.

c) Commenter's Suggestion to Address Excessive/Unsafe Speed

***Comment:** Mr. Brohard indicates that a proposed traffic signal at the southerly driveway operating in "Rest In Red" will reduce excessive/unsafe speeds during light traffic volumes. He further states that the same operational strategy should also be considered for the existing traffic signal on Overhill Drive at Northridge Drive.*

Response: As noted above, MUTCD traffic signal warrants would not be met at the southern driveway, even if consolidation of all Project traffic to one driveway were to occur. As such, a traffic signal at the southern driveway is not determined to be necessary. Additionally, incorporation of a two-way left turn lane with the proposed Project would be designed to provide safe turning movements and future implementation of the Overhill Drive corridor improvements per County implementation of the CTSP

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SUBJECT: RESPONSE TO TRANSPORTATION-RELATED COMMENTS FROM THE "SEPTEMBER 10 RPC HEARING: THE VIEW PROJECT AT 5101 OVERHILL DRIVE" COMMENT LETTER DATED AUGUST 26, 2025

(including roadway reconfiguration to reduce lanes to one lane in each direction with a two-way left turn lane) would target hazardous driving behavior and speeding. "Rest In Red" signal timing at the existing traffic signal at Overhill Drive/Northridge Drive would be subject to consideration by Los Angeles County Public Works and is not directly related to the development of the proposed Project.

Conclusion

As demonstrated in the responses above, the comments raised by Tom Brohard, P.E., in the letter dated August 19, 2025, have not resulted in the identification of any new significant environmental impacts associated with the Project. While several suggestions and recommendations are presented in the letter, the Project and its accesses have been designed in conformance with applicable County requirements, and no significant transportation impacts have been identified in the Project's EIR. As such, additional mitigation measures are not required to be incorporated into the Project.