



City Clerk Council and Public Services &lt;clerk.cps@lacity.org&gt;

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**Oppose Metro TCN- LA Council File 22-0392**

1 message

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**Scott Jung** <sjung810@hotmail.com>  
Reply-To: Scott Jung <sjung810@hotmail.com>  
To: LA City Clerk <clerk.cps@lacity.org>

Wed, Dec 28, 2022 at 8:40 AM

To whom it may concern:

I urge you to halt plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

Contrary to the findings of in the DEIR, there is a preponderance of evidence demonstrating the negative impacts digital billboards have on public safety by altering driver behavior, drawing driver attention away from the roadway and toward the advertisements. Human error is the leading cause of traffic accidents, and lawmakers have come to recognize the importance of reducing driver distraction by enacting laws banning cell phone use while driving. As digital billboards have become more common, an emerging body of research indicates that digital billboards create similar distraction conditions. A comprehensive compendium of digital billboard safety studies can be found at [www.scenic.org/compendium](http://www.scenic.org/compendium).

Recent research demonstrates that even changing electronic signs erected solely for public information purposes create hazards for drivers, indicating that the medium of digital signs is inherently dangerous. The Traffic Safety section of the DEIR fails to account for this evidence. The report contains no original analysis of the relationship between signs and driver safety and relies on a literature review of stale and inadequate research.

Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. However, Metro essentially states in this program that hazards created by installing digital signs are a problem that the rest of the city must mitigate. However, the dangers posed by Metro's signs would not be limited to its property. The City's roadway users would suffer the consequences, which would undermine the Vision Zero Program.

Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

Sincerely,  
Scott Jung  
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