

Communication from Public

Name: J. Ross, West LA 90064

Date Submitted: 10/24/2022 09:45 AM

Council File No: 22-0392

Comments for Public Posting: I oppose Metro's proposed four digital billboards along Pico Blvd. (NFF 14 and 15) and the 405 freeway (FF 26 and 27) in West LA, along with the entire Metro program. Facts and background: 1. Digital billboards along Pico Blvd. may be located in Commercial or Industrial zones, but their lights may shine into mixed-use buildings with residences along the corridor. The lights may also shine into the animal shelter on Pico Blvd. a. FF billboards will be 680-1,100 sf and 50-ft. tall. b. NFF billboards will be 370-680 sf and 30-ft. tall. 2. Billboards are allowed only in Sign Districts (Hollywood, Downtown, major entertainment areas). 3. Billboards will provide traffic information, public service announcements, and commercial advertising (revenue will be used for transit projects). 4. Billboards will collect data for traffic operations. 5. Billboards images will change as often as every 8 seconds, but no images will flash or move (like video). 6. Smaller analog signs are posted on overpasses (text only, no video). Findings and justifications: 1. Colorful and bright images on digital billboards distract drivers and cause crashes. The bright lights and moving images draw in drivers' attention more intensely than static billboards, and more than turning your head to simply look at the same buildings, people, other cars, etc. that drivers every day (even if it's for the same amount of time). a. <https://www.scenic.org/blog/research-shows-that-digital-traffic-safety-messages-contribute-to-highway-accidents-and-fatalities/> b. <https://www.latimes.com/science/story/2022-04-21/reminders-to-drive-safely-led-to-more-car-crashes-in-texas-study-finds> (the most recent report) c. Veridian/Wachtel study on digital signage and driver distraction: <http://www.fairwarning.org/wp-content/uploads/2016/03/compendium-final-2-223.pdf> d. Article about Wachtel study: Evidence Mounts of Distraction Risks from Digital Billboards Along Roadways: <https://www.fairwarning.org/2016/03/digital-billboards/> 2. An alternative is to install freeway signs behind sound walls, so they are not visible to residences and vehicles on streets. 3. An alternative to free-standing billboards outside of freeway walls is to install them on overpasses (analog signs are already installed in some locations), so they are not visible to residences and vehicles on streets. 4. Courts may use these digital billboards that are located out of Sign Districts as justification and precedent to allow digital billboards anywhere in the city (digital billboards are allowed only in Sign Districts currently). The digital billboard at Santa Monica and Bundy was turned off because it was installed illegally outside of a Sign District (Hollywood, Downtown).

Communication from Public

Name: Del Rey Residents Association
Date Submitted: 10/24/2022 03:21 PM
Council File No: 22-0392
Comments for Public Posting: The attachments to this letter will exceed the 5 MB limit, so they are not attached, although they were sent to everyone on the distribution list except the City Clerk.



October 24, 2022

ONE GATEWAY PLAZA
Mail Stop 22-9
Los Angeles, CA 90012

Attn: Shine Ling, Development Review Team

Re: Transportation Communications Network (“TCN”) Draft Environmental Impact Report
(DEIR), comments due October 24, 2022

Two decades ago, the City of Los Angeles imposed a ban on digital off-site signs, Ordinance 174547. Now, Metro and the City of Los Angeles have entered into a Memorandum of Agreement (C-139852) that would allow digital billboards to be erected on property that is co-owned by Metro and the City. For the reasons outlined more fully below, the Del Rey Residents Association (“DRRA”) is opposed to the Metro Transportation Communications Network (“TCN”) program. The following comments on the DEIR are not exhaustive of all our concerns but are those that are feasible for non-experts to address.

Aesthetics

The public has spoken and has been opposed to digital advertising for decades. Please see the dozens of communications from the public and community impact statements from Neighborhood Councils in Council Files 11-1705 and 22-0392. The DEIR has no discussion of the cumulative effects of visual clutter on the general public and drivers alike.

In Del Rey, we are most concerned about the billboards FF29 and FF30 proposed for the intersection of the Marina (90) Freeway and Culver Boulevard. That is next to the Ballona Wetlands Ecological Reserve, and we take issue with the DEIR conclusion that the potential impacts to views of the Ballona Wetlands would be less than significant (DEIR, IV.A.3.d. Threshold (a)(1)). We also disagree with the statement “Furthermore,

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based on the Site Location of the proposed TCN Structure next to a freeway or major roadway, their size and height, and the existing urban setting of the Site Locations and surroundings, the TCN Structures would not substantially contrast with the existing aesthetics features, such as trees, landscaping, and open space areas” (DEIR, IV.A.3.d, Threshold (c)). The signs would attract attention and detract from the benefits the open space of the Wetlands provide for drivers. Our comments on the TCN Initial Study¹ (attached) noted that a digital sign on a business at 5450 Lincoln Boulevard (in Del Rey) is clearly visible from the other side of the Ballona Wetlands (about 1.5 miles away). We would like Metro to respond to each of the concerns raised by us in that letter.

Despite our particular interest in ensuring that no digital billboards are erected near the Ballona Wetlands Ecological Reserve, and our desire to have all static billboards removed from Metro property along the Culver Blvd. Bike Path that runs through Del Rey (from the 405 freeway to McConnell Avenue, about 1.5 miles), we support Alternative One – the no project alternative. In our opinion, there is no take down ratio that would be sufficient to overcome the negative effects of digital billboards in Los Angeles.

The DRRA fully supports the removal of all static display billboards from Metro-owned property. Complete removal would improve the quality of life in our neighborhoods by reducing cyclist, driver and pedestrian distractions, reducing the commercialization of our lives and eradicating the unsightly structures that hold up the billboards. We should not have to allow digital billboards as the price for having the static billboards removed.

Biological Resources

According to the DEIR, the Project will have “less than significant” impact from “Substantial Light or Glare.” In fact, the DEIR fails to address the effect of light and noise from billboards on humans and wildlife. A recent article in The Atlantic² raises this issue, as does the story of the migrating goose that disrupted the October 12, 2022 Dodgers-Padres playoff game.³ The best way to mitigate the light pollution from the digital billboards is to choose Alternative 1, i.e. No Project.

¹ DRRA letter of August 1, 2022, attached.

² <https://www.theatlantic.com/magazine/archive/2022/07/light-noise-pollution-animal-sensory-impact/638446/>

³ “Where Has Goose Gone?” from Los Angeles Times, published in Yahoo News, October 13, 2022.

Energy consumption – Section IV.E

We disagree with the conclusion that the cumulative impacts related to energy use and conflicts with plans will have a less than significant impact.

According to the DEIR, the Project will result in a net increase in energy demand of 2,288,690 kWh per year. DEIR, Section IV.E. Per the U.S. Energy Information Administration, in 2020 the “average annual electricity consumption for a U.S. residential utility customer was 10,715 kWh.” Thus, the net increased use from the TCN will be equivalent to the energy consumption of 213 homes per year.

The DEIR analysis places too much reliance on the increase in energy usage as a percentage of the total sales (0.1%) of the Department of Water and Power (DWP). This is a specious argument given the size of DWP. We are in an era of climate change when the mandate is to reduce energy use, not rationalize ways to increase it. According to the DEIR, this Project is not contemplated to reach 100 percent renewable energy until 2035. Section IV.E.3.c.

Gov. Newsom has proposed clean electricity targets of 90% by 2035 and 95% by 2040. <https://www.gov.ca.gov/2022/08/12/governor-newsoms-ambitious-climate-proposals-presented-to-legislature/> (8/12/22).

Increasing consumption will make these targets harder to reach. Even if renewable energy were the answer to climate change, increases in consumption mean more renewable energy will need to be produced. Until 100% renewable energy is available for all, those using such energy force others to continue using dirty energy.

The energy consumption of the digital billboards should be re-analyzed with an emphasis on the effects of the increase in energy use. We suggest that a redirected analysis will find that the demand during operation will cause wasteful, inefficient, and unnecessary use of energy and impacts will be significant.

Land Use and Planning, Section I.

The DEIR acknowledges that the Project Impact on Land Use and Planning would be “Significant and Unavoidable.”

The DEIR Section IV (Other CEQA Considerations) is required to discuss the significant and unavoidable impacts that would result from the Project,

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and the reasons why the Project is being proposed notwithstanding the significant and unavoidable impacts. Our Councilmember Mike Bonin summed it up clearly⁴: “[T]he scope and intent of the project is clear: install large digital billboards at highly visible Metro-owned locations for revenue generation purposes.” Other than the generation of revenue to be allocated in a manner yet to be specified, what benefit will result from Metro being allowed to ignore a ban on digital billboards that has been in place for two decades? A piecemeal dismantling of the ban will make it increasingly difficult to stop digital pollution of our environment. Why should Metro be allowed to erect digital billboards when private companies cannot?

Zoning

The Project will require an amendment to the Zoning Code that has not yet been written or approved, although the City Council has instructed the Department of City Planning to draft the amendment (CF 22-0392). After years of study, the City of Los Angeles has developed a new Zoning Code that is currently going through the adoption process with the Downtown Community Plan Update. The Zoning Ordinance enabling the implementation of the TCN Program would apply solely to the 56 proposed Site Locations for the TCN Structures and any locations for associated sign takedowns. (Executive Summary, page I-6). The DEIR does not explain why Metro needs a Zoning Code that is different from the one that the City Planning Commission recommended for approval on September 23, 2021.

Zoning near each of the 56 TCN Project sites and any potential takedown sites is a critical issue that has not been adequately considered.

1. The executive summary states that industrial zoning “is generally buffered by commercial uses to provide separation from residential uses.” Del Rey has several neighborhoods that are zoned Industrial, and yet apartment complexes and schools have been built in those areas, e.g. the area covered by the Glencoe Maxella Specific Plan and the area between Ballona Creek and Jefferson Boulevard. How will Metro ensure that the digital billboards are not built on Metro property that is next to areas that are de facto residential?
2. The State of California is hoping to make housing more affordable by allowing construction of housing in buildings that were previously zoned for commercial use.⁵ The DRRA has been asked to consider a number of such projects, particularly in the Glencoe-Maxella Specific Plan area. However, current land use planning does not

⁴ Letter of June 1, 2022 from Mike Bonin re Metro’s TCN Notice of Preparation (attached)

⁵ “2 laws expand options for new housing,” L.A. Times, September 29, 2022, page 1, regarding Senate Bill 6 and Assembly Bill 2011, which take effect January 1, 2023.

provide any certainty as to where those developments will occur. The DEIR should show how Metro is going to ensure that the TCN Project complies with the Community Plans that are being updated citywide. At a minimum, this should include a review of the draft plans that are in circulation and a letter from the Department of City Planning confirming that they agree or disagree with the statements in the DEIR.

The Palms Mar Vista Del Rey Community Plan was adopted in 1997 and has been going through updating since 2019. Del Rey is transected by Centinela Avenue and bounded by Lincoln, Washington, Sepulveda and Jefferson Boulevards. The State of California has changed the law to promote housing construction within half a mile of any of these streets. The analysis in the DEIR must ensure compatibility with planned and reasonably foreseeable residential use, not just with areas specifically zoned residential. For all project sites, adequate mitigation measures must include siting, orientation, buffering, and screening from all residential dwellings.

3. Alternative 3 assumes that the Project would “eliminate or relocate FF-29 and FF30 outside of the coastal area of the Palms-Mar Vista-Del Rey Community Plan.” The DEIR does not clearly define what is meant by the “coastal area of the Palms-Mar Vista – Del Rey Community Plan area” and should include a map showing where relocation might be considered. Except for the areas within the Glencoe-Maxella and Playa Vista Specific Plans, the rest of Del Rey falls within the Coastal Transportation Specific Plan. Parts of Del Rey also are within the jurisdiction of the California Coastal Commission. As stated above, we are opposed to FF-29 and FF-30 at any location.

Community Benefits

If digital billboards are permitted, who will decide what community benefits must be provided in exchange? Who will determine which community gets those benefits? How will the revenue sharing from the billboards be allocated within the City? Any system of allocation must provide for notice to the community, an opportunity for the community to be heard, consideration of the environmental impacts and findings.

Metro needs to analyze each potential TCN Project site separately and to provide data showing what was analyzed and what methodology was used. Each structure erected or taken down will have a unique environmental impact, depending on its location.

Take-downs

The DEIR states that in exchange for being allowed to erect 56 TCN structures (98 digital ad faces, according to Scenic LA), static billboards with twice the square footage of the digital billboards (DEIR page I-7) would be removed. This take-down ratio is far too low.

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Because one digital billboard can feature ads from multiple advertisers, a digital billboard can generate far more revenue than a static billboard. At a minimum, the environmental impact of each digital billboard should be offset by taking down the number of static billboards that generate the same amount of revenue as the digital billboard. This is likely to be closer to a take-down ratio of 10 to one.

The DEIR does not explain how it would be decided which static billboards would be taken down and when that would occur. How would Metro ensure that those decisions are made fairly and equitably so that the static billboards are removed from the same neighborhood that is being burdened with a digital billboard?

Transportation: Section IV.K and Appendix K

Gibson relied on three studies to analyze whether the TCN structures present potentially significant traffic safety concerns. Two of the three studies were conducted by the Foundation for Out of Home Advertising Research & Education (“FOARE”). DEIR Section IV.K.3.b. The FOARE research projects “help ensure OOH [out of home] advertising is competitive and a preferred means for marketing and promotion.” The Board of Directors of the Foundation are all from advertising companies.

The use of studies conducted by a foundation created to further the interests of the business that will benefit from the Project is an egregious conflict of interest. Moreover, studies that demonstrate safety concerns have been ignored. The Transportation analysis must be redone using unbiased research and without the use of the FOARE studies.

We note the oft-referenced study by the National Center for Transportation Systems Productivity and Management that “revealed that the presence of digital billboards increased the overall crash rates in areas of [digital] billboard influence compared to control areas downstream of the digital billboard locations.” Digital Advertising Billboards and Driver Distraction (April 1, 2015)(Contract #DTRT12GUTC12 with USDOT Office of the Assistant Secretary for Research and Technology, Section 7.1.1.)

Furthermore, the Transportation analysis uses the expected benefits of the TCN program to rationalize digital billboards. The purpose of the CEQA process is not to weigh the benefits of a project against the detrimental impact on the environment. CEQA requires the environmental effects of adding offsite digital advertising billboards to Metro property to be analyzed independent of the benefits other aspects of the Project may deliver. For example, see Section IV.K.3.d.1(a)(1). “For example, the

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TCN Program would aim to improve the bus passengers' experience by helping to facilitate transit signal priority and bus wi-fi and efficiently relay bus arrival time information to riders. Therefore, the Project would not conflict with the applicable goals and initiatives set forth in the Vision Plan."

The DEIR does not explain why Metro cannot use intelligent technology components to promote roadway efficiency, improve public safety and augment Metro's communication capacity without using digital billboards.

According to the Department of City Planning, the City and Metro entered into a Memorandum of Agreement (C-139852) to share revenue generated from the off-site advertising on these signs for 20 years. It is unclear who will pay the costs to erect the TCN, or who will decide who will build the TCN, who may advertise on the TCN and what may be advertised on the TCN. In short, the DEIR is seeking to assess the environmental impacts of a Project that is not yet ready to be evaluated.

Appendix B: Metro TCN Lighting Study

In Del Rey, we are most concerned about the billboards FF29 and FF30 proposed for the intersection of the Marina (90) Freeway and Culver Blvd. because of the proposed location next to the Ballona Wetlands Ecological Reserve. However, light pollution from the digital billboards must be addressed citywide. What will be done to prevent "sky glow" from the billboards? (See "A switch's flip side" from Los Angeles Times, September 22, 2022, page 1⁶, and "The Sky Needs Its 'Silent Spring' Moment"⁷ from Scientific American).

The whole point of a digital billboard is for the advertising to be seen, preferably over as wide an area as possible. If there is no "potential visibility" of the sign, its advertising is not effective.

Appendix B, Part A. Summary, states that "the proposed Project will not introduce a new source of light trespass and or glare at residential properties or other sensitive use properties within the City of Los Angeles." Then the DEIR states that it also monitored "potential for visibility of the Signs" from residential properties nearby. However, if the digital billboard is visible from residential property or sensitive use property, it will be disruptive, particularly if the display changes every eight seconds, 24 hours a day.

To prepare the Lighting Study, not all of the proposed Project Sites were monitored to determine if there was a "potential for visibility" from

⁶ See attached pdf copy.

⁷ Doi:10.1038/scientificamerican1022-46, article by Joshua Sokol, originally published with the title "Saving the Night Sky" in Scientific American 327,4, 46-55 (October 2022).

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residential properties nearby. Further, the DEIR does not explain where the monitoring sites were located. The Project Sites needed to be monitored from the residential properties or other sensitive use properties where the billboards would be visible.

The Initial Study in April 2022 states on page 9 that the “digital display faces would be set to refresh every eight seconds and would transition instantly with no motion, moving parts, flashing, or scrolling messages.” Does that mean that there will be no videos like the ones shown on the digital billboard at Manchester Avenue and the 405 in Inglewood, which announces upcoming entertainment offerings? Where is that regulated? Who decides on the content of the advertising on the billboards?

Earlier this year, the City Council agreed to the Sidewalk and Transit Amenities Program (STAP) (CF 20-1536 and 20-1536-2) which would allow digital advertising on transit furniture in the public right-of-way. The STAP program will have digital elements in Transit Shelters, Digital Kiosks, Interactive Kiosks, Digital Urban Panels. STAP raises the same issues as the TCN program – energy consumption, light pollution, effects on traffic – and like TCN, it is seen as a revenue source for the City. We believe that the revenues from these digital signage programs do not outweigh the damage caused by the signs.

Best regards,

DEL REY RESIDENTS ASSOCIATION

DocuSigned by:
Elizabeth Layne

By Elizabeth Campos Layne, President

Attachments

1. Del Rey Residents Association Comment Letter of August 1, 2022
2. “How Light and Noise Pollution Confound Animals’ Senses”, The Atlantic, July 2022
3. “Where has goose gone?” Los Angeles Times, as posted on Yahoo News, October 13, 2022
4. Mike Bonin’s comment letter of June 1, 2022
5. Article about new housing laws, Los Angeles Times, page 1, September 29, 2022
6. “A switch’s flip side,” Los Angeles Times, page 1, September 20, 2022
7. “Saving the Night Sky,” Scientific American (October 2022)

Cc: (via e-mail)

Shine Ling, tcn@metro.net

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Councilmember Mike Bonin (C.D. 11), councilmember.bonin@lacity.org

Del Rey Neighborhood Council, board@delreync.org

Westside Regional Alliance of Councils, Land Use and Planning Committee,

wraclupc@gmail.com

City Clerk – clerk@lacity.org re CF 22-0392

Department of City Planning

Hagu.solomon-cary@lacity.org

Andrew.Pennington@lacity.org

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Communication from Public

Name: Del Rey Residents Association
Date Submitted: 10/24/2022 03:25 PM
Council File No: 22-0392
Comments for Public Posting: This comment letter has been submitted twice before but did not post successfully, so now we are trying with a gmail address.



August 1, 2022

Los Angeles City Council
Nury Martinez, President
200 N. Spring Street
Los Angeles, CA

Re: Metro Transit Communication Network Program Proposal to Allow Digital Billboards

Dear Council Members,

The Del Rey Residents Association (“DRRA”) is **opposed** to the Metro Transit Communication Network Program (TCN Program) proposal to allow digital billboards on joint LA City/Metro property and urges the Council to **reject the proposal**.

The DRRA fully **supports the removal of all commercially-oriented static display billboards from Metro-owned property**. Complete removal would improve the quality of life in our neighborhoods by reducing cyclist, driver and pedestrian distractions, reducing the commercialization of our lives and eradicating the unsightly sign structures that hold up the billboards. However, **removal of existing static display billboards must not come at the cost of introducing digital billboards**.

Residents of Los Angeles have long expressed their disdain for digital billboards. **The TCN Program is an affront to the interests of individuals, neighborhood organizations and Neighborhood Councils who have nearly unanimously fought against digital billboards in our city** and supported only the strictest standards for placement of digital billboards.¹

Moreover, if the City allows digital billboards on Metro property, its ability to limit off-site digital billboards on private property may be hampered. This issue should be fully analyzed by the City Attorney.

The Del Rey Residents Association is particularly concerned about the impact of digital billboards proposed for two locations at the intersection of the Marina Freeway and Culver Boulevard in Del Rey. This intersection is **adjacent to the Ballona Wetlands, a unique natural landscape in Los Angeles**. The Wetlands provide habitat for migratory birds, waterfowl and land wildlife and provide a visual respite for drivers, bicyclists and

pedestrians. **The large, high-light emitting digital billboards will interfere with “sensitive habitats”** that the City should be doing its best to protect.²

Road Safety Concerns:

Electronic billboards will cause **more of a distraction** compared to static billboards by encouraging drivers to switch mental tasks and look at the changing images more often - instead of looking at the road.³

We refer you to an oft-referenced study by the National Center for Transportation Systems Productivity and Management. The study “revealed that the presence of digital billboards increased the overall crash rates in areas of [digital] billboard influence compared to control areas downstream of the digital billboard locations.”^{4 5 6}

Light Impact:

In addition to **constantly changing advertising** content contributing to driver distraction, **excessive light** emitting from billboards also poses a **safety hazard**.

In the abstract of a study “aimed at developing guidelines ... concerning the reduction of advertisements located in the vicinity of roads”, researchers concluded, “. . . excessive or incorrect distribution of media luminance in the driver’s field of vision, especially at night, may have a significant effect on the disturbance of the visual process. The driver’s night vision is generally adapted to low ambient luminance values, illuminated by vehicle and road lighting.”⁷

Digital billboards typically emit more light directly towards drivers than other light sources. This is particularly relevant to proposal to place digital billboards at the **90 Freeway/Culver Boulevard intersection** adjacent to the low-lit Ballona Wetlands, where the light-dark contrast will be greater than in highly lit locations.

Digital billboards at that intersection will also be visible to many **nearby residences**. The digital sign on the commercial property at 5450 Lincoln Boulevard can be seen from the other side of the Ballona Wetlands (about 1.5 miles away). It may be effective advertising for the sign owner but artificial night light is known to disrupt the behavior of humans, insects and animals.⁸

Increased Energy Usage in the time of Climate Change:

Digital billboards use more power than static billboards and drastically more power than having no billboards. Digital billboards use energy 24 hours a day compared to only nighttime use for static billboards and use more energy during the day than static billboards. Based on energy usage from one digital billboard company, a double-sided digital billboard uses approximately the same energy as 15 to 23 single family homes.⁹


Electricity usage must be reduced, not increased. Climate change-induced heat waves are putting a strain on the electric power grid. Consumer and business consumption is increasing for many reasons. Los Angeles is nowhere near 100% “clean” energy. And contrary to its name, “clean” energy still has negative environmental impacts. As stewards of the environment for future generations, we must scrutinize how every decision will impact energy usage.

Putting the relatively small revenue that would come from the proposed TCN Program ahead of safety, the environment, and human and animal well-being is short-sighted and dangerous.

Thank you very much for considering our concerns.

Sincerely,

DEL REY RESIDENTS' ASSOCIATION

DocuSigned by:

B30E294C35C64EB
Elizabeth Campos Layne
President

¹ See, for example, the dozens of communications from the public and community impact statements from Neighborhood Councils in Council Files 11-1705 and 22-0392.

² See the Initial Study for the Transportation Communication Network Program, section IV Biological Resources findings that the project will have a potentially significant impact on the Ballona Wetlands.

³ Drivers so exposed “tailgate more, drift more across lanes, are more inclined to cross intersections unsafely, have more variability in their driving speed and have a more distracted gaze.” Guest Commentary. “Digital billboards downtown: a bad idea for Baltimore.” *The Baltimore Sun*, October 18, 2021 (linking to various academic studies).

⁴ Digital Advertising Billboards and Driver Distraction, National Center for Transportation Systems Productivity and Management (April 1, 2015) (Contract #DTRT12GUTC12 with USDOT Office of the Assistant Secretary for Research and Technology, Section 7.1.1

⁵ In another example, study authors found that “[r]esults show a significant shift in the number and length of glances toward the billboards and an increased percentage of time glancing off road.

A Field Study on the effects of digital billboards on glance behavior during highway driving, *Accident: Analysis and prevention* 88:88-96 (published March 2016)

⁶ We compare the safety of digital billboards to static billboards because the static billboards already exist. However, the consensus is that any billboards are a distraction (which is their intended purpose) and driver distraction leads to decreased safety.

⁷ *The Journal of the Illuminating Engineering Society, Procedure for Measuring the Luminance of Roadway Billboards and Preliminary Results* (Published online 16 Oct 2020) <https://www.tandfonline.com/doi/full/10.1080/15502724.2020.1803752>

⁸ Our night sheds a bad light on wildlife, European Wilderness Society, 2021 <https://wilderness-society.org/our-artificial-night-sheds-a-bad-light-on-wildlife/>

⁹ City of South San Francisco Initial Study and Mitigated Negative Declaration, Nov. 2019, pg. 50. Also see San Diego Gas & Electricity Company's study, "Digital Billboard Energy Use in California": "DBB are comprised of LEDs, power supplies, cooling systems, lighting controls, and a computer, with LEDs being the largest contributor to a DBB's power draw." In summary: "Given the large power requirements and constant usage, DBBs consume a significant amount of energy. https://www.etcc-ca.com/sites/default/files/reports/et14sdg8011_digitalbillboardreport_2014-7.pdf Study for San Diego Gas and Electric Company, July 2014

cc: Mayor Eric Garcetti
Council Member Mike Bonin, Council District 11
City Attorney Mike Feuer
Shine Ling, tcn@metro.net
Ginny Brideau, Community Relations Manager, Metro Westside/Central
(servicecouncils@metro.net)
LA City Clerk's Office, Council File 22-0392