

Communication from Public

Name: Robin Rudisill

Date Submitted: 11/06/2023 08:09 PM

Council File No: 22-0392

Comments for Public Posting: The Metro TCN Program must be denied. Set forth below are just a few of the reasons. Digital signage that takes drivers' eyes off the road must not be located where they can be seen by drivers in the City's High Injury Network (HIN). Numerous safety studies, done in the U.S. and worldwide, prove that digital billboards cause traffic accidents and fatalities, which shows that this program would put Angelenos in danger. In addition, the program conflicts with many General Plan Elements that protect Angelenos and would undermine the City's Vision Zero goals. 11 of the 16 non-freeway facing signs are located on the City's HIN, identified as such because the streets in the network have a higher incidence of severe and fatal collisions. It is unconscionable that a program such as this, with the significant safety risks associated with digital signs that change every 8 seconds, would even be considered let alone approved in the HIN!! There is no analysis at all of the impact digital billboards would have on the HIN. And especially unacceptable is the idea that a Plan Approval in 5 years is an adequate mitigation for the risks. CPC Commissioner Gold stated "I do remain deeply skeptical of the safety impacts that will result from this." CPC President Samantha Millman stated "Even though I know we have heard that there's no traffic safety issues with signs, I don't know that I fully agree with that statement. I think the jury's still out and there's a lot of conflicting data. And while some of the studies from state and federal agencies say one thing, we also know that there are lots of studies that say for every second your eyes go off the road, there's an increase in traffic accidents and that digital signage can cause your eyes to go off the road for a certain amount of time. I just am not comfortable saying definitively, one way or another." It's very clear that the safety issues have been barely glossed over to date and the City Council has a duty to further analyze the significant safety risks associated with the Metro TCN Program. In August 2023, the City of La Mesa rejected digital billboards in a surprise vote because "a majority of the City Council felt the extra revenue wouldn't make up for potentially distracting drivers." This is not surprising because Traffic Safety studies from around the world have demonstrated that changing digital advertising signs are dangerous and distracting to drivers. Yet, Metro dismisses these facts relying instead on industry studies. Use of Metro sites for

temporary and permanent housing must trump use of the sites for billboards! The Mayor and City Council need to remind themselves of their priorities. In March 2023 the Metro Board Executive Management Committee was presented a list of 17 metro-owned properties that could be used as future development sites for temporary and permanent supportive housing and "safe parking." This list includes four sites that have been identified as locations for four of the proposed billboard structures. Using these four sites for temporary and permanent housing and safe parking is the priority of the City. That priority must be honored and those four sites must be used for emergency housing. The program is overwhelmingly opposed by 24 Neighborhood and Community Councils, 16 community/environmental organizations and the SAG/AFTRA Union for its impacts on filming in L.A. This amounts to tens if not hundreds of thousands of Angelenos. If more citizens were aware of this proposal, there would be an exponential increase in opposition. Many of those speaking in favor of the program appear to be paid speakers, talking from a script and by rote. Of great concern is the fact that there has been no cumulative impact analysis, based on a review of the environmental documents for the City's STAP program and the TCN program, of the three separate billboard programs currently being considered by the City—STAP, Metro TCN and IKE. A cumulative impacts analysis must be performed that includes an analysis of the impacts of all three programs together on the scenic environment of the City. To not include a cumulative impacts analysis on the environment of all three programs in either the STAP or the Metro TCN environmental analyses is a violation of CEQA as the City was well aware of the other programs at the time of the CEQA analysis. In addition, the City is making a very significant up front investment in STAP, expecting to recover that investment, and more, with future advertising revenues. However, the Metro TCN program is likely to have the impact of significantly reducing the STAP revenues, as advertisers will be more attracted to the TCN program with its higher visibility. The City's fiscal responsibilities require it to perform an analysis of the financial impacts of all three programs considered together. The program must be denied and the \$1 million penalty for denial must be re-negotiated with Metro.

Communication from Public

Name: Stephanie Aston

Date Submitted: 11/06/2023 08:09 PM

Council File No: 22-0392

Comments for Public Posting: Subject Line: CF# 22-0392 OPPOSE Metro Digital Billboard, Agenda Item # 10 I/We strongly oppose the Metro Transportation Communication Network (TCN) digital billboard advertising Program (Program). Below is a summary of some of the proposed Program elements that are problematic (also see August 22, September 5 & September 27 letters from Coalition for a Beautiful Los Angeles). The current proposal represents a huge policy change for the City (as one City Planning Commissioner commented, “Frankly, this is a sea change in signage in our City”). If the City Council Planning and Land Use Management Committee (PLUM) votes to approve this Program over the community’s objections, it is incumbent upon the Committee to ensure protections for its citizenry. Additional Mitigation Needed: City proposes 80 sign faces with less than a 3:1 take-down ratio (not adequate to offset the impacts of digital vs. static signs). City proposes an 8-second refresh rate based on [digital billboard] industry standards instead of the 20-second refresh rate recommended by Illuminating Engineering Society Recommended Practice for Off-Roadway Sign Luminance. City proposes operating hours from 5:00 a.m.-midnight – a 19-hour digital sunrise. Operating hours of 7:00 a.m.-midnight are more than adequate. City proposes a 200-foot buffer from Scenic Highways in conflict with the Mobility Element of the General Plan that requires a 500-foot setback from the centerline of a Scenic Highway. The ordinance must comply with the City’s General Plan. During the City Planning Commission (CPC) hearing, staff commented that the two Bowtie State Park billboards were located too close to the Park. Even at the proposed distances of 619 and 820 feet, staff said it was best not to site the billboards at those locations. Yet, staff did not recommend removing other digital signs proposed in close proximity or adjacent to sensitive uses (such as FF-30 Ballona Wetlands Ecological Reserve; NFF-1 Barnsdall Art Park/World UNESCO Site; FF-25 Sepulveda Basin Wildlife Reserve/Woodley Park). City proposes all digital billboard faces be equipped with horizontal louvers to reduce light trespass. Two billboard structures, adjacent to environmentally sensitive properties, are also slated to have vertical louvers. Post-CPC Planning report is now recommending vertical louvers be installed

on all billboard faces within 500 feet of open space and current residential uses. This fails to take into account future housing projects or other sensitive uses. All digital sign faces should include both horizontal and vertical louvers. The Program proposes four digital billboards located on four parcels that have also been identified by Metro as suitable for joint development agreements for housing projects (NFF-17, NFF-10, NFF-4, and NFF-5). Despite the Mayor's Emergency Declarations and Metro's commitment to prioritize housing, no analysis has been conducted to determine the best use of these parcels for housing vs. billboards. City proposes to locate 11 of 16 non-freeway facing digital billboards on the City's High Injury Network streets. This undermines Vision Zero. In August 2023, the City of La Mesa rejected digital billboards in a surprise vote because "a majority of the City Council felt the extra revenue wouldn't make up for potentially distracting drivers." This is not surprising because Traffic Safety studies from around the world have demonstrated that changing digital advertising signs are dangerous and distracting to drivers. Yet, Metro dismisses these facts relying instead on industry studies. The Program does not account for changes in the environment that might occur over time and does not include a provision to allow for new or updated information and studies. It fails to give the City Council authority to amend the standards, and other provisions to mitigate impacts on the visual environment, on residential or other properties, to reduce driver distraction or other hazards to traffic, or to otherwise protect and promote the public health, safety and welfare and apply these amended standards to existing signs and digital displays. Language to do so should be incorporated into the approval as recommended in May 25, 2021 CPC Letter of Determination. The Program is overwhelmingly opposed by 24 Neighborhood and Community Councils, 16 community/environmental organizations, and the SAG/AFTRA Union for its impacts on filming in LA. The above list attempts to highlight some of the significant unmitigated impacts of the digital billboard Program that if not addressed will blight the City and endanger roadway users for decades to come.

Communication from Public

Name: Ester Gonzalez

Date Submitted: 11/06/2023 10:08 PM

Council File No: 22-0392

Comments for Public Posting: CF# 22-0392 OPPOSE Metro Digital Billboard, Agenda Item # 10 I, resident of Los Angeles, strongly oppose the Metro Transportation Communication Network (TCN) digital billboard advertising Program (Program). Below is a summary of some of the proposed Program elements that are problematic (also see August 22, September 5 & September 27 letters from Coalition for a Beautiful Los Angeles). The current proposal represents a huge policy change for the City (as one City Planning Commissioner commented, “Frankly, this is a sea change in signage in our City”). If the City Council Planning and Land Use Management Committee (PLUM) votes to approve this Program over the community’s objections, it is incumbent upon the Committee to ensure protections for its citizenry. Additional Mitigation Needed: City proposes 80 sign faces with less than a 3:1 take-down ratio (not adequate to offset the impacts of digital vs. static signs). City proposes an 8-second refresh rate based on [digital billboard] industry standards instead of the 20-second refresh rate recommended by Illuminating Engineering Society Recommended Practice for Off-Roadway Sign Luminance. City proposes operating hours from 5:00 a.m.-midnight – a 19-hour digital sunrise. Operating hours of 7:00 a.m.-midnight are more than adequate. City proposes a 200-foot buffer from Scenic Highways in conflict with the Mobility Element of the General Plan that requires a 500-foot setback from the centerline of a Scenic Highway. The ordinance must comply with the City’s General Plan. During the City Planning Commission (CPC) hearing, staff commented that the two Bowtie State Park billboards were located too close to the Park. Even at the proposed distances of 619 and 820 feet, staff said it was best not to site the billboards at those locations. Yet, staff did not recommend removing other digital signs proposed in close proximity or adjacent to sensitive uses (such as FF-30 Ballona Wetlands Ecological Reserve; NFF-1 Barnsdall Art Park/World UNESCO Site; FF-25 Sepulveda Basin Wildlife Reserve/Woodley Park). City proposes all digital billboard faces be equipped with horizontal louvers to reduce light trespass. Two billboard structures, adjacent to environmentally sensitive properties, are also slated to have vertical louvers. Post-CPC Planning report is now recommending vertical louvers be installed

on all billboard faces within 500 feet of open space and current residential uses. This fails to take into account future housing projects or other sensitive uses. All digital sign faces should include both horizontal and vertical louvers. The Program proposes four digital billboards located on four parcels that have also been identified by Metro as suitable for joint development agreements for housing projects (NFF-17, NFF-10, NFF-4, and NFF-5). Despite the Mayor's Emergency Declarations and Metro's commitment to prioritize housing, no analysis has been conducted to determine the best use of these parcels for housing vs. billboards. City proposes to locate 11 of 16 non-freeway facing digital billboards on the City's High Injury Network streets. This undermines Vision Zero. I do not want more blue light, more light pollution. Especially in the few areas that have some level of darkness near natural park areas. I would be depressed to see an electric billboard near the LA river above the open bottom part near Lincoln Heights and Frogtown. There are birds and other wildlife that migrate here. It is a fact that light interferes with their migration flyways. Special interests that will profit are the only ones whose opinion is being considered. Residents that will actually be affected are being ignored.

Communication from Public

Name: John F Martinez
Date Submitted: 11/06/2023 10:11 PM
Council File No: 22-0392
Comments for Public Posting: I'm against ANY lit billboards in LA. I strongly oppose the Metro Transportation Communication Network (TCN) digital billboard advertising Program. The current proposal represents a huge policy change for the City (as one City Planning Commissioner commented, "Frankly, this is a sea change in signage in our City"). If the City Council Planning and Land Use Management Committee (PLUM) votes to approve this Program over the community's objections, it is incumbent upon the Committee to ensure protections for its citizenry. John F Martinez

Communication from Public

Name: probyn gregory

Date Submitted: 11/06/2023 10:12 PM

Council File No: 22-0392

Comments for Public Posting: I strongly oppose the Metro Transportation Communication Network (TCN) digital billboard advertising Program (Program). Below is a summary of some of the proposed Program elements that are problematic (also see August 22, September 5 & September 27 letters from Coalition for a Beautiful Los Angeles). The current proposal represents a huge policy change for the City (as one City Planning Commissioner commented, “Frankly, this is a sea change in signage in our City”). If the City Council Planning and Land Use Management Committee (PLUM) votes to approve this Program over the community’s objections, it is incumbent upon the Committee to ensure protections for its citizenry.

Additional Mitigation Needed: City proposes 80 sign faces with less than a 3:1 take-down ratio (not adequate to offset the impacts of digital vs. static signs). City proposes an 8-second refresh rate based on [digital billboard] industry standards instead of the 20-second refresh rate recommended by Illuminating Engineering Society Recommended Practice for Off-Roadway Sign Luminance. City proposes operating hours from 5:00 a.m.-midnight – a 19-hour digital sunrise. Operating hours of 7:00 a.m.-midnight are more than adequate. City proposes a 200-foot buffer from Scenic Highways in conflict with the Mobility Element of the General Plan that requires a 500-foot setback from the centerline of a Scenic Highway. The ordinance must comply with the City’s General Plan. During the City Planning Commission (CPC) hearing, staff commented that the two Bowtie State Park billboards were located too close to the Park. Even at the proposed distances of 619 and 820 feet, staff said it was best not to site the billboards at those locations. Yet, staff did not recommend removing other digital signs proposed in close proximity or adjacent to sensitive uses (such as FF-30 Ballona Wetlands Ecological Reserve; NFF-1 Barnsdall Art Park/World UNESCO Site; FF-25 Sepulveda Basin Wildlife Reserve/Woodley Park). City proposes all digital billboard faces be equipped with horizontal louvers to reduce light trespass. Two billboard structures, adjacent to environmentally sensitive properties, are also slated to have vertical louvers. Post-CPC Planning report is now recommending vertical louvers be installed on all billboard faces within 500 feet of open space and current residential uses. This fails to take into account future housing

projects or other sensitive uses. All digital sign faces should include both horizontal and vertical louvers. The Program proposes four digital billboards located on four parcels that have also been identified by Metro as suitable for joint development agreements for housing projects (NFF-17, NFF-10, NFF-4, and NFF-5). Despite the Mayor's Emergency Declarations and Metro's commitment to prioritize housing, no analysis has been conducted to determine the best use of these parcels for housing vs. billboards. City proposes to locate 11 of 16 non-freeway facing digital billboards on the City's High Injury Network streets. This undermines Vision Zero. In August 2023, the City of La Mesa rejected digital billboards in a surprise vote because "a majority of the City Council felt the extra revenue wouldn't make up for potentially distracting drivers." This is not surprising because Traffic Safety studies from around the world have demonstrated that changing digital advertising signs are dangerous and distracting to drivers. Yet, Metro dismisses these facts relying instead on industry studies. The Program does not account for changes in the environment that might occur over time and does not include a provision to allow for new or updated information and studies. It fails to give the City Council authority to amend the standards, and other provisions to mitigate impacts on the visual environment, on residential or other properties, to reduce driver distraction or other hazards to traffic, or to otherwise protect and promote the public health, safety and welfare and apply these amended standards to existing signs and digital displays. Language to do so should be incorporated into the approval as recommended in May 25, 2021 CPC Letter of Determination. The Program is overwhelmingly opposed by 24 Neighborhood and Community Councils, 16 community/environmental organizations, and the SAG/AFTRA Union for its impacts on filming in LA.

Communication from Public

Name: Flo Selfman
Date Submitted: 11/06/2023 08:21 PM
Council File No: 22-0392
Comments for Public Posting: The only reason for these signs is money. They are a hazard to driver safety. Drivers are distracted enough without adding to it. I am strongly against these signs. Find other ways to get money.

Communication from Public

Name:

Date Submitted: 11/06/2023 08:25 PM

Council File No: 22-0392

Comments for Public Posting: do not place digital billboards, with the rate of pedestrian traffic deaths, we should not be adding to the distractions that exist

Communication from Public

Name: Sheila Winston
Date Submitted: 11/06/2023 09:13 PM
Council File No: 22-0392
Comments for Public Posting: No! Just no!

Communication from Public

Name: Janie Orenstein

Date Submitted: 11/06/2023 09:16 PM

Council File No: 22-0392

Comments for Public Posting: We have so much man-made visual blight in Los Angeles and it's environs. Driving accidents have increased significantly due to visual distractions (I include phone/texting as part of the distraction). Creating these bill boards is just another cause for distraction coupled with a disregard for esthetics . Please vote "NO" on the new billboard option.

Communication from Public

Name:

Date Submitted: 11/06/2023 09:23 PM

Council File No: 22-0392

Comments for Public Posting: I am absolutely opposed to Metro's TCN plan to install digital billboards at freeway intersections if only because this is totally unsafe and would only add to distractions for drivers. This is a totally dangerous proposal.

Communication from Public

Name: Dale Fernandez

Date Submitted: 11/06/2023 09:43 PM

Council File No: 22-0392

Comments for Public Posting: “This citizens of this city need more mindless screen time” -No one ever said I am against the digital billboard program. There is no benefit for the city and its citizens. There will be visual blight and an increase in the light pollution of the city, as well as the possibility of more distracted drivers. The committee has to consider that the only benefit is for the billboard companies since they will have an increased revenue from multiple advertisers in the same amount of space. I believe this approval will be a slipper slope to more advanced jumbo tron ‘video images’ of commercials on our mountainsides as well as thoroughfares. Dale Fernandez 91604

Communication from Public

Name: Michael Gross
Date Submitted: 11/06/2023 06:40 PM
Council File No: 22-0392
Comments for Public Posting: No LED signage. Dangerous and ugly. Trashes Los Angeles, if you want that. Harms birds. Kills pedestrians and motorists. GET SERIOUS. MONEY OR EVERYTHING ELSE.

Communication from Public

Name:

Date Submitted: 11/06/2023 06:47 PM

Council File No: 22-0392

Comments for Public Posting: Dear Los Angeles City Council Members: I am writing to express my vehement opposition to giant digital boards for LA Metro's TCN! I wrote to the City Planning Committee to express my position on this issue just last month. My main points in that earlier letter are as follows: 1. Giant Digital Boards (GDB's) will add to the light pollution of our city, which according to the National Park Service is already 100 times brighter than it would be without light pollution. Light pollution affects and changes our circadian rhythms and negatively impacts everyone's ability to sleep. Everyone deserves to get a good night's sleep! And no one's home should be bombarded with artificial light from GDB's all throughout the night! 2. I am quite certain these GDB's will not be placed in expensive neighborhoods like Larchmont or Brentwood but will be placed instead in areas that are already suffering from light pollution, sound pollution, and other forms of environmental pollution. In other words, these boards will probably form the basis for more environmental injustice and discrimination against poorer neighborhoods. I think it likely that extensive litigation will ensue. 3. Humankind can no longer afford to ignore the natural world in its efforts to build or make changes to its cities. Light pollution is causing birds to lose their migratory paths across and alongside our continent. One thousand birds a night can and are killed when glass buildings are lit up after dark. We are in the midst of an insect apocalypse and millions of moths (nighttime pollinators) are killed by bright lights. These insects are the basis for our entire food chain! I care very much about the natural world that supports us and advocate for protecting it. Would you want a GDB board on your street or in your neighborhood? I am quite certain the answer is NO! For all the reasons above, I urge the PLUM committee to join me, other community members, Neighborhood Councils, and environmental groups to oppose the use of giant digital boards for the L.A. Metro TCN! Sincerely, Susan Ryan Los Angeles, CA

Communication from Public

Name: Lauren Chang

Date Submitted: 11/06/2023 07:21 PM

Council File No: 22-0392

Comments for Public Posting: Dear City Clerk, We represent the Los Angeles County Metropolitan Transportation Authority (“LACMTA”) with respect to the proposed Transportation Communication Network Program. LACMTA submits the attached letter with proposed substantive revisions to the TCN District Ordinance. The Council File for this matter is 22-0392. Please transmit our letter to the PLUM Committee members at your earliest convenience. Also, please add this information to the administrative record for the matter. Thank you, Lauren Chang

November 6, 2023

File Number: 89EH-376404

BY EMAIL

Planning and Land Use Management
Committee
Los Angeles City Council
City of Los Angeles
200 N. Spring Street, Room 340
Los Angeles, California 90012
email: clerk.plumcommittee@lacity.org

Re: Proposed TCN Ordinances – Requested Revisions
(November 7 PLUM Hearing-Council File No. 22-0392)

Honorable Councilmembers:

This firm represents the Los Angeles County Metropolitan Transportation Authority ("LACMTA") with respect to the proposed Transportation Communication Network Program (the "TCN Program"). LACMTA very much appreciates the City's significant efforts thus far, in particular the exemplary work by the Department of City Planning, to implement the TCN Program in accordance with the Memorandum of Agreement (the "MOA") dated as of January 12, 2022, executed by LACMTA and the City of Angeles (the "City").

On September 14, 2023, the City Planning Commission (the "CPC") considered three ordinances with respect to the TCN Program (the "TCN Ordinances"), the principal of which (the "TCN District Ordinance") would establish the Transportation Communication Network District (the "TCN District"). The CPC recommended that the City Council approve the TCN Ordinances, subject to several recommended changes. The CPC's Letter of Determination was transmitted to the Planning and Land Use Management Committee (the "PLUM Committee") on October 26, 2023. Attached to that determination letter is the current version of the TCN Ordinances, which incorporates the changes requested by the CPC.

The purpose of this brief letter is to summarize LACMTA's proposed substantive revisions to the TCN District Ordinance that it believes are reasonable and appropriate to achieve the purposes of the TCN Program, as follows:

1. Section 5.E.1 (Termination of Sign Rights). LACMTA requests that this provision be revised to state that the TCN District Ordinance will expire upon the expiration of the MOA, as that agreement may be amended following the adoption of the ordinance.

2. Sections 6.F and Tables 7-1 and 7-2.

a. Freeway Facing Signs. The CPC recommended the removal of Freeway Facing Signs FF-3, FF-13 and FF-14. LACMTA does not contest the removal of FF-13 and FF-14, but requests that FF-3 be retained. The removal of FF-3 was recommended because it is less than 2,640 feet from the closest Freeway Facing Sign on the same side of a freeway. However, that is substantially farther than the minimum separation of 1,000 feet required by Caltrans and FF-3 is located approximately 1,700 feet from the closest Freeway Facing Sign (FF-1).

b. Non-Freeway Facing Signs. LACMTA will not contest the elimination of Non-Freeway Facing Signs NFF-1, NFF-7, NFF-12 and NFF-20 from the TCN Program.

3. Section 6.G.2.d and e (Refresh Rate). With respect to subsection d., the language should be revised to clarify that this requirement only applies to Freeway Facing Signs and Non-Freeway Facing Signs (and not to unrelated Off-Site Signs with Digital Displays), which LACMTA has always understood is the intent. With respect to subsection e., LACMTA requests a minimum separation of not more than 1,500 feet between Freeway Facing Signs and Non-Freeway Facing Signs on the same side of a Freeway or roadway, rather than 2,640 feet.

4. Section 6.J.2 (Refresh Rate). Please modify this section to clarify that LACMTA will use the Digital Displays for up to 1/8th of the overall period when the Digital Displays are in use.

5. Section 6.K.3 (Platforms and Ladders). LACMTA requests that this provision be modified to state that any ladder, platform or other service appurtenance for a sign that is visible from a public right-of-way will be shielded from such public view to the extent feasible.

6. Section 8 (Sign Reduction). This section sets forth the requirements for the removal of existing, static Off-Site Signs in connection with the construction and operation of the new Freeway Facing Signs and Non-Freeway Facing Signs. LACMTA requests that Section 8 be revised to include the following elements:

- Establish sign removal banks for the Freeway Facing Signs and Non-Freeway Facing Signs to provide a framework to keep track of the existing, static signs to be removed and apply banked signs as building permits are issued for Freeway Facing Signs and Non-Freeway Facing Signs.
- With respect to Freeway Facing Signs, LACMTA must remove 200 existing, static signs located within the boundaries of the City, provided that (1) 50 existing Off-Site Signs must be removed prior to the issuance of the first building permit for a Freeway Facing Sign, (2) thereafter, LACMTA must remove a minimum of four (4) existing Off-Site Signs for the issuance of a building permit for each Freeway Facing Sign and (3) LACMTA must use good-faith efforts to remove all or substantially all of the existing Off-Site Signs located on LACMTA's properties within the boundaries of the City.

- In order to obtain building permits for Non-Freeway Facing Signs, LACMTA must remove, on a rolling and cumulative basis, three square feet of sign area on existing Off-Site Signs within the boundaries of the City for each square foot of new sign area on a Non-Freeway Facing Sign. The removed signs shall be located within 2,640 feet of a Non-Freeway Facing Sign site, provided that (1) the 2,640-foot radius may be expanded to 5,280 feet if the inventory of existing signs within the 2,640-foot radius is inadequate and/or LACMTA cannot secure agreements for the removal of a sufficient number of existing signs within such radius and (2) the 5,280-foot radius may be expanded as necessary based on the same considerations.
- The existing Off-Site Signs that are removed shall be presumed to be legal signs and no evidence of the same shall be required.

7. Section 5.B.2.b (Findings for Project Permit Compliance). The additional required finding for the approval of Project Permit Compliance for a Non-Freeway Facing Sign, which finding requires conformance with the General Plan, should be removed because the City Council will have to make this finding to adopt the TCN District Ordinance and it should not thereafter have to be made to approve each Non-Freeway Facing Sign.

8. Section 5.B.2.c (Finding for Modification/Deviation Request). The additional required finding for the approval of modifications, adjustments and exceptions to the TCN District Ordinance with respect to Non-Freeway Facing Signs should also be eliminated. The LAMC already requires numerous findings, and the additional required finding that the modification, adjustment or exception would not constitute a grant of privilege is unnecessary, as well as vague and ambiguous in this context.

We appreciate the PLUM Committee's consideration of LACMTA's requests.

Very truly yours,



Jack H. Rubens
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

Communication from Public

Name:

Date Submitted: 11/06/2023 08:04 PM

Council File No: 22-0392

Comments for Public Posting: Please do not allow digital billboards! It will ruin views we have in Los Angeles of mountains and hills beautiful buildings etc. Do you want this as your legacy? Always remembered as those who failed to stop digital billboards and thus ruined the many spectacular views we have in Los Angeles for money!!!! They will ruin just the every day scenes we enjoy while driving. Please don't allow and do you job Protecting the citizens of Los Angeles and not lining your pockets.

Communication from Public

Name: David S Jackson
Date Submitted: 11/06/2023 06:02 PM
Council File No: 22-0392
Comments for Public Posting: Los Angeles has enough visual blight. Please do not allow digital billboards. Thank you.

Communication from Public

Name: Elizabeth Layne
Date Submitted: 11/06/2023 06:08 PM
Council File No: 22-0392
Comments for Public Posting: Hello please see attached letter from Del Rey Residents Association.



November 6, 2023

Planning and Land Use Committee*
Los Angeles City Council
Room 340, City Hall
200 N. Spring Street
Los Angeles, CA 90012

Re: Metro's Transportation Communication Network
Council File 22-0392

We do not want digital billboards in Del Rey, and we are particularly opposed to the proposed billboard next to the Ballona Wetlands Ecological Reserve, which is in Del Rey. To confirm our opposition, we have made a financial contribution to the plaintiff's side in the pending lawsuit, *Coalition for a Scenic Los Angeles v. Los Angeles County Metropolitan Transportation Authority*, Los Angeles County Superior Court Case No. 23STCP00626.

The attached copy of our August 1, 2022 letter of opposition explains why the City of Los Angeles should not allow the digital billboards on Metro territory.

DEL REY RESIDENTS ASSOCIATION

DocuSigned by:

Elizabeth Layne

CC5A2DDF768E4E3...
Elizabeth Campos Layne, President

Enclosure

*Land Use and Planning Committee
councilmember.harris-dawson@lacity.org
Heather.hutt@lacity.org
Imelda.padilla@lacity.org
John.lee@lacity.org
Katy.yaroslavsky@lacity.org

Cc:
Traci.park@lacity.org
Marian.ensley@lacity.org (Mayor Karen Bass)

Post Office Box 661450 – Los Angeles, CA 90066
www.delreyresidentsassn.org

Communication from Public

Name:

Date Submitted: 11/06/2023 09:27 AM

Council File No: 22-0392

Comments for Public Posting: I am very OPPOSED to Metro's TCN. I believe we deserve better. I believe we deserve beautiful towns and places not the ugliness and depression that billboards bring, even worse, digital billboards. I oppose them also because they are distracting and dangerous. I do not give our public spaces over to corporations! I ask that you reject this horrible idea! Please reject this!

Communication from Public

Name: Joel Rochlin
Date Submitted: 11/06/2023 09:30 AM
Council File No: 22-0392
Comments for Public Posting: Please see attached Letter from Los Feliz Improvement Association and consider it my personal letter.



advocacy and action
for Los Feliz

2023-2024

President

Debra Matlock

First Vice-President

Amy Gustincic*

Second Vice-President

Lynne T. Jewell

Coordinating Secretary

Donna Kolb

Recording Secretary

Marian Dodge*

Treasurer

Donald Seligman*

Directors

Philip Gasteier

Ray Hovsepian

Melody King

Alex Kondracke

Chris Laib*

Elizabeth Lovins

Deanne Paul

Joel Rochlin

Karen Stetler

Sam Wasserman

*Past President

Terri Osborne, Department of City Planning
via email terri.osborne@LAcity.org

July 20, 2023

RE: CPC-2022-5401-CA, CPC-2023-3653-ZC, ENV-2022-5286-EIR—oppose

The Los Feliz Improvement Association, representing all residents of Los Feliz, opposes the Transportation Communication Network (TCN) as proposed by LA Metro.

Digital billboards create more distractions for drivers, making our street more dangerous for drivers, cyclists and pedestrians. New digital billboards will add visual blight to the landscape and intrusive light pollution in nearby homes and businesses. They represent a commercialization of the public space. And they will lead to negative impacts to wildlife, like altered migratory behavior in birds.

The TCN could lead to an explosion of digital signage as it constitutes a new non-contiguous Supplemental Use District, and sparks demands from neighboring property owners for similar rights to erect billboards, resulting in lawsuits that the city will lose.

These and other related lawsuits will be a financial burden that will wipe out any revenue from advertising sales and may return the City to the chaotic environment it experienced in the decades before the 2002 ban on new billboards was put in place.

Please consider the real needs of residents and what will be good for the City, not what will benefit the sign companies, and reject the TCN proposal.

Sincerely,
The Board of Directors of LFIA

Debra Matlock
President

CC: Nithya Raman, Councilmember, LA Council District 4
Jennifer Hull, Field Deputy, LA Council District 4
Mehmet Berker, Senior Deputy for Transportation, Infrastructure, and Public Space,
Council District 4

Communication from Public

Name: Ayda A

Date Submitted: 11/06/2023 12:16 PM

Council File No: 22-0392

Comments for Public Posting: As a constituent who works in housing, as an attorney, as an Angeleno, I'd like to know why elected officials are not concerned with standard of living but instead on how they can make money in the short term only. It is obvious that digital billboards are emblematic of blight, high crime rates, depression/anxiety, and a danger to biodiversity. It's a lot harder to reverse something once it's been allowed (lowered taxes on billionaires and corporations, etc.) so please do not allow these things in the city. Look at places that are pleasant to live, they generally don't have billboards. The city should be focused on rezoning to improve density and mixed use, instead of this blight. Vote against these terrible eyesores that will be deadly to plants, animals and insects as well.

Communication from Public

Name: Reid Breitman

Date Submitted: 11/06/2023 02:45 PM

Council File No: 22-0392

Comments for Public Posting: I support allowing digital billboards, especially on city owned property, so the city can derive revenue. But if it is allowed on the city property, it should also be allowed on private property. Would be nice if the city would be able to collect some sort of tax, and at the very least, the property tax would capture one percent of the increased value, but economic activity is good in any event.

Communication from Public

Name: John H. Welborne

Date Submitted: 11/06/2023 03:27 PM

Council File No: 22-0392

Comments for Public Posting: I tried to post this comment before, but I never have received the confirming e-mail that the City Clerk website said would be forthcoming, and my comment has not been posted. So, I try again. I write in numerous capacities, but primarily as the President Emeritus of the Angels Flight® Railway Foundation -- the owner and steward of City of Los Angeles Historic Cultural Monument # 4. On the PLUM Committee November 7 agenda is the billboard company-driven proposal for Metro to utilize portions of its real estate throughout the City of Los Angeles to erect large digital billboards — despite the City’s general prohibition of such visual blight. It only recently came to my attention that the proposal includes bright digital billboard erection at Metro’s Fourth and Hill corner across from DTLA’s (and the City’s) landmark Angels Flight® Railway. The negative impacts are obvious. The historic location’s use for filming (La La Land, Bosch, Perry Mason, The Muppet Movie, Lincoln Lawyer, and probably 40 other productions in the past 20 years) will be compromised. Hundreds of thousands, if not millions, of tourist images that go world-wide through Instagram and other such postings could then depict a Blade Runner-type neighborhood instead of this important part of the Historic Core, adjoining restored buildings: the Grand Central Market, the Broadway Department Store (now State Office Building) and the Subway Terminal Building (as well as Angels Flight®). While I strongly believe that the possible \$16 million annual revenue to the City from the proposed LACMTA "Transportation Communication Network" is a paltry payment in comparison to the visual blight to be brought Citywide to all Angelenos and our visitors (while this exception for Metro obviously becomes the “camel’s nose under the tent” regarding more digital signage, Citywide) . . . I write today just to ask you to please SPARE THE HISTORIC ANGELS FLIGHT® RAILWAY NEIGHBORHOOD. I urge PLUM and the Council to DELETE this location from any City zoning exception that would allow a Metro billboard. This should not happen at Fourth and Hill Streets in DTLA.