December 5, 2011

INTERNATIONAL SIGN ASSOCIATION

Date: 12/5/11
Submitted in PLUM Committee
Council File No: 08-2020, 11-1705
Item No.: 1
Deputy: Comm from Public

Honorable Councilman Ed Reyes
Chair, Planning and Land Use Management Committee
200 N. Spring Street, Room 410
Los Angeles, CA 90012

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

Dear Councilman Reyes:

I am contacting you on behalf of the International Sign Association (ISA), a 2,100 member organization that represents the on-premise sign industry. ISA has 190 members in California that manufacture, install and maintain signs for hundreds of small businesses in your city, state and region. Our industry has the expertise to provide practical advice on how our products work best and should be treated to benefit all community stakeholders. We appreciate the opportunity to provide comments on the proposed sign ordinance language for Los Angeles.

We acknowledge your leadership and efforts by protecting on-site sign rights. We truly appreciate the due diligence of the Planning Department by obtaining stakeholder input throughout this sign ordinance update process.

We have recommendations dealing with the proposed illumination standards for digital displays.

The code proposes two methodologies for maximum digital sign brightness, Nits and foot candles. To minimize confusion and ensure consistency, ISA recommends that the City of Los Angeles adopt one methodology, foot candle. The Nits methodology measures the amount of light emitting from a sign but does not indicate how bright the sign is to the human eye. The International Sign Association foot candle recommendations are based on a study that utilizes accepted practice by the Illumination Engineering Society of North America (IESNA). The recommended foot candle method takes into account ambient light to ensure safe and effective illumination levels for digital displays. In addition, to determine compliance with the foot candle regulations is straightforward for industry and the City, when compared to the Nits approach. Also, the foot candle methodology has been adopted by a number of communities throughout the country, with excellent results.

The ISA recommended illumination levels are already in the proposed code. We request that PLUM remove the Nits language in Section 14.4.19 C, and include the attached ISA recommended legislative language.

We appreciate your consideration of our recommendations. Do not hesitate to contact me with any questions at 480-773-3756 or james.carpentier@signs.org.

Best Regards,

James Carpentier AICP
Manager State and Local Government Affairs

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ISA RECOMMNENED DELETIONS ARE ~~STRICKEOUT BLACK~~
ISA RECOMMENDED ADDITIONS ARE IN UNDERLINE BLACK

~~C. The maximum brightness of any digital display shall not exceed 300 candelas per square meter during the nighttime and 4,500 candelas per square meter during the daytime. Digital displays shall transition smoothly at a consistent rate from the permitted daytime brightness to the permitted nighttime brightness levels, beginning at 45 minutes prior to sunset and concluding 45 minutes after sunset. Measurements shall be performed by a testing agency approved by the Department of Building and Safety, and submitted by the owner of the sign when requested by that Department.~~

C. ~~D.~~ All ~~off site~~ digital displays shall be equipped with a sensor or other device that automatically adjusts the brightness of the display according to changes in ambient lighting to comply with the brightness limitation of 0.3 foot candles above ambient lighting, ~~as specified in Section 14.4.4 F of this Code, and~~ as measured from a preset distance from the sign face calculated with the following formula: The square root of the product of the sign area and one-hundred. Measurements shall be performed by a testing agency approved by the Department of Building and Safety, and submitted by the owner of the sign when requested by that Department.