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City Planning Commission
Van Nuys City Hall
Council Chambers, Room 201
14410 Sylvan Street
Van Nuys, CA 91041

October 23, 2012

Re: NBC/Universal Evolution Plan
Sign Supplemental Use District
CPC-2007-251-GPA-ZC-SP-SPA-CA

Beachwood Canyon Neighborhood
Bel Air Knolls Property Owners
Bel Air Skycrest Property Owners
Bel Air Ridge Association
Benedict Canyon Association
Brentwood Hills Homeowners
Brentwood Residents Coalition
Cahuenga Pass Property Owners
Canyon Back Alliance
Crests Neighborhood Assn.
Franklin Ave./Hollywood Bl. West
Franklin Hills Residents Assn.
Highlands Owners Assn.
Hollywood Dell Civic Assn.
Hollywood Heights Assn.
Hollywoodland Homeowners
Holmby Hills Homeowners Assn.
Kagel Canyon Civic Assn.
Lake Hollywood HOA
Laurel Canyon Assn.
Lookout Mountain Alliance
Los Feliz Improvement Assn.
Mt. Olympus Property Owners
Mt. Washington Homeowners All.
Nichols Canyon Assn.
N. Beverly Dr./Franklin Canyon
Oak Forest Canyon Assn.
Oaks Homeowners Assn.
Outpost Estates Homeowners
Pacific Palisades Residents Assn.
Residents of Beverly Glen
Roscomare Valley Assn.
Shadow Hills Property Owners
Sherman Oaks HO Assn.
Studio City Residents Assn.
Sunset Hills Homeowners Assn.
Tarzana Property Owners Assn.
Torreyson Flynn Assn.
Upper Mandeville Canyon
Whitley Heights Civic Assn.

Dear President Roschen and Commissioners:

The Federation of Hillside and Canyon Associations, Inc., representing 40 homeowner and residents associations spanning the Santa Monica Mountains from the Pacific Ocean to east of Griffith Park, appreciates the Commission's thoughtful review of the NBC/Universal Sign District. However, the Federation has the following concerns and suggestions to improve the Ordinance.

1. Take-Down Requirement. At the September 27, 2012 Planning Commission Hearing, the Commission directed the Planning Department to include sign take-down requirements in the Ordinance. Take-down requirements are critical to the Commission's and the City's ongoing efforts to reduce billboard blight. Section 5.F.3 of the new draft Ordinance references "billboard removal requirements," stating that "billboard removal requirements" are provided in Section 8 of the Ordinance and that no exceptions may be granted from these Section 8 "billboard removal requirements." But the draft Ordinance does not include any take-down requirements. Section 8 of the Ordinance does not provide any "billboard removal requirements," it addresses the unrelated topic of "Sign District Boundaries and Figures Following LAFCO Action." The Ordinance should be revised to include take-down requirements that would result in a net signage reduction.

2. Mulholland Design Review Exemption. The Ordinance provides that the only sign permitted in Sub-District 6 is the existing sign that is to be relocated within the Sub-District. See Table No. 1 (Maximum Sign Area, listing "1,000 square feet (relocated sign)" as the entire sign area permitted within Sub-District 6); Table 2 (Permitted Sign Types, listing "1 relocated existing Billboard" as the only sign permitted in Sub-District 6). But Section 6.T, titled "Mulholland Scenic Parkway Specific Plan" does not unambiguously reflect this Sub-District 6 limitation to the one existing (relocated) sign. This ambiguity, which could cause unnecessary confusion in the future, must be remedied by the following revision:

T. Mulholland Scenic Parkway Specific Plan. Notwithstanding the requirements of the Mulholland Scenic Parkway Specific

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Plan (Ordinance No. 167,943), **the one existing sign that will be relocated within Sub-District 6 and which is** ~~signage on the subject property~~ located within the Outer Corridor of the Specific plan shall not be subject to the Mulholland Scenic Parkway Specific Plan. **No additional signage shall be permitted in Sub-District 6.** Buildings, including public facilities, located within the Outer Corridor of the Specific Plan shall be subject to the regulations of the Specific Plan."

3. Light intensity measurement. The current draft of the Ordinance calls for the measurement of illumination and light trespass in foot candles. *See e.g.*, Section 6.K.2 (limiting illumination of Supergraphic and Projected Images to no more than two foot candles). At the prior Commission hearing, however, there was discussion that candelas provide a more objective and accurate measurement of light intrusion and intensity. That is why the City used candelas as the method for measuring light intensity for the Wilshire Grand project. The same measurement should be used here.

4. Hours of illumination. The draft Ordinance allows for the illumination of signs until 2 a.m. despite the fact that such illumination may be visible from residential units. *See e.g.*, Section 6.K.1 (requiring only that illuminated signs be designed, located or screened to “minimize to the greatest reasonable extent possible direct light sources onto any exterior wall of a residential unit”). Given the potentially intrusive nature of such illumination, the draft Ordinance must be revised to require that any illuminated signage visible from residential units must be turned off by 11 p.m. instead of 2 a.m.

The Hillside Federation asks that these four changes be adopted by the Commission to clarify and strengthen the Ordinance’s provisions.

Sincerely,

Marian Dodge

Marian Dodge

cc: Councilmember LaBonge
Department of City Planning
Santa Monica Mountains Conservancy
Mulholland Design Review Board
Coalition to Ban Billboard Blight