



July 30, 2018

To: PLUM Committee Members, Los Angeles City Council
From: Patrick Frank, President, Coalition to Ban Billboard Blight
Re: Council File 11-1705, Citywide Sign Ordinance

Please place this document in the Council File

To the Members of the PLUM Committee:

Several public comments have been filed recently regarding the Citywide Sign Ordinance which contain false or misleading statements, either about digital signs in general or about the current legislative process in particular. Writing on behalf of the Coalition to Ban Billboard Blight and our hundreds of associates in every council district, I wish to respectfully submit several points.

1. It is incorrect that the general public accepts digital billboards, as a recent public comment alleged. As evidence I urge the PLUM Committee to study the Community Impact Statements that have been submitted in this matter. Twenty neighborhood councils have specifically opposed the PLUM Committee proposed legislation through Community Impact Statements. (One recent communication to PLUM has been mislabeled as coming from the North Hollywood Northeast Neighborhood Council when it came in fact from just one member of that body, and it is not a Community Impact Statement.) No neighborhood council has filed a Community Impact Statement supporting the PLUM proposed legislation; all oppose it.

2. Digital billboards do not benefit the community. Many public comments have equated the implantation of digital billboards with various types of community improvements such as pedestrian crossings, bike lanes, and tree plantings, but there is no necessary connection between them. Every community improvement that is alleged to accompany the implantation of a digital billboard can be realized through other methods such as the general appropriations process or through a Business Improvement District, to name two such available means. These improvements can be accomplished without the added visual clutter that a digital billboard brings, and a community that wishes to have such improvements need not suffer the intrusion of digital billboards as a price to be paid.

3. Digital billboards contribute to driver distraction which causes accidents. Sign companies wishing to implant digital billboards often refer to a study carried out by the Federal Highway Administration which found that digital billboards do not distract drivers enough to represent a significant safety hazard. But this study is flawed, was never adequately peer-reviewed, and in fact it has been directly refuted by later peer-reviewed studies (<https://www.dropbox.com/s/ylz8flwto5iglmj/FHWA2013.pdf>). I further refer the committee members to the legal filing on behalf of the Coalition by Chatten-Brown and Carstens, which details the state of existing research on the impact of digital signs. The Highway Administration study is very much an outlier in the spectrum of studies on the safety of digital billboards, and should not be relied upon in crafting legislation.

4. Donations by billboard companies of free space to charitable organizations are laudable, but fuller context requires that their donations to current members of the PLUM Committee should also figure in the discussion. Nearly every member of the committee has received free favorable billboard promotion during past election cycles, donated by sign companies. For example, the chair of the committee received 100 free favorable billboards in 2015 (<http://www.latimes.com/local/cityhall/la-me-billboard-election-20150121-story.html>). These expenditures are legal, but they contribute to the impression that the legislation that has emerged from the PLUM Committee, which the sign companies favor, is tainted by these gifts.

5. Billboard blight happens when sign companies have too few restraints in placing billboard advertising structures. This is precisely what happened in the past with static billboards across Los Angeles. The PLUM Committee has recognized this fact by encouraging the creation of a Billboard Blight Reduction Fund, and by proposing takedowns of existing static signs in exchange for erection of new digital signs. In addition, nearly 1,000 billboards in Los Angeles have questionable legal status, either because of a lack of existing permit papers or because they were built or modified in violation of their permits. This amounts to an intolerable situation for any well-governed city.

6. The City Planning Commission version of the proposed sign ordinance, known as Version B Plus, will help to reduce billboard blight. In exchange for erecting a new digital billboard, Version B Plus requires taking down ten static billboards. This is a strong takedown ratio that parallels that of many other cities that carefully regulate the placement of billboards. In view of the past history of Los Angeles billboard regulation, that ratio is necessary here. The locations of these required takedowns can be stipulated by fine-tuning the legislation. In contrast, the lower takedown ratios that the PLUM Committee proposal embodies are weak in comparison.

7. Version B Plus is a sensible compromise between the needs of businesses to advertise, traffic safety, considerations of neighborhood character, and the public's right to serene driving. Version B Plus will limit digital billboards to sign districts in areas zoned Regional Commercial, where, presumably, traffic will move more slowly, thus mitigating the safety problem. Moreover, sign districts are created only after significant community input, unlike the relatively easy Conditional Use Permit process that the PLUM version includes. If we wish to give the public significant input into where new digital signs will be located, then the sign district is the best method of achieving this.

What kind of billboard regulation will Los Angeles have? Will we regulate digital billboards, or will we have billboard blight? That is the question that we face. Our visual environment is at stake, and this legislation will set the rules for years to come. The Coalition to Ban Billboard Blight would prefer that the City Council nurture an urban forest of trees instead of billboards, for many reasons. But we also favor the "reasonable regulation" that many other commenters have mentioned. By reasonable, we mean balanced, with consistent community input. We believe that the best course for the PLUM Committee would be to fine-tune and ratify Version B Plus.



Honorable Council President Herb Wesson, Jr.
City of Los Angeles
200 N. Spring St., Room 430
Los Angeles, CA 90012

Dear Honorable Council President Wesson,

I am writing to encourage you to support common sense regulation of billboards and digital signage and express my support of the Los Angeles Outdoor Advertising Coalition (LAOAC).

The San Fernando Valley Rescue Mission serves thousands of homeless and hungry people with our shelter and outreach programs. As a charitable organization that is supported completely by private donations, grants and proceeds from three thrift stores, we depend on the generosity of companies such as those in the LAOAC.

The outdoor advertising industry has provided us critical space on billboards, helping spread the word about services and hope. Billboards not only encourage donations, but also advise potential clients of available services, playing a critical part in the health and welfare of our neighborhoods.

Many of our clients have responded to information posted on billboards and taking that resource away could have dire consequences. Because so many of our clients may not have access to other media – newspapers, radio, television or computers – billboards may be the only way they find out about the services we provide.

I encourage the Council to take immediate action to implement reasonable regulation of both traditional and digital off-site signs in the city. Our belief is that doing so will result in a better working environment for charities, businesses and public safety overall.

Sincerely,

A handwritten signature in blue ink, appearing to read "April Lindh".

April Lindh
Executive Director