

September 23, 2015

David H. Ambroz President, City Planning Commission 200 North Main Street Los Angeles, CA 90012

Date: 4-19	-16		
Submitted in PLU	IM	Comr	nittee
Council File No:	11-170	5	
Item No.:	2		
Deputy: Communic	ation t	YOM	Public

Dear President Ambroz:

As the City Planning Commission begins the challenging task of reviewing potential changes to citywide sign regulations, you will certainly be subjected to much heated rhetoric, threats of litigation and sharply conflicting stakeholder and community input, particularly regarding digital billboards. Thank you, in advance, for taking on this task and working diligently to serve the public's interests.

I believe that any proposal to permit digital billboards for offsite advertising should be rejected by the Commission and by the City Council unless it complies with a few guiding principles:

- The proposal must be limited to a reasonable total number of digital boards and must lead to a substantial reduction in the total number of static billboards in the city;
- The proposal must include significant community benefits to mitigate impacts in the surrounding community;
- The proposal must benefit all residents of the city by generating significant general fund revenues; and
- The proposal must treat all parts of the city equitably in both its benefits and its impacts, while still respecting the unique nature of each neighborhood and soliciting the public's input.

Your task in reviewing and evaluating ordinance versions A and B in the PLUM Committee's report will certainly be a significant and challenging one. Nonetheless, I believe the CPC should seize this opportunity to ensure that the city's sign policy best serves the needs of our residents by fully complying with the guiding principles

noted above. I therefore request that the Commission also consider and analyze a different approach to the sign ordinance that would provide more benefits to city residents. My proposed approach includes the following key components:

- Public-only option: Digital off-site signs outside of sign districts should be prohibited, except on selected city-owned property, allowing the city much greater control as the landowner as well as the regulator.
- **Neighborhood input:** There must be a process established for gathering thorough neighborhood input on placement, accompanied by an environmental study to mitigate impacts to the affected community.
- **Better than 4:1 ratio:** The city should establish a sign removal program requiring the removal of more than four square feet of static sign area in exchange for every one square foot of new digital sign area (higher than a 4:1 removal ratio) for off-site digital signs outside of sign districts. The city should also mandate that the requisite takedown of static signs be within an agreed upon radius of the proposed digital signs, so that the same community that gets the digital sign also gets substantial relief from the removal of existing static signs.
- Community benefits: The city should require a community benefits program for the neighborhood impacted by the signs on city-owned properties.
- **Citywide cap:** The number of signs located outside of sign districts should be capped at a reasonable number citywide, also including a cap on market share for any one company at less than 50 percent.
- **Geographic equity:** The city should create geographic standards to prevent signs from being concentrated in any one neighborhood or community.

I believe **the city's sign program should not allow digital signs on private property outside of sign districts**, and I oppose a conditional use permitting process for such signs on private property. On a related point, I also strongly oppose any grant of amnesty for unpermitted billboards as part of this program or otherwise.

In my view, it is absolutely critical that we embrace and adopt the public-only option. This is the only kind of digital sign ordinance that will directly benefit the residents of Los Angeles by providing our communities with real control over sign placement and operations, while also potentially generating tens of millions of dollars in revenue for our city. These funds could be used for improving neighborhood services, like street resurfacing, sidewalk repair, tree trimming and public safety, and dealing with our homeless crisis.

David H. Ambroz City Planning Commission September 23, 2015 Page 3

Of course, the program I am proposing will require thorough community input for site placement, environmental studies, and approval by the City Council, in addition to a thorough RFP process, which should be run by the City Administrative Officer. The RFPs themselves should be packaged together so that companies would bid on bundles of locations, which would be geographically diverse and tie together economically disparate portions of the city. Bundling locations in this way would ensure that both higher and lower socio-economic areas would be treated equitably.

The RFPs should also contain a number of options to ensure that all sign companies are able to bid competitively. For example, agreeing to take down a number of static signs for one digital location could add points to the RFP. Alternatively, if a company has no static signs to remove, it could provide community benefits to the area surrounding the new digital sign.

Any sign program implemented in the City of Los Angeles, whether it's my proposal or another, must take into consideration the thoughts and concerns of our communities and work toward the goal of reducing billboard blight. I appreciate your commitment to helping develop a policy that achieves that goal.

If you have questions or require more information, please contact my Chief of Staff, Areen Ibranossian, at 213-473-7002.

Very truly yours,

Paul Krekorian

Councilmember, District 2

cc: Mayor Eric Garcetti City Attorney Mike Feuer

Director of Planning Michael LoGrande Vice President Renee Dake Wilson

Commissioner Robert L. Ahn

Commissioner Caroline Choe

Commissioner Richard Katz

Commissioner John W. Mack

Commissioner Samantha Millman

Commissioner Dana Perlman

Commissioner Marta Segura