

Communication from Public

Name: Lois Becker on behalf of Bel Air Skycrest Property Owners' Association

Date Submitted: 08/02/2023 12:08 PM

Council File No: 22-0392

Comments for Public Posting: Bel Air Skycrest Property Owners' Association (BASPOA) requests delay of Aug 17th CPC hearing on Metro Digital Billboard Ad Program in order to allow public time to respond to yet-to-be-released Staff Report. See attached.



August 2, 2023

Re: City Planning Commission Hearing of Metro Digital Billboard Ad Program Must Be Rescheduled

Reference: CPC-2022-5401-CA, CPC-2023-3653-ZC, ENV-2022-5286-EIR

Dear City Planning Commission:

I am writing on behalf of Bel Air Skycrest Property Owners' Association (BASPOA) regarding the upcoming hearing on the Metro Digital Billboard Advertising Program. This hearing, now scheduled for August 17th, must be POSTPONED in order to allow stakeholders adequate time to read and respond to the Staff Report.

The exact date of its release is yet to be determined, but with the Public Comment Period closing on August 4th, the Staff Report coming out sometime after that, and the CPC hearing set for the 17th, the public would have a less-than-two-week window in which to read the report and prepare for the hearing. This is a clear violation of the Planning Department's Public Participation Policy as well as City Charter requirements for Neighborhood Councils.

BASPOA has numerous concerns about the Metro Program and about billboards generally – particularly digital billboards – and we are not alone in these concerns, as demonstrated by the turnout and testimony at the June 12th presentation. They are a blight on both our urban landscape and what remains of our natural environment; and they are proven to create dangerous distractions on our roads. Proponents claim that they will offer valuable transportation and PSA-related messages, but the reality is that 7 out of 8 images on these digital billboards will be advertising. The proliferation of billboards cheapens our city and is bad for the mental health of our citizens.

Clearly, this is not what the people of Los Angeles want. We have shown up for years and years of hearings on this subject and have made our wishes abundantly clear – to severely limit both quantity and kinds of billboards and the areas where billboards are allowed and to ensure mitigations and a truly meaningful number of takedowns whenever new billboards do go up. The proposed Metro Program does not respect our wishes. It does not respect the signage

rules that the City has already passed but instead seems intent on finding ways to take another bite out of the apple. And now it attempts to cut the public out of the process so that the program can move ahead as fast as possible. This is wrong.

Please, we urge you to delay the CPC hearing. Give the public the time we need to fully participate in this process. And give yourselves the time to really *listen* to and consider the arguments. What value do these billboards really offer? Where are the mitigations for their many negative impacts? Where are the benefits from this program, except to the billboard companies? Please respect and protect your constituents. We are counting on you!

Thank you.

A handwritten signature in cursive script that reads "Lois Becker". The signature is written in black ink and is positioned above the typed name.

Lois Becker, BASPOA Community Liaison

Communication from Public

Name: E Arias

Date Submitted: 08/02/2023 01:26 PM

Council File No: 22-0392

Comments for Public Posting: Rushed approvals hinder public participation: The City's staff report will be issued sometime after the August 4, 2023 deadline for comments. That does not give the public, organizations, or Neighborhood Councils sufficient time to review the report and give meaningful public input prior to the CPC hearing (especially difficult during summer when people are on vacation) in violation of the Planning Department's own Public Participation Policy and contrary to the City Charter's mandate for Neighborhood Councils. Why the rush? Why the lack of transparency? Reschedule the CPC hearing to give the community time to review and comment. It's really about ads... not improving traffic safety: Neither the City nor the public have been provided information to allow analysis of the purported benefits of a transportation communication network that is supposed to improve traffic safety. No evaluation mechanisms or measures for success have been defined. AllVision, the Program's contractor, is an advertising company. Seven out of every eight images on the digital signs would show advertising. Changing digital advertising is dangerous and distracting: The City has failed to conduct independent analysis or review the many available safety studies or consider the impact of these signs on the City's High Injury Network and Vision Zero. It has also failed to acknowledge the serious consequences of driver distraction on roadway safety, particularly on the most vulnerable roadway users: bicyclists and pedestrians. California's Office of Traffic Safety defines distracted driving as "anything that takes your eyes or mind off the road." Even messages created to promote traffic safety result in distraction and accidents! City gets the short end of the stick: The City has yet to be provided with site plans and renderings of the locations of the signs making it impossible for the City and the public to evaluate the benefits and detriments of the Program. The City will not be operating the signs, Metro will be in control. Provide full renderings (to scale) of each location and sign, including dimensions and spacing between other digital signs in the vicinity, prior to consideration of these Ordinances. Overrides local community planning documents: Sign types and locations were chosen by Metro without collaboration with the City, overriding the City's existing Specific Plans and other land use overlays adopted after significant community engagement and

input. Remove all signs that would violate existing adopted Plans and Overlays. Fails to deliver benefits: The Program's removal of a small number (3 to 1 ratio) of old static billboards of limited economic value and impact on the community does not represent meaningful blight reduction when compared to the recommended (10 to 1 ratio) takedown by the City's Planning Commission. Require minimum 10 to 1 takedown ratio. Freeway signs impact underserved communities disproportionately: Distribution of signs creates unequal burdens. Signs erected adjacent to freeways are more likely to impact underserved communities. No environmental justice analysis has been provided. Provide environmental justice analysis prior to consideration of these Ordinances. NO resource impacts analysis: The City has failed to conduct its own environmental analysis to assess whether the digital ads will have significant impacts on important City resources, such as Bowtie State Park, Ballona Wetlands Ecological Reserve, Sepulveda Basin Wildlife Reserve, Grand Central Market, Mulholland Scenic Parkway, and others. Remove all signs that would impact the City's biological, historical, cultural, and/or coastal resources. May violate public privacy: Digital billboards have been shown to capture personal data from passers-by without permission. There has been no discussion as to the extent of data gathering and protections for the public or data storage security. Include prohibitions on data collection and selling/sharing. Overrides impacts to Coastal Zone: Metro approved a sign at the Ballona Wetlands Ecological Reserve (along the I-90 Marina Freeway) knowing it would have significant impacts on coastal resources because Metro approved overriding considerations. The City must remove the Ballona Wetlands sign. NO cumulative impacts analysis: After implementation of the Program, the downtown area will have a dozen signs within a three-mile radius, all in the vicinity of the recently-established Lusk Children's Orthopedic Hospital sign district. Public gets the short end of the stick: The Program does not allow the community the right to appeal any of the freeway-facing signs. The freeway-facing signs are between 50-90 feet above grade. Sets a negative precedent: The draft Ordinance seeks to allow non-contiguous billboards to be erected under a Supplemental Use District, rather than follow court guidance directing the City to maintain its ban on new billboards by limiting billboards to contiguous areas within Sign Districts.

Communication from Public

Name: Barbara L Broide
Date Submitted: 08/02/2023 09:51 PM
Council File No: 22-0392
Comments for Public Posting: Please add to this Council File all comments previously submitted directly to Metro in opposition of the TCN Program to ensure that they are made part of this Council File record. They are to be incorporated here by reference. Thank you, Coalition for a Beautiful Los Angeles