

August 8, 2011

Via Email & PLUM Hearing Hand Delivery

Councilmember Ed P. Reyes, Chair
Councilmember Jose Huizar
Councilmember Paul Krekorian
c/o Michael Espinosa – Legislative Assistant / Michael.Espinosa@lacity.org
The Los Angeles City Council; Planning & Land Use Management Committee
200 North Spring Street
Los Angeles, CA 90012

Re: PPCC Opposes “Sign Ordinance” /File No. 08-2020 / PLUM Hearing August 9, 2011 Item (5)

Dear Councilmembers Reyes, Huizar and Krekorian:

Pacific Palisades Community Council (“PPCC” opposes the Sign Ordinance as presently drafted. The Executive Committee of PPCC voted on this proposed ordinance, as the full Board is on summer schedule. PPCC’s opposition is based on the following key points:

1. **Community Groups Have Insufficient Notice.** Rather than the customary sixty (60) days notice, we received twenty-one (21) days to review, vet language, adopt positions and present a voice on the Sign Ordinance. The PPCC, other groups and affected persons have not had a chance to adequately evaluate and react to the substantial zoning code changes now proposed to take effect.

2. **The “Internal Sign Exception” (proposed LAMC Art. 4, Sec. 14.4.3(A)) Must Be Changed.** The intent of this exception is to accommodate signs in large, enclosed spaces like malls and stadiums through sign districts, a comprehensive sign program or during temporary construction. Planning has indicated that it would consider a revision(s) to the current wording because it is a total exception to the City’s sign regulations (i.e., no site characteristics are considered). †*Without change, the PPCC believes that both our specific plan and non-specific plan areas may become subject to unregulated interior signs (including on-site digital signs) because we have small commercial atrium office buildings, enclosed retail plazas, schools with courtyard areas, and walled baseball fields at our recreation center.* PPCC has suggested to Planning, in order of preference, the following options: (a) delete proposed change and leave the existing LAMC which regulates interior signs, (b) have the interior sign exception not apply to off-site signs and digital signs, or (c) cross-reference Sec. 91.6216.4.3 (Sign Districts) and LAMC 14.4.24 (Comprehensive Sign Program) to ensure that the interior sign exception applies only to larger projects. †

3. **The New “Donor Sign” Definition (proposed LAMC Art. 4, Sec. 14.4.2) Should be Deleted.** This definition should be deleted because it arguably regulates content. Second, it does not specify whether donor signs are recognized as off-site or on-site signs. *Therefore, the definition may provide a loophole for a proliferation of unregulated on-site and off-site “donor” signs throughout the Pacific Palisades (note: our specific plan bans only “off-site commercial” signs).* †

4. **The Off-Site Sign Definition (proposed LAMC Art. 4.4, Sec. 14.4.2) Should be Clarified.** Planning agreed to consider PPCC’s recommendation that the word "exclusively" be inserted before "used to advertise" in this definition – to be consistent with the definition of “on-site” signs and encompass all forms of commercial advertising.

5. **The Impact of the Sign Ordinance on Public and Charter School Campuses In Areas Not Covered by Specific Plans is Unclear.** *When Palisades Charter High School erected a digital sign, homeowners experienced light spillover from flashing, rolling, scrolling 24/7 messages that also created a substantial distraction to drivers along Temescal Canyon Road and Sunset Boulevard (the sign is one long block from Sunset Blvd.).* The PPCC quite simply has not had time to research the impact of the proposed ordinance, if any, on these government-owned properties in the Palisades.

6. **The "Three Tiered Approach to Deviations" (proposed LAMC Art. 4, Sec.'s 14.4.4(B), 14.4.4(C), 14.4.4(D), 14.4.22, 14.4.23, 14.4.24) is Not Acceptable as Written.** † The PPCC is gravely concerned about Planning's May 11, 2011 letter to the Budget and Finance Committee which states that the Comprehensive Sign Program "might apply to the Department of Recreation and Parks . . . [as] a new discretionary procedure that would enable the City to approve otherwise prohibited signs (including digital off-site signs) in certain locations . . ." *PPCC objects to the "three tiered approach" as drafted because the Sign Ordinance allows otherwise prohibited on-site signs in our parks and may allow otherwise prohibited off-site and temporary signs on other properties where the city may apply for a comprehensive sign program.* Finally, the PPCC objects to the application of the "three tiered approach" without time to evaluate how adjustments of 20% will affect on-site signs in our commercial areas.

7. **Regulation of Digital Displays (proposed LAMC Art. 4, Sec. 14.4.19) is Insufficient.** The Sign Ordinance contains bare minimum standards. *Based on our experience with Palisades Charter High School (ref. Paragraph 5 above), the PPCC is most concerned that spillover light is not regulated – along with regulation of size, spacing, and the number of signs which are critical factors to driver safety and contributors to visual blight.*

Thank you in advance for your consideration.

Sincerely,

Janet Turner, Chair
310-573-0382

CC's: CD 11: Councilmember Rosendahl, Norm Kulla, Whitney Blumenfeld, Paul Backstrom, Joaquin Macias / City Planning Department: Michael LoGrande, Alan Bell, Daisy Mo