



City Clerk Council and Public Services <clerk.cps@lacity.org>

Public Comments on CF 20-1536 and CF 20-1536-S21 message

Sylvia Ruiz <sylvia@tierraconceptsinc.com>
Reply-To: Sylvia Ruiz <sylvia@tierraconceptsinc.com>
To: LA City Clerk <clerk.cps@lacity.org>

Sun, Dec 4, 2022 at 11:50 AM

To whom it may concern:

I urge you to vote to NOT approve the STAP contract with Tranzito/Vector. I call your attention to the following concerns:

Safety: When pedestrian deaths are rising to frightening levels, placing digital displays at bus stops will only exacerbate distracted driving.

Privacy: The City does not appear to understand the threat to personal privacy posed by wireless devices collecting cell phone data from passersby. The City claims that only "anonymous" data will be collected, but does not explain how it will verify this when a private company will actually be operating the system. Anonymous" data can be used to target individuals through re-identification, a practice commonly used by data brokers.

Cost: The CAO's report makes clear that there are actually no revenue guarantees, and yet the City will be required to spend over \$230 million to launch STAP. This is fiscally irresponsible. Costs and revenues are uncertain. The City has taken on the fiscal responsibility and duty to implement vast elements of the program (as well as the public automated toilet program for which there have not been sufficient funds identified).

Equity: Fiscal pressures apparently require that the early installations of transit shelters be done in affluent areas where the highest revenues will be generated. This repeats the injustices of the current program where transit riders in the hottest areas will have to wait for shelters. For how long?

Billboard Ordinance/ Sign Regulations: It appears that one of the main reasons the City is pushing STAP is to revise the LAMC to remove current protections against advertising structures on the PUBLIC right-of-way and to allow all manners of commercial advertising structures without limit. The City claims to be helping transit riders, but it appears the true motivation for the program is to facilitate the generation of advertising revenues.

Aesthetics: "Great streets" are not defined by their advertising structures. Protection of the public right-of-way from commercialization is a value worth protecting.

Sustainability: Energy conservation is a hallmark of a truly green city. These digital structures consume energy, pollute the night sky, and impact the lives of the smaller creatures with whom we share the landscape does not meet best sustainability practices.

It would be best to revisit STAP from the start, but consideration should at least be postponed for at least 6 months so that critical questions can be answered, changes made to reflect the problems identified, and a proper CEQA environmental review implemented. A 10 to 20-year contract deserves the full attention of all those involved and requires careful evaluation. A hurried approval to meet the Oct. 14 "last date to act" would represent both a terrible injustice and a glaring example of a lost opportunity to make a genuine contribution to improving the quality of life of all transit riders --an opportunity that may not return for another decade.

Sincerely,
Sylvia Ruiz
PO Box 86995
Los Angeles, CA 90086