



**Friends of Griffith Park**

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friendsofgriffithpark.org

January 10, 2013

Honorable Councilmembers Reyes, Huizar, and Englander  
Los Angeles City Council Planning, Land Use Management Committee  
City Hall  
200 N. Spring Street  
Los Angeles, CA 90012

Re: Council File 08-2020, 11-1705, Citywide Sign Ordinance

Dear Councilmembers Reyes, Huizar and Englander,

In anticipation of the January 14th deadline, Friends of Griffith Park has directed the following comments on the draft Sign Ordinance to Alan Bell of the Planning Department and are also bringing them to your attention:

Dear Mr. Bell:

At the end of 2011, the PLUM Committee directed Planning staff to ensure that nothing in the final wording of ordinance 08-2020 could be interpreted to allow advertising in parks. Section O, per the current Report (12/04/2012) pertaining to "City Parks and Facilities" was to be excluded.

Instead, the Sign Ordinance draft presented on 12/11/12 recommends that a new category, Tier 2 Sign District, be established per proposed amendment language of Section 13.11 code, and the pertinence of "no off-site signs within parks and city-owned facilities" be applicable to all but Tier 1 Sign Districts:

**O. Off-Site Signs in City Parks and Facilities.** Notwithstanding any other language to the contrary in this Code, ~~including to include Section 14.4.3 A and Section 14.4.24 D,~~ no off-site sign shall be allowed in any park or other facility owned by the City of Los Angeles unless such sign is allowed within a Tier 1 Sign District established pursuant to Section 13.11 of this Code.

We believe this new wording is a loophole that undermines PLUM's directive and ask that the language be removed from the draft before the ordinance is presented again to PLUM on 1/22/12.

Of serious concern also is the draft's new language recommending that the Zoo in Griffith Park be permitted to apply for Sign District status. This provision did not appear

in the previous draft of the ordinance, making it impossible to comment on it during the public process that took place in 2011.

Granting of a Sign District is, in itself, already an exception under the proposed Sign Ordinance. In the drafting of the Ordinance, instruction #1 specified where a Sign District could be created. The answer, "Commercial or Industrial zoned areas", was referred to as the "heart of the Sign Ordinance" at the 12/11/12, PLUM meeting. The basis relates to the fact that the Court does not want "willy-nilly" decisions, therefore a land-use basis for assigning Sign Districts is required.

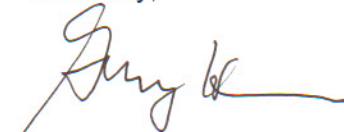
Besides, there are no arguments for making an exception for the Zoo. The Court requires reduction in blight, a community esthetics benefit or improvement in traffic. Since there is no blight or signage to replace, and no traffic to improve, the criteria for a Sign District at the Zoo is not met.

The Zoo is a park facility on dedicated parkland and is entirely within a city park. Its potential designation as a Sign District is a loophole that will allow other park facilities to apply for Sign Districts status, proliferating commercial advertising in city parks. We ask you to remove this language and recommendation.

Finally, at the end of 2011, the PLUM Committee directed that Perry Motion (11-1705) remain in Committee, and that planning staff work with other "public space" departments to develop strict "policy procedure" for signs in public space. The main question at hand was whether "donor signs" and "sponsor signs," (such as those for sports leagues), could be allowed within the framework of the off-site advertising code. At that time, PLUM directed the Department of Recreation and Parks to work with the public to develop a policy. We made it known then that we were eager to collaborate with Recreation and Parks in the shaping of an appropriate policy, and we still stand ready to do so.

However, the Department has not reached out us and we now believe that the direction allowing for the development of sign policy outside of Planning and its codes will result in commercial advertising in parks. In that the governance of the Recreation and Parks Department originated the plan to sell commercial advertising in parks, we believe that ceding policy development to them will lead to its introduction. We ask that Planning proactively add language to the Sign Ordinance disallowing commercial advertising in City parks and recommend its adoption to the PLUM Committee. City parks are zoned Open Spaces and should not be candidates for this activity.

Sincerely,

A handwritten signature in black ink, appearing to read "Gerry Hans", with a long horizontal flourish extending to the right.

Gerry Hans  
President  
Friends of Griffith Park

Cc: Councilmember Tom LaBonge