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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

August 28, 2023

Los Angeles City Planning Commission

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

Vincent P. Bertoni, Director, Los Angeles Dept. of City Planning

Connie Llanos, Interim General Manager, Los Angeles Dept. of Transportation

Via email to all addressees

Re: **Council File 22-0392 - Proposed Metro TCN Program; City Planning Commission (CPC) Hearing 9/14/23; Request for Hearing Postponement Pursuant to WRAC Policy - Notice and Ample Opportunity to Review and Comment on Infrastructure and Public Property Developments**

Dear Los Angeles City Planning Commission, Mayor Bass, Council President Krekorian, Councilmembers Hutt, Park, Yaroslavsky and Raman, Director Bertoni and Interim GM Llanos:

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. Together, WRAC's Member Councils represent over 500,000 Los Angeles stakeholders.

We bring to your attention WRAC's Statement of Principles (Standing Rule 4 to the WRAC Bylaws), which provide in pertinent part:

"WRAC expects governing bodies to notify all relevant parties -- including relevant WRAC Member Organizations -- of all proposed residential, commercial or infrastructure developments requiring discretionary approvals, and of public property developments, whether or not discretionary, having a broad impact on WRAC neighborhoods or on the region as a whole. . . . Such notice should be provided sufficiently in advance of the governing body's determination to allow ample time for WRAC Member Organizations to consider, review and comment on the proposal." (<https://westsidecouncils.com/bylaws/>)

It is fundamental to a respectful and responsive relationship between the City, local councils and the communities they represent, that before any decision is reached on proposed infrastructure and public property developments, governing officials provide WRAC Member Councils with adequate notice and **sufficient opportunity to meaningfully comment** – including WRAC's certified Neighborhood Councils as well as its respected and established Community Councils (which, as the City Council officially recognized in 2014 in Council File No. 13-1625, serve the same function in their communities).

Although WRAC has not yet taken a specific position on Council File 22-0392 or the Metro TCN program (the Program), we emphasize our serious concern and insist that the process must comply with WRAC's Statement of Principles, *to provide ample time for meaningful review and comment on the CPC staff report and the Program.*

Unfortunately, at this writing the CPC staff report has *not yet been distributed*. Even if the report were to be released today, it is impossible for our Member Councils to adequately review and reach a conclusion on any of the report's recommendations – let alone schedule and hold board meetings necessary to take action to comment on the staff report – prior to the current comment deadlines which are *only a few days away* (September 5 or September 12, based on the September 14 hearing date). It is entirely unrealistic, given their meeting schedules, to expect our Member Councils to be able to adequately review the report, make board recommendations, and hold board meetings to decide on their positions or input, any earlier than 60 days after the report is released.

We note that WRAC's previously adopted position is **opposed to digital billboards outside of sign districts in the 22 areas already zoned as Regional Commercial for high-intensity commercial use**. WRAC has also opposed and/or expressed concerns about the public safety and aesthetic impacts of **digital advertising (signage with changing messaging) in the public right of way** (e.g., the IKE and STAP programs). Moreover, based on the work and advice of two WRAC committees (Land Use & Planning and Mobility & Transportation), on August 21, 2023, WRAC's board passed two motions for recommendation to our Member Councils, which are currently under consideration – a motion to oppose the City's participation in the Program and the related proposed ordinance/s, and a motion requesting referral of the matter to the City Council Transportation Committee and LADOT, to research and study roadway user distraction from digital billboards and other signage with changing messaging.

Whether to allow digital billboards anywhere in the City – and/or to change current City Code to effect the Program – are major policy issues with **potentially significant public safety and aesthetic impacts affecting all Angelenos**. We therefore respectfully urge the City Planning Commission **to postpone the September 14th hearing of this matter until at least 60 days after the staff report is released**, to allow WRAC's Member Councils – and other neighborhood councils and similar organizations in the City – ample time to consider, comment and provide input to the CPC on the staff report and the Program.

Thank you for your anticipated cooperation and consideration.

Sincerely,

Robin Greenberg and Christina Spitz

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

cc (via email):

Jared Rivera, Deputy Mayor of Community Engagement, Mayor's Office; Randall Winston, Deputy Mayor of Infrastructure, Mayor's Office; Karo Torossian, Chief of Staff, CD 2; Sahag Yedalian, Director of Transportation, CD 2; Doug Mensman, Director of Infrastructure, CD 2; Kimani Black, Chief of Staff, CD 10; Hakeem Parke-Davis, Deputy for Planning, CD 10; Gabriela Medina, District Director, CD 11; Jeff Khau, Planning Deputy, CD 11; George Hakopiants, District Director, CD 5; Jarrett Thompson, Transportation Deputy, CD 5; Emma Taylor, District Director, CD 4; Mehmet Berker, Sr. Deputy, Transportation, Infrastructure & Public Space, CD 4