



SOHA Comment Letter on Transportation Communication Network for Filing in CF 22-0392

1 message

Bob Anderson <bobhillsideordinance@gmail.com>
To: LA City Clerk <Clerk.CPS@lacity.org>

Mon, Jul 10, 2023 at 7:03 AM

Dear LA City Clerk,

The Sherman Oaks Homeowners Association (SOHA) submits the attached comment letter opposing the Transportation Communication Network and asks that you add it as a public communication to Council File 22-0392.

Please reply and let me know that you can do this, or if you have any questions.

Thank you.

Bob Anderson
Vice President and Chair, Transportation Committee
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SOHA Opposes TCN Ordinance 2023 07 10.pdf
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July 10, 2023

Terri Osborne

Los Angeles City Planning Department

Metro Transportation Communication Network (Council File 22-0392)

terri.osborne@lacity.org**Subject: SOHA Strongly Opposes Metro's Transportation Communication Network (TCN) and LA City Planning Department's TCN Ordinance That Would Implement It****References**

1. LA City Council, *Memorandum of Agreement (MOA) for the development of a Transportation Communication Network (TCN) Program between the City and Metro, establishing a revenue-sharing framework that provides the City with 50 percent of net revenue from outdoor advertising on TCN structures located within the boundaries of the City*, December 8, 2021
2. LA Planning Department, *Transportation Communication Network District Ordinance, Final Draft*
3. Metro, *Transportation Communication Network CEQA Draft EIR Presentation*, October 2022
4. Los Angeles Planning Department, *Fact Sheet – Digital Signs: LA Metro's Transportation Communication Network (TCN)*
5. Metro Board Report to Planning and Programming Committee, *Transportation Communication Network Environmental Impact Report*, January 18, 2023

The Sherman Oaks Homeowners Association **strongly opposes** the Los Angeles County Metropolitan Transportation Authority's (Metro's) **Transportation Communication Network (TCN)** and the LA City Planning TCN Ordinance that would implement the TCN in any way.

Although we have many reasons for opposing the TCN and TCN Ordinance, **our primary reason is that we can find no person nor any organization that supports the TCN.** As of July 5th, there are Community Impact Statements from 16 different Neighborhood Councils on Council File 22-0392 – and all oppose or strongly oppose the TCN. No NC Impact Statements support the TCN. There are 38 communications from the public on the Council File – and all oppose or strongly oppose the TCN. There is also a letter from former Councilmember Koretz expressing his concerns about the TCN. No public communications support the TCN. The Hillside Federation opposes the TCN as "... designed to attract the attention of as many people as possible, they pose a danger to drivers and bathe the surrounding ecology and homes with light pollution." Scenic America opposes the TCN based on their legal opinion as "... an unmitigated disaster for the City of Los Angeles and its citizens."

We have one simple question. **Why is the LA City Council considering a TCN project that has zero support from the people of Los Angeles?** This is a no-brainer – it is unwanted and unneeded.

TCN is unwanted because its displays will be a distraction for everyone exposed to them. They are HUGE and HIGH (see figure below) – much larger than existing freeway displays. Although limited to minimal animation, the TCN displays are designed to attract the attention of as many people as possible. They pose dangerous distractions to drivers and pollute surrounding communities and homes with light.

TCN Displays Are Huge and High



In January 2023, the *LA Times* reported “... 312 people were killed in traffic collisions last year [2022], 5 percent more than in 2021 and a 29 percent increase over 2020. LA’s streets remain particularly deadly for pedestrians and bicyclists ...” Many attribute increasing traffic collisions and deaths to driver distraction. **The TCN will cause more driver distraction on freeways and streets** near sign structures and will most probably increase traffic collision deaths.

TCN is unneeded because the information on its displays is already available on our smartphones and becoming more available on our vehicle displays – except the TCN advertising – which most of us don’t want or need. In fact, smartphones and vehicles give step-by-step route instructions and traffic information – so who needs a distracting 50-foot display. And TCN will be outmoded technology in ten years – when all of us will have the latest technology on our new smartphones and vehicles. Any additional communication and safety functions that TCN might provide don’t require displays at all.

TCN is really a money grab. A Memorandum of Agreement (MOA) between Metro (county) and the City of Los Angeles (Reference 1) gives LA half the net advertising revenue from TCN. Everyone we talk to is convinced money is the primary driving force for TCN. But TCN operation and maintenance costs will be high – and time will tell just how much “net” revenue LA actually receives.

The Planning Department’s draft TCN District Ordinance (Reference 2) confirms that the **TCN displays are huge and very high– making them even more of a dangerous distraction to drivers.** It states “A maximum total of 33 Freeway Facing Sign faces shall be permitted. Freeway Facing Signs may be either single-faced or double-faced. A maximum total of 60 Sign Faces shall be permitted.” Ordinance Table 7-1 shows that 32 signs have 672 square-foot displays (about 50 by 14 feet), and one has a 1,200 square-foot display. Sign height limits vary from 50 to 100 feet above grade, the typical being 80 to 90 feet.

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Metro's TCN CEQA Draft EIR Presentation from October 2022 (Reference 3) further enlightens us on the key TCN components:

- Intelligent Technology – TCN Structures incorporate Metro's Regional Integration of Intelligent Transportation Systems technology;
- Roadway Efficiency – TCN Structures provide real time data collection to aid in traffic control, bus transit signal priority, and overall bus/rail passenger experience;
- Improve Public Safety & Communication – TCN Structures broadcast public safety and Metro messaging throughout the TCN to commuters; and
- Revenue Generation for Transportation Projects.

As noted earlier – drivers already have all the intelligent technology they need on their smartphones and vehicles. **The fourth bullet – revenue generation – appears to be TCN's driving force for Metro and the LA City Council.** TCN will be expensive to build, operate, maintain, and upgrade. TCN funding would be better spent on safer and more plentiful public transit.

The Planning Department's TCN Fact Sheet (Reference 4) includes a TCN display structure illustration on the I-5 freeway near San Fernando Road (page 11). The fact sheet illustration distorts and downplays the huge size and height of the planned TCN structure. The figure below provides a more realistic representation of the 50-foot-wide display – more than three traffic lanes wide – which is 85 feet high. The TCN Ordinance (Reference 2) sets the maximum display size and 85-foot height for this site located at Assessor Parcel Number 2408038900. **These displays must be huge and high because most are two-sided and must be visible from both sides of the freeway – to maximize advertising revenue – and also distraction.**

LA Planning Department Fact Sheet Downplays TCN Size and Height



This January's Metro Board Report on the TCN Environmental Impact Report (Reference 5) provides the final piece of the TCN puzzle. It lists Metro's eight key EIR objectives. The fifth objective is "Maximizing Advertising Revenue". **Since when did maximizing revenue become a key environmental objective?** As noted earlier, the public sees TCN as an unneeded and unwanted money grab.

SOHA urges the Planning Department and City Council to stop TCN immediately in any form.

MOST IMPORTANTLY – It is critical that all public comments and communications on TCN received by the Planning Department be transferred and posted on the Council File Management System (CF 22-0392) so the entire City Council can read them before their next vote on TCN.

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Thank you. Please contact me at BobHillsideOrdinance@gmail.com or (213) 364-7470

Respectfully,



Bob Anderson
Board Member and Chair, Transportation Committee
Sherman Oaks Homeowners Association

cc: Councilmember Nithya Raman, CD4 (Sherman Oaks)
Council President Paul Krekorian, CD2
Councilmember Eunisses Hernandez, CD1
Councilmember Bob Blumenfield, CD3
Councilmember Katy Yaroslavsky, CD5
Councilmember Imelda Padilla, CD6
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Councilmember Hugo Soto-Martinez, CD13
Councilmember Kevin de Leon, CD14
Councilmember Tim McOsker, CD15
Mayor Karen Bass
Lindsay Imber, President, Sherman Oaks Neighborhood Council
Jeff Kalban, Chair, SONC Vision Committee
City Clerk for Council File 22-0392