



clerk CIS <clerk.cis@lacity.org>

Community Impact Statement - Submission Details

LA City SNow <cityoflaprod@service-now.com>
Reply-To: LA City SNow <cityoflaprod@service-now.com>
To: Clerk.CIS@lacity.org

Mon, Nov 6, 2023 at 10:00 PM

A Neighborhood Council Community Impact Statement (CIS) has been successfully submitted to your Commission or City Council. We provided information below about CISs and attached a copy of the CIS.

We encourage you to reach out to the Community Impact Statement Filer to acknowledge receipt and if this Community Impact Statement will be scheduled at a future meeting. Neighborhood Council board members are volunteers and it would be helpful if they received confirmation that you received their CIS.

The CIS process was enabled by the Los Angeles Administrative Code §Section 22.819. It provides that, "a Neighborhood Council may take a formal position on a matter by way of a Community Impact Statement (CIS) or written resolution." NCs representatives also testify before City Boards and Commissions on the item related to their CIS. If the Neighborhood Council chooses to do so, the Neighborhood Council representative must provide the Commission with a copy of the CIS or resolution sufficiently in advance for review, possible inclusion on the agenda, and posting on the Commission's website. Any information you can provide related to your agenda setting schedule is helpful to share with the NC.

If the CIS or resolution pertains to a matter *listed on the Commission's agenda*, during the time the matter is heard, the designated Neighborhood Council representative should be given an opportunity to present the Neighborhood Council's formal position. We encourage becoming familiar with the City Council's rules on the subject. At the Chair's discretion, the Neighborhood Council representative may be asked to have a seat at the table (or equivalent for a virtual meeting) typically reserved for City staff and may provide the Neighborhood Council representative more time than allotted to members of the general public. They are also permitted up to five (5) minutes of time to address the legislative body. If the CIS or resolution pertains to a matter *not listed on the agenda*, the designated Neighborhood Council representative may speak during General Public Comments.

We share this information to assist you with the docketing neighborhood council items before your board/commission. If you have questions and/or concerns, please contact the Department of Neighborhood Empowerment at empowerla@lacity.org.

***** This is an automated response, please DO NOT reply to this email. *****

Contact Information

Neighborhood Council: Historic Highland Park

Name: Clara Solis

Email: clara.solis@highlandparknc.com

The Board approved this CIS by a vote of: Yea(12) Nay(0) Abstain(0) Ineligible(1) Recusal(0)

Date of NC Board Action: 10/05/2023

Type of NC Board Action: Against

Impact Information

Date: 11/07/2023

Update to a Previous Input: No

Directed To: City Council and Committees

Council File Number: 22-0392

Agenda Date:

Item Number:

Summary: The HHPNC Board voted at its Board and Stakeholder meeting held October 5, 2023 to submit this Community Impact Statement regarding Council File 22-0392: In Opposition to Digital Off-Site Signs/Outdoor Advertising/Transportation Communication Network Program Structures/LACMTA. The HHPNC concludes that there is not sufficient evidence that this project is needed or that it will benefit residents of Los Angeles. Further, we are concerned that to the contrary, this project could present a danger to motorists and pedestrians, have a negative impact on our historical resources, and negatively impact the well-being of our residents and wildlife. The DEIR was biased in favor of the project and inadequately addressed the significant impacts from it. For example, Appendix K, the Transportation and Traffic Safety Review cherry picked three studies, two of which were industry sponsored. We are concerned that none of these

studies looked at large cities like Los Angeles where traffic is legendary and where a significant portion of the population use a primary language other than English. Additionally, studies not cited show the signs are particularly distracting to less experienced and older drivers. We are concerned about public safety. We encourage you to reject this proposal. Please note: Our six page letter has an exhibit of studies and articles which will be submitted separately.

Ref:MSG9288000



HHPNC COMMUNITY IMPACT STATEMENT CF22-0392 TCN .docx (1).pdf
336K

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Certified as NC #33 May 28, 2002

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HISTORIC HIGHLAND PARK NEIGHBORHOOD COUNCIL

October 6, 2023

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

COMMUNITY IMPACT STATEMENT

In Opposition to Building of Transportation Communication Network- TCN

RE: Council File 22-0392: In Opposition to Digital Off-Site Signs/Outdoor Advertising/
Transportation Communication Network Program Structures/LACMTA

The Historic Highland Park Neighborhood Council (HHPNC) represents over 60,000 Los Angeles stakeholders who reside, own property or conduct business in the neighborhoods of Highland Park and Garvanza. The HHPNC Board voted at its Board and Stakeholder meeting held October 5, 2023 to submit this Community Impact Statement regarding Council File 22-0392: In Opposition to Digital Off-Site Signs/Outdoor Advertising/ Transportation Communication Network Program Structures/LACMTA.

The purpose of the proposed project is to “provide a network of TCN Structures that would incorporate intelligent technology components to promote roadway efficiency, improve public safety, increase communication, and provide for outdoor advertising that would be used to fund new and expanded transportation programs. The TCN Program also includes the removal of existing static signage throughout the City. Implementation of the Project would include the

installation of up to 34 Freeway-Facing (FF) TCN Structures and 22 Non-Freeway Facing (NFF) TCN Structures, all on Metro owned property.”

The HHPNC concludes that there is not sufficient evidence that this project is needed or that it will benefit residents of Los Angeles. Further, we are concerned that to the contrary, this project could present a danger to motorists and pedestrians, have a negative impact on our historical resources, and negatively impact the well-being of our residents and wildlife.

We are also concerned that there will be significant impacts including safety impacts to pedestrians and motorists from the building of this project. The Draft Environmental Impact Report was biased in favor of the project and inadequately addressed the significant impacts from it. For example, Appendix K, the Transportation and Traffic Safety Review cherry picks three studies to conclude that drivers overwhelmingly pay attention to the road ahead, regardless of the presence of CEVMS or billboards. Two of the studies included are industry sponsored. Additionally, for no clearly explained reasons, the preparer excludes studies done outside of the United States. In doing this, the preparer seems to disregard the widely used literature reviews prepared by Jerry Wachtel, CPE of the Veridian Group. Wachtel’s work is cited extensively by local and state government researchers.

Further, for the reasons stated within this letter we believe this project will endanger the safety of Los Angeles residents.

I. SAFETY

The HHPNC is concerned for the safety of motorists and residents in the City of Los Angeles from the effects of TCN. We share the concerns indicated below in Wachtel’s Literature Review.

A. Wachtel’s 2018 Updated Literature Review (See Attached) concludes:

1. Broadly summarized, the more recent studies have tended to find that outdoor advertising signs, particularly Commercial Electronic Variable Message Signs (CEVMS) Commercial Electronic Variable Message Signs, attract drivers' attention, and that more dramatic and salient signs attract longer and more frequent glances.
2. Several of the reported studies suggested that the distraction caused by outdoor advertising signs could be tolerated by experienced drivers and when attentional or cognitive demands of the driving task were low, but that the risk increased when such signs competed for the driver's visual attention with more demanding road, traffic, and weather conditions, when travel speeds were higher, or when an unanticipated event or action (such as a sudden lane change or hard braking by a lead vehicle) occurred to which the driver had to respond quickly and correctly.
3. In addition, the more recent research continues to show that the drivers most susceptible to unsafe levels of distraction from roadside billboards are

the young (who are more prone to distraction and less adept at emergency vehicle response) and the elderly (who have more difficulty with rapidly shifting attention, poorer night vision and glare susceptibility, and slower mental processing time). As will be seen in this Compendium, these concerns are heightened today, with our elderly driver population growing quickly, traffic increasingly dense, more roads under maintenance or repair (construction and work zones create added risks), and larger, brighter digital and video roadside advertising signs competing for the driver's attention.

4. Finally, the most recent epidemiological studies (dating from 2014 and 2015) have begun to demonstrate what has long been suspected but not proven - that roadside billboards are associated with increases in crash rates where such billboards are located.
- B. Appendix K, Transportation and Safety Review as previously indicated cherry picked two industry prepared studies in Ohio from 2007 and one 2012 Federal Highway Administration Study. These studies each have limitations and in our opinion are far from conclusive in determining that CEVMS are safe.
1. The 2012 study was conducted in two cities, one in Richmond, Virginia and the other in Reading, Ohio. In both cities, there was a small sample size, in Reading 31 participants and in Richmond 24 participants. The author acknowledges that there were issues with the interpretation of the specific contributions made by billboards and the environment to the driver's behavior. The author also found that, "The drivers were generally more likely to gaze at CEVMS than at standard billboards," even though he concluded that drivers spent most of their time gazing at the task at hand. Additionally, the billboard refresh rate was 8-10 seconds. The Metro billboard refresh rate would be 8 seconds less than in the study. Shorter refresh rates could be more distracting.
 2. One of the 2007 studies, looked at driver fixation time with CEVMS and found it to be longer than for regular billboards it was less than 1 second, which they concluded was less than the 2.0 second fixation duration threshold that is considered dangerous by the NHTSA
 3. The other 2007 study looked at traffic accidents. A 2009 FHA study, indicates the limitations of such studies, "crashes are rare multicausal events which are difficult to measure."
- C. We are concerned that the studies conducted do not look at cities like Los Angeles and that the safety of our residents are at risk.
1. None of the studies cited have studied a large city such as Los Angeles where our traffic is legendary.
 2. Additionally, we have a large population whose primary language is not English. None of the studies referenced have looked at multilingual populations whose primary language is other than English.

- D. There is a failure to consider the totality of the circumstances that drivers today face including increasingly complex cars and cell phones or how that one second distraction along with other distractions impact drivers. See The LA Times article from July 2022:
<https://www.latimes.com/business/story/2022-07-06/we-are-killing-people-how-technology-has-made-your-car-a-candy-store-of-distraction>

II. TRAFFIC

Our stakeholders have raised the question of what impact these signs will have on traffic. Residents have noticed that where these signs are located on a freeway such as the I-5 in Commerce near the Citadel, traffic slows. Additionally, while the authors may find that a one second fixation is not significant, in a city of millions and tens of thousands of drivers passing these signs, those seconds add up. We do not believe this issue was sufficiently addressed in the study.

III. IMPACTS ON WILDLIFE

The HHPNC is concerned about the impacts this proposed project will have on humans and wildlife.

- A. A recent article in the LA Times cites the impacts from light pollution on residents and wildlife. In the article, the journalist(s) reflect that animals cannot avoid light pollution. (See attached):
<https://www.latimes.com/science/story/2022-09-20/how-an-effort-to-reduce-fossil-fuel-use-led-to-another-environmental-problem-light-pollution>)
1. UCLA Urban Ecologist, Travis Longcore, PhD states, “There are many, many species who don’t go out and forage during the full moon because it’s too bright and they know they’re going to be vulnerable to predators,”
 2. The article states, “According to the National Audubon Society, 80% of North American migratory bird species fly at night, and they’re confounded by city lights.”
 3. Further, there are impacts on humans as well, for example, “Humans, too, are vulnerable to light pollution. Artificial light blocks the production of melatonin, a hormone that regulates sleep cycles, and disrupted sleep cycles have been linked to an array of health problems. The American Medical Assn. [warned](#) in 2016 that high-intensity, blue-rich LED lights were “associated with reduced sleep times, dissatisfaction with sleep quality, excessive sleepiness, impaired daytime functioning, and obesity.”
- B. Our community is concerned that there are cumulative impacts from this project which have not been fully addressed including light pollution which will impact the poorest residents and our communities of color who often live closest to transportation corridors. There will also be cumulative impacts to wildlife including migratory wildlife. This project will add to light pollution as will the recently approved bus station LED’s.
- C. The Biological report that was prepared was inadequate in addressing the impacts to wildlife. It suggests there could be impacts near the Los Angeles River

but fails to even visit the site to see what is there. Additionally, it appears there could be impacts to migratory wildlife that use these bodies of water on their migrations. It does not study the impact to Hollenbeck Park in Boyle Heights which appears to be near FF-10 and FF-11. At this park, egrets and other waterfowl use the park as a stopping ground. FF-06 and FF-07 is located in a particularly sensitive area, between Elysian park, Egret Park, an area of the Los Angeles River that indeed has vegetation near the Los Angeles River Greenway Trail, Confluence Park, below Los Angeles River Center and Gardens. Sites FF13 and FF14 should be excluded for impacts to federally listed Least Bell's Vireo. We are concerned that impacts and mitigation to wildlife in these areas and throughout the city were not fully addressed including impacts to birds and bats.

IV. CORRUPTION

The HHPNC is concerned because our city has seen a great deal of corruption in recent years. We are concerned that this proposed project will undoubtedly create more opportunities for corruption.

- A. The City of Los Angeles has faced corruption amongst politicians and staff. Billboard companies and commercial digital billboards have also been a problem. We are concerned that this project presents more opportunity for corruption within our city. (See the attached articles for more information on this.)
- B. According to the indictment of Huizar, the approvals of the sign district for The Reef (Council File 16-1058-S2) and of the redevelopment of the billboard-fronted Luxe Hotel (Council File 17-1009-S2) were allegedly tainted by illegal developer-funded kickbacks to Huizar as chair of the PLUM Committee. The alleged bribery took the form of free trips, concert tickets, nepotism, and campaign contributions.

V. IMPACTS TO HISTORICAL RESOURCES

- A. Visual Impacts to Fourth Street Bridge. We are concerned about the visual impacts to this historic bridge. A look at the location of the sign NFF-21 reveals no urgent need for signage except to obtain advertising dollars. This sign is not needed for safety. It is not replacing anything. It should be removed from consideration.
- B. NFF-13 and NFF-16 are likewise not replacing anything but will have visual impacts to historical resources, Little Tokyo Historic Village and Japanese Village Plaza. The 30 foot structures would have a significant impact on the communities and the large senior populations. They could also impact senior housing nearby.
- C. NFF-2 will have significant visual impacts to the Spring Street bridge. Again, there is no need for signage at this location as none exists now. This is just another opportunity for revenue at the cost of a beautiful historic view that will be greatly diminished by a 30 foot sign.

VI. DISPROPORTIONATE IMPACTS TO COMMUNITIES OF COLOR AND LOW INCOME COMMUNITIES

We are concerned that this project will have disproportionate impacts to lower income communities and communities of color. Metro properties, freeways and public transportation are more often in these communities. Therefore, these communities will have more of the proposed unsightly signs with light pollution and traffic safety impacts. Additionally, there is housing located near some of the proposed signs. The residents living nearby will have their health impacted by increased pollution from traffic stalls to view the signs, the light pollution and increased traffic safety risks.

For the foregoing reasons, the HHPNC urges the denial of the TCN project.

Thank you for the opportunity to comment.

A handwritten signature in black ink, appearing to read 'Angela Gonzales-Torres', written in a cursive style.

Angela Gonzales-Torres
President, Historic Highland Park Neighborhood Council