

Craig Lawson & Co., LLC

Land Use Consultants

June 26, 2015

Via Electronic Mail

Honorable Councilmember Jose Huizar, Chair
Planning and Land Use Management Committee
City of Los Angeles
City Hall, Room 395
200 North Spring Street
Los Angeles, CA 90012

RE: CF 11-1705 - Proposed Revisions to Citywide Sign Regulations

Dear Honorable Members of the Planning and Land Use Management (PLUM) Committee:

At its December 16, 2014 meeting, the PLUM Committee directed the Department of City Planning (DCP), Chief Legislative Analyst (CLA), and the City Attorney to prepare amendments to the proposed Citywide Sign Ordinance. Included among the nine (9) issue areas PLUM requested revised or additional language was the following directive:

“Clarify/include provisions regarding on-site signage on access easements on adjacent properties.”

According to a report prepared by DCP dated June 18, 2015 summarizing the prepared revisions, in response to the above-referenced directive pertaining to signage on access easements, DCP indicates that:

“New language has been added clarifying the intent of the City’s ban on new off-site signs. Signage on one lot advertising a business on the immediately adjoining lot is still considered on-site, subject to certain restrictions enforced by the Department of Building and Safety.”

While this summary in DCP’s report is fairly clear, the proposed language in Version A of the revised Ordinance that seeks to effectuate this objective is not and may create problems of interpretation. The proposed language in DCP’s Version A is as follows:

N. Legal Access on Adjoining Lots.

A sign providing advertising for a business located on an immediately adjoining lot shall not be considered an off-site sign if pedestrian access for

the benefit of the lot where the business is located is provided across the common property line continuously to where the sign is located. Such access shall be provided on grade and not less than 4' in width and shall be documented though a recorded easement to the satisfaction of the Department of Building and Safety.

We suggest that this proposed language be modified to eliminate unnecessary and confusing clarifying terms (examples: “immediately adjacent” as opposed to “adjacent”; and adding *vehicular* access in addition to *pedestrian* access easements.) Our recommended revised language is as follows:

“A sign providing advertising for a business located on an adjoining property shall not be considered an off-site sign if pedestrian and/or vehicular access for the benefit of the lot where the business is located is provided across the property on which the sign is located. Such access shall be documented though a recorded easement to the satisfaction of the Department of Building and Safety.”

Thank you for your thoughtful consideration of this request. Should you have any questions, please do not hesitate to contact me at (310)838-2400 x104.

Sincerely,

Craig Lawson

Craig Lawson
Craig Lawson & Co., LLC

CC: Andrew Westall, Office of Council President Herb Wesson