

Communication from Public

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Comments for Public Posting: I urge the Department of City Planning and City Council Members to reject the proposed Transportation Communication Network (TCN) ordinance for the legal and monetary reasons below. Before a billboard ban went into effect in 2022, the City of Los Angeles (LA) had to assign several lawyers just for billboard related litigation. This litigation was a significant expense, especially when the billboard company won its case and LA had to pay for their litigation costs. Also, LA only has limited control over billboards because of first amendment rights and not being able to select which entities get sign rights. In the past, litigation required LA to allow a greater number of billboards than intended. Approving the TCN ordinance will create a new land designation, "a non- contiguous Supplemental Use District." Given the breadth of the TCN exception to a billboard ban, allowing the ordinance will effectively end the new billboard ban and open LA to years of litigation and loss of control over how many and where billboards are placed. Additionally, LA currently only allows parcels over a certain size to apply for a Supplemental Use District, which allows the adoption of zoning laws that vary from neighboring properties. The TCN zoning proposal would apply different zoning laws to dozens of publicly owned properties with varying characteristics. The idea that neighboring property owners would not demand similar rights is highly unlikely. Furthermore, the TCN Supplemental Use Districts could result in claims of illegal discriminatory "spot zoning." If some current billboards are no longer allowed because of the concentration of billboards on property owned by the regional transportation authority, it could result in additional expenses for paying billboard companies and the land owners who rent the space for billboards compensation for loss of revenue. Finally, the provision in the TCN allowing billboards on property which is not commercially zoned will violate state and federal law designed to implement the Federal Highway Beautification Act. Also, many of the proposed billboards are on publicly owned property currently zoned for Public Facilities (PF) and thus would violate federal sign law and never qualify for Caltrans permits. Adoption of the Transportation Communication Network ordinance would be a mistake and cost the City of Los Angeles far more than any revenue from the billboards. Thus, the ordinance needs to be

rejected. Thank you, Ann Dorsey Northridge, CA 91325