

Sidewalk & Transit Amenities Program (STAP) Implementation

Frequently Asked Questions - CEQA

Will STAP installations, including those that include digital displays, be compatible with their surroundings and with land uses in the vicinity?

The selection of sites for STAP inventory would be guided by the goal of providing shelter, shade, safety, and comfort to the maximum number of transit riders, users of active transportation, and pedestrians through a program that is sustained by revenue generated from advertising on the program elements.

The siting of STAP elements is intended to ensure that they will be compatible with their surrounds and land uses in the vicinity. The siting matrix proposed for STAP would guide the placement of STAP furniture elements based on Street Classifications and adjoining land uses. Siting criteria can be summarized as follows:

- No transit shelters/advertising displays would be allowed on Hillside Local or Hillside Limited Street Classifications regardless of adjoining land use.
- No transit shelters/advertising displays would be allowed on all Street Classifications where bus stops are established in front of “One-Family Residential” land uses.
- Limited allowance for transit shelters/advertising displays, except for bus stops established in front of One Family Residential land uses on all Major Arterial, Secondary Highway, Collector, Industrial Collector, Industrial Local, Hillside Collector, One-Way Service Road, Bi-Direction Service Road, Pedestrian Malls, and City Scenic Highway Street Classification
- Limited allowance for transit shelters at bus stops and for advertising displays on Federal/State Scenic Highways only where adjoining land uses are Commercial, Manufacturing, or Parking
- Limited allowance for transit shelters/advertising displays on the side or back yards of One-Family Residential in cases where bus stops are established on side or back yard border areas fronting Major Arterial, Secondary Highway, Collector, Industrial Collector, or Industrial Local Street Classification

Proposed transit shelters with or without advertising displays would be generally confined to the City’s commercial, industrial, parking, and open space areas; no transit shelters with or without advertising displays would be constructed or replaced under this program along the frontages of properties on Hillside Limited Streets, Hillside Local Streets, designated federal and State Scenic Highways. and the frontages of properties in One-Family Residential zones.

Siting of STAP transit shelters would comply with applicable guidelines and standards and sign regulations for street furniture and signs installed in the public road right-of-way in the Mobility Plan, Specific Plans, Streetscape Plans, corridor plans, overlay zones, Commercial Design

Overlays, Historic Preservation Overlay Zones, and other applicable plans (and subject to additional approvals, if necessary).

Approximately one fourth to one third of the new transit shelters will be equipped with digital advertising panels. These shelters will provide:

- Visual real-time bus arrival information on E-paper
- Audio real-time bus arrival information operated by push button aimed at assisting people with vision impairment;
- USB charging ports;
- Wi-Fi; and
- Energy-efficient LED edge lighting.

The design and operating features of the shelters with digital advertising panels are intended to ensure compatibility with the local setting of a shelter. Digital content will not include any full-motion video or sound and the display time for each image will be at least 10 seconds. Controls on the brightness of images will ensure that the brightness of the digital screens is similar to the brightness of the static ad panels currently used in existing street furniture.

[References: IS/MND 2.3 (Program Objectives), 2.4 (Program Elements), 3.11 (Land Use and Planning), Appendix D (Land Use Consistency Analysis); RTC 5.0 (Land Use and Planning), RTC Appendix 1 (Technical Memorandum STAP and Mobility Element/General Plan)]

Will transit shelters that have digital advertising panels distract drivers or affect traffic safety?

None of the proposed future advertising displays or kiosks anticipated for site selection and placement would obstruct a motorist's view of any traffic control device, including street signs, traffic signals, or prominent road markings, because they would be placed on sidewalk areas and subject to LAMC Section 62.200, which prohibits obstructions to driver visibility at street intersections and applies to signs and other improvements that may be constructed within the public right-of-way.

With respect to driver distraction, the findings of a relevant Federal Highway Administration (FHWA) research and background literature study indicated that drivers directed most of their visual attention to areas of the roadway that were relevant to the task at hand (i.e., the driving task). The report stated, "Collectively, these studies did not demonstrate that the advertising signs detracted from drivers' glances forward at the roadway in a substantive manner while the vehicle was moving." The FHWA study further found "for tasks such as driving, the task demands tend to outweigh stimulus salience when it comes to gaze control." In other words, an experienced motorist will adjust their driving according to the immediate and nearby environment, which includes consideration of numerous factors, such as the speed and amount of adjacent traffic, weather conditions, presence of traffic signals, speed limit signs, and pedestrian crosswalks, as well as the adjacent land uses. The presence of nearby digital imagery is another element among many that a motorist would consider while driving.

Studies have shown multiple factors influencing a driver's response to visual stimuli, including their driving experience, general behavior and attitudes about driving, level of fatigue or drowsiness, personal stress levels, and driving while impaired, to name a few. Driver attention can be diverted from the task of concentrating on the road in several ways, including engaging with the vehicle's radio or entertainment system, handling food or drink, and/or responding to a hand-held cell phone, to take some common examples. After review of the key findings in the available electronic billboard literature, an in-depth traffic study to review the degree to which drivers may be influenced by the presence of a digital display at a transit shelter or kiosk would not be able to scientifically isolate the various cause-and-effect relationships to such a fine degree, considering all of the foregoing examples, that it would sufficiently settle the debate. Section 15204 (a) of the CEQA Guidelines states that "CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors."

In an abundance of caution, the project has incorporated several specific limitations on the physical dimensions of digital advertising displays, along with limiting illumination contrast with ambient light levels; not allowing for full motion videos or sound; and establishing minimum image refresh rates. Together, these will help reduce the potential for causing motorist distractions. As further indicated in the IS/MND, the City reserves the right to exempt its approval of any of the contractor's individual proposed locations of shelters, sidewalk amenities, and advertising displays and signs where the City has determined certain roadway segments and characteristics involve high-demand driver task engagement. As a result, the placement of STAP project elements and future advertising displays would not be expected to impact the safety of drivers, pedestrians, and transit users, and, for CEQA purposes, the issue of driver distraction as a traffic hazard remains less than significant.

Much of the information on driver distraction relates to full-size billboards, including billboards with digital displays. It is important to note that the digital displays that would be associated with STAP displays are a fraction of the size of a typical billboard. A typical billboard is 14 feet by 48 feet (672 square feet) which a typical STAP digital display panel is approximately 21 square feet – less than 4% of the area of a billboard. Further, billboards are elevated to maximize their visibility and billboard displays are intended to capture the attention of drivers. Conclusions about driver distraction that may apply to billboards should not be assumed to be valid for the much smaller STAP displays.

[References: IS/MND 3.17.3 (Transportation Impact Analysis) , Appendix F (Transportation/Traffic Impact Analysis); RTC 2.0 (Driver Distraction/Safety)]

Will STAP installations have aesthetic impact or impair visual resources?

The siting of STAP elements is intended to ensure that they will be compatible with their surrounds and land uses in the vicinity. As discussed in the IS/MND, the anticipated sensitivity of residents and business owners (i.e., those anticipated for having the potentially largest quantity of views) in terms of awareness and values is described as high. Other aspects have less sensitivity, such as

location and duration of views, which range moderately low to high; overall, community residents are considered to have a moderately high total sensitivity level to the proposed changes, while business owners, employees, and customers would have moderate sensitivity. The resulting changes to the views within the streetscape are not expected to be substantial due to the nature of the changes. The addition of the bus shelter and its associated elements and future advertising displays would be new objects along the road and would be placed in a prominent position. However, views of the bus stops and sidewalk areas would be brief at regular traffic speeds. For pedestrians and transit users, the views would be longer in duration than that of drivers and travelers along the roadway, but these too are transient as they use or pass by the shelter. Based on viewer sensitivities, the IS/MND concludes that there would be moderate exposure to viewers that would have moderately high sensitivity, but changes in visual quality and visual character would be low.

Because the proposed shelters would replace all existing shelters and the use of digital advertising displays would occur mainly in areas where static advertising displays already exist on the transit shelter or in the vicinity of the shelter, the visual impact associated with the proposed replacement shelters and future advertising displays is anticipated to be less than significant, as discussed in the IS/MND. Where no shelter or advertising display currently exists, but new shelters and future advertising displays are proposed, the impact would still be anticipated to be less than significant. Firstly, this is because of the limitations set in the STAP on the placement of shelters within residential areas and other standards and guidelines that have been designed into the program. Secondly, to the typical roadway travelers, bus stop elements are standard streetscape elements throughout the City, and the project would merely replace existing bus stop elements, such as signage and benches with advertising, that currently exist in these locations. To preserve the visual character of individual neighborhoods, the STAP transit shelters (relocated or new) and associated amenities, including signs and advertising displays that are proposed within the planning areas of Specific Plans, Streetscape Plans, overlay zones, Commercial Design Overlays, Historic Preservation Overlay Zones, and other applicable plans, to be designed to comply (and subject to additional approvals, if necessary) with applicable guidelines and standards and sign regulations for street furniture and signs installed in the public road right-of-way prior to installation/construction.

[References: IS/MND 3.1 (Aesthetics) , Appendix A (Aesthetics and Visual Impact Analysis); RTC 1.0 (Visual); Memo from Maria Martin to Shirley Lau, dated August 19, 2022, re: STAP Scenic Quality Consistency]