



westsidecouncils.com

Bel Air-Beverly Crest Neighborhood Council
Brentwood Community Council
Del Rey Neighborhood Council
Mar Vista Community Council
Neighborhood Council of Westchester-Playa
North Westwood Neighborhood Council
Pacific Palisades Community Council

Palms Neighborhood Council
South Robertson Neighborhoods Council
Venice Neighborhood Council
West LA-Sawtelle Neighborhood Council
Westside Neighborhood Council
Westwood Community Council
Westwood Neighborhood Council

September 7, 2023

Los Angeles City Planning Commission (CPC)

Hon. Karen Bass, Mayor, City of Los Angeles and Chair, Metro Board of Directors (Metro Board)

Hon. Paul Krekorian, President, Los Angeles City Council, Councilmember, CD 2 and Member, Metro Board

Hon. Heather Hutt, Councilwoman, CD 10 and Chair, City Council Transportation Committee (CTC)

Hon. Traci Park, Councilwoman, CD 11 and Vice-Chair, CTC

Hon. Katy Yaroslavsky, Councilwoman, CD 5, Member, CTC and Member, Metro Board

Hon. Nithya Raman, Councilmember, CD 4 and Member, CTC

Via email to all addressees and submission to the City Clerk online filing portal in CF 22-0392

Re: **Council File 22-0392; CPC-2022-5401-CA; CPC-2023-3653-ZC; ENV-2022-5286-EIR - Proposed Metro TCN Program; CPC Hearing 9/14/23; OPPOSED**

Dear Los Angeles City Planning Commission, Mayor Bass, Council President Krekorian and Councilmembers Hutt, Park, Yaroslavsky and Raman:

As noted in our letter of August 28, 2023, the Westside Regional Alliance of Councils (WRAC) is a cooperative coalition, founded in 2009, of all fourteen neighborhood and community councils on the Westside of Los Angeles located in CDs 5 and 11 and portions of CDs 4 and 10.

WRAC's Member Councils have long expressed serious concerns about the dangers and adverse impacts on public safety and aesthetics of digital billboards and other signage with moving images in the City's public-right of way. Our standing position is that ***WRAC opposes digital billboards and digital signage outside of sign districts in the 22 areas already zoned as Regional Commercial for high-intensity commercial use*** (WRAC positions adopted in 2020/Citywide Sign Ordinance; in 2020/STAP program; and in 2023/IKE program).¹

In light of these concerns and positions, a super-majority (nine) of WRAC Member Councils have now adopted the following position (or taken modified positions in keeping with its spirit) to ***oppose the City's participation in the Metro TCN program***, which is accordingly an adopted position of WRAC:

The Westside Regional Alliance of Councils (WRAC), has significant concerns about process and substance related to the Metro Transportation Communication Network (TCN) program, including the fact that:

- *the program moved forward without notice to or substantive community input from stakeholders prior to implementation of an EIR process; this is in contravention of expected norms as well as WRAC's Statement of Principles (Standing Rule 4 of the WRAC Bylaws), which calls for advance notice and ample time to review and comment by WRAC's member councils on all proposed public infrastructure or other public property developments;*

¹ As a preliminary matter, we further note that several of WRAC's Member Councils have requested postponement of the current CPC hearing, to allow for meaningful comment on the 563-page staff report – which was not released until 9/1/23 (*the afternoon before a holiday weekend and only one business day before the first comment deadline*). WRAC's Member Councils patently have not been provided adequate time for review and comment, as called for in WRAC's Statement of Principles (referenced in the first bullet point above and in our 8/28/23 letter, also requesting postponement of the hearing).

- *the City ceded its power as lead agency for EIR purposes to the Metro board, which approved the EIR for Metro TCN on consent overriding considerations with impacts on City resources;*
- *Metro TCN is a digital billboard advertising program with moving images that will: (1) distract drivers and create dangerous situations which will undermine the City's Vision Zero goals, and (2) blight the environment of 22 Community Plan areas in Los Angeles;*
- *Metro TCN in substance contravenes longstanding WRAC positions opposed to digital billboards (outside of sign districts in areas already zoned as regional/commercial) and to digital advertising in the public right of way (proposed "IKE" kiosks);*

Therefore, WRAC opposes the City's participation in the Metro TCN program and specifically opposes adoption of the proposed City ordinances that would fast track implementation of the Metro TCN program within the City of Los Angeles.

The following WRAC Member Councils have advised that they have adopted the above position or taken modified positions in keeping with its spirit: Brentwood Community Council, Mar Vista Community Council, Neighborhood Council Westchester/Playa, Pacific Palisades Community Council, Venice Neighborhood Council, West Los Angeles-Sawtelle Neighborhood Council, Westside Neighborhood Council, Westwood Community Council and Westwood Neighborhood Council.

Three additional WRAC Member Councils have publicly expressed *opposition to digital billboards outside of designated sign districts*: Bel Air-Beverly Crest Neighborhood Council, Palms Neighborhood Council and South Robertson Neighborhoods Council (CIS in CF 11-1705 from each of these Councils as well as from most of the above WRAC Member Councils).²

Allowing new digital billboards – and/or amending current City Code to effect the Metro TCN Program – would constitute major changes in City policy with potentially significant adverse impacts on public safety (resulting from driver distraction) and aesthetics (creating visual pollution), detrimentally affecting all Angelenos. We therefore respectfully urge the CPC **to disapprove of the proposed ordinances and the City's participation in the Metro TCN Program.**

Thank you for your consideration and attention to this important matter.

Sincerely,

Robin Greenberg and Christina Spitz

Robin Greenberg, Chair
Christina Spitz, Vice-Chair
Westside Regional Alliance of Councils

cc (via email):

Vincent P. Bertoni, Director, Los Angeles Dept. of City Planning
Connie Llanos, Interim General Manager, Los Angeles Dept. of Transportation

² North Westwood Neighborhood Council (NWNC) minority report: "At the September 6, 2023 regular Board meeting, the [NWNC] voted 8 to 2, with 3 abstentions, against the [WRAC] motion "Oppose City's Participation in Metro TCN Program."