

Communication from Public

Name: Joanne Russell

Date Submitted: 12/14/2023 07:43 PM

Council File No: 22-0392

Comments for Public Posting: I join the Coalition for a Beautiful Los Angeles along with 28 Neighborhood and Community Councils, 24 environmental and community organizations and thousands of Angelenos in opposition to Metro's proposal to install digital billboards along many of the City's busiest freeways and commercial corridors. Residents voted this idea down before, not fair to try and do an end run around voters for capitalistic commercial use that brings not public benefits (unless a % of the corporate profit will come back to the City for homelessness or community programming/education). They are public safety hazards because they distract and night blind drivers; opens the door to a proliferation of electronic billboards and set a negative precedence creating a new form of environmental pollution; there is no public benefit as the ads will be commercials for goods and services out of the scope for the majority of Angelinos; unfair to tax the community's power grids when some still experience 'brown outs' power should be conserved for other uses. Thank you, JMRussell

Communication from Public

Name: Tiffany Wright
Date Submitted: 12/14/2023 07:48 PM
Council File No: 22-0392
Comments for Public Posting: See attached letter



Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

December 14, 2023

BY EMAIL

Office of the City Clerk
Los Angeles City Council
City of Los Angeles
200 N. Spring Street, City Hall – Room 395
Los Angeles, California 90012
email: Clerk.CPS@lacity.org

Re: Clarifying Comments on the Transportation Communication Network Program's Data Collection Capabilities and the Regional Integration of Intelligent Transportation Systems (RIITS)
Council File: 22-0392

Honorable Councilmembers:

On December 7, 2023, Metro provided clarifying comments in response to Citizens for a Better Los Angeles's ("CBLA's") comments regarding the TCN Program's data collection. On December 11, 2023, CBLA submitted a follow-up letter to the City of Los Angeles that misconstrues Metro's letter and goes on to accuse Metro of misleading and deceiving the Council. CBLA's accusations are nothing more than groundless conjecture, and a response is likely unnecessary. Nevertheless, Metro provides the following to set the record straight.

First, CBLA accuses Metro of discussing the RIITS program to "misrepresent CBLA's concerns and to mislead the Council and the public." To the contrary, Metro's intention in discussing RIITS was to explain that the data Metro intends to collect via the TCN Program is general traffic information to be used in RIITS. Therefore, Metro provided information about RIITS, such as the type of data collected and how it is accessed and used. Metro's letter did not claim that "CBLA has alleged that the existing RIITS program collects data from personal devices," and in fact noted that CBLA does not object to RIITS.

Second, CBLA accuses Metro of deception because of its word choice in describing Metro's role in implementing the TCN Program. Metro's explanation that the TCN signs and structures would be "owned and operated exclusively" by Metro was merely meant to convey what has been stated throughout this process: that the signs will be owned and controlled by Metro, not advertising companies. The role of Metro's partner All Vision in the TCN Program has never been "disguised," nor has the fact that the TCN signs will include advertising.

Third, CBLA goes on to express its skepticism about the veracity of Metro's statements that the TCN signs will not collect personal data from the occupants of vehicles in the vicinity of signs because CBLA believes Metro is already collecting personal data through a completely separate project – installation of digital kiosks at Metro rail stations. But this assertion, as with CBLA's previous assertions, is based merely on suspicions and not actual facts. The TCN Program is completely unrelated to the digital kiosk program described in the letter.

Metro has been transparent about the TCN Program and its data collection in the lengthy public processes conducted by both Metro and the City for the project. CBLA's assertions are unfounded.

Very truly yours,

LOS ANGELES COUNTY METROPOLITAN
TRANSPORTATION AUTHORITY

By _____
Holly Rockwell
Senior Executive Officer
Transit Oriented Communities & Real Estate

cc: Ms. Hagu Solomon-Cary, AICP (w/encls.) (BY EMAIL)
Ms. Terri Osborne (w/encls.) (BY EMAIL)

Communication from Public

Name: Eileen Maria Hiss

Date Submitted: 12/14/2023 05:13 PM

Council File No: 22-0392

Comments for Public Posting: NO TO DIGITAL BILLBOARDS!!! While we wind down for the holidays, this move to approve digital GIANT billboards is nothing but a service to CORPORATE ADVERTISING. Advertising Industry Corporate Profit is the Motive. Digital display billboards bring in 6–10 times the income of traditional billboards because the company can sell the same space multiple times. These facts benefit the advertiser but the city sees no actual income from these signs. One billboard may generate tens of thousands of dollars a month for the advertiser. As for the locations?? Targeting areas for "affordable" low income housing, digital billboard blight reduces the costs to purchase land. Who wants to live in a spot where there is a giant electronic billboard obstructing the view?

Communication from Public

Name: Barbara Smiley
Date Submitted: 12/14/2023 06:06 PM
Council File No: 22-0392
Comments for Public Posting: Do NOT allow digital billboards to further make our neighborhoods look like TRASH. Besides looking hideous they are dangerous.

Communication from Public

Name: jim wiles
Date Submitted: 12/14/2023 07:23 PM
Council File No: 22-0392
Comments for Public Posting: Please do not allow these huge digital signs. It is just not good for human beings. For a change, do what is right.

Communication from Public

Name: Heather Alexander

Date Submitted: 12/14/2023 11:02 AM

Council File No: 22-0392

Comments for Public Posting: No more billboards. There are too many distractions while driving! The light pollution is too much for an ever increasing neurodivergent population. Commercialism has peaked. The architecture and culture needs to show more than what's on sale,

Communication from Public

Name: Diana L Nave

Date Submitted: 12/14/2023 12:04 PM

Council File No: 22-0392

Comments for Public Posting: I strongly oppose Metro's TCN plan and urge a no vote on it. I am particularly concerned about its potential for distracted driving. In addition to signs proposed at freeway interchanges that would operate 22 hours a day, 12 of the proposed non-freeway facing signs are on high injury network streets. This runs counter to the City's Vision Zero. In fact the proposal was never reviewed by the City's Transportation Committee. I am also very disturbed about signs that are proposed adjacent to historical buildings such as Union Station. We have worked too hard to clean up visual blight in Los Angeles to open this door and give METRO the capacity for signs that our current City Ordinances would not allow while not holding them to the standards that other sign companies need to abide by. For example, PLUM amended the Program to reduce takedown of existing billboards from 125 to 50 prior to installation of new digital billboards, in contrast to the billboard industry's 2002 offer to remove 2,500 static billboards in exchange for 50 freeway facing digital billboard structures, and to allow takedowns of poster board sized signs (200 square feet) instead of actual billboards. This ordinance is a give away to Metro!

Communication from Public

Name: Kevin Berman

Date Submitted: 12/14/2023 03:19 PM

Council File No: 22-0392

Comments for Public Posting: These electronic billboards are the last thing this city needs, the light pollution alone is horrendous, and there aren't enough public safety messages to warrant this outlandish number of signs. We all know the next step will be paid advertising. Leave it to the CHP and keep it on the freeways. One trip through Inglewood and you know exactly why these shouldn't be put in Los Angeles

Communication from Public

Name: Robert Hansen

Date Submitted: 12/14/2023 03:39 PM

Council File No: 22-0392

Comments for Public Posting: The idea of these Electric Billboards is not new, it is however a mistake. They attract vandals with a message of their own, they are disruptive, and dangerous to drivers, if you can't read your phone while driving because it's dangerous, why would you read flashing billboards up above your eyeline, just as dangerous and will cause accidents. It's trashy, not meant for Los Angeles. If you want them so badly, let's do a test program and have all of you who vote for this to have one of these signs put in front of your house for 30 days, then vote for the truth. We don't need these dangerous polluting signs

Communication from Public

Name: Coalition for a Beautiful Los Angeles
Date Submitted: 12/14/2023 03:54 PM
Council File No: 22-0392
Comments for Public Posting: See attached letter from Coalition for a Beautiful Los Angeles describing inconsistencies and missing conditions from the Metro TCN Ordinance that weakens the City's authority to impose measures to make the Program safer and more cost effective for its citizens. Thank you.

Coalition for a Beautiful Los Angeles

Defend our Public Spaces • Protect Our Visual Environment

December 14, 2023

Los Angeles City Council
Los Angeles City Hall
200 N. Spring Street
Los Angeles, CA 90012
VIA EMAIL

RE: Inconsistencies and Conflicts in Metro TCN Ordinance; Council File # 22-0392

Dear Councilmembers:

Coalition for a Beautiful Los Angeles (Coalition)¹ asks City Council members to review and correct the inconsistencies and missing conditions from Metro TCN digital billboard program (Program) Ordinances that are scheduled for approval at Friday, December 15, 2023, City Council hearing. These inconsistencies and missing conditions, as outlined below, weaken the City's authority to regulate the Program and impose corrective measures if needed.

I. Inconsistent Language: the TCN Ordinance does not agree with itself

Two technical-correction amendments were adopted into the TCN Ordinance without removing the original language, making the existing text confusing, contradictory, and difficult to understand:

G. General Sign Location Requirements (page 15)

2. Prohibited locations:

c. Freeway Facing Signs and Non-Freeway Facing Signs shall not be located on a site within 200 feet, as measured from the centerline of a roadway designated as a scenic highway, scenic parkway, scenic corridor or scenic route as designated by the State of California Department of Transportation. Freeway Facing Signs and Non-Freeway Facing Signs shall not be located on a site within 500 feet of the centerline of a scenic highway as designated in Mobility Plan 2035.

There are references to both 200 feet (original language) and 500 feet (corrected language) for the distance between the centerline of a scenic highway.

d. TCN Support Structures with a Digital Display(s) shall be at least 1,000 feet away from any other digital Off-Site Sign with a Digital Display on the same side of any portion of a Freeway for Freeway Facing Signs or on the same side of any portion of a roadway other than a Freeway for Non-Freeway Facing Signs, provided that such Off-Site Signs shall not include Digital Displays installed in or on bus and transit shelters pursuant to the Sidewalk and Transit Amenities Program (STAP) established by the City or any successor program. The foregoing

¹ The Coalition for a Beautiful Los Angeles (formerly Coalition to Ban Billboard Blight), established in 1986, is a non-profit dedicated to preserving, protecting and enhancing the scenic beauty and visual character of Los Angeles through education, outreach, and advocacy.

shall not be construed to prohibit Off-Site Signs with double-faced Digital Displays oriented toward opposing directions of the Freeway or roadway other than a Freeway. Compliance will be verified with measurements taken between the TCN Support Structures or other applicable Off-Site Signs with a Digital Display(s).

e. TCN Support Structures with a Digital Display(s) for Freeway Facing Signs located on the same side of a Freeway shall not be located within a minimum distance of 1,500 feet from another TCN Support Structure with a Digital Display(s) for Freeway Facing Signs.

There are references to both 1,000 feet (original language) and 1,500 feet (corrected language) as the distance for freeway-facing (FF) signs located on the same side of a freeway.

II. Mathematical inconsistencies

As part of the Metro TCN Program, the ordinance addresses the required removal of 200 static billboards in conjunction with the installation of 52 FF sign faces that will be installed on 29 FF sign structures. However, the language in the section of the ordinance devoted to describing the planned takedown process, does not appear to meet the Memorandum of Agreement (MOA) 200-sign takedown requirement.² With the initial removal of 50 signs, and the described formula (4 sign takedown for each sign after the first 50), it does not appear that the total of 200 signs will be removed prior to the completion of digital billboard installation.

Section 8 SIGN REDUCTION (pages 23-24)

A. Removal of Off-site signage

1. For Freeway Facing Signs, a total of two hundred (200) static OffSite Sign Faces, inclusive of associated Sign structures, located within the legal boundaries of the City of Los Angeles, shall be removed in accordance with the provisions below:

i. A total of fifty (50) static Off-Site Sign Faces shall be removed anywhere within the City boundaries prior to the approval of the first new Freeway Facing Sign.

ii. After the first fifty (50) static Off-Site Sign Faces are removed, a minimum of four (4) static Off-Site Sign Faces shall be removed prior to the approval of a new Freeway Facing Sign, until the total two hundred (200) static Off-Site Sign Faces have been removed. The removal of the minimum of four (4) static Off-Site Sign Faces removed for each new Freeway Facing Sign shall occur within 2,640 feet of the Freeway Facing Sign for which that Off-Site Sign Face removal is to be credited. The 2,640-foot radius may be expanded to up to a 5,280-foot radius if LACMTA determines that the inventory of static Off-Site Sign Faces within the 2,640-foot radius will not result in the removal of the required number of static Off-Site Sign Faces; if LACMTA determines that 300 (2) a 5,280-foot radius will not result in the removal of the required number of static Off-Site Sign Faces, then the balance of the minimum of four signs required to be removed that are not located within the 5,280-foot radius shall be within the boundaries of the Council District of the new Freeway Facing Sign; if LACMTA determines that the boundaries of the Council District of the new Freeway Facing Sign will not result in the removal of

² The City doesn't appear to be in possession of a list of billboard locations targeted for removal in order to verify the locations of billboards to be removed.

the required number of static Off-Site Sign Faces, then the removed signs shall be within the boundaries of the City of Los Angeles.

iii. The size of the static Off-Site Sign Faces to be removed, that are not located on LACMTA property, shall be no less than 300 square feet or a combination of smaller signs that total no less than 300 square feet.

The Ordinance requires the removal of 50 static off-site FF sign faces prior to installation of the first billboard structure, in addition to a 4:1 takedown for the remaining 28 structures; that is 50 plus 112 (4 x 28), totaling 162 – NOT meeting the MOA-required 200 static billboard takedown.

Alternatively, if the calculations are done based upon FF sign faces, the resulting number would require removal of significantly more signs than the defined goal of 200 (approximately 254) and more than Metro claimed to have available for takedown.

In either case, the numbers do not add up.

Additionally, the amendment (iii) that adds language pertaining to the inclusion of signs that are poster-sized or smaller, represents a serious change from what was stated in the EIR, recommended by Planning and CPC. The public was presented with a plan to reduce billboard blight by removing a minimum of 200 static billboards. There was no earlier discussion as to the difference between signs on Metro property or other land.³ The industry standard makes a clear distinction between the size of billboards (672 square feet) and the standard size of advertising posters (220 square feet). The current language that allows for removal of signs no less than 300 square feet or a combination of signs that total no less than 300 square feet means essentially that any size sign can be counted for takedown. This undermines one of the main stated public benefits of the program.

Billboard company literature as well as generic resources make clear distinctions between billboards and posters.

The [Lamar advertising company website](#) notes the following:

How big is a billboard? Typically 14 feet high and 48 feet wide, a bulletin provides 672 square feet of space for your ad. Bulletins offer unparalleled visibility.

[Adquick](#) notes the following:

A [bulletin](#) is the billboard you picture in your mind when you visualize what a billboard looks like. Bulletins are 14 feet high and 48 feet wide, offering 672 square feet of advertising space.

The next size billboard down from a bulletin is a [poster](#). Posters are smaller than bulletins, with the standard size measuring 10 feet high by 22 feet wide, offering 220 square feet of advertising space.

Further, it should be noted that poster-sized and smaller signs counted toward removals are very often not lighted signs. Thus the claim that the takedown ratio to installation of digital billboards will result in a mitigation of light reduction cannot be met.

³ In other cities, Metro has been required to remove billboards whether on Metro land or private property to meet takedown requirements.

III. Lack of protections for the City and its citizens

The City has not included any conditions giving City Council the authority to impose additional corrective measures if the impacts from digital billboards aren't mitigated as described in the Program, e.g. are proven to increase accidents, intrusive light glare, block visibility, etc. Further, there are no provisions to update to new technologies following initial installations as they become available over the life of this decades-long Program.

The City Attorney reviewed language recommended by the City Planning Commission (CPC) during consideration of amendments to strengthen the 2002 Sign Ordinance in what was referred to as "Version B+." That language states:

- Based on new or updated information and studies, the City Council reserves the right to amend the standards and other provisions set forth in this Section and the illumination limitations set forth in Section 14.4.4 E of this Code in order to mitigate impacts on the visual environment on residential or other properties, to reduce driver distractions or other hazards to traffic, or to otherwise protect and promote the public health, safety and welfare. Further, the City Council reserves the right to apply these amended standards to existing signs and digital displays.

It is critical that the City reserve its authority and include the above language, especially given the long duration of the digital billboard Program. As CPC president Samantha Millman stated in a September 14, 2023 Los Angeles Times post, the panel is "experimenting with something that has not been done before in the City."⁴

IV. Unable to meet City's fiduciary responsibility

It does not appear the City has any ability to weigh in on Program costs and keep them from escalating out of control or protect against unnecessary or inflated expenses even though it will share 50 of those costs. Language that provides the City with audit powers and defined roles in the strategic decisions that govern project delivery costs must be included in any approved Program Ordinance.

We appreciate your review of these issues and inconsistencies so that they may be addressed and/or removed and the program improved before it is adopted.

Thank you for your attention to these important matters,



Barbara Broide
Co-President



Wendy Rosen
Co-President

⁴ David Zahniser, [L.A. planning commission backs plan for 80 digital billboards on Metro sites](https://www.latimes.com/california/story/2023-09-14/planning-commission-endorses-dozens-of-new-digital-billboards-in-los-angeles), LA Times, September 14, 2023, available at: <https://www.latimes.com/california/story/2023-09-14/planning-commission-endorses-dozens-of-new-digital-billboards-in-los-angeles>

Communication from Public

Name: Liz Amsden
Date Submitted: 12/14/2023 04:25 PM
Council File No: 22-0392

Comments for Public Posting: For years, our elected officials and their staffs have been pressured by the lobbyists for powerful industries that want to flood the City with seductive signage for their clients' products. Those paying to put their ads in our faces, will always want more aggressive displays, the larger, the more numerous, and the more distracting the better. Digital signboards are a significant danger in a City already challenged with maintaining traffic safety. Image change motion creates multiple driving hazards, including attracting eyeballs away from the road which is unacceptable in a congested urban environment. All types of billboards contribute to urban blight, however digital ones aggravate light pollution, disrupt our peaceful neighborhoods, hurt property values, harm the environment, and negatively impact the physical and mental health of people and animals living within range of their electronic humming and flickering lights. Especially with the extended hours. Little kids can't go to sleep at seven if there is humming and flickering outside their windows. How the heck is Los Angeles EVER going to REDUCE its carbon footprint, if the City authorizes these power-sucking monstrosities? Everything MUST go on hold until and unless a solution satisfactory to ALL parties, including every resident, is reached. Repeating that digital billboards have no impact on safety over and over does not make it true. What the digital signs deal does NOT address is how such will be regulated, leaving lots of lovely loopholes for their purveyors to disregard consumer protection and allow waivers for everything else including location, hours of operation, and light pollution. Take-down requirements are absolutely needed so why REDUCE them? And NO Angeleno living where they are supposed to be erected wants the bad to be replaced with worse! A study comparing stretches of highways with digital billboards in Florida and Alabama without indicated teens were more easily distracted... there were 25% to 30% fewer accidents, especially multi-vehicle collisions, in areas with only static signage. And that was on highways with far less driving challenges than we face every day on our city streets. People will be even more distracted by flashing lights and enticing messages and, without appropriately reducing speed, this will lead to increased accidents and injuries. Nor do I believe there will be any positive impact on the City's budget. As Co-Chair of the Neighborhood Council

Budget Advocates for six or seven years, I've seen how the City manipulates its own budget and have absolutely no faith that Metro's underlying calculations even approach reality. In fact, having worked in the film business much of my life, I am highly cognizant about just how "net" revenues are calculated. The gross income that Metro and the TCN proponents are pushing as bait may be truly tantalizing but after their shyster accountants extract their expenses, how much do you think will actually remain for Angelenos? Check out the calculations provided by Scenic America – THERE is your reality. Based on many years of advocacy, I strongly believe that any comments in support of these plans are affiliates of or paid by those who stand to gain most from this travesty. And those who are employees of or hired hands will always act in their own best interests, NOT those of their fellow citizens. In this case, I am representative of a groundswell of citizen concern. Having taken over Los Angeles County, Allvision and its brethren are now in Mortal Kombat to impose a Bladerunner-esque nightmare on the City of Los Angeles. Please give the boot to the TCN concept and its purveyors. Permanently. People should matter more than profit.