



# PACIFIC PALISADES COMMUNITY COUNCIL

December 5, 2011

via e mail and hand delivered

Councilmembers Reyes, Huizar and Kerkorian  
c/o [sharon.gin@lacity.org](mailto:sharon.gin@lacity.org)  
Los Angeles City PLUM Committee  
200 North Spring Street  
Los Angeles, CA 90012

Date: 12/5/11

Submitted in PLUM Committee

Council File No: 08-2020, 11-1705

Item No.: 1

Deputy: Comm from Public

**Re: Opposition to Citywide Sign Ordinance as Revised on 11.21.11; Council File No.'s 08-2020, CF 11-1705**

Dear Councilmembers Reyes, Huizar and Kerkorian:

Pacific Palisades Community Council (PPCC) has been an integral part of stakeholder leadership efforts to improve the Citywide Sign Ordinance for the good of every neighborhood in Los Angeles. As the Mayor often states, the core services of City government are to protect the public's safety and to provide public parks and recreation centers that are refuges for children . . . in every sense of the word.

There have been some very positive changes to the Ordinance and we applaud Planning's efforts in this regard. However, the PPCC continues to object to the Ordinance for the following key reasons:

1. **The "interior sign exception" is fatally flawed and must be re-written** because it continues to allow the proliferation of on-site signs throughout the City and off-site signs in parks and city owned facilities located in sign districts. The "interior sign exception" (Sec. 13, Art. 4.4, Sec. 14.4.3(A)) must be changed to (a) apply only to large, campus type properties as proposed by Councilmember Weiss, (b) exclude all parks and city owned facilities, (c) restore prior language that required interior signs have to actually face "inward", and (d) eliminate the new language allowing illumination affects on residential properties.

2. **Sign Illumination Limits must be defined cumulatively** to protect residential properties, traffic intersections and other sensitive uses from light intensities produced by a grouping of signs. The PPCC advocates again a very simple change, modifying Sec. 13, Art. 4.4, Sec.14.4.4(F) to read at the start: "No one sign *or grouping of two or more signs* shall be arranged and illuminated . . ."

3. **The Ordinance does not require a net reduction in off-site signs**, and elimination of this purpose and affect is not consistent with the City's 2002 billboard ban and series of public meetings held in 2009. The PPCC advocates again that takedown provisions of a square footage ratio of at least one-to-one be mandatory. Any alternative, such as 'community benefit measures' must be provided in addition to, and not in lieu of, takedowns.

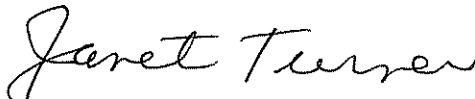
4. **"Community Benefit Measures" grant improper rights for new off-site signage and may not be interpreted and applied objectively**; thus, Sec. 12, Sec. 13.11 C must be re-written. First, to

achieve new sign permits using community benefits, the Ordinance now states that measures need merely to be *implemented* (Sec 13.11(C)2(d)) by the applicant. This is in stark contrast to sign reduction (Sec. 13.11(C)1(d)) and historic buildings (Sec. 13.11(C)3(a)) where permits and new sign rights are granted only after completion of takedowns and a rehabilitation project. It is only proper that new sign permits be granted once remedial measures have been completed, and not just *implemented*. Second, suggested measures contained in Sec. 13.11(C)(2)(a)(5-8) (such as “*other improvements*”) are vague, subjective, and subject the City to further litigation. PPCC advocates again that these subparagraphs be deleted entirely or re-written to include only those community benefits that can be measured like a takedown requirement, i.e., in terms of linear, square or cubic feet.

5. **Comprehensive Sign Programs (so-called “mini-sign districts”)** should not allow any off-site advertising because this enables billboards, digital signs and other forms of commercial advertising to proliferate outside of established sign districts and into small, local communities. PPCC advocates again that Sec. 13, Art. 4.4, Sec. 14.4.24(D), Sec. 14.4.24 (E) (1, 5, and (6)(d)) be stricken and/or re-written accordingly.

6. **The Ordinance should not grandfather in sixteen (16) sign districts** (instead of the two (2) originally proposed) without a significant allowance of time for public hearings, CEQA study, equity and social justice analysis and study of any community benefit measures applied for. It is disturbing that public notice of yet another sign district (Laurel Canyon Corridor Sign District) and the City’s request that it be allowed to apply for a sign district encompassing the L.A. Zoo was just given. The PPCC is most concerned that the L.A. Zoo will be the first of many requested exceptions for city parks and other facilities to have offsite signage that “*maximizes special revenue from advertising opportunities, such as banners and signage . . .*” (ref: 12.01.11 CAO Memo to PLUM). Further, the PPCC has not received or reviewed the promised CEQA update for this Ordinance. Thus, the PPCC advocates again Sec. 14, Art. 4.4 be substantially re-written to address these deficiencies.

Sincerely,



Janet Turner, Chair  
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