

**Public Comments Not Uploaded Council File No.: 22-0392 - METRO Transit Communications Network - Hearing 5/10/22**

1 message

**Barbara Broide** <bbroide@hotmail.com>

Tue, May 10, 2022 at 7:20 AM

Reply-To: clerk.plumcommittee@lacity.org

To: Councilmember Marqueece Harris-Dawson <councilmember.harris-dawson@lacity.org>, Councilmember Gil Cedillo <councilmember.cedillo@lacity.org>, Councilmember Bob Blumenfield <councilmember.blumenfield@lacity.org>, "Councilmember John S. Lee" <councilmember.lee@lacity.org>, "Councilmember.Rodriguez@lacity.org" <councilmember.rodriguez@lacity.org>

Cc: Mike Bonin CM <councilmember.bonin@lacity.org>, "councilmember.koretz@lacity.org" <councilmember.koretz@lacity.org>, "clerk.plumcommittee@lacity.org" <clerk.plumcommittee@lacity.org>, Mayor Garcetti <mayor.garcetti@lacity.org>

Cc: Mike Bonin CM <councilmember.bonin@lacity.org>, "councilmember.koretz@lacity.org" <councilmember.koretz@lacity.org>, "clerk.plumcommittee@lacity.org" <clerk.plumcommittee@lacity.org>, Mayor Garcetti <mayor.garcetti@lacity.org>

The advancement of this program without adequate public engagement is wrong. There are no CIS statements submitted because no one was informed that this item was to come before PLUM now. Neighborhood councils could not agendaize and consider the item having been given such short notice of the May 10<sup>th</sup> "special" meeting.

The potential impacts of this Metro program are great and when faced with a devil's choice of weighing injuries and deaths on our streets and highways against the financial benefits of a share of advertising revenues, there should be more discussion and efforts to minimize sign exposure.

Instead, the City and METRO are on a collision course of polluting our public right-of-way with an ever-increasing barrage of changing commercial digital advertisements without regard to many important factors. No one has noted that the addition of more and more signage does not equate to more and more dollars. There is a very obvious reduction in the yield or value of EACH sign the more signs that populate our streets!

With the introduction of a new LAMC to allow for unlimited advertising structures on the public right-of-way, the City has created a problem for itself and has diminished the future value of its signage programs. Instead, by severely limiting the numbers of sign, the City could derive high value from each and every one permitted. Chicago implemented such a plan. Instead, we will see our roadways commercialized and polluted, aesthetics and quality of life sacrificed.

The cumulative impact of all the current proposed sign programs and any future programs must be weighed and cannot be ignored.

Finally: The Council owes it to your constituents to request current information on studies documenting the driver distraction dangers of these signs so that your decisions are made being fully informed of the tradeoffs you are making. If you are going to be making deals with the devil, you should know the costs involved.

**From:** Clerk.PublicComment@lacity.org <Clerk.PublicComment@lacity.org>

**Sent:** Tuesday, May 10, 2022 6:22 AM

**To:** bbroide@hotmail.com <bbroide@hotmail.com>

**Subject:** Public Comment Submission Validation - Council File No.: 22-0392

To bbroide@hotmail.com,

\*\*\*\*\* PLEASE DO NOT REPLY TO THIS AUTOMATED EMAIL \*\*\*\*\*

## Public Comment Submission Validation

Your Public Comment is now pending. For security purposes, please confirm your submittal by clicking on 'Click here to Validate' button below:

[Click here to Validate](#)

---

**Council File Number:** 22-0392

**Comments for Public Posting:**

It is extremely troubling to find that the proposed City-Metro TCN program has been winding its way through City Hall without any public outreach. When the Metro Board approved the program in 2021, subject to LA City consideration, we citizens were told not to be concerned and that there would be ample time to weigh in when the project was considered by Council. (Metro took no public comment at the Board meeting when the program was adopted.) Now to find that the MOU was approved in December is quite appalling. This program requires careful analysis and refinement if and when it is to move forward to implementation. There are many who would tell the City that the pursuit of this program is a bad idea from both a policy and practical viewpoint. The potential of shared revenues generated should not provide distraction from the very real negative impacts that this program will bring. And, before the program is reviewed by Council, Council should first seek review of environmental impacts and an EIR to assess alternatives, mitigations and review any analysis of those impacts that cannot be mitigated. The PLUM Committee in the past has completely ignored any concerns raised pertaining to the public safety dangers associated with off-site changing digital messaging signs. It is almost as if the lure of revenues has blinded those considering these programs. Research exists from studies worldwide and in the U.S. as to the distracting nature of changing digital signs--distractions that result in accidents. (See: <https://www.scenic.org/sign-control/digital-billboards/safety-studies/>) Yet, the Council has failed to request an independent review of current studies to provide decisionmakers with the data to consider when weighing these digital advertising programs. Just last month (4/25/22), an article in the LA Times reported on a study in Texas that showed that roadside message boards increased the likelihood of drivers crashing or dying. (See: <https://www.latimes.com/science/story/2022-04-21/reminders-to-drive-safely-led-to-more-car-crashes-in-texas-study-finds>). In addition to public safety impacts, there are also impacts on public health--particularly on those with seizure disorders, those with various eye conditions, and the signs are considered to be "urban stressors" on already stressed-out urban dwellers. Additionally, even minimal night light pollution is documented to affect sleeping patterns resulting in negative impacts on overall physical health and well-being (see: [https://www.npr.org/sections/health-shots/2022/04/01/1089997121/light-disrupts-sleep?utm\\_source=pocket-newtab](https://www.npr.org/sections/health-shots/2022/04/01/1089997121/light-disrupts-sleep?utm_source=pocket-newtab) ). Not only are humans negatively impacted by added night sky pollution and artificial night lighting--so are the animals, bugs and birds we live with. The cumulative impacts of the various digital off-site advertising programs being pursued in LA is of great concern. Our City should be focusing on efforts to expand our urban canopy instead of populating our streets, highways & sidewalks with digital advertising structures--some of which may actually take the place of street trees! The adoption of any new LA Municipal Code section that allows for new advertising structures in the PUBLIC ROW is BAD policy. These signage programs, including the TCN, STAP and IKE, degrade our urban environment. Aesthetics matters. Their adoption undermines current sign policy and may threaten the City's ability to regulate off-site signs. In fact, this committee should ask the City Attorney to analyze how this program and new LAMC threaten the City's sign policies and ability to enforce. Also requested should be an assessment as to LA's legal liability to be held responsible for injuries or deaths that occur from accidents in proximity to these signs. And, what is the cumulative impact of

all these programs? Compliance with the General Plan/Mobility Element has not been adequately addressed. In addition to the issues identified above, this program cannot be considered now because relevant details about its proposed operation have not been disclosed. Items such as sign locations, protections for sensitive uses & residential neighborhoods (200 ft distance from these signs is inadequate), hours of operation, brightness standards, content guidelines, mechanisms for community input including opt out options, rotation rates, hours of operation, privacy rights and data gathering, the ability to track accident data in proximity to signs (and the ability to remove signs where accidents are documented) are all factors to be discussed and analyzed. The reported take-down ratio is completely inadequate; the CPC has recommended a 10:1 removal of static to new digital signs to reflect the differences in value between digital and static signs. There are other issues related to removals that must be addressed. The Council should seek an analysis that yields the highest financial return with the LEAST number of advertising panels. The City can do better.

---

If the above button is not clickable or is broken, please copy and paste the entire URL (minus any spaces) into your browser window.

<https://cityclerk.lacity.org/Confirmation/?EmailConfirmation=2&c=11CD7465-AA85-4622-9106-04EFE6FC18E0&em=bbroide@hotmail.com>

If you DO NOT want to submit this public comment, simply ignore this E-mail and do not click on the link above.

Thank you,

Office of the City Clerk  
Council & Public Services Division  
City of Los Angeles  
<https://clerk.lacity.org/council-and-public-services>