

## **Communication from Public**

**Name:**

**Date Submitted:** 09/26/2022 02:01 PM

**Council File No:** 20-1536

**Comments for Public Posting:** See attached

September 26, 2022

Los Angeles City Council  
200 North Spring Street  
Los Angeles, CA 90012

**Philip Recht**  
Partner

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Re: Sidewalk and Transit Amenities Program and  
Related Ordinance  
Council File Nos. 20-1536 and 20-1536-S1

Dear Members of the City Council:

This firm represents Summit Media, LLC (“Summit”). We submit this letter as a supplement to Summit’s letter dated May 31, 2022 concerning defects in the Initial Study/Mitigated Negative Declaration (“MND”) and related items associated with the Sidewalk and Transit Amenities Program (“STAP”), Council File Nos. 20-1536 and 20-1536-S1.

As noted in that earlier letter, the MND fails to include a complete and accurate project description, and fails to properly analyze various potentially significant impacts of the proposed project. This is true not only of the STAP proposal but also of the accompanying proposed ordinance that would amend the LAMC to allow digital signage in public rights of way. The proposed ordinance is scheduled for further Council consideration on September 28, 2022.

As more fully discussed in the letter dated September 19, 2022 on behalf of Citizens for a Better LA (which Summits joins and incorporates as if set forth in full herein), the MND does not appropriately serve as a Program Environmental Impact Report (EIR) (i.e., predicate analysis) upon which future projects that would be allowed under the proposed ordinance might be properly analyzed; does not completely describe or analyze such projects; and does not properly analyze, or analyze at all, the potential cumulative effects of such projects.

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For all these reasons, as well as the reasons set forth in Summit's May 31, 2022 letter, a full EIR must be completed before the proposed ordinance can properly be considered for enactment.

Sincerely,

A handwritten signature in blue ink, appearing to read "P. J. Recht", is written over a faint, light blue rectangular background.

Philip Recht  
Partner