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## Public Comment Compliance with Disability Access Laws

1 message

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**Sara Johnson** <sarajohnsonpm@gmail.com>

Fri, Feb 14, 2025 at 7:14 AM

To: rita.moreno@lacity.org

Cc: disability@lacity.org, cityattorney@lacity.org, publichealth@ph.lacounty.gov, clerk.cps@lacity.org

Dear LA City Public Health Commission, President Mandel, and Ms. Moreno,

I am writing to inquire about the public comment process for the Los Angeles City Commission on Public Health teleconference meetings (example: <https://lacity.primegov.com/Portal/Meeting?meetingTemplateId=137451>). It appears that public comment is only allowed in person and not remotely, despite the meeting having virtual attendance option: "The Commission will take public comment from members of the public in-person only; there will be no public comment by teleconference." Noticeably, there's no written public comment option does clearly available.

As public health stewards, I trust you are acutely aware that the ongoing COVID-19 pandemic has led to **thousands of Angelenos including myself becoming disabled and/or housebound**, further emphasizing the need for accessible remote options for public participation.

The Brown Act requires that public meetings be open and accessible, including ensuring that public comment can be submitted remotely when meetings are conducted virtually.

Moreover, under Section 504 of the Rehabilitation Act and the Americans with Disabilities Act (ADA), government entities are legally bound to provide reasonable accommodations to ensure individuals with disabilities can fully participate in public meetings. **Denying remote participation for public comment in these circumstances raises concerns about non-compliance with both state and federal disability access laws.**

It is also important to note that **Section 504 protections are increasingly at risk in several states**, making it even more critical that Los Angeles takes a leadership role in ensuring accessibility, especially in an accelerating political climate that is becoming more anti-inclusive. The Los Angeles County Department of Public Health Commission has already taken steps to upgrade its technology that facilitates remote public comment, setting a precedent for other city agencies to follow.

**The city should be setting an example in ensuring that all residents have equitable access to participate in vital public health discussions, particularly when these protections are increasingly under threat.** Additionally, in this digital age and work-from-home, pandemic-forward era, there is simply no excuse for a leading world-class city like Los Angeles not to be technologically up to date in offering accessible public participation options.

Given these considerations, I would like to ask for clarification on the Commission's policies regarding remote public comment. **Will you provide the option for remote participation at meetings, and if not, could you explain why?** I believe the Commission has a responsibility to set an example by ensuring accessibility for all residents.

Thank you for your attention to this important matter. **I look forward to your response.**

Sincerely,  
Sara Johnson

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**Cc:**

- Los Angeles Department of Disability: disability@lacity.org
- Los Angeles City Attorney: cityattorney@lacity.org
- Los Angeles County Department of Public Health: publichealth@ph.lacounty.gov

References:

- **“17 States Sue To End Protections For Students With Special Needs:** This article discusses a lawsuit filed by 17 states, including Texas, challenging federal regulations that protect students with disabilities under Section 504”, <https://www.forbes.com/sites/petergreene/2025/02/13/17-states-sue-to-end-protections-for-students-with-special-needs/>
- **“Texas v. Becerra: What it is and How You Can Help Stop the Attack on Section 504:** This resource provides an overview of the Texas v. Becerra case, where a group of 17 states is suing the U.S. government to eliminate Section 504 protections in health care and human services”, <https://dredf.org/protect-504>
- **“Suit Over Gender Dysphoria Could Dismantle New Disability Rules:** This article examines how a lawsuit involving 17 states could potentially dismantle new disability protections, including those under Section 504”, <https://www.them.us/story/suit-over-gender-dysphoria-could-dismantle-disability-rights>