

Communication from Public

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Council File No: 26-0173

Comments for Public Posting: Cityfi submits this comment in connection with Council File 26-0173. The following findings are drawn from "Before the World Arrives: Confronting the Costs of LA's Failing Signage Regime," an independent analysis examining the fiscal, land use, and governance implications of Los Angeles' current signage system. Several provisions in CF 26-0173 align with policy recommendations included in that analysis. Revenue Foregone: Our analysis estimates that the City of Los Angeles forgoes more than \$60 million annually in potential revenue as a result of under-regulated signage activity — revenues not captured due to noncompliant signage operating outside the City's permitting and revenue-sharing frameworks. Impact on City-Operated Programs: The current regulatory environment creates a competitive disadvantage for City-sanctioned advertising programs. The Sidewalk and Transit Amenities Program (STAP) and the Bus Bench Program lose revenue to unregulated signage activity that operates outside the rules governing these programs. Land Use: Cityfi's analysis identified approximately 2,400 potential housing units on parcels currently occupied by signage structures, representing capacity for more than 10,000 residents. 2028 Olympic Games: The approach of the 2028 Olympic and Paralympic Games introduces additional legal and reputational risks if the current signage regulatory framework remains unchanged. International advertising standards and heightened public scrutiny during major global events create exposure for the City if noncompliant signage is not addressed beforehand. The analysis identified the following gaps in current enforcement capacity: the absence of proactive monitoring systems (such as satellite imagery or automated detection) limits efficient identification of violations; current penalties have not been calibrated to reflect advertising revenues generated by noncompliant operators, reducing their deterrent effect; and administrative complexity in permitting creates barriers to compliance for legitimate operators. Comparative Context: Major peer cities including New York and Chicago have implemented more restrictive frameworks to regulate off-site signage and strengthen enforcement. Los Angeles' current framework is less restrictive by comparison. Source: Before the World Arrives: Confronting the Costs of LA's Failing Signage Regime, Cityfi

(2026). Marla Westervelt, Sam Sklar, Erin Clark, and Chrissy Anecito. Available at:
cityfi.co/portfolio/costs-of-illegal-signage-la