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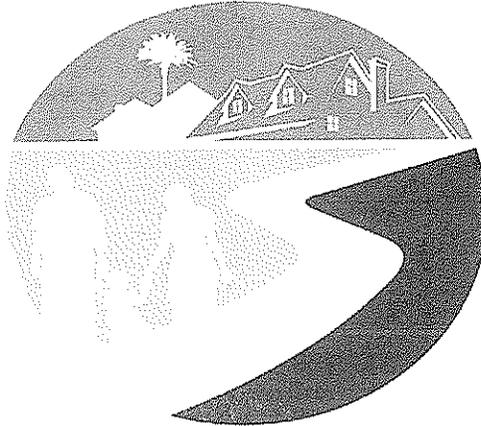
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November 14, 2011

Honorable Members of the City Council
& City Council PLUM committee
c/o City Clerk
Room 395, City Hall
Los Angeles, CA 90012

RE: City Council File 08-2020 Citywide Sign Ordinance revisions

Dear Honoarable Members,

The Mid City Neighborhood Council (MINC) is in **opposition** of the proposed Sign Ordinance Revision (City file 08-2020; 08-3386-S1:) currently being considered by the City Planning Commission because the revised language does little to address our concerns that our neighborhood will soon be overwhelmed with the Midtown Crossing SUD invading and intruding into our residential areas. First and foremost, we do not support the "grandfather" status of the Midtown Crossing SUD because the proposed sign ordinance would make such districts impermissible in a Neighborhood Commercial Center, which is the current status of the Midtown Crossing development. If the developer, CIM, were to receive the entitlement, Midtown Crossing would be the only Neighborhood Commercial Center to receive such an SUD entitlement citywide as these would be banned under the proposed sign ordinance and we think that is unfair to other competitors wanting to develop commercial centers of this scale citywide.

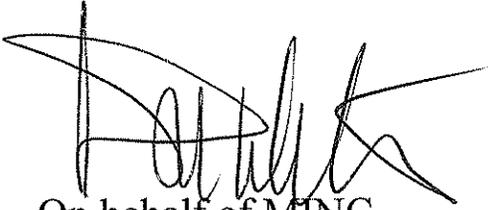
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Secondly, the proposed outline for the Community Benefits Program is heavy in infrastructure and public safety concerns, but is deficient in terms of actual direct and tangible benefits for the community. For example, in Mid City, we have approximate densities of 17,000 person p/sq. mile, yet very scant open space, parklands and green space. We suggest offering a ratio formula swap that is tied to the total sq. footage of the signage granted in an SUD, and requiring the developer to provide for, or pay into funds dedicated to developing park space, open space and green space. Another idea is to allow the community input on what the actual benefits would be. For example, our community is very dense yet the only community facility available to the public is the LAPD's Community Room at Wilshire Station. This space is often booked, crowded and in need of maintenance. We think it would be beneficial to the community if CIM were to entertain the idea of providing for a deed-dedicated Community Room at Midtown Crossing. Westside Pavilion has such a space in the interiors (least desirable space for retailers) of the main building and it serves the community well. We think that the City Planning Commission should broaden the scope of the types of benefits that are offered to the community.

Also, the revised language in the Sign Ordinance would do little to improve the area surrounding Midtown Crossing because most of the items (widened sidewalks, landscaping, street improvements and medians) were already secured during the entitlement process for the development of the shopping center. Now, CIM will get an additional entitlement for a sign district without providing for additional Community Benefits. *It is essential that the development of the shopping center and all improvements required by such be clearly separate from any additional SUD entitlement and the Community Benefits provided be clearly different and in addition to those provided by construction of the shopping center.*

Finally, with regard to the actual siting of signs at Midtown Crossing, MINC is concerned that the proposed SUD will result in an unprecedented intrusion of lighting, advertising and visual clutter invading R-1 zoned areas immediately adjacent to the center. For more that 3 years now, CIM has been extremely difficult in getting specific information on the size, location, style and brightness of the proposed signs. For this and other reasons, we feel it is unfair to "grandfather" the Midtown Crossing SUD because CIM has not exactly been forthright in their plans for erecting signage on the center.

Note: The concepts in this letter were voted on in our Stakeholder meeting dated 11.14.2011. That MINC agenda was posted as required with the agenda item of the proposed Sign Ordinance Revision (City file 08-2020; 08-3386-S1)

A handwritten signature in black ink, appearing to read 'Allan DiCastro', with a large, sweeping flourish extending to the right.

On behalf of MINC
Allan DiCastro
MINC President