

Communication from Public

Name: Scenic Los Angeles

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Comments for Public Posting: We can do better than STAP Now that the StreetsLA STAP program has finished its demonstration phase, Scenic LA offers its comments. Our deep reservations and ambivalence about this project are clear. We agree that Angelenos deserve new bus shelters, and that they should be world-class because this is a world-class city. They should provide shade, seating, and real-time bus information. After visiting the two trial shelters at several locations and during various times of day, we believe that the current approach is misguided and that we can do better. The city never considered the most distinctive bus shelter, which would have been ad-free. Granted, the city's finances were in bad shape when the Request for Proposals was written, and ad revenue would have contributed to installation and maintenance. But recent federal aid, a large state surplus, and a rebounding economy now allow us to aim higher. Ad-free shelters are preferable on legal, safety, environmental, aesthetic, and privacy grounds. Instead, about 750 of the proposed shelters will have digital screens at street level with messages that change every eight seconds. Legal: The proposed new digital signs will imperil the city's ability to enforce the 2002 sign ban. How can the city tell sign companies that they can't erect new billboards if the city itself is doing so on a massive scale? This is an open invitation for a legal challenge from an industry that has demonstrated its capacity to actively seek such opportunities. Safety: The new shelters will endanger pedestrians. While no safety study of digital ads on bus shelters has yet been done, numerous studies testify to the distraction that digital billboards cause. Just one example: A 2017 University of Alabama study found a 25 percent increase in accidents on highways near digital billboards. By necessity, the city's new bus shelters will be located in the most pedestrian-heavy areas. The city's Vision Zero plan, which is already struggling to meet its targets, is certain to become a complete failure. Environmental: The Tranzito executive stated that his company's digital shelters would use approximately 7000 kwh of electricity per year. (Executives of JCDeCaux declined to answer.) The average Los Angeles household uses 6000 kwh per year. Using the Tranzito numbers—which surely need an audit—750 new digital shelters will use the same amount of power as 875 Los Angeles households. That is more than ten

eighty-unit apartment buildings. Devoting that much electricity to ephemeral and dangerously distracting advertising is a waste of scarce resources. Aesthetic: New digital signs will multiply the number of ads that Angelenos are already subjected to each day. Specifically, the 750 screen-bearing shelters will bring 6,480,000 new ad messages every day across the city, magnifying its already excessive visual blight. Moreover, the public service component of the messages will be a mere 5 percent, or three minutes per hour, a pittance that all city agencies and neighborhood councils will haggle over. In view of these issues, Council Motion 20-1536, which urges the protection of scenic corridors and specific plans, needs to be strengthened and passed. Privacy: Anyone who comes near these shelters, whether walking or driving, will surrender data from their cell phones, unless they have taken the complicated steps to opt out. The data is supposed to be anonymous, but personalizing it is easy because each person's movements are unique. And further, we have no assurance that the city will keep our data safe against the growing sophistication of hackers. Plus, the city is required to share the data with the sign contractor for use in ad optimization. These new bus shelters will thus become yet one more set of hidden digital spies. The previous shelter contract was botched by both the city and JCDeCaux. It generated only 56% of projected revenues. Now we can do better. This game-changing project demands a full CEQA Environmental Impact Review that considers all of the issues raised above. Better yet: Extend the current shelter contract and reissue the RFP with world-class parameters. That's the route to a world-class shelter. Scenic Los Angeles is ready to discuss the next steps at any time. We all want LA to be the best it can be. Patrick Frank, President Coalition for a Scenic Los Angeles A Chapter of Scenic America