March 18, 2013

Michael LoGrande
Director
City of Los Angeles Department of City Planning
201 N Figueroa St
Los Angeles, CA 90012

RE: Comments on Outdoor Advertising and Signage Effort

Dear Director LoGrande,

On behalf of the Los Angeles County Business Federation (BizFed), representing more than 100 business organizations with more than 250,000 businesses across our region, including more than 80,000 businesses in the City of Los Angeles, we are writing to offer comments for your consideration as the City works to address the issue of billboards and digital signs.

For businesses, community organizations, and public agencies in neighborhoods across the City, billboards and digital signs can be important tools for advertising, marketing, public communication, and community engagement. However, while many of our members embrace these benefits, we also recognize that growth has resulted in many billboards and digital signs in locations that are undesirable for both residents and outdoor advertisers and signage companies. Therefore, we believe there is a need for comprehensive, clear, fair, easily understood rules, and we commend the Department of City Planning and the Planning and Land Use Management Committee (PLUM) for assembling various stakeholders to engage in a Visioning Group to begin tackling this issue.

As work on this issue continues, we offer the following thoughts, which we hope can inform the process of developing a comprehensive approach to govern outdoor advertising and signage in the City:

- Given the potential benefits of digital billboards and signs to businesses, community organizations, and public agencies, the City should explore establishing a policy that would reduce overall billboards by allowing the judicious and strategic conversion of static billboards to be replaced by digital billboards and signs.
- A strategic reduction and conversion policy should allow community benefits as an alternative if sign reduction is not feasible. Examples of community benefits include sidewalk repair, landscaping amenities, the planting of street trees, parks and open space, facade improvements, street furniture, and similar measures designed to enhance affected neighborhoods. Council offices should have the flexibility to work with the neighborhoods they represent to address the unique and specific needs of their respective communities in ways that are fair and equitable to outdoor advertisers and signage companies.
- For such a strategy to be effective at reducing overall billboards, it will be important to ensure that there is enough opportunity and
flexibility to convert static billboards to digital billboards and signs. If there are too few areas in which digital billboards and signs are allowed, there will be insufficient incentive for outdoor advertisers and signage companies to participate.

- The City must take care to ensure a level playing field among all outdoor advertising and signage companies without picking winners and losers among these businesses. Past efforts to regulate digital billboards and signs have failed neighborhoods and the outdoor advertising and signage industry as a whole by creating a monopoly in which only two companies possess 100 percent of digital billboards in the City.

Additionally, if the Visioning Group, or some successor entity, is to continue, we suggest bringing additional voices to the discussion, including BizFed, which was not a formal member (although several of our members participated in other capacities.) The formal group was made up largely of billboard companies and their lawyers, and neighborhood council representatives from established single-family neighborhoods. We recommend ensuring participation from representatives from both new emerging neighborhoods and neighborhoods that are seeking revitalization. In both cases, high-density, high-rise, mixed-use streetscapes attract very different residents seeking a very different neighborhood character from established single-family neighborhoods. Additionally, the group should include owners on whose property billboards are located, as they will be directly affected by any new policies.

Again, we appreciate work of the Visioning Group thus far and the PLUM Committee's efforts to address an issue that so directly affects the character and economy of the City of Los Angeles. We look forward to continue engaging all of the relevant stakeholders to ensure a fair and comprehensive solution.

Sincerely,

Will Wright
Co-Vice Chair, BizFed Land Use/Development/Construction & Housing Committee
American Institute of Architects – LA

Carlene Matchniff
Co-Vice Chair, BizFed Land Use/Development/Construction & Housing Committee

Tracy Rafter
BizFed CEO
IMPOWER, Inc.

CC: Planning and Land Use Management Committee. Los Angeles City Council
December 4, 2014

Honorable Herb Wesson, Jr.
President
200 North Spring Street, Room 470
Los Angeles, CA 90012

Dear Honorable Council President Wesson:

On behalf of the Los Angeles County Business Federation (BizFed) – representing more than 125 business organizations with nearly 265,000 businesses across our region – we are writing to express support for the outdoor advertising industry’s efforts to work with the City to find a legislative solution regarding digital signs in the City of Los Angeles. If forced to go dark, public safety agencies, nonprofit groups, and businesses will be negatively impacted.

Digital signs contribute to public safety, a facet of digital signs that many opponents of digital signage in Los Angeles intentionally overlook. Whether signs are used to support outreach efforts for local nonprofits, or notifying the community in emergency situations, digital signs provide critical information to communities throughout the city.

Outdoor advertising plays a unique roll for businesses seeking to market their services and products at a rate averaging 86% less than TV and 66% less than newspapers. Demolition of these signs would reduce the City’s opportunity for revenue generation and could result in permanent loss of digital signage in Los Angeles.

It is imperative that the City of Los Angeles finds a legislative solution that will allow for the permitting of existing digital signs, as well as establish a comprehensive sign ordinance allowing for the fair and reasonable use of modern digital technology. By establishing a reasonable ordinance, similar to the policies that exist in more than 450 localities in 43 states – the City can take advantage of the significant economic, community, and public safety benefits digital signs provide.

We recognize the long history of this issue in the City of Los Angeles and encourage the City Council and staff to work with the industry to restore the use of digital signs and craft a policy for the fair and reasonable use of digital signs, and in a timely manner. This will ensure that valued community partners are able to continue supporting the Los Angeles civic and business community.

Sincerely,

Don St. Clair
BizFed Chair
Woodbury University

David Fleming
BizFed Founding Chair
Latham & Watkins LLP

Tracy Rafter
BizFed CEO
IMPOWER, Inc.