

OPPOSE THE PENDING INSTALLATION OF THE METRO TRANSPORTATION COMMUNICATIONS NETWORK (TCN) PROJECT ALONG THE 405 FREEWAY IN WEST LOS ANGELES

From the WRAC Mobility and Transportation Committee (MTC)

October 16, 2024

Broide/Miner, passed 9-0-1

“The _____ NC/CC, a member of the Westside Regional Alliance of Councils (WRAC), opposes the pending installation of the Metro Transportation Communication Network (TCN) structures along the 405 Freeway in West Los Angeles, North of the 10 Freeway interchange. These structures will be located in Council Districts 11 and 5 in Metro’s Exposition Blvd. right-of- way.* “

Council Files: [22-0392](#) and [22-0392-S1](#) (CFMS) (lacity.org)

*Locations per the Metro TCN Draft EIR, II, Project Description (attached):

a) Table II-1 Freeway Facing TCN Structure Locations, page II-9, the locations are the I-405 North Lanes at Exposition Boulevard (Assessor’s Parcel #4256010902) and the I-405 South Lanes at Exposition Boulevard (Assessor’s Parcel #4260039906), and

b) Table II-2 Non-Freeway Facing TCN Structure Locations, page II-10, the locations are Pico Boulevard and Exposition Boulevard, South of rail (Assessor’s Parcel #4260025902) and ico Boulevard, 445 feet West of Sawtelle Boulevard (Assessor’s Parcel #4260039906).”

BACKGROUND

In December of 2023, [WRAC took a position against the City of Los Angeles participating in the Metro Transportation Communication Network \(TCN\)](#) for the following reason:

- the program moved forward without notice to or substantive community input from stakeholders prior to implementation of an EIR process; this is in contravention of expected norms as well as WRAC’s Statement of Principles (Standing Rule 4 of the WRAC Bylaws), which calls for advance notice and ample time to review and comment by WRAC’s member councils on all proposed public infrastructure or other public property developments;
- the City ceded its power as lead agency for EIR purposes to the Metro board, which approved the EIR for Metro TCN on consent overriding considerations with impacts on City resources;
- Metro TCN is a digital billboard advertising program with moving images that will: (1) distract drivers and create dangerous situations which will undermine

the City's Vision Zero goals, and (2) blight the visual environment of 22 Community Plan areas in Los Angeles;

- Metro TCN in substance contravenes longstanding WRAC positions opposed to digital billboards (outside of sign districts in areas already zoned as regional/commercial) and to digital advertising in the public right of way (proposed "IKE" kiosks);

Despite the widespread opposition to the Metro TCN program and the 80 digital billboards it would construct around the City of Los Angeles on land owned by Metro, the City Council voted in favor of participating in this program.

After the City Council's vote, advocate groups filed lawsuits with the City and County to against the TCN program and challenge the placement of signs in sensitive areas around the City. These lawsuits were minimally successful, in that they removed only the TCN structures slated for installation in the ecologically-sensitive Ballona wetlands near the 90 freeway and Lincoln Blvd.

The main cause for concern with the TCN digital billboard structures pending installation on the Westside in the Metro Exposition Blvd. right-of-way is the negative impacts these digital billboards will have on roadway and freeway safety.

Research shows that digital billboards alter driver behavior, drawing driver attention away from the roadway and toward the advertisements. Human error is the leading cause of traffic accidents, and lawmakers have come to recognize the importance of reducing driver distractions. For example, they have enacted laws banning cell phone use while driving. As digital billboards have become more common, an emerging body of research indicates that digital billboards create similar distractions. A comprehensive collection of links to digital billboard safety studies can be found at the Scenic America advocacy website: <https://www.scenic.org/take-action/resources/digital-billboard-studies/>

In addition to negative impacts on roadway and freeway safety, digital billboards will increase visual blight in our City. Los Angeles already has too many billboards, and Angelenos are bombarded with advertisements at every major intersection. The Metro TCN program will also add advertisements directly on our freeways.

If Metro and the City of Los Angeles really need a way to generate more money, is partnering with the billboard industry really the best option? Or should they instead go back to the voters and ask for more money. Because when asked, voters in Los Angeles have a proven track record of funding well-documented public needs.

The billboards will also waste energy, making our City less green. Solar panels and trees planted on these Metro properties would be a better, greener choice.

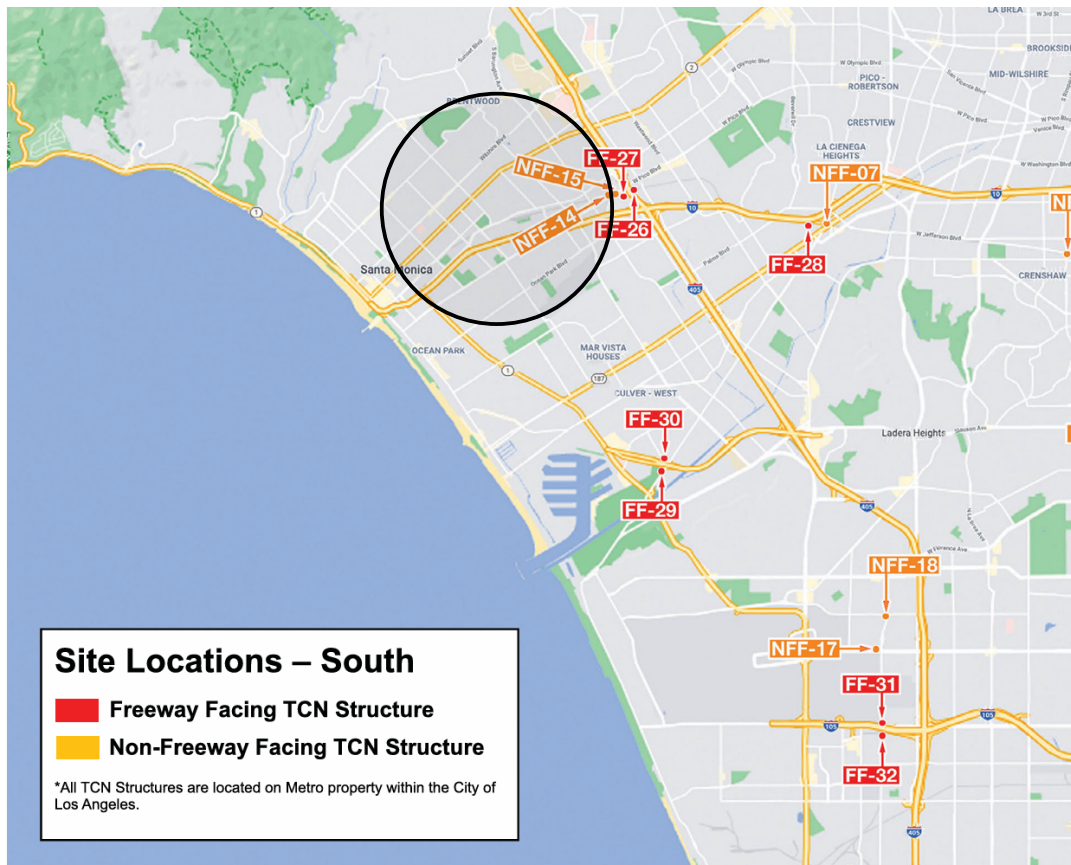
In regards to revenues generated by the Metro TCN program, in February 2022, the CAO executed a Memorandum of Agreement (MAO) between the City and Metro for the proposed TCN Program (C-139852). The MOA states that the City shall receive 50% of the net revenue from a TCN Program operated by Metro within the City.

Per the motion in Council File: [22-0392-S1 \(CFMS\) \(lacity.org\)](#), TCN Revenue Fund receipts received by the City of Los Angeles will be distributed as follows:

1. 25% shall be allocated/programmed Citywide; and,
2. 75% shall be allocated/appropriated by Council District (CD) based on the percentage of total area (square feet) of operational digital displays located within each CD, and expenditures of allocated/appropriated amounts shall be made at the discretion of the individual CD Offices in accordance with the spending categories defined in the terms of the Memorandum of Agreement.

METRO TCN PROGRAM SPECIFICATIONS FOR THE WESTSIDE LOCATIONS

Summarized From the Metro TCN Draft EIR (attached)



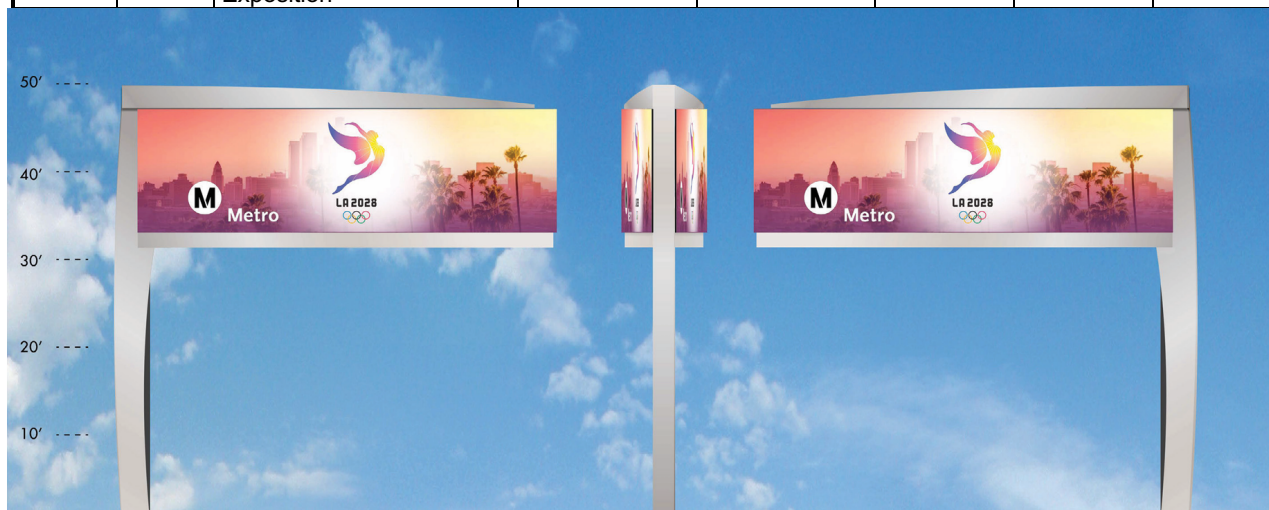
Each TCN Structure will have one or two faces depending on the location.

Metro says the digital display faces are designed to “provide efficient and effective illumination while minimizing light spill-over, reducing sky-glow, and improving nighttime visibility through glare reduction.” These TCN Structures will use light emitting diodes (LED) lighting with a daytime maximum up to 6,000 maximum candelas and 300 maximum candelas at nighttime, depending on the location. The digital display faces will be set to refresh every 8 seconds. They will transition instantly with no motion, moving parts, flashing, or scrolling messages. Illumination will conform to applicable Federal and State regulations for signs oriented towards roadways and freeways.

Freeway Facing TCN Structures are designed to be viewed from the highway. Each of the Project’s Freeway Facing TCN Structures at the I-405 Freeway and Exposition Blvd. will be double-sided, 14 feet high and 48 feet wide, with 672 square feet per sign. These structures are located adjacent to the elevated freeway and freeway on/off ramps and transitions. The Freeway Facing Structures will be located up to 95 feet in height above the finished grade of the adjacent highway as shown on Figure II-4 on page II-15.

**Table II-1
Freeway Facing TCN Structure
Locations**

Sign ID	Map No.	Location	Assessor's Parcel Number	Sf per Digital Display (No. of Digital Display Faces per TCN)	Digital Display Height (ft)	Digital Display Width (ft)	Sign Height (from grade)
FF-26	2	I-405 North Lanes at Exposition	4256010902	672 (2)	14	48	95
FF-27	2	I-405 South Lanes at Exposition	4260039906	672 (1)	14	48	95



Non-Freeway Facing TCN Structures range in size from 300 square feet to 672 square feet per sign, with the majority being approximately 300 square feet. Additionally, the Non-Freeway Facing Structures will be located up to 30 feet in height above finished grade.

Each of the Project's Non-Freeway Facing TCN Structures on Pico Blvd. will be single-sided, 10 feet high and 30 feet wide, with 300 square feet per sign. These structures are located adjacent to the elevated freeway and E Line (formerly Expo Line) tracks. The Non-Freeway Facing Structures will be located 30 feet in height above finished grade of the adjacent roadway as shown on Figure II-5 on page II-16.

**Table II-2
Non-Freeway Facing TCN Structure
Locations**

Sign ID	Map No.	Location	Assessor Parcel Number	sf per Digital Display (No. of Digital Display)	Digital Display Height (ft)	Digital Display Width (ft)	Sign Height (from grade)
NFF-14	2	Pico Boulevard and Exposition Boulevard, South of rail	4260025902	300 (1)	10	30	30
NFF-15	2	Pico Boulevard, 445 feet West of Sawtelle Boulevard	4260039906	300 (1)	10	30	30

