

Communication from Public

Name: Barbara Broide

Date Submitted: 11/27/2021 12:16 AM

Council File No: 20-1536

Comments for Public Posting: It is extremely troubling to see the City Attorney's report (R21-0343) and accompanying draft ordinance which seeks to amend the LAMC to allow for outdoor advertising structures on the public right-of-way beyond the rights specifically granted in the LAMC for advertising on transit shelters. This proposed LAMC change was first mentioned in the STAP program's draft mitigated negative declaration (MND) document although never previously presented or discussed in any of the "outreach" sessions on the STAP program presented by Public Works/StreetsLA. Further, in the MND we find that the MND goes much further than attempting to address the plans for the street furniture / transit shelter program described in STAP outreach presentations; it introduces the potential for what could be an unlimited number of outdoor advertising structures on the public right-of-way. These structures are not described in any detail. The number is not firmly established other than to mention that as many as 500 additional structures could be rolled out over a two-year period. The locations of these structures is not specified. In short, by amending the LAMC as proposed, anything could happen. We could see digital billboards on City streets. We could see different kinds of advertising structures on our parkways. We could even see advertising structures on designated scenic highways / roadways! This conflicts with the City's own Mobility Element of the General Plan. The need for the STAP program to be evaluated via a complete Environmental Impact Report was likely raised in a number of responses to the MND. The purpose of this comment is to clearly oppose the proposed LAMC change to allow for additional outdoor advertising structures in the public right-of-way. If the City has a specific need to expand advertising rights on the public right-of-way (such as to allow for the commercial sponsorship of the bikeshare program), then there should be an open and transparent process established to fully vet that proposal. To attempt to sneak in a change in the LAMC which has broad implications and impacts is not acceptable. To sneak in entirely new outdoor advertising initiatives under the STAP program at this late date is inappropriate. It only serves to underscore the need for an EIR because the MND cannot begin to evaluate the impacts of the undefined additional advertising efforts or of any cumulative

impacts that will occur alongside the STAP program. (The MND was not sufficient for the STAP program when it was "just" the STAP program.) Further, it should be remembered that the City's authority to regulate advertising was the result of hard-won courtroom victories/rulings. The City must act with extreme caution when considering any initiatives that could serve to undermine its regulatory authority. One would hope that the City Attorney's office has warned Public Works and those promoting these efforts of the dangers that increased municipal advertising activity could bring. Finally, it is noted that the language in the MND grants the authority to approve the undefined additional outdoor advertising structures to the Board of Public Works -- a politically appointed body, not an elected one. There is no process defined for involvement of neighborhood councils nor of the City Council. The granting of such authority is troubling and also inappropriate. The introduction of these new proposed components presented under the STAP umbrella demonstrates to the public that not only was and is there a lack of transparency, but that there apparently was a plan to deceive and mislead the public as to the true intent of those promoting the program. When are the reports and information requested by the Blumenfield/Bonin motion expected to be received? Wasn't that the purpose of this Council File?

Communication from Public

Name: J. Ross

Date Submitted: 11/28/2021 11:55 AM

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