

## Communication from Public

**Name:**

**Date Submitted:** 07/13/2023 03:28 PM

**Council File No:** 22-0392

**Comments for Public Posting:** We are against adding billboards to the Los Angeles Community. We need to preserve the natural beauty in the City and respect nature that is so unique to this area and many people, both residents and tourists come to enjoy and appreciate.

## Communication from Public

**Name:** KT

**Date Submitted:** 07/13/2023 06:05 PM

**Council File No:** 22-0392

**Comments for Public Posting:** I oppose the Metro Digital Billboard Program. It's really about ads... not improving traffic safety: Neither the City nor the public have been provided information to allow analysis of the purported benefits of a transportation communication network that is supposed to improve traffic safety. No evaluation mechanisms or measures for success have been defined. AllVision, the Program's contractor, is an advertising company. Seven out of every eight images on the digital signs would show advertising. Changing digital advertising is dangerous and distracting: The City has failed to conduct independent analysis or review available safety studies or consider the impact of the signs on the City's high injury network and Vision Zero, and has also failed to acknowledge the serious consequences of driver distraction on roadway safety, particularly on the most vulnerable roadway users: bicyclists and pedestrians. Rushed approvals hinder public participation: Neighborhood Councils and the public have not been given sufficient notice or time to review the proposed City Ordinances in time for the Hearing Officer and City Planning Commission hearings, in violation of the Planning Dept.'s own public participation policy. City gets the short end of the stick: The City has yet to be provided with site plans and renderings of the locations of the signs making it difficult to evaluate the benefits and detriments of this Program. The City will not be operating the signs. Overrides local community planning documents: Sign types and locations were chosen by Metro without collaboration with the City, overriding the City's existing Specific Plans and other land use overlays adopted after significant community engagement and input. Fails to deliver benefits: The program's removal of a small number (3:1 ratio) of old static billboards of limited economic value and impact on the community when compared to the recommended (10:1 ratio) takedown by the City's Planning Commission does not represent meaningful blight reduction. Freeway signs impact underserved communities disproportionately: Distribution of signs creates unequal burdens. Signs erected adjacent to freeways are more likely to impact underserved communities. No environmental justice analysis has been provided. NO resource impacts analysis: The City has failed to conduct its own environmental analysis to assess whether the digital ads will have significant impacts on

important City resources, such as Bowtie State Park, Ballona Wetlands Ecological Reserve, Sepulveda Basin Wildlife Reserve, Grand Central Market, Mulholland Scenic Parkway, and others.

May violate public privacy: Digital billboards have been shown to capture personal data from passers-by without permission. There has been no discussion as to the extent of data gathering and protections for the public or data storage security.

Overrides impacts to Coastal Zone: Metro approved a sign at the Ballona Wetlands Ecological Reserve (along the I-90 Freeway) knowing it would have significant impacts on coastal resources. The City has included the Ballona Wetlands sign in its Ordinance.

NO cumulative impacts analysis: After implementation of the Program, the downtown area will have a dozen signs within a three mile radius, all in the vicinity of the recently-established Lusk Children's Orthopedic Hospital sign district.

Public gets the short end of the stick: The Program does not allow the community the right to appeal any of the freeway-facing signs.

Sets a negative precedent: The draft Ordinance seeks to allow non-contiguous billboards to be erected under a Supplemental Use District, rather than follow court guidance directing the City to maintain its ban on new billboards by limiting billboards to contiguous areas within Sign Districts. This application of a Supplemental Use District risks opening the door to outdoor advertisers seeking their own non-contiguous sign districts, challenging the City's 2002 Sign Ordinance adopted to reduce visual blight and improve community aesthetics and traffic safety.

Unclear revenue-sharing: Under the terms of the contract, the City will receive a share of Metro's ad revenues after vendor expenses, yielding significantly less than if this were a City-operated program. The Program competes with and decreases the value of the City's other digital ad initiatives.