

**Background/Supplemental Info. – Motions re Metro-TCN program
recommended to the WRAC Board by WRAC MTC:
(1) referral to Council Transportation Cmtee & LADOT
(2) Oppose Metro-TCN Program & Ordinances**

Council File: CF22-0392

Case #s: CPC-2022-5401-CA, CPC-2023-3653-ZC, ENV-2022-5286-EIR.

Planning Dept. info: <https://planning.lacity.org/plans-policies/metro-tcn>

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Background:

1. The Land Use and Planning Committee passed a Motion on Aug. 15 to oppose the City's participation in the TCN program.
2. WRAC has opposed other digital sign/advertising programs, including:
 - a. Digital billboards outside the 22 areas already zoned as Regional Commercial for high-intensity commercial use).
 - b. Digital signs installed in or near bus shelters outside the 22 areas.
 - c. The proposed IKE kiosks with digital signage in the public ROW.
3. CD11's Mike Bonin removed some billboards near Playa Vista (ecological zone, Coastal Zone), so NCs can request removal of billboards in their districts.
4. When NCs expressed concerns to the Planning Dept. at the start of its review, they said the city proposal would be "much different" than Metro's proposal. We see no differences, other than a few billboards being removed, and this proposal remains primarily an advertising program that creates visual blight.
5. Metro approved the TCN in Jan. 2023 only with overriding considerations to harmful CEQA impacts.
6. 16 of the 22 non-freeway digital billboards will be installed on city streets that are part of the City's high-injury network.
7. Digital billboards that distract drivers conflict with goals of Vision Zero, and will create more crashes with cars, bicyclists and pedestrians.
8. The proposal circumvents decades of work on City Sign Ordinances. It creates non-contiguous Supplemental Use Districts with 90 single billboards scattered across the city, as opposed to the Sign Ordinance which requires defined, contiguous areas in high-energy entertainment areas like Hollywood and Downtown.
9. The City pre-committed to the Metro TCN program without public notice or communication with the public, and even agreed to a \$1,000,000 withdrawal penalty.
10. The City relinquished being lead agency on this program. It should have done their own EIR, instead of relying on the one conducted by Metro.
11. The proposal may violate the L.A. General Plan and 22 Community Plans stretching from Sylmar to South L.A., Local Coastal Plans, Pedestrian-Oriented Districts (prohibit digital, flashing signs), and regulations about scenic corridors and highways.
12. The program raises ethical issues around using public spaces for profit. 87% of images are for advertising, so this is more of an advertising program than a public safety/information program. The City will receive half of advertising revenue.
13. Bright lights at night inhibit sleep, which prevents the brain from healing during rest at night and causes mental health problems.
14. Bright lights that change during the day create a strobe effect, which harms those who work at night and must rest during the day.
15. Studies don't guarantee that drivers won't be distracted. The studies only analyze head movements. They can't measure how intensely new, different, changing, bright images pull in

drivers' attention (which is much different and less intense than browsing familiar streets and buildings, as you drive along and scan for problems).

16. When all drivers on a freeway are distracted by digital billboards at the same time, all of their reaction times decrease. In addition, most drivers speed, so their reaction times are already reduced. This will directly lead to more crashes (even public safety signs like "Fasten Your Seatbelt" distract drivers and lead to some crashes).
17. If the City insists on overriding the public's opposition, then the following restrictions should be added:
 - a. 50% of images must be for non-profits/ charities and public safety information.
 - b. Advertising images / non-safety images may change a maximum 1 time per minute (instead of 3 per minute, every 20 seconds).
 - c. Advertising safety images must be turned off from 9:00 pm to 7:00 am.
 - d. Takedowns of static billboards should be 10 to 1 (not a lower 3 to 1).

Regional impact: Almost all NCs will have these proposed digital billboards in their districts.

Prepared by Jay Ross

Member, WRAC MTC & LUPC; Secretary & PLUM Chair, WLASNC