

II. Responses to Comments



II. Responses to Comments

A. Introduction

Sections 21091(d) and 21092.5 of the Public Resources Code (PRC) and CEQA Guidelines Section 15088 govern the lead agency’s responses to comments on a Draft EIR. CEQA Guidelines Section 15088(a) states that “[T]he lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments that were received during the notice comment period and any extensions and may respond to late comments.” In accordance with these requirements, this section of the Final EIR provides the responses prepared by the Los Angeles County Metropolitan Transportation Authority (Metro) to each of the written comments received regarding the Draft EIR.

Section II.B, Matrix of Comments Received on the Draft EIR, includes a table that summarizes the environmental issues raised by each commenter regarding the Draft EIR. In addition, Section III.C, Topical Responses, includes topical responses that address commonly raised topics during the public comment period. Finally, Section III.D, Response to Comments, provides a responses to each of the written comments raised regarding the Draft EIR. Copies of the original comment letters are provided in Appendix FEIR-1 of this Final EIR.

II. Responses to Comments

B. Matrix of Comments Received on the Draft EIR

Table II-1
Matrix of Comments Received on the Draft EIR

Letter No.	Commenter	Executive Summary	Project Description	Environmental Setting	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Public Services—Libraries	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Utilities and Service Systems—Solid Waste	Utilities and Service Systems—Energy Infrastructure	Cumulative Impact	Alternatives	General/Other	CEQA	Mitigation Measures	Support
STATE AND REGIONAL																																		
1	Miya Edmonson LDR/CEQA Branch Chief Caltrans District 7 100 S. Main St., MS 16 Los Angeles, CA 90012-3721																						X									X		
2	Evelyn Aguilar Air Quality Specialist CEQA-IGR/Planning, Rule Development & Implementation SCAQMD 21865 Copley Dr. Diamond Bar, CA 91765-4178																															X		
3	Honorable Paul Koretz Council District 5 Los Angeles City Hall 200 N. Spring St., Rm. 440 Los Angeles, CA 90012-3241				X																		X							X	X	X		
4	Perla Garcia Secretary III Los Angeles County Fire perla.garcia@fire.lacounty.gov																														X			
5	Nancy Rodeheffer Fire Prevention Division Los Angeles County Fire 5823 Rickenbacker Rd. Commerce, CA 90040-3027																														X			

**Table II-1 (Continued)
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6	Ronald M. Durbin Chief, Forestry Division Prevention Services Bureau Los Angeles County Fire 1320 N. Eastern Ave. Los Angeles, CA 90063-3294																																				X																		
7	Rochelle Campomanes LEED AP Departmental Facilities Planner II Facilities Planning Bureau Los Angeles County Sheriff's Dept. recampom@lasd.org																																							X															
ORGANIZATIONS																																																							
8	Matt Wersinger President Del Rey Neighborhood Council 4325 Glencoe Ave., #9365 Marina del Rey, CA 90292-6444 Pooja Bhagat Land Use Officer Del Rey Neighborhood Council 4325 Glencoe Ave., #9365 Marina del Rey, CA 90292-6444		X				X																																																
9	Elizabeth Campos Layne President Del Rey Residents Assn. P.O. Box 661450 Los Angeles, CA 90066-9250		X		X		X								X																																X	X							
10	Sam Dunlap Cultural Resource Director Gabrielino Tongva Tribe tongvatcr@gmail.com																								X																														
11	Glassell Park Improvement Assn. P.O. Box 65881 Los Angeles, CA 90065-0881					X		X																																															

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12	Patricia McPherson Grassroots Coalition patriciamcpherson1@verizon.net					X	X																								X	X			
13	Theresa Saso HHPNC Secretary Historic Highland Park Neighborhood Council P.O. Box 50791 Los Angeles, CA 90050-0791 Charles Blumsack President Historic Highland Park Neighborhood Council P.O. Box 50791 Los Angeles, CA 90050-0791				X		X	X															X									X	X		
14	Benjamin J. Hanelin Latham & Watkins 355 S. Grand Ave., Ste. 100 Los Angeles, CA 90071-1560		X												X								X							X	X				
15	Travis Longcore President Los Angeles Audubon Society P.O. Box 411301 Los Angeles, CA 90041-8301						X																								X				
16	Mark Falzone President Scenic America 727 15th St. NW, Ste. 1100 Washington, DC 20005-6029		X		X										X								X								X				

Table II-1 (Continued)
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17	Patrick Frank Scenic Los Angeles patrick.frank@scenic.org Wendy-Sue Rosen Scenic Los Angeles rosenfree@aol.com Scenic Los Angeles wncluc@gmail.com		X		X				X		X				X	X							X							X	X	X																					
18	Celinda Jungheim Secretary Villa Marina Council 4777 La Villa Marina Marina del Rey, CA 90292-7006		X		X																		X									X																					
19	Karl Eggers Walk Bike Long Beach 5437 Cherry Ave., Apt. B Long Beach, CA 90805-5550								X																																												
20	Jay Ross Secretary West LA Sawtelle Neighborhood Council 1645 Corinth Ave., Ste. 201 Los Angeles, CA 90025-3150																															X																					
21	Barbara Broide President Westwood South of Santa Monica Boulevard HOA P.O. Box 64213 Los Angeles, CA 90064-0213 Westside NC Land Use/Mobility Committee wncluc@gmail.com		X		X		X								X								X						X		X																						
FORM LETTERS																																																					
22	Opposition Form Letter				X										X								X									X																					

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INDIVIDUALS																																				
23	Patricia Allinson																																			X
24	Patricia Allinson		X		X										X															X		X				
25	Hector Alonzo																																		X	
26	Robert Aronson				X										X																				X	
27	George Ball				X										X																				X	
28	Wejeha Bilal																																		X	
29	Ron Bitzer		X																													X	X			
30	Tony Butka																																	X		
31	Greg Cahill																																	X		
32	Matthew Canchola				X										X																			X		
33	Dawn M. Coulson																																	X		
34	Suzanne Danziger				X										X																			X		
35	Elizabeth East				X										X																			X		
36	Thomas Fukuman				X										X																			X		
37	Frances Goff				X										X																			X		
38	Nancy Goldberg				X										X																			X		
39	Amy Gustincic				X																													X		
40	Amber Hernandez																																	X		
41	Jill Holden				X										X																			X		
42	Nancy Hubbs-Chang				X										X																			X		
43	Janice Hynek				X										X																			X		
44	Stephanie Jackel				X										X																			X		
45	Laurie Kelson				X										X																			X		
46	Julie Klabin				X										X																			X		
47	Tony Knight				X										X																			X		
48	Cindy Koch				X										X																			X		
49	Scott Levine																																	X		

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50	John Lorick				X										X								X															
51	Zachariah Love				X										X									X														
52	Steven Luftman				X										X									X														
53	Patricia Mace				X										X									X														
54	Patricia Mace				X										X									X														
55	Casey Maddren					X		X			X													X														
56	Jonny Pray				X										X									X														
57	Leslie A. Ridings																																				X	
58	Judith Roach				X										X									X														
59	Judith Roach				X										X									X														
60	Linda Rosenthal				X										X									X														
61	Jay Ross				X										X									X														
62	Robin Rudisill				X										X									X					X									
63	Lisa M. Schumacher		X		X	X																		X														
64	Eric Sheehan																																					
65	Dan Silver				X										X									X														
66	Ed and Bee Simpson																																					
67	Clara Solis																																					
68	David L. Swartz		X																																			
69	Christina Turbeville				X		X								X										X													
70	Tina Turbeville				X		X																		X													
71	Kent Vinson		X																					X														
72	Jeanette Vosburg					X	X																													X		
73	Suellen Wagner				X										X										X													
74	Diana Waters				X										X										X													
75	Diana Waters				X										X										X													
76	Eric Wrobbel				X										X										X													
77	Hilary Young				X										X										X													

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COMMUNITY MEETINGS																																				
78	TCN Community Meeting—October 6, 2022 Verbal Comments		X																				X									X				
79	TCN Community Meeting—October 6, 2022 Chat Comments		X		X									X									X													
80	TCN Community Meeting—October 7, 2022 Verbal Comments		X											X																				X		
81	TCN Community Meeting—October 7, 2022 Chat Comments		X											X									X					X				X				

II. Responses to Comments

C. Topical Responses

1. Transportation Studies

Multiple comments stated that the Draft EIR did not conduct a comprehensive review of the available research on traffic safety related to digital billboards, or disagreed with the conclusions of Metro’s transportation experts. As stated in the Draft EIR, the research selected found that a correlation between digital billboards, or Commercial Electronic Variable Message Systems (CEVMS) and traffic collisions was “inconclusive at best.” The comments cited additional studies which purportedly demonstrate the negative impacts of digital billboards on public safety and thus nullify the conclusions of the Draft EIR. Upon further review, none of the additional studies cited in the comments provide conclusive evidence that digital billboards cause traffic collisions. Nor do those studies undermine the conclusions of the Draft EIR and the studies relied on for the Draft EIR analysis. The commenter is referred to Appendix K.2 for Supplemental Transportation Analysis.

Additional comments expressed concerns about the potential for bias in the Draft EIR’s conclusions, as two of the studies cited in the Draft EIR were conducted by the Foundation for Outdoor Advertising Research and Education (FOARE). Aside from general claims of bias, none of the comments point to substantive flaws in the methodology or conclusions of these studies. Regardless, to the extent that the potential for bias exists (in studies conducted by either the advertising industry or advocacy groups opposed to digital billboards), the Draft EIR’s reliance on additional independent research forecloses the argument that the conclusions therein are the result of bias. The Draft EIR’s analysis relied on findings from the Federal Highway Administration (FHWA), an independent federal agency.

Importantly, while the available research does not demonstrate a correlation between digital billboards and traffic accidents, the Project would nevertheless incorporate various features to reduce driver distraction. The TCN Structures would refresh every eight seconds and would transition instantly with no motion, moving parts, flashing, or scrolling messages. The light emitted by the displays would be adjustable throughout the day and night, and louvers would help to maintain a sharper image.

Thus, the conclusions of the Draft EIR are valid, and Metro declines to change those conclusions in the Final EIR. The following provides a detailed review of the Draft EIR development and a review of the additional research cited in the comments.

Draft EIR Literature Review

The Draft EIR contained a literature review which selected three studies and two additional informational studies pertinent to understanding the relationship between roadway safety and digital billboards. The purpose of the literature review was to identify research that was “specifically relevant and can inform the potential safety effects of the Metro TCN Program.” Therefore, studies that do not involve similar signs or roadway conditions are not directly applicable to the Project and it is therefore appropriate for Metro to consider those studies as not reliable or informative in analyzing the impacts of the Project. Four criteria were utilized to narrow the scope of studies analyzed in the literature review:

- 1. Studies included were required to measure the relationship between digital billboards and roadway safety in order to include the most pertinent information related to the Metro TCN Program.*
- 2. Studies included were required to be conducted in the United States. The United States has a unique set of roadway characteristics defined by the United States Department of Transportation (USDOT), state agencies (i.e., the California Department of Transportation [Caltrans]), and local governments (i.e., the Los Angeles Department of Transportation [LADOT]) through documents such as the Manual on Uniform Traffic Control Devices. While some of these characteristics may be the same or similar to those in other countries, for the purpose of consistency in roadway conditions, only studies in the United States were included.*
- 3. Studies included were required to be conducted by a government agency or have their results published in an academic journal. Both government agencies and academic journals have rigorous standards for research that may include, but are not limited to, peer reviewed findings, feedback through a formal public engagement process, and technical expertise on the subject matter. Thus, these are verifiable and fact-based sources.*
- 4. Studies included were required to provide the latest information available from that resource. Numerous studies on billboards and traffic safety were conducted in the late 1990s and early 2000s that have since been updated, such as the Federal Highway Administration study referenced below. Thus, only studies that provided the most current information were included in the literature review.*

The traffic safety analysis in the Draft EIR focused on research conducted within the United States to ensure that only the studies most relevant to the Project were considered. In particular, this ensured that the roadway design in the studies was consistent with the standards established in the United States. Roadway design is not standardized across the globe and regulations differ across country borders. These might include, but are not limited to, lane widths, frequency and types of roadway signage, speed limits, pedestrian and bicycle infrastructure, vehicle size and design, and countless other factors that can contribute to different driving conditions outside the United States. Utilizing studies not representative of these conditions to determine the Project's impacts would be uninformative and potentially speculative. Thus, in an attempt to control for these unknown variables, studies were limited to those based in the United States.

As stated in the Draft EIR, the traffic safety analysis did not include all of the studies conducted in this field. Instead, it identified and focused on key studies pertaining specifically to the relationship between digital billboards and traffic safety under typical driving conditions in the United States.

The Federal Highway Administration (FHWA) is the premier agency in the United States tasked with the construction, maintenance, and preservation of the country's highway system. The agency conducts hundreds of research studies pertaining specifically to highway safety and mobility and is an authority within the industry when it comes to roadway safety. This research, including the FHWA study which was described in Appendix K, Transportation Study of the Draft EIR, informs the policies and roadway design guidelines for state and local agencies across the United States, including Caltrans and LADOT. Thus, it is a reputable agency with a vested interest in public safety and the referenced study is considered valid within the transportation industry, despite critiques on methodology as discussed further below. This study has been utilized by other agencies such as Los Angeles Department of Public Works Bureau of Engineering in its *Initial Study and Mitigated Negative Declaration for the Sidewalk and Transit Amenities Program* published in February 2022, and by the City of San Francisco in its *Initial Study and Mitigated Negative Declaration for 345 Shaw Road and Additional Billboards Project* (2019).

As digital billboard technology has developed, the issue has been raised as to whether digital billboards themselves, regardless of compliance with operating restrictions, present a distraction to drivers and thereby create conditions that could lead to accidents. FHWA has monitored the issue closely, and released its report updating the agency's view of the issues and research most recently in 2012. The FHWA reports address the basic research question of whether operation of a CEVMS along the roadway is associated with a reduction of driving safety for the public.

The reports identify three fundamental methods for answering this question: (1) whether there is an increase in crash rates in the vicinity of CEVMS, (2) whether there is an increase in near-crashes, sudden braking, sharp swerving and other such behaviors in the vicinity of CEVMS, and (3) whether there are excessive eye glances away from the roadway in the vicinity of CEVMS. The reports discuss existing literature and reports of studies, key factors and measures relating to CEVMS, and effects on traffic. An extensive bibliography is included in the reports. The reports do not purport to provide guidance to states on the control of CEVMS. The reports confirm that there have been no definitive conclusions about the presence or strength of adverse safety impacts from CEVMS. Similarly, a study performed under the National Cooperative Highway Research Program (NCHRP), Project 20-7 (256) titled "Safety Impacts of the Emerging Digital Display Technology for Outdoor Advertising Signs" (NCHRP Report) reviewed existing literature. These reports agree that digital billboards should be regulated as a means of protecting the public interest.

A subsequent FHWA report confirmed through a study using an eye-tracking system that the percentage of time that drivers dedicated to the road ahead was not significantly affected by the presence of CEVMS.

Various restrictions have been identified that relate to the location and operation of digital billboards that seek to reduce safety concerns. These relate to brightness, message duration and message change interval, billboard location with regard to official traffic control devices, roadway geometry, vehicle maneuver requirements at interchanges (i.e., lane drops, merges and diverges), and specific constraints on the placement and operation of such signs. Regulation of operations could include, for example, the time any single message may be displayed, the time of message transition, brightness of the sign and controls that adjust brightness based on the ambient light environment, and design and placement that ensures that the sign does not confuse drivers, or create dangerous glare.

Restrictions on digital billboards contained within the Outdoor Advertising Act and enforced by Caltrans regulate many of the conditions that have been identified as relevant to traffic safety. Caltrans regulates the location and size of each proposed digital billboard through its application process as well as the distance between such signs. California statutory provisions regulate brightness of displays. Through state law and the Vehicle Code, such signage would be prohibited from displaying flashing lights or images.

There are various studies supporting conflicting conclusions regarding the safety of digital billboards and incidence of driver distraction. However, none have demonstrated a causal link between digital billboards and traffic collisions. The analysis in this document has been performed using state and federal published studies and adopted regulations as the best information available at this time.

Two studies authored by the Foundation for Outdoor Advertising Research and Education (FOARE) were also included as part of the Draft EIR. FOARE represents decades of experience within the advertising industry and understands the guidelines and regulations concerning traffic safety across the United States. Both studies conducted by FOARE included in the Draft EIR are available for review on Transport Research International Documentation (TRID), an integrated database that combines the records from Transportation Research Board's (TRB) Transportation Research Information Services (TRIS) database and the Organisation for Economic Co-operation and Development's (OECD) International Transport Research Documentation (ITRD) database. This database is a trusted resource within the transportation industry.

No studies on digital billboards and traffic collisions conducted specifically within the City of Los Angeles were identified that met the criteria to be considered for the literature review of the Draft EIR.

As stated in the literature review on page 6 of the Draft EIR:

Overall, the studies indicate that a correlation between roadway hazards and CEVMS is, at best, inconclusive. There are countless factors that can change driver attention and fixation on the road ahead, including scenery, on-site signage at local business, and other off-road distractions. Further, traffic conditions can impact the frequency and duration of driver fixation away from the road ahead.

The research included in Appendix K, Transportation Study, of the Draft EIR, which was conducted by industry experts, did not find evidence to support the claim that digital billboards directly cause traffic collisions. As further described in this response, the additional articles provided during the public comment period similarly do not demonstrate a causal link between digital billboards and traffic collisions. Further review of the additional research studies is provided below.

Review of Additional Research

The following research studies were cited in the comments received during the public comment period. A comprehensive review of these studies was conducted in preparation for the comment response to assess their consistency with the Draft EIR and the studies cited therein. Of these, the studies that are most relevant to the Project (according to the literature review criteria above and in the Draft EIR) are discussed more fully below.

Compendium of Recent Research Studies on Distraction from Commercial Electronic Variable Message Signs (CEVMS), Jerry Wachtel, CPE, President, The Veridian

Group, Inc. Berkeley, California, Feb., 2018, provides a collection of different research articles related to digital billboards collected from around the world. This study was not expanded upon further as it was updated in 2020. The updated study is provided below.

Compendium of Recent Research Studies on Distraction from Commercial Electronic Variable Message Signs (CEVMS), Jerry Wachtel, CPE, President, The Veridian Group, Inc. Berkeley, California, Feb., 2016 (October 2020 edition) (“Compendium Study”), provides a collection of different research articles related to digital billboards collected from around the world. Due to its inclusion of multiple other studies related to digital billboards and traffic safety, this study was further expanded on in the following section.

Can Behavioral Interventions be too Salient? Evidence from Traffic Safety Messages, Jonathan D. Hall and Joshua M. Madsen, Science Volume 376 Issue 6591, (April 22, 2022) (“Behavioral Interventions Study”), provides an analysis of displaying traffic safety messaging on highways in Texas. This study is expanded upon in the following section.

A Peer-Reviewed Critique of the Federal Highway Administration (FHWA) Report Titled: “Driver Visual Behavior in the Presence of Commercial Electronic Variable Message Signs (CEVMS)” prepared by Jerry Wachtel, President, The Veridian Group, Inc (January 2015) (“FHWA Critique”), provides a critique of the FHWA study referenced in the Draft EIR. This study is expanded upon in the following section.

Seattle Coordinated Street Furniture Program: Human Factors Considerations, The Veridian Group, Inc., October 2017 (“Seattle Study”), evaluated Seattle’s proposed street kiosk installations which would include digital advertisements along sidewalks in urban areas. This study is expanded upon in the following section.

The Acquisition of Visual Information by the Driver: Interaction of Relevant and Irrelevant Information. Luoma J., National Highway Traffic Safety Administration; Washington, DC, USA: 1986, conducted an evaluation of driver visual cues in a driving simulator. This study did not meet the criteria for inclusion based on the age of the study and its use of a driving simulator.

Ads on the road: A study into the effects of perceptual load and expertise on reaction time to road signs, Clark O.J. and Davies S.P., Proceedings of the British Psychological Society (BPS) Annual Conference; Dublin, Ireland. 2–4 April 2008, conducted an evaluation of reaction time to road signs using a driving simulator. This study did not meet the criteria for inclusion based on being conducted outside of the United States and using a driving simulator.

The role of roadside advertising signs in distracting drivers. Bendak S., Al-Saleh K., Int. J. Ind. Erg. 2010, conducted research on driver distraction based on the presence of advertising signage. This study was part of the Compendium Study and did not meet the criteria for inclusion based on being conducted outside of the United States.

'We are killing people': How technology has made your car 'a candy store of distraction' Mitchell, R., Los Angeles Times, July 6, 2022, discusses advances in technology available within vehicles that can create distraction for drivers. This is a newspaper article, not a research study, and thus is not reviewed further. Regardless, the article does not address billboards or collisions due to the presence of billboards and, thus, did not meet the criteria for inclusion.

The studies listed above which met the above criteria are reviewed in more detail below:

Compendium Study

The Compendium Study provides an overview of 27 individual studies, including the FHWA study cited in the Draft EIR.

Many of the studies cited in the Compendium Study do not consider digital billboards, or fail to distinguish between the effects of digital billboards and other types of roadway signs. Because the Project specifically includes digital displays, the Draft EIR properly declined to draw speculative conclusions about the potential impacts of the digital TCN structures based on the findings of those less relevant studies.

Other studies in the Compendium Study considered driver distractions from digital billboards but did not demonstrate, or even explore, a connection between those metrics and driver performance or safety. Given the Draft EIR's specific focus on safety, and not generally on attention paid to billboards, these studies were appropriately excluded from analysis in the Draft EIR.

Nineteen of the 27 of the studies provided in the Compendium Study were conducted abroad. While they provide contributions to this field of research, they are not specifically representative of the road conditions present in the United States. The Compendium Study itself identifies the different conditions abroad as limitations to the applicability of many of these studies in the United States. Thus, as discussed above and in the Draft EIR, these studies are not directly relevant to the Project and do not undermine the Draft EIR's conclusions.

Of the remaining eight studies in the compendium, four studies utilized videos or driving simulators and asked drivers to perform tasks looking outside the vehicle while tracking their eye movement. While informative about the potential for driver distraction, these studies do not reflect typical roadway or driving conditions and do not demonstrate that digital billboards cause more collisions under typical driving conditions. Thus, these studies do not assist in analyzing the Project's potential traffic safety impacts in a real-world setting.

To the degree that studies relating to driver distractions are generally informative, the net reduction in roadway signs resulting from the Project would ultimately reduce the opportunity for driver distraction that is attributable to roadway signs.

Three additional studies listed in the Compendium Study were considered for further review, including:

- *A Field Study on the Effects of Digital Billboards on Glance Behavior During Highway Driving.* Belyusar, D., Reimer, B., Mehler, B., & Coughlin, JF. (2016). *Accident Analysis and Prevention*, 88, 88-96. (“Field Study”)
- *Statistical Analysis of the Traffic Safety Impacts of On-Premise Digital Signs.* Hawkins, HG, Jr., Kuo, PF, & Lord, D. (2014). Paper No: 14-2772. Presented at the 93rd Annual Meeting of the Transportation Research Board. (“Statistical Analysis”)
- *Investigation of the Potential Relationship between Crash Occurrence and the Presence of Digital Advertising Billboards in Alabama and Florida.* Sisiopiku, VP, Islam, M, Haleem, K, Alluri, P. & Gan, A. (2014). Proceedings of the Transportation Research Board (TRB) 94th Annual Meeting. (“Alabama and Florida Study”)
- Field Study—This research tasked 123 drivers across different age groups and genders to drive an instrumented vehicle along a designated route past a digital billboard on a highway with a speed limit of 65 MPH. The results found statistically significant changes in the number of glances and duration of glances toward the billboard compared to sections of the roadway where the billboard was not visible. Notably, the duration of glances was found to be longer at times when the displays switched to a new advertisement compared to staying stagnant. However, the author of the Compendium Study notes that only one billboard was used in this analysis and that “there could be characteristics of that sign, or its location, which make the results not generalizable to other billboards.” Further, this study did not measure the relationship between glances and driver performance or compare the data to any objective metric for traffic safety. Thus, this study does not invalidate the Draft EIR's conclusion that there is no conclusive evidence demonstrating a correlation between digital billboards and traffic collisions.

Statistical Analysis—This research reviewed crash frequency at 135 on-premise digital signs compared to 1,301 signs at control sites across four different states. The study found no statistically significant relationship between signs and crash frequency and that “there is no evidence [that] the installation of on-premise signs at the locations [studied] led to an automatic increase in the number of crashes.” These findings were based on on-premise digital signs, rather than off-site digital signs like those proposed by the Project, and thus are not directly informative about the Project’s impacts. This study does not invalidate the Draft EIR’s conclusion that there is no conclusive evidence demonstrating a correlation between digital billboards and traffic collisions.

Alabama and Florida Study—This research reviewed crash frequency at 18 digital billboard locations along major limited-access roadways in Florida and Alabama over a 3-year and 5-year period, respectively. The study found that the crash rates within “digital advertising billboard influence zones” increased 25% in Florida and 29% in Alabama compared to control sites. Further, the authors hypothesized that the overrepresentation of certain types of crashes (sideswipe and rear-end) in the data suggested that driver distraction was the cause. However, the author of the Compendium Study questions the validity of the “digital advertising billboard influence zones,” which were identified utilizing imagery from Google Street View rather than by actually measuring driver sight-distance of the billboard. Further, the Compendium Study raises doubts about whether the crash data even correspond to dates when the digital billboards were installed and operational. Given the substantial flaws in this study, and the Draft EIR’s inclusion of only those studies meeting “rigorous standards for research” and that are “verifiable and fact-based,” the exclusion of this study from the Draft EIR’s Literature Review was appropriate. Regardless, without additional information to confirm that the study areas were appropriately selected and that billboards were present and operational during the study period, it cannot be definitively concluded that the digital billboards caused an increase in vehicle collisions. Thus, the study does not invalidate the findings of the Draft EIR.

As discussed above, none of the research included within the Compendium Study which meets the criteria for inclusion in the Literature Review would invalidate the findings of the Draft EIR. Specifically, no evidence is found which identifies a causal relationship between traffic collisions and digital billboards and none of the studies suggested that the average glance time at a roadside digital billboard was longer than the two second threshold identified in the FHWA Study. Further, the Compendium Study acknowledges that the research on digital billboards has not demonstrated an increase in crash rates where these signs are located. This is consistent with the findings of the Draft EIR which states that the correlation between digital billboards and traffic collisions was found to be inconclusive. Thus, the statements and conclusions in the Draft EIR are not inconsistent with the Compendium Study.

Behavioral Interventions Study

The Behavioral Interventions Study analyzed the practice of displaying digital traffic safety messages on Changeable Message Signs (CMS) in Texas to encourage drivers to drive more safely. The study suggests that these types of messages can actually be more distracting for drivers, reporting that between August 2012 and December 2017 “vehicle crashes increased by an average of 4.5 percent in the 6.2 miles following signs displaying year-to-date road fatality statistics.” The FHWA has since outlined best practices for CMS.

CMS is a different type of roadway sign than the proposed TCN Structures. CMS is typically located above a roadway or immediately adjacent to a roadway, within the public right of way. These signs are generally operated by a local or state agency and are used only to display text. As these signs are intended to display pertinent information to drivers, they are much closer to the roadway than standard or digital billboards. The displays may also refresh at a faster rate than digital billboards, depending on the type and length of the message being displayed and the posted speed limit of vehicles. Within the state of California, Caltrans regulates CMS under the *Changeable Message Sign (CMS) Guidelines*, Caltrans (April 2021). Under Caltrans guidelines, “The display time for a FCMS (Freeway CMS) is generally three seconds per phase.” The TCN Structures proposed by the Project would be located outside of the public right of way and thus would be located further away from the roadway than a typical CMS sign. The TCN Structures would also utilize 8.0 second refresh rates, which are over twice as long as refresh rates for CMS. Due to these differences between CMS and the TCN Structures, the findings of this study are not directly applicable to the Project. Thus, the study would not invalidate the findings of the Draft EIR. Additionally, as noted above and discussed more fully in the Draft EIR, the Project would incorporate various features to reduce driver distraction.

FHWA Critique

The FHWA Critique suggests major flaws in the methodology and preparation of the FHWA study. These purported flaws include, but are not limited to, the size of the dataset, insufficient collection of data, modifications to the study between the draft and final release of the report, the tools used in the study to measure eye tracking performance, and the selection of literature reviewed.

Despite this, the FHWA Critique does not conclude that CEVMS signs cause an increase in unsafe road conditions for drivers or other road users. The FHWA Critique merely concludes: “Given the lack of information provided by the study’s authors about key details of their research, the apparent internal conflicts in critical data provided, and the problems with the experimental equipment, *a reader is unable to assess the validity of the findings as presented.*” It later suggests: “If FHWA can’t appropriately address the issues

raised in this report, it owes it to both sides of this debate to fund a replication of this effort with reasonable methods and a scientific advisory committee.”

The FHWA Critique provides recommendations for further study to address the FHWA methodology concerns raised by the authors and to account for additional research which continues to be published. Although critics have questioned the methodology of the FHWA study, the body of research in this field has not disproved its conclusion—namely, that digital billboards do not directly present a traffic safety concern. Further, despite the FHWA Critique, many within the transportation industry continue to rely on this study and others from the FHWA. Thus, the Draft EIR’s reliance on this study is consistent with norms within the transportation industry and is not improper. Regardless, as discussed above, the FHWA Critique does not demonstrate a correlation between digital billboards and traffic collisions. The conclusions of the Draft EIR therefore remain valid.

Seattle Study

The purpose of the Seattle Study was to “evaluate, from a human factors perspective, the street-level display screens that are a key component of the city’s proposed Coordinated Street Furniture Program, with specific regard to concerns about possible driver and other street-user distraction, and to suggest ways to minimize these concerns.”

The kiosks evaluated in this study were proposed to be located at street level in mostly urban environments and incorporate advertising messages that would change every several seconds. The kiosks would display images as well as video and offer a variety of amenities for the public, including free Internet access. The report recommended that the kiosks face away from the street and not be constructed in certain sites, but demonstrated no correlation between the kiosks and traffic collisions. However, because the kiosks represent a fundamentally different design than the Project, this study is not particularly helpful in assessing the Project’s impacts. Regardless, this study does not invalidate the Draft EIR’s conclusion that there is no conclusive evidence demonstrating a link between digital billboards and traffic collisions.

II. Responses to Comments

C. Topical Responses

2. City of Los Angeles Vision Zero

In response to comments stating that the TCN Structures would create additional roadway hazards and further undermine the City's ability to achieve its Vision Zero program goals, this response has been prepared to further clarify that the Project would not conflict with the Vision Zero Los Angeles Program, implemented by the Los Angeles Department of Transportation (LADOT). As stated in Section IV.K, Transportation, of the Draft EIR, "the Vision Zero Los Angeles Program, implemented by LADOT, represents a citywide effort to eliminate traffic deaths in the City by 2025... In order to achieve these goals, LADOT has identified a network of streets, called the High Injury Network (HIN), which has a higher incidence of severe and fatal collisions. The HIN, which was last updated in 2018, represents 6% of the City's street miles but accounts for approximately two-thirds (64%) of all fatalities and serious injury collisions involving people walking and biking." With regard to the HIN, 16 of the 22 proposed signs would be located adjacent to a street on the HIN. However, as noted in the Draft EIR, the TCN Structures would be located outside the public right-of-way. Therefore, the TCN structures would not preclude LADOT from installing Vision Zero improvements, such as installing curb extensions, speed feedback signage, high visibility pedestrian crossings, lane reductions/narrowing, within the public right-of-way to improve pedestrian visibility and safety for all road users.

As described in Section IV.K, Transportation, of the Draft EIR, the Project was evaluated in accordance with State CEQA Guidelines Appendix G, which includes the following significance thresholds related to transportation/traffic:

Threshold (c): Substantially increase hazards due to a geometric design feature (e.g., sharp curves, or dangerous intersections or incompatible uses (e.g., farm equipment).

Consistent with the LADOT Transportation Assessment Guidelines (TAG), a significant impact would occur if the project proposes new driveways, or introduces new vehicle access to the property from the public right-of-way; or proposes to or is required to make any voluntary or required modifications to the public right-of-way, or substantially increases hazards due to geometric design features.

The project does not propose any new roads, driveways, intersections, bikeways, trails, sidewalks, crosswalks or improvements to these facilities that may lead to an

increase in areas for potential vehicle, pedestrian and/or bicycle conflicts. The Project elements would be located so as to maintain/meet ADA accessibility requirements and would not create obstacles that would be considered hazardous to pedestrians or bicyclists. However, the potential for visual distraction due to the Project is considered in terms of their potential to create traffic hazards. LAMC Section 14.4.5 addresses the identification and permitting of “hazard[s] to the safe and efficient operation of vehicles upon a street or freeway.” A screening tool checklist developed by the LADOT provides a useful framework for considering potential traffic hazards, although it was not developed to augment the CEQA Appendix G Environmental Effects/Initial Study Checklist, per se.

In a memorandum titled *Suspension of Section 338 of the Manual of Policies and Procedures* (Revised) (Jaime de la Vega, General Manager, October 11, 2012), LADOT provides an evaluation checklist, titled Hazard Review for Sign Permits Evaluation Checklist, for potential hazards caused by signs and support structures. The checklist consists of the following three questions:

1. *Would the proposed sign or sign support structure obstruct a motorist’s view of any traffic control device?*
2. *Are approaching motorists faced with important decision-making tasks within 500-feet of the proposed sign location? (To make this determination, it is necessary to check if the approaching motorist is confronted with a horizontal curve, lane drop, merge or weave area, or changeable message sign.)*
3. *Is the digital billboard proposed along a street block that has a midblock pedestrian crosswalk?*

As outlined in checklist, LADOT’s guidance considers several factors related to location when evaluating the permit applications for digital billboards and adjacency to a HIN alone does not preclude the installation of a sign. None of the signs or structures proposed as part of the Project would conflict with the checklist items and Metro would continue to coordinate with LADOT to ensure no potential safety hazards would arise during the installation or operation of the signs. Thus, as stated in the Draft EIR, the Project would not conflict with the City’s Vision Zero Program and impacts with regard to hazards would be less than significant. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

II. Responses to Comments

C. Topical Responses

3. Biological Resources

The potential impacts of the TCN Structures on biological resources are discussed in Section IV.C, Biological Resources, of the Draft EIR, and in Appendix D, Biological Resources Technical Report, to the Draft EIR. As described therein, the Draft EIR analyzes the Project's impacts from lighting on biological resources in the vicinity of the proposed Site Locations. As described in Section IV.C, Biological Resources, of the Draft EIR, impacts with regard to biological resources would be less than significant with the implementation of Mitigation Measures BIO-MM-1 through BIO-MM-4. These mitigation measures include implementation of biological resource protection measures during construction, measures to address potential migratory and nesting birds, measures to address avoidance of impacts to Least Bell's Vireo, and measures to address avoidance of impacts to special-status species bats.

As set forth in Chapter III, Corrections, Revisions, and Clarifications to the Draft EIR, of the Final EIR, Section IV.A, Aesthetics, of the Draft EIR was revised to include additional clarifying language regarding the Project meeting CALGreen standards for lighting. As set forth therein, the California Administrative Code, Chapter 10, Section 114 Table 114-A, page 222, defines properties within Los Angeles as LZ3: "Urban Areas as defined by the US Census." Table 114-A includes a definition in column 5, "Moving Down to Lower Zones" under row "LZ3" that states "Special districts and government designated parks within a default LZ3 zone may be designated as LZ1 or LZ2 by the local jurisdiction, without any size limits." The most conservative use of these designations is LZ1, which has a recommended light trespass of 1 lux (0.09 fc). For evaluation purposes, this more conservative value was applied to Elysian Park to the west of FF-6 and FF-7, the proposed Bowtie State Park south of FF-13 and FF-14, the mapped resources in the vicinity of TCN Structure FF-25, and the Ballona Wildlife Reserve to the south of TCN Structures FF-29 and FF-30. Additionally, Project Design Feature AES-PDF-1 was included to require the incorporation of louvers or other equivalent features at Site Locations FF-13, FF-14, FF-25, FF-29, and FF-30 to reduce lighting levels to 0.02 fc, which is well below the more stringent standard for LZ1 set forth under CALGreen. Further, additional research has been completed to provide further justification that the levels of lighting as part of the proposed Project would not result in significant and unavoidable biological impacts.

As described in Section IV.C, Biological Resources, of the Draft EIR, all 56 TCN Structures, including TCN Structures at Site Locations FF-6, FF-7, FF-13, FF-14, FF-25, FF-29 and FF-30, would not result in significant impacts associated with light or glare, including sky-glow. Specifically, the digital display faces would be designed to provide efficient and effective illumination while minimizing light spill-over, reducing sky-glow, and improving nighttime visibility through glare reduction. The digital display would use LED lighting and the maximum candelas would be up to 6,000 candelas during the daytime and up to 300 candelas during the nighttime. All TCN Structures, including those near the Ballona Wildlife Reserve, would have a light trespass illuminance less than the Los Angeles Municipal Code (LAMC) maximum of 3.0 fc at sensitive use properties, as well as the even more restrictive CALGreen standard of 0.74 fc maximum for light zone LZ3. The LED lighting system would direct the light from the display down toward the primary viewing angles of people on the adjacent roadway and limit light up toward the sky. Therefore, the displays would not substantially increase “skyglow.” In addition, louvers would be installed to shade the LED lights from creating unintentional light spillage, assist in reducing reflection, and in turn would create a sharper image. Further, the digital display faces would be set to refresh every eight seconds and would transition instantly with no motion, moving parts, flashing, or scrolling messages. Illumination of the digital displays would also conform to applicable Federal and State regulations for signs oriented toward roadways and freeways.

Additionally, LED lighting differs from standard lighting. LED lighting systems are more efficient than all previous known sources of light, which means LED sources deliver more light per watt of energy input, and therefore produce correspondingly less heat and UV radiation. It is not expected that light from the TCN Structures would attract insects, including pollinators. While there is some potential for change in insect behavior as a result of the additional lighting from the Project, studies are inconclusive as to whether LED lighting attracts or deters insects due to the lack of UV rays and emitting less heat than other forms of lighting. Additionally, while there is potential for nighttime pollinators to be deterred from inhabiting locations near lighting, there is no indication that these species would not relocate to another nearby area, thereby making the overall impact to insect populations less than significant.

Additional Clarifying Analysis for Site Locations FF-29 and FF-30

The TCN Structures located adjacent to the Ballona Wildlife Reserve, Site Locations FF-29 and FF-30, are proposed to be freeway facing and are located within disturbed areas. The area immediately adjacent to these Site Locations includes a Caltrans building, numerous pole lights, street lights, power poles and power lines. The closer of the two locations FF-29, is located approximately 150 feet from the edge of mapped wetlands and is separated from the Ballona Wildlife Reserve by the SR-90 Freeway off-ramp. FF-30 is

separated from the Ballona Wildlife Reserve by the SR-90 Freeway and the Freeway off-ramp.

In preparation of the analysis provided within Appendix D, Biological Resources Technical Report, of the Draft EIR, the Ballona Wetlands Restoration Project EIR was evaluated and several avoidance measures from that EIR that are applicable to the Project were included within Section IV.C, Biological Resources, of the Draft EIR. These include Mitigation Measures BIO-MM-1 through BIO-MM-4 to reduce potential construction impacts related to biological resources to a less than significant level as summarized above.

With regard to the TCN Structures located in the vicinity of the Ballona Wildlife Reserve, Project Design Feature AES-PDF-1 has been incorporated into the Project as set forth in Chapter II, Revisions, Clarifications and Corrections to the Draft EIR, of this Final EIR. Project Design Feature AES-PDF-1 requires that state of the art louvers or other equivalent design features be incorporated into the design of TCN Structures FF-29 and FF-30 such that the light trespass illuminance at the Ballona Wildlife Reserve to the south of the Marina Freeway, west of Culver Boulevard will not exceed 0.02 footcandle (fc). This maximum light trespass of 0.02 fc is well below the most stringent recommendation of 0.09 fc for the LZI Zone for “Special Districts and Government Designated Parks” within the California Administrative Code described above. Therefore, this supplemental analysis provides additional justification that sensitive species located in the area of the Site Locations would not have adverse impacts in regard to activities such as foraging, nesting, and migration. As concluded in Draft EIR Section IV.C, Biological Resources, of the Draft EIR, potential impacts to biological resources from lighting would be less than significant.

Additional Research on Digital Display Operational Impacts

A biological impacts assessment report prepared by H.T. Harvey & Associates for a similar digital sign project concluded that the project would not have significant effects on biological resources, including migratory wildlife and sensitive habitats. (See H.T. Harvey & Associates, *345 Shaw Road/South San Francisco Highway 101 Clear Channel Billboard Project, SCH 2019119036—Biological Impacts Assessment* (August 27, 2019).) That assessment considered several biological resources studies, including several co-authored or edited by T. Longcore, who commented on the biological impacts of the TCN Project on behalf of the Audubon Society. (See *id.* at pp. 12, 23–24, citing *Effects of artificial night lighting on mammals* (2006), *Road lighting on grassland birds: Local influence of road lighting on a black-tailed godwit population* (2006); *Artificial night lighting and insects: Attraction of insects to streetlamps in a rural setting in Germany* (2006); *Effects of artificial night lighting on migrating birds* (2006); *Artificial Night Lighting and Protected Lands* (2016), *Ecological light pollution* (2004); *Influences of Artificial Light on Marine Birds* (2006).) It explained that the billboards angled to focus illuminance in a narrow cone directed at traffic such that illuminance of surrounding areas including sensitive habitats results in negligible

illuminance to the surrounding areas. (*Id.* at pp. 13, 18.) This report used a threshold of 0.1 fc for evaluating potential impacts to wetland and aquatic habitats and the fish and wildlife communities they support.

The report also found that the billboards' peak nighttime luminance during operation (approximately 46 candelas/ft²—or 495.14 candelas/m²) was only a fraction of that of a full moon at its brightest point (232 candelas/ft²—or 2497.23 candelas/m²), and that they would have an 8 second refresh rate, which would cause birds to not perceive the billboards as fixed light sources. (*Id.* at pp. 20, 22.) Consequently, the billboards would not attract birds or interfere with their migratory or other flight patterns. (*Ibid.*) Lastly, the project also employed louvers for any sites that may cause increased illuminance on sensitive habitats located near proposed billboards. (*Id.* at pp. 20, 21.) Therefore, the report concluded that the project would not result in significant impacts on wildlife as a result of increased lighting. (*Id.* at pp. 21–22.)

The TCN Project is comparable to the project analyzed in the H.T. Harvey & Associates biological impacts assessment. The TCN Structures would be similarly designed to be viewed from highway and road traffic, thus limiting illuminance of surrounding areas, and include louvers to prevent unintentional light spillage near sensitive sites. (Draft EIR, p. IV.A-31–IV.A-32.) As discussed above, with implementation of Project Design Feature AES-PDF-1, illuminance at the Ballona Wildlife Reserve (due to FF-29 and FF-30) and at the mapped biological resources in the vicinity of FF-25 would be reduced to 0.02 or less, which would be well below the 0.1 fc threshold used in the Harvey & Associates report. Moreover, the TCN Structures will have the same 8 second refresh rate as the project studied in the H.T. Harvey & Associates biological impacts assessment, and thus will not appear as fixed light sources like the moon and attract migrating species or affect the foraging, breeding, or other behavior of wildlife species. (*Ibid.*; Lighting Research Center, *Illumination fundamentals* (2006) Pasadena, CA: Optical Research Associates 48; Jones, J. and C.M. Francis, *The effects of light characteristics on avian mortality at lighthouses* (2003) *J. Avian Biol.* 34(4), pp. 328–333; Gehring, J., P. Kerlinger, and A. Manville II, *Communication towers, lights, and birds: Successful methods of reducing the frequency of avian collisions* (2009) *Ecological Applications* 19(2), pp. 505–514; see also T. Harvey & Associates, *Biological Impacts Assessment, supra*, at pp. 20–21.) Lastly, the TCN Structures' maximum nighttime luminance during operation (300 candelas/m²) will be even *less* than that of the billboards analyzed in the H.T. Harvey & Associates assessment (495.14 candelas/m²) in comparison to that of the moon during peak brightness (2497.23 candelas/m²), and therefore will also not have a significant impact from lighting on biological resources such as migratory species. (*Ibid.*)

II. Responses to Comments

D. Comment Letters

Comment Letter No. 1

Miya Edmonson
LDR/CEQA Branch Chief
Caltrans District 7
100 S. Main St., MS 16
Los Angeles, CA 90012-3721

Comment No. 1-1

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced NOP. Metro proposes to implement the TCN Program, which would provide a network of TCN Structures that would incorporate intelligent technology components to promote roadway efficiency, improve public safety, increase communication, and provide for outdoor advertising that would be used to fund new and expanded transportation programs consistent with the goals of the Metro Vision 2028 Plan. The TCN Program also includes the removal of existing static signage throughout the City of Los Angeles. Implementation of the Project would include the installation of up to 34 Freeway-Facing (FF) TCN Structures and 22 Non-Freeway-Facing (NFF) TCN Structures, all on Metro-owned property.

Caltrans regulates the placement of outdoor advertising displays visible from California highways. The project would require Outdoor Advertising (ODA) License. For questions, inquiries, and any other questions you may have, please call (916) 654-6473 or reference to the following website for additional information.

<https://dot.ca.gov/programs/traffic-operations/oda>

Each of the proposed Freeway-facing TCN Structures would be compliant with all Caltrans requirements, as detailed above. All of the locations would be located at least 500 feet away from any freeway designated as a Scenic Highway and their locations would be outside of the freeway right of way. All locations would be at least 500 feet away from a landscaped freeway, consistent with Caltrans guidelines. Further, at Project completion, none of the TCN Structures would be located within 500 feet of an existing sign or within 1,000 feet of an existing digital billboard on the same side of the freeway.

Additionally, all TCN Structures would be located on Metro-owned property and would be equipped with Metro's Regional Integration of Intelligent Transportation Systems (RIITS), which provides comprehensive, timely, and real-time information among freeway, traffic, transit, and emergency systems across various agencies including local and regional transit agencies, to improve traffic and transportation systems, and to disseminate information regarding roadway improvements, and during emergency events. Thus, the Project would be consistent with Caltrans guidelines for digital signage locations near freeways.

Response to Comment No. 1-1

This general comment provides a general summary of the Project and reiterates that Caltrans regulates the placement of outdoor advertising displays visible from California highways. Additionally, Metro understands the Project would require Outdoor Advertising License. Further, upon Caltrans' review of the Draft EIR, this comment states that the Freeway Facing Site Locations would be compliant with all Caltrans requirements including: all Freeway Facing Site Locations would be located at least 500 feet away from any freeway designated as a Scenic Highway and their locations would be outside of the freeway right of way, all Freeway Facing Site Locations would be at least 500 feet away from a landscaped freeway, consistent with Caltrans guidelines, and further, upon completion none of the TCN Structures would be located within 500 feet of an existing sign or within 1,000 feet of an existing digital billboard on the same side of the freeway. Caltrans states the Project would be consistent with Caltrans guidelines for digital signage locations near freeways. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 1-2

In accordance with SB 743 and updates to the CEQA Guidelines, the focus of transportation analysis has shifted from driver delay to vehicle miles traveled (VMT). The operation of the Project would not result in new uses that would generate vehicle miles traveled on a daily basis. Any vehicle trips and associated VMT resulting from maintenance activities would be infrequent. Additionally, in accordance with LADOT's TAG, construction worker trips are not evaluated under CEQA. As such, the Project would not result in significant traffic impacts with regard to VMT. Therefore, Caltrans concurs that no traffic impact would occur, and mitigation is not required at this time. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Response to Comment No. 1-2

This comment summarizes the Project's vehicle miles traveled (VMT) during project operations. Caltrans concurs that no traffic impacts would occur and no mitigation is

required at this time. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 1-3

If any temporary lane closures on the State facility are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. Caltrans would need to review and approve the construction management plans prior to the start of the construction. Any transportation of heavy construction equipment and/or materials that requires the use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend that large-size truck trips be limited to off-peak commute periods.

Response to Comment No. 1-3

This comment states that if any temporary lane closures on the State facility are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans. Additionally, this comment states that any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles of State highways will need a Caltrans transportation permit, and Caltrans recommends large size truck trips be limited to off-peak commute periods. Metro will submit a standard construction management plan for review and approval by Caltrans as well as obtain any required permits for the Project, including from Caltrans. The recommendation to limit trips generated by large trucks to off-peak commute periods is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 1-4

Please be reminded that any work performed within the State Right-of-way will require an Encroachment Permit from Caltrans. Any modifications to State facilities must meet all mandatory design standards and specifications.

Response to Comment No. 1-4

Metro understands that as stated in this comment any work performed within the State Right-of-way will require an Encroachment Permit from Caltrans and any modifications to State facilities must meet all mandatory design standards and specifications. Metro will obtain any required permits for the Project, including from Caltrans. This comment is noted for the record and will be forwarded to the decision-

makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 1-5

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2022-04059AL-DEIR.

Response to Comment No. 1-5

This comment concludes the letter and provides a point of contact that will be included on future public mailings for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 2

Evelyn Aguilar
Air Quality Specialist
CEQA-IGR/Planning, Rule Development & Implementation
SCAQMD
21865 Copley Dr.
Diamond Bar, CA 91765-4178

Comment No. 2-1

South Coast AQMD staff received the Draft Environmental Impact Report (Draft EIR) for the Proposed Metro's Transportation Communication Network Project (South Coast AQMD Control Number: LAC220913-03). Staff is currently in the process of reviewing the Draft EIR. The public commenting period is from 9/9/2022–10/24/2022.

Response to Comment No. 2-1

This comment acknowledges receipt of the Draft EIR for the Project and states that SCAQMD staff is in the process of reviewing the Draft EIR. SCAQMD also confirms that staff were able to access the Draft EIR on the Metro's website. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 2-2

Upon review of the files provided as part of the public review period, I was able to access the Draft EIR and appendices on Metro's website.

Please provide an electronic copy of any live modeling and emission calculation files (complete files, not summaries) that were used to quantify the air quality impacts from construction and/or operation of the Proposed Project as applicable, including the following:

1. CalEEMod Input Files (.csv files);
1. [sic] Live EMFAC output files;
1. [sic] Any emission calculation file(s) (live version of excel file(s); no PDF) used to calculate the Project's emission sources.

You may send the above-mentioned files via a Dropbox link in which they may be accessed and downloaded by South Coast AQMD staff by 09/28/22. Without all files and

supporting documentation, South Coast AQMD staff will be unable to complete a review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.

Response to Comment No. 2-2

This comment requests copies of all the technical documents related to air quality, electronic versions of all emission calculation files, and air quality modeling that were used to quantify the air quality impacts from construction and/or operation of the Project. In response to this comment, all requested files were provided to the SCAQMD via a Dropbox link, as requested by the commenter. On September 28, 2022, SCAQMD staff confirmed receipt of the requested materials. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 2-3

If you have any questions regarding this request, please contact me.

Response to Comment No. 2-3

This comment concludes the letter and provides a point of contact that will be included on future public mailings for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 3

Honorable Paul Koretz
Council District 5
Los Angeles City Hall
200 N. Spring St., Rm. 440
Los Angeles, CA 90012-3241

Comment No. 3-1

I have extreme concerns about the proposed Transportation Communication Network (TCN) Program. The last thing the City of Los Angeles needs is additional digital signs.

Response to Comment No. 3-1

The commenter expresses general opposition to the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 3-2

All advertising signs distract drivers, create visual blight, and lead to injuries and fatalities. There are three proposed TCN Structures (NFF-07, FF-26, FF-28) in Council District Five. While I do believe that Metro should scrap the entire program, I echo the calls of my constituents when I say that, at a minimum, Metro should remove all three proposed TCN Structures from my district.

Response to Comment No. 3-2

The commenter expresses general opposition to the Project, specifically for Site Locations NFF-7, FF-26, and FF-28. The commenter raises concerns about the Project's aesthetic and transportation safety impacts. The Project's aesthetic and transportation impacts are analyzed in Section IV.A, Aesthetics, and Section IV.K, Transportation, respectively, of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 3-3

While the City has allowed digital signage in some instances in exchange for clear and tangible public benefits or streetscape improvements, the proposed TCN program includes no discernible public benefits and I assert will instead degrade the public realm. The City

of Los Angeles is not for sale, and extreme exceptions to the City's current sign restrictions should not be granted to allow these advertising displays.

Response to Comment No. 3-3

The commenter expresses general opposition to the Project and states the Project has no discernable benefits. As discussed in Chapter II, Project Description, of the Draft EIR, the Project would incorporate intelligent technology components to promote roadway efficiency, improve public safety, augment Metro's communication capacity, provide for outdoor advertising where revenues would fund new and expanded transportation programs consistent with the goals of the Metro 2028 Vision Plan, and result in an overall reduction in static signage displays throughout the City of Los Angeles (City). This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 3-4

Instead of pursuing this dead-on-arrival proposal, Metro should explore alternatives to meet its project objectives. Such alternatives could include providing Metro's Regional Integration of Intelligent Transportation Systems (RIITS) information to boost roadway efficiency, in addition to other project components, on more traditional signs which do not sell advertising space. Additionally, alternatives should better explore increased buffering from residential uses, reduced brightness, and other mitigation measures as it appears that the proposed locations will have direct impacts on adjacent residential units and other potentially sensitive users.

Response to Comment No. 3-4

The commenter suggests to incorporate the intelligent technology components without the use of the TCN Structures. As described in Chapter II, Project Description, of the Draft EIR, the underlying purpose of the Project is to provide a network of TCN Structures that would incorporate intelligent technology components to promote roadway efficiency, improve public safety, augment Metro's communication capacity, provide for outdoor advertising where revenues would fund new and expanded transportation programs consistent with the goals of the Metro 2028 Vision Plan, and result in an overall reduction in static signage displays throughout the City of Los Angeles. The commenter's suggestion would not meet the underlying purpose of the Project as proposed by Metro. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 3-5

While the Environmental Impact Report (EIR) brings to light certain impacts of the project on the environment, the simple fact is that the negative impacts of this project go far and well beyond the scope of an EIR and California Environmental Quality Act review. The EIR lays out the potential for significant and unavoidable impacts related to Aesthetics, Cultural Resources, and Land Use and Planning.

Response to Comment No. 3-5

The commenter expresses general opposition to the Project. Specifically, the commenter points to the project's significant and unavoidable impacts, which are analyzed in Section IV.A, Aesthetics; Section IV.D, Cultural Resources; and Section IV.I, Land Use and Planning, of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 3-6

Additionally, the EIR relies on unproven mitigation measures to potentially address significant impacts related to Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Noise, and Tribal Cultural Resources.

Response to Comment No. 3-6

The commenter has not provided any supporting information as to why the mitigation measures would not reduce impacts to a less than significant level. Section IV.C, Biological Resources; Section IV.D, Cultural Resources; Section IV.F, Geology and Soils; Section IV.H, Hazards and Hazardous Materials; Section IV.J, Noise; and Section IV.L, Tribal Cultural Resources, of the Draft EIR identify and discuss mitigation measures for these impacts. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 3-7

There is no way that the undefined potential benefits of this program would possibly outweigh the clear and obvious negative environmental and societal impacts associated with increased digital advertising and increased traffic dangers. I urge you to halt this program as soon as possible.

Thank you for the opportunity to provide comments on this project today.

Response to Comment No. 3-7

The commenter expresses general opposition to the Project and asserts that it has undefined benefits. As discussed in Chapter II, Project Description, of the Draft EIR, the Project would incorporate intelligent technology components to promote roadway efficiency, improve public safety, augment Metro's communication capacity, provide for outdoor advertising where revenues would fund new and expanded transportation programs consistent with the goals of the Metro 2028 Vision Plan, and result in an overall reduction in static signage displays throughout the City. The commenter also expresses concern about the environmental impacts of the Project, in particular to traffic. Section IV.K, Transportation, analyzes impacts in regard to transportation safety. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 4

Perla Garcia
Secretary III
Los Angeles County Fire
perla.garcia@fire.lacounty.gov

Comment No. 4-1

The Los Angeles County Fire Department is no longer accepting Environmental Impact Report (EIR)—City Requests applications by mail. Please register and submit your Environmental Review application through the EPIC-LA website at:

<https://epicla.lacounty.gov>

1. Please see attached and follow the steps on the EPIC-LA User Guide—Fire—Environmental (EIR)—City Requests.
2. The requirements for the submittal is to upload all electronic (PDF format) City Transmittal letters and other review documents on EPIC-LA.

The Los Angeles County Fire Department review period for an EIR is 30 days. We will upload the comments in the Files/Attachments tab on or before the deadline.

For any questions or concerns regarding the Environmental Review application or process, please contact Secretary III, Perla Garcia at (323) 890-4330 or Perla.Garcia@fire.lacounty.gov

Response to Comment No. 4-1

This comment acknowledges receipt of the Draft EIR for the Project and requests the Draft EIR be submitted for review through the EPIC-LA website. In response to this comment, the Draft EIR was uploaded to the EPIC-LA website on September 27, 2022. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 5

Nancy Rodeheffer
Fire Prevention Division
Los Angeles County Fire
5823 Rickenbacker Rd.
Commerce, CA 90040-3027

Comment No. 5-1**CONDITIONS**

1. This project is located entirely in the jurisdiction of the City of Los Angeles; therefore, the City of Los Angeles Fire Department has jurisdiction concerning this project and will be reviewing the Final Map Submittal. This project is located in close proximity to the jurisdictional area of the County of Los Angeles Fire Department; however, this project is unlikely to have an impact that necessitates a comment concerning general requirements from the County of Los Angeles Fire Department Fire Prevention Division Land Development Unit.

For any questions regarding the report, please contact Nancy Rodeheffer at (323) 890-4243 or Nancy.Rodeheffer@fire.lacounty.gov.

Response to Comment No. 5-1

This comment acknowledges that the Project is located entirely outside of the jurisdiction of the Los Angeles County Fire Department. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 6

Ronald M. Durbin
Chief, Forestry Division
Prevention Services Bureau
Los Angeles County Fire
1320 N. Eastern Ave.
Los Angeles, CA 90063-3294

Comment No. 6-1

THE METRO VISION 2028 PLAN, PROPOSES TO INPLEMENT [sic] THE INSTALLATION OF UP TO 34 FREEWAY FACING TRANSPORTATION COMMUNICATION NETWORK (TCN) STRUCTURES AND 22 NON-FREEWAY FACING TCN STRUCTURES, ALL ON METRO-OWNED PROPERTY, CITY OF LOS ANGELES, FFER202210844

The Metro Vision 2028 Plan [sic] reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

The subject property is entirely within the City of Los Angeles, which is not a part of the emergency response area of the Los Angeles County Fire Department (also known as the Consolidated Fire Protection District of Los Angeles County). Therefore, this project does not appear to have any impact on the emergency responsibilities of this Department.

For any questions regarding this response, please contact Ed Lamas, Planning Analyst, at (323) 881-2404 or Eduardo.Lamas@fire.lacounty.gov

LAND DEVELOPMENT UNIT:

This project is located entirely in the jurisdiction of the City of Los Angeles; therefore, the City of Los Angeles Fire Department has jurisdiction concerning this project and will be reviewing the Final Map Submittal.

This project is located in close proximity to the jurisdictional area of the County of Los Angeles Fire Department; however, this project is unlikely to have an impact that

necessitates a comment concerning general requirements from the County of Los Angeles Fire Department Fire Prevention Division Land Development Unit.

For any questions regarding the report, please contact Nancy Rodeheffer at (323) 890-4244, or at nancy.rodeheffer@fire.lacounty.gov

FORESTRY DIVISION—OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, brush clearance, vegetation management, fuel modification for Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance.

For any questions regarding this response, please contact Forestry Assistant, Nicholas Alegria at (818) 890-5719.

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department does have some environmental regulatory jurisdiction within the City of Los Angeles. However, HHMD has no comments or requirements for the Metro TCN project at this time.

Please contact HHMD Hazardous Materials Specialist III, Jennifer Levenson at (323) 890-4114 or Jennifer.Levenson@fire.lacounty.gov if you have any questions.

Response to Comment No. 6-1

This comment acknowledges that the Project is located entirely outside of the jurisdiction of the Los Angeles County Fire Department for the Planning Division and Land Development Unit. Additionally, the Forestry Division has statutory responsibilities which include erosion control, watershed management, rare and endangered species, brush clearance, vegetation management, fuel modification for Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Further, the Health Hazardous Materials Division of the Los Angeles County Fire Department does have some environmental regulatory jurisdiction within the City of Los Angeles, but does not have any comments or requirements at this time. Contact information is provided for all divisions.

This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 7

Rochelle Campomanes
LEED AP
Departmental Facilities Planner II
Facilities Planning Bureau
Los Angeles County Sheriff's Dept.
recampom@lasd.org

Comment No. 7-1

I received an email regarding the Notice of Availability of a Draft EIR on Metro's Transportation Communication Network project. I could not open the links. I went to Metro's website, but it is being blocked due to security purposes. Please send NOA and Draft EIR to my email for our review.

Response to Comment No. 7-1

This comment requests copies of the Notice of Availability for the Project and Draft EIR be sent directly to the commenter's email address. On September 14, 2022 the Los Angeles County Sheriff's Department staff confirmed receipt of the requested materials. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 8

Matt Wersinger
President
Del Rey Neighborhood Council
4325 Glencoe Ave., #9365
Marina del Rey, CA 90292-6444

Pooja Bhagat
Land Use Officer
Del Rey Neighborhood Council
4325 Glencoe Ave., #9365
Marina del Rey, CA 90292-6444

Comment No. 8-1

Here is the comment letter:

The Del Rey Neighborhood Council (DRNC) opposes Metro's TCN project digital bill boards for many reasons listed below. We would prefer Alternate [sic] 1 where no environmental impact occurs. However, as Metro is proposing to take down more than 200 static Bill boards, we support Alternate [sic] 3 where-in digital bill board are not proposed at site locations FF29 [sic] and FF-30 in addition to other multiple locations. Attached is DRNC's letter to Metro.

Response to Comment No. 8-1

The commenter expresses general opposition to the Project, but however, expresses support of Alternative 3—Elimination of All Project Significant and Unavoidable Impacts. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not specifically address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 8-2

Please note that on October 13th, the DRNC Board passed the following motion:

Del Rey Neighborhood Council has passed the following motion and requests Los Angeles City Council support Metro Transportation Communication Network's Draft EIR Alternate 3 to protect our coastal wetlands. As a condition of our support, we request FF29 [sic] & FF30 [sic] be eliminated completely, and we require that Metro confirm taking down

existing static billboards at all locations along Culver Blvd from the 405 to 90 Fwy and along the wetlands.

Please see attached letter. Request to please inform us of next steps related to the EIR for the TCN project.

Response to Comment No. 8-2

The commenter expresses support for Alternative 3—Elimination of All Project Significant and Unavoidable Impacts with conditions. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 8-3

The Del Rey Neighborhood Council opposes Metro's TCN project digital bill boards for many reasons listed below.

Response to Comment No. 8-3

The commenter expresses general opposition to the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 8-4

We would prefer Alternate [sic] 1 where no environmental impact occurs. However, as Metro is proposing to take down more than 200 static Bill [sic] boards, we support Alternate [sic] 3 where-in digital bill board are not proposed at site locations FF29 [sic] and FF-30 in addition to other multiple locations. Listed below are some background and reasons for our position:

Response to Comment No. 8-4

The commenter expresses support for Alternative 3—Elimination of All Project Significant and Unavoidable Impacts with conditions. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not specifically address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 8-5

- A. Digital Billboards in Del Rey along the 90 Fwy at the proposed FF29 [sic] and FF30 [sic] locations will create significant irreversible and unavoidable long-term damage to the Ballona creek coastal wetland that consists of both permanent and migratory population of fauna and flora in this sensitive habitat. Even though mitigation measures have been proposed, there is no study or evidence shared of the long-term impact and consequences of radiation and other impacts from light and sound waves that will impact the migratory and permanent populations that this sensitive habitat supports.

Response to Comment No. 8-5

As described in Section IV.C, Biological Resources, of the Draft EIR, Project impacts would be less than significant with the implementation of Mitigation Measures BIO-MM-1 through BIO-MM-4. Additionally, as discussed in Topical Response No. 3, Project Design Feature AES-PDF-1, would limit light trespass at the Ballona Wildlife Reserve a maximum of 0.02 foot-candles. This maximum light trespass of 0.02 fc is well below the most stringent recommendation of 0.09 fc for the LZI Zone for “Special Districts and Government Designated Parks” within the California Administrative Code. For further discussion, refer to Topical Response No. 3, further explaining the Project’s less than significant impact from lighting on biological resources.

The proposed TCN Structures would be required to adhere to specific FCC regulations regarding electric magnetic fields (EMFs). All digital displays would meet all necessary FCC regulations and have the necessary certifications on file. The digital displays are entirely safe and will not create interference or “electrical noise” to the surrounding area including construction workers, residents and children in schools. Furthermore, an agency is not required to conduct every study requested by the public. (Laurel Heights Improvement Assn. v. Regents of University of California (1988) 47 Cal.3d 374, 415.) This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 8-6

- B. As Metro is proposing taking down over 200 static billboards, we are supporting Alternate [sic] 3 on the condition that all static billboards along the 90 FWY [sic] and along Culver Blvd be taken down as a condition of our support. If this entails that METRO [sic] work with other public and private authorities to take down the existing static billboards, we request them to do so immediately.

Response to Comment No. 8-6

The commenter expresses support for Alternative 3—Elimination of All Project Significant and Unavoidable Impacts with conditions. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 8-7

The median along Culver Blvd has a wide green zone with soft and hard landscaping, a walking trail and is perceived and used as a park by the community. Members of the Del-Rey community have expressed Culver median be designated as a park in the future. The static bill boards are incongruous to the use of the space as a park due to its graphic content and overbearing scale specifically as the community uses Culver Blvd and it's [sic] median to cross over to multiple elementary schools to the south such as Braddock Elementary, Stoner Elementary, Marina Del Rey middle school, Vista mar charter to name a few.

Response to Comment No. 8-7

The commenter recommends specific static display take down locations. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 8-8

- C. In general some community members have expressed a general dislike for digital bill boards as a source of revenue generation, cause of light pollution and as a source of distraction that could potentially lead to accidents.

Response to Comment No. 8-8

The commenter expresses general opposition to the Project due to the dislike for the Project as a source of revenue generation, as well as concerns regarding aesthetics and transportation safety. For a discussion of aesthetics and transportation safety related issues, refer to Sections IV.A. Aesthetics and IV.K Transportation, respectively, of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not specifically address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 8-9

Hence, *Del Rey Neighborhood Council has passed the following motion and requests City Council support Metro Transportation Communication Network's Draft EIR Alternate [sic] 3 to protects our coastal wetlands. As a condition of our support, we request FF29 [sic] & FF30 [sic] be eliminated completely, and we require that Metro confirm taking down existing static billboards at all locations along Culver Blvd from the 405 to 90 Fwy and along the wetlands.*

Response to Comment No. 8-9

The commenter expresses general opposition to the Project, but expresses support for Alternative 3, Elimination of All Project Significant and Unavoidable Impacts with conditions. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not specifically address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 9

Elizabeth Campos Layne
President
Del Rey Residents Assn.
P.O. Box 661450
Los Angeles, CA 90066-9250

Comment No. 9-1

Here is the comment letter:

Two decades ago, the City of Los Angeles imposed a ban on digital off-site signs, Ordinance 174547. Now, Metro and the City of Los Angeles have entered into a Memorandum of Agreement (C-139852) that would allow digital billboards to be erected on property that is co-owned by Metro and the City. For the reasons outlined more fully below, the Del Rey Residents Association (“DRRA”) is opposed to the Metro Transportation Communications Network (“TCN”) program. The following comments on the DEIR are not exhaustive of all our concerns but are those that are feasible for non-experts to address.

Response to Comment No. 9-1

The commenter expresses general opposition to the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not specifically address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 9-2**Aesthetics**

The public has spoken and has been opposed to digital advertising for decades. Please see the dozens of communications from the public and community impact statements from Neighborhood Councils in Council Files 11-1705 and 22-0392.

Response to Comment No. 9-2

The commenter expresses general opposition to the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 9-3

The DEIR has no discussion of the cumulative effects of visual clutter on the general public and drivers alike.

Response to Comment No. 9-3

This comment summarizes the general concerns of the commenter regarding the regarding the cumulative aesthetics impacts of the EIR. Contrary to this comment, page IV.A-49 of Section IV.A, Aesthetics, of the Draft EIR, discusses the Project's cumulative aesthetic impacts. Additionally, Section IV.K, Transportation, of the Draft EIR, and Topical Response No. 1 and Topical Response No. 2 provide a discussion on transportation safety where impacts are found to be less than significant. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 9-4

In Del Rey, we are most concerned about the billboards FF29 [sic] and FF30 [sic] proposed for the intersection of the Marina (90) Freeway and Culver Boulevard. That is next to the Ballona Wetlands Ecological Reserve, and we take issue with the DEIR conclusion that the potential impacts to views of the Ballona Wetlands would be less than significant (DEIR, IV.A.3.d. Threshold (a)(1)).

Response to Comment No. 9-4

As shown in Figure IV.A-8 in Section IV.A, Aesthetics, of the Draft EIR, Site Locations FF-29 and FF-30 are located on Metro properties immediately adjacent to SR-90 that are within a chain link fenced area. As discussed in Section IV.C, Biological Resources, of the Draft EIR, these Site Locations occur approximately 150 feet from the northeastern edge of the Ballona Wildlife Reserve, within an area mapped as non-wetland habitat. Site Location FF-29 is separated from the Ballona Wildlife Reserve by the SR-90 Freeway off-ramp and Site Location FF-30 is separated from the Ballona Wildlife Reserve by the SR-90 Freeway and the off-ramp. Given the orientation of the digital displays to the SR-90 and the size of the displays, public views of the displays would primarily be from the SR-90 Freeway. In addition, given the location and size of the two TCN Structures, the intermittent and transitory views of the Ballona Wildlife Reserve from the SR-90 and other more distant public locations would be obstructed on a very limited basis. Thus, potential impacts to views of the Ballona Wildlife Reserve would be less than significant. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 9-5

We also disagree with the statement “Furthermore, based on the Site Location of the proposed TCN Structure next to a freeway or major roadway, their size and height, and the existing urban setting of the Site Locations and surroundings, the TCN Structures would not substantially contrast with the existing aesthetics features, such as trees, landscaping, and open space areas” (DEIR, IV.A.3.d, Threshold (c)). The signs would attract attention and detract from the benefits the open space of the Wetlands provide for drivers.

Response to Comment No. 9-5

As shown in Figure IV.A-8 in Section IV.A, Aesthetics, of the Draft EIR, Site Locations FF-29 and FF-30 are located on Metro properties immediately adjacent to SR-90 that are within a chain link fenced area. As discussed in Section IV.C, Biological Resources, of the Draft EIR, these Site Locations occur approximately 150 feet from the northeastern edge of the Ballona Wildlife Reserve, within an area mapped as non-wetland habitat. Site Location FF-29 is separated from the Ballona Wildlife Reserve by the SR-90 Freeway off-ramp and Site Location FF-30 is separated from the Ballona Wildlife Reserve by the SR-90 Freeway and the off-ramp. Given the orientation of the digital displays to the SR-90 and the size of the displays, public views of the displays would primarily be from the SR-90 Freeway. In addition, given the location and size of the two TCN Structures, the intermittent and transitory views of the Ballona Wildlife Reserves from the SR-90 and other more distant public locations would be obstructed on a very limited basis. Thus, potential impacts to views of the Ballona Wildlife Reserve would be less than significant. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 9-6

Our comments on the TCN Initial Study¹ (attached) noted that a digital sign on a business at 5450 Lincoln Boulevard (in Del Rey) is clearly visible from the other side of the Ballona Wetlands (about 1.5 miles away).

¹ DRRA letter of August 1, 2022, attached.

Response to Comment No. 9-6

The commenters previous comment letter included as an attachment was dated August 1, 2022, was submitted prior to the September 9, 2022, release of the Draft EIR for public review. The commenter expresses general concerns regarding transportation safety, aesthetics, and energy use. Further, the commenter further supports the removal of the static displays, however, not at the expense of introducing additional digital billboards. As the comment letter raises substantially similar topics as included in the Draft EIR

comment letter, the commenter is referred to the responses included in Comment Letter No. 9 in its entirety. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 9-7

We would like Metro to respond to each of the concerns raised by us in that letter.

Response to Comment No. 9-7

This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. Please see Response to Comment No. 9-6 for a response to this comment.

Comment No. 9-8

Despite our particular interest in ensuring that no digital billboards are erected near the Ballona Wetlands Ecological Reserve, and our desire to have all static billboards removed from Metro property along the Culver Blvd. Bike Path that runs through Del Rey (from the 405 freeway to McConnell Avenue, about 1.5 miles), we support Alternative One—the no project alternative. In our opinion, there is no take down ratio that would be sufficient to overcome the negative effects of digital billboards in Los Angeles.

Response to Comment No. 9-8

The commenter expresses general opposition to the Project and supports Alternative 1, No Project Alternative. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 9-9

The DRRA fully supports the removal of all static display billboards from Metro-owned property. Complete removal would improve the quality of life in our neighborhoods by reducing cyclist, driver and pedestrian distractions, reducing the commercialization of our lives and eradicating the unsightly structures that hold up the billboards. We should not have to allow digital billboards as the price for having the static billboards removed.

Response to Comment No. 9-9

The commenter expresses general opposition to the Project due to concerns regarding transportation safety and aesthetic impacts. For further discussion of

transportation and aesthetic issues, refer to Section IV.K, Transportation, and Section IV.A, Aesthetics, respectively, of the Draft EIR. Additionally, removal of existing signs is not required to mitigate any significant environmental impacts of the proposed TCN Program. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 9-10

Biological Resources

According to the DEIR, the Project will have “less than significant” impact from “Substantial Light or Glare.” In fact, the DEIR fails to address the effect of light and noise from billboards on humans and wildlife. A recent article in The Atlantic² raises this issue, as does the story of the migrating goose that disrupted the October 12, 2022 Dodgers–Padres playoff game.³ The best way to mitigate the light pollution from the digital billboards is to choose Alternative 1, i.e. [sic] No Project.

² <https://www.theatlantic.com/magazine/archive/2022/07/light-noise-pollution-animal-sensory-impact/638446/>

³ “Where Has Goose Gone?” from Los Angeles Times, published in Yahoo News, October 13, 2022.

Response to Comment No. 9-10

Appendix B, Lighting Study, of the Draft EIR, evaluates the light trespass illuminance at the nearest residential use property line, not within the living areas within a residential structure, consistent with established standards and recommendations from CALGreen and IESNA. Light from the signs within the residential structure would be significantly less than the illuminance at the property line due to the additional distance from the sign, the exponential reduction of light with distance, and losses from window glazing. Therefore, the illuminance within the residential living unit would be extremely low (far less than the threshold), and the impact on human health from the sign illuminance would not be significant. Furthermore, all lighting sources in the state of California are regulated by Title 20, which stipulates requirements of flicker frequency to eliminate any hazards due to flicker. Flicker is defined as the amplitude modulation of light at frequencies that has effects on human physiology.¹ Besides intermittent maintenance during operations at the Site Locations, the TCN Structures would not produce noise. The proposed TCN Structures would be required to adhere to specific FCC regulations regarding electric magnetic fields (EMFs). All digital displays would meet all necessary FCC regulations and have the

¹ Jon McHugh, “Measuring Flicker: California’s JA10 Test Methods and Its Uses.”

necessary certifications on file. The digital displays are entirely safe and will not create interference or “electrical noise” to the surrounding area.

Contrary, to this comment, as described in Section IV.A, Aesthetics, of the Draft EIR, no mitigation measures are required to reduce lighting levels during project operations to a less than significant level. Further, refer to Topical Response No. 3 for a discussion which further clarifies the Project would meet CALGreen standards for lighting at all Site Locations. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 9-11

Energy consumption [sic]—Section IV.E

We disagree with the conclusion that the cumulative impacts related to energy use and conflicts with plans will have a less than significant impact.

Response to Comment No. 9-11

This comment summarizes general concerns regarding the cumulative energy impacts included in the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. See Responses to Comments Nos. 9-12 through 9-15 below.

Comment No. 9-12

According to the DEIR, the Project will result in a net increase in energy demand of 2,288,690 kWh per year. DEIR, Section IV.E. Per the U.S. Energy Information Administration, in 2020 the “average annual electricity consumption for a U.S. residential utility customer was 10,715 kWh.” Thus, the net increased use from the TCN will be equivalent to the energy consumption of 213 homes per year.

Response to Comment No. 9-12

This comment generally summarizes Project-related energy demand information provided in the Draft EIR. The energy demand information provided for context regarding residential utility usage for the record and will be forwarded to the decision-makers for their review and consideration. In addition, as shown on Table IV.G-7 in Section IV.G, Greenhouse Gas Emissions, of the Draft EIR, the Project would result in a reduction in maintenance vehicle trips due to the reduction in the number of displays. Signage to be removed would include, at a minimum, approximately 200 static displays located within the City. Further, the TCN digital displays are updated remotely and do not require vehicle trips to change advertising that is currently done with the existing static displays.

Comment No. 9-13

The DEIR analysis places too much reliance on the increase in energy usage as a percentage of the total sales (0.1%) of the Department of Water and Power (DWP). This is a specious argument given the size of DWP. We are in an era of climate change when the mandate is to reduce energy use, not rationalize ways to increase it. According to the DEIR, this Project is not contemplated to reach 100 percent renewable energy until 2035. Section IV.E.3.c.

Response to Comment No. 9-13

Contrary to what is stated in this comment, the Draft EIR provided a comparison of the Project's energy usage to the total sales of the Los Angeles Department of Water and Power (LADWP) to provide some context and made no significance conclusions based on this comparison. Although the Project would result in an increase in energy usage, LADWP is required to comply with Senate Bill (SB) 100. As discussed in Section IV, Greenhouse Gas Emissions, of the Draft EIR, SB 100 was passed to require electricity providers such as LADWP to increase the renewable energy content of their energy portfolio each year. SB 100 also requires energy portfolios of each electricity provider to consist of at least 60% renewable energy by 2030. Based on the increase in renewable energy in the coming years, GHG emissions resulting from Project electricity usage would decline due to SB 100 requirements. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 9-14

Gov. Newsom has proposed clean electricity targets of 90% by 2035 and 95% by 2040. <https://www.gov.ca.gov/2022/08/12/governor-newsoms-ambitious-climate-proposals-presented-to-legislature/> (8/12/22). Increasing consumption will make these targets harder to reach. Even if renewable energy were the answer to climate change, increases in consumption mean more renewable energy will need to be produced. Until 100% renewable energy is available for all, those using such energy force others to use continue using dirty energy.

Response to Comment No. 9-14

The energy analysis includes citation to the LADWP Power Strategic Long-Term Resources Plan. As part of this plan, the LADWP takes into account growth in the region and associated increase in energy consumption as part of the long-term planning projections. Also included in these projections is compliance with SB 100 which requires LADWP to procure an increasing percentage of renewable energy each year. As the Project would obtain electricity from the LADWP, the Project would also be consistent with

Statewide renewable (clean) energy targets. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 9-15

The energy consumption of the digital billboards should be re-analyzed with an emphasis on the effects of the increase in energy use. We suggest that a redirected analysis will find that the demand during operation will cause wasteful, inefficient, and unnecessary use of energy and impacts will be significant.

Response to Comment No. 9-15

The suggested methodology in this comment “emphasis on the effects of the increase in energy use” would not be consistent with CEQA Appendix F. An increase in energy use is not considered a significant impact. Instead, a significant impact is determined based on whether the Project would result in wasteful, inefficient, and unnecessary use of energy. The Project’s energy impacts presented Section IV.E, Energy, of the DEIR is consistent with CEQA Appendix F requirements regarding energy impacts. Table IV.E-2 on page IV.E-24 of the DEIR, clearly presents the increase in energy usage during operation of the Project. The Project would comply with the latest CALGreen and Title 24 energy requirements such as use of LED lighting which is more efficient than the existing static displays. Therefore, the operation of the Project would not result in wasteful, inefficient and unnecessary use of energy during operations. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 9-16

Land Use and Planning, Section I.

The DEIR acknowledges that the Project Impact on Land Use and Planning would be “Significant and Unavoidable.”

The DEIR Section IV (Other CEQA Considerations) is required to discuss the significant and unavoidable impacts that would result from the Project, and the reasons why the Project is being proposed notwithstanding the significant and unavoidable impacts.

Response to Comment No. 9-16

Section VI. Other CEQA Considerations of the Draft EIR, provides a discussion of significant and unavoidable impacts that would result from the Project and the reasons why the Project is being proposed notwithstanding the significant and unavoidable impacts. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 9-17

Our Councilmember Mike Bonin summed it up clearly⁴: “[T]he scope and intent of the project is clear: install large digital billboards at highly visible Metro-owned locations for revenue generation purposes.”

⁴ Letter of June 1, 2022 from Mike Bonin re Metro’s TCN Notice of Preparation (attached)

Response to Comment No. 9-17

As described by the commenter, a letter from City Councilmember Bonin was sent on June 1, 2022, during the Notice of Preparation scoping period. The comment letter summarizes concerns regarding the Project, specifically related to the proximity to residential uses in general, as well as the potential biological and aesthetic impacts from FF-29 and FF-30. Additionally, aesthetic concerns are mentioned in regard to NFF-17 and NFF-18. Further, the commenter is referred to Response to Comment No. 9-21 regarding the evaluation of existing and future residential uses in the vicinity of the proposed TCN Structures. For further discussion of aesthetics and biological resources specific to the locations of FF-29 and FF-30, refer to Sections IV.A, Aesthetics, and IV.C, Biological Resources, respectively, of the Draft EIR. The Draft EIR conservatively assumes that Site Locations FF-29 and FF-30 are located within the jurisdiction of the Coastal Commission, and therefore, would conflict with the Palms-Mar Vista-Del Rey Community Plan policy associated with placing off-site commercial signage in the coastal area. Metro is pursuing a formal boundary determination from the Coastal Commission for the Site Locations FF-29 and FF-30. Should it be determined that these Site Locations are within the Coastal Zone, a Coastal Development Permit would be required for Site Locations FF-29 and FF-30. Further, as described in IV.I Land Use of the Draft EIR, the Project would not conflict with the applicable goals and policies of the Coastal Act. If it is determined that FF-29 and FF-30 are not located within the Coastal Zone, no land use or related aesthetic impacts would occur as a result of these two proposed TCN Structures. In addition refer to Section IV.C, Biological Resources, of the Draft EIR for a review sensitive habitat and species located in the vicinity of the Site Locations. As described therein, impacts to biological resources are found to be less than significant with the implementation of Mitigation Measures BIO-MM-1 through BIO-MM-4. Further, In regard to the aesthetic concerns for NFF-17 and NFF-18 aesthetic impacts at these two locations were found to be less than significant as described in Section IV.A, Aesthetics, of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 9-18

Other than the generation of revenue to be allocated in a manner yet to be specified, what benefit will result from Metro being allowed to ignore a ban on digital billboards that has been in place for two decades?

Response to Comment No. 9-18

As discussed in Chapter II, Project Description, of the Draft EIR, in addition to raising revenue, the TCN Program would promote roadway efficiency, improve public safety, augment Metro's communication capacity, and result in an overall reduction in static signage displays throughout the City. The Draft EIR also specifies the allocation of generated revenue, which would fund new and expanded transportation programs consistent with the goals of the Metro 2028 Vision Plan.

As discussed in Chapter II, Project Description, of the Draft EIR, the City's ban on new off-premise signs was enacted in 2002. The ban on new off-premise signs also prohibits conversion of existing signs to digital displays, and any new off-premise sign must be within an adopted Sign District, Specific Plan, or Supplemental Use District which preclude the ability to put signage on residentially zoned properties. The TCN Program is contingent on the adoption of a Zoning Ordinance by the City. The proposed Zoning Ordinance would amend the City's sign regulations in Chapter I of the Los Angeles Municipal Code (LAMC) to authorize the TCN Structures. The Zoning Ordinance would create a new class of signage for the TCN Structures, given their unique attributes and intelligent technology which are not currently accounted for in the Zoning Code. The Zoning Ordinance would create a mechanism for the review and approval of the TCN Structures. The Zoning Ordinance would not otherwise change the existing regulations for signs, including off-site and digital signage, in the City. The anticipated development from the Zoning Ordinance would be limited to the 56 TCN Structures, as well as the take-down of approximately 200 static displays located within the City. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 9-19

A piecemeal dismantling of the ban will make it increasingly difficult to stop digital pollution of our environment. Why should Metro be allowed to erect digital billboards when private companies cannot?

Response to Comment No. 9-19

TCN Structures would be permitted under the City's 2002 ban within an adopted Sign District, Specific Plan, or Supplemental Use District. Refer to Response to Comment No. 9-18 regarding the proposed Zoning Ordinance for the TCN Structures. The remainder

of this comment regarding the ban's effectiveness is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 9-20

Zoning

The Project will require an amendment to the Zoning Code that has not yet been written or approved, although the City Council has instructed the Department of City Planning to draft the amendment (CF 22-0392). After years of study, the City of Los Angeles has developed a new Zoning Code that is currently going through the adoption process with the Downtown Community Plan Update.

The Zoning Ordinance enabling the implementation of the TCN Program would apply solely to the 56 proposed Site Locations for the TCN Structures and any locations for associated sign takedowns. (Executive Summary, page I-6). The DEIR does not explain why Metro needs a Zoning Code that is different from the one that the City Planning Commission recommended for approval on September 23, 2021.

Response to Comment No. 9-20

As described on page II-1 of Chapter II, Project Description, of the Draft EIR, the TCN Program is contingent on the adoption of a Zoning Ordinance by the City. The proposed Zoning Ordinance would amend the City's sign regulations in Chapter I of the Los Angeles Municipal Code (LAMC) to authorize the TCN Structures. The Zoning Ordinance would create a new class of signage for the TCN Structures, given their unique attributes and intelligent technology which are not currently accounted for in the Zoning Code. The adoption of a Zoning Ordinance includes the drafting of said ordinance, a public hearing, review and recommendation by the City's City Planning Commission, and consideration and adoption by the City Council. Although the complete text of the Zoning Ordinance has not been finalized, the Draft EIR fully analyzes the impacts of the proposed Zoning Ordinance. As noted in Section IV.I, Land Use, of the Draft EIR, the Zoning Ordinance would create a mechanism for the review and approval of the TCN Structures and would not authorize new signage other than the TCN Structures. The Zoning Ordinance would create a mechanism for the review and approval of the TCN Structures. The Zoning Ordinance would not authorize new signage other than the TCN Structures. The Zoning Ordinance would address the time, manner, and place aspects of the TCN Program, including the allowable locations, size and height limitations, urban design requirements, and applicable community benefits including take-down requirements for the removal of existing static off-premise signs. The Zoning Ordinance would not otherwise change the existing regulations for signs, including off-site and digital signage, in the City. Based on

the above, the anticipated development from the Zoning Ordinance would be limited to the 56 TCN Structures as well as the take-down of approximately 200 static displays located within the City. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 9-21

Zoning near each of the 56 TCN Project sites and any potential takedown sites is a critical issue that has not been adequately considered.

1. The executive summary states that industrial zoning “is generally buffered by commercial uses to provide separation from residential uses.” Del Rey has several neighborhoods that are zoned Industrial, and yet apartment complexes and schools have been built in those areas, e.g. the area covered by the Glencoe Maxella Specific Plan and the area between Ballona Creek and Jefferson Boulevard. How will Metro ensure that the digital billboards are not built on Metro property that is next to areas that are de facto residential?
2. The State of California is hoping to make housing more affordable by allowing construction of housing in buildings that were previously zoned for commercial use.⁵ The DRRA has been asked to consider a number of such projects, particularly in the Glencoe-Maxella Specific Plan area. However, current land use planning does not provide any certainty as to where those developments will occur. The DEIR should show how Metro is going to ensure that the TCN Project complies with the Community Plans that are being updated citywide. At a minimum, this should include a review of the draft plans that are in circulation and a letter from the Department of City Planning confirming that they agree or disagree with the statements in the DEIR.

⁵ “2 laws expand options for new housing,” L.A. Times, September 29, 2022, page 1, regarding Senate Bill 6 and Assembly Bill 2011, which take effect January 1, 2023.

The Palms Mar Vista Del Rey Community Plan was adopted in 1997 and has been going through updating since 2019. Del Rey is transected by Centinela Avenue and bounded by Lincoln, Washington, Sepulveda and Jefferson Boulevards. The State of California has changed the law to promote housing construction within half a mile of any of these streets. The analysis in the DEIR must ensure compatibility with planned and reasonably foreseeable residential use, not just with areas specifically zoned residential. For all project sites, adequate mitigation measures must include siting, orientation, buffering, and screening from all residential dwellings.

Response to Comment No. 9-21

Pursuant the State CEQA Guidelines Section 15125, an EIR must include a description of the physical environmental conditions in the vicinity of the Project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. A Notice of Preparation of a Draft EIR for the Project was released on April 18, 2022, and therefore established baseline conditions for the Project. As described in Chapter III, Environmental Setting, of the Draft EIR, the TCN Structures would be located adjacent to freeways and major roadways on Metro-owned properties that are used primarily for Metro operations, which include rail corridors, stations, parking, bus depots, and equipment lots. The majority of the TCN Structures would be located within commercial/industrial areas where there is a mix of uses such as manufacturing, warehouse, retail, studios, storage, and surface parking. These areas already include various types of signage as well as lighting from a variety of sources including vehicle headlights, street lights, exterior and interior building lights, exterior lighting for wayfinding, and lighting associated with signage. The Draft EIR evaluated all known and reasonably foreseeable residential uses located with the vicinity of a TCN Structure as part of the Draft EIR. A site specific evaluation for each individual TCN Structure was performed and took into account each individual Site Location's environmental setting as well as attributes such as dimensions, digital display angles, height, and nearby sensitive uses including residential uses. The Draft EIR determined that impacts would be limited to historical resources impacts associated with impacting the integrity of setting of historical resources and related aesthetic and land use impacts due to Site Locations NFF-2, NFF-3, NFF-16, and NFF-21, and land use policy impacts associated with placing off-site commercial signage (Site Locations FF-29 and FF-30) in the coastal area. All other impacts including potential aesthetic, lighting and noise impacts to nearby residential uses, were concluded to be less than significant based on the detailed analysis in the Draft EIR. Additionally, Metro carried forth extensive coordination efforts with the City of Los Angeles on the preparation of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 9-22

3. Alternative 3 assumes that the Project would “eliminate or relocate FF-29 and FF30 [sic] outside of the coastal area of the Palms–Mar Vista–Del Rey Community Plan.” The DEIR does not clearly define what is meant by the “coastal area of the Palms–Mar Vista–Del Rey Community Plan area” and should include a map showing where relocation might be considered. Except for the areas within the Glencoe-Maxella and Playa Vista Specific Plans, the rest of Del Rey falls within the Coastal Transportation Specific Plan. Parts of Del Rey also are within the jurisdiction of the California Coastal Commission. As stated above, we are opposed to FF-29 and FF-30 at any location.

Response to Comment No. 9-22

As described in the City's Palms-Mar Vista-Del Rey Community Plan, the *coastal area* of the Palms–Mar Vista–Del Rey Community Plan corresponds with the areas located within the jurisdiction of the California Coastal Commission. In the event Alternative 3 is adopted, the potential relocation of FF-29 and FF-30 is dependent on formal boundary determination of these Site Locations by the California Coastal Commission. Should it be determined that these Site Locations are not within the Coastal Zone, the potential land use and aesthetic plan policy impacts associated with placement of signs within the coastal area of the Palms–Mar Vista–Del Rey Community Plan area would not occur. Further, in the event Alternative 3 is selected and it is determined that these Site Locations are located within the Coastal Zone, the potential relocation of FF-29 and FF-30 would only be relocated to an alternative Site Location that would not result and significant and unavoidable impacts. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 9-23**Community Benefits**

If digital billboards are permitted, who will decide what community benefits must be provided in exchange? Who will determine which community gets those benefits? How will the revenue sharing from the billboards be allocated within the City? Any system of allocation must provide for notice to the community, an opportunity for the community to be heard, consideration of the environmental impacts and findings.

Response to Comment No. 9-23

As described in Chapter II, Project Description, of the Draft EIR, the Zoning Ordinance would address the time, manner, and place aspects of the TCN Program, including the allowable locations, size and height limitations, urban design requirements, and applicable community benefits including take-down requirements for the removal of existing static off-premise signs. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 9-24

Metro needs to analyze each potential TCN Project site separately and to provide data showing what was analyzed and what methodology was used. Each structure erected or taken down will have a unique environmental impact, depending on its location.

Response to Comment No. 9-24

A site specific evaluation for each individual TCN Structure was performed and took into account each individual Site Location's environmental setting as well as attributes such as dimensions, digital display angles, height, and nearby sensitive uses including residential uses. Each environmental topic included in Section IV.A, Aesthetics, through Section IV.M, Utilities—Electric Power, of the Draft EIR include a discussion on the methodology used for each specific environmental topic. The Draft EIR determined that impacts would be limited to historical resources impacts associated with impacting the integrity of setting of historical resources and related aesthetic and land use impacts due to Site Locations NFF-2, NFF-3, NFF-16, and NFF-21, and land use policy impacts associated with placing off-site commercial signage (Site Locations FF-29 and FF-30) in the coastal area. Additionally, the Project will comply with the Chapter IV. Mitigation Monitoring and Reporting Program of this Final EIR, for both installation of the TCN Structures and take down of the existing static displays. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 9-25**Take-downs**

The DEIR states that in exchange for being allowed to erect 56 TCN structures (98 digital ad faces, according to Scenic LA), static billboards with twice the square footage of the digital billboards (DEIR page I-7) would be removed. This take-down ratio is far too low.

Because one digital billboard can feature ads from multiple advertisers, a digital billboard can generate far more revenue than a static billboard. At a minimum, the environmental impact of each digital billboard should be offset by taking down the number of static billboards that generate the same amount of revenue as the digital billboard. This is likely to be closer to a take-down ratio of 10 to one.

The DEIR does not explain how it would be decided which static billboards would be taken down and when that would occur. How would Metro ensure that those decisions are made fairly and equitably so that the static billboards are removed from the same neighborhood that is being burdened with a digital billboard?

Response to Comment No. 9-25

As part of the TCN Program, a take-down component would be implemented that would include the removal of at least 110,000 square feet (2 to 1 square footage take-down ratio) of existing static displays. Signage to be removed would include, at a minimum, approximately 200 static displays located within the City. The final takedown ratio will be determined as part of the establishment of City's Zoning Ordinance. The Zoning Ordinance

would be limited to the review and approval of up to 56 TCN Structures citywide as described in Chapter II, Project Description, of the Draft EIR. The Zoning Ordinance would regulate the location, operation, design, take-down program and community benefits of the TCN Structures. Further, the Zoning Ordinance would not otherwise change the existing regulations for signs, including off-site and digital signage, in the City. Additionally, removal of existing signs is not required to mitigate any significant environmental impacts of the proposed TCN Program, so neither Metro nor the City is required to evaluate the feasibility of requiring additional takedowns as part of the CEQA process. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 9-26

Transportation: Section IV.K and Appendix K

Gibson relied on three studies to analyze whether the TCN structures present potentially significant traffic safety concerns. Two of the three studies were conducted by the Foundation for Out of Home Advertising Research & Education (“FOARE”). DEIR Section IV.K.3.b. The FOARE research projects “help ensure OOH [out of home] advertising is competitive and a preferred means for marketing and promotion.” The Board of Directors of the Foundation are all from advertising companies.

The use of studies conducted by a foundation created to further the interests of the business that will benefit from the Project is an egregious conflict of interest. Moreover, studies that demonstrate safety concerns have been ignored. The Transportation analysis must be redone using unbiased research and without the use of the FOARE studies.

We note the oft-referenced study by the National Center for Transportation Systems Productivity and Management that “revealed that the presence of digital billboards increased the overall crash rates in areas of [digital] billboard influence compared to control areas downstream of the digital billboard locations.” Digital Advertising Billboards and Driver Distraction (April 1, 2015) (Contract #DTRT12GUTC12 with USDOT Office of the Assistant Secretary for Research and Technology, Section 7.1.1.)

Response to Comment No. 9-26

Refer to Topical Response No. 1, Transportation Studies, for a discussion further justifying the use of the studies that were included in Section IV.K, Transportation, and Appendix K, Transportation and Traffic Safety Review, of the Draft EIR. As described therein, the research selected found that a correlation between digital billboards and traffic collisions was “inconclusive at best.” The comments cited additional research which claim to demonstrate the negative impacts of digital billboards on public safety and should nullify the results of the Draft EIR. Upon further review, none of the additional studies cited in the

comments provide conclusive evidence that digital billboards cause traffic collisions. Nor do those studies undermine the conclusions of the Draft EIR and the studies relied on for the Draft EIR analysis.

Comment No. 9-27

Furthermore, the Transportation analysis uses the expected benefits of the TCN program to rationalize digital billboards. The purpose of the CEQA process is not to weigh the benefits of a project against the detrimental impact on the environment. CEQA requires the environmental effects of adding offsite digital advertising billboards to Metro property to be analyzed independent of the benefits other aspects of the Project may deliver. For example, see Section IV.K.3.d.1(a)(1). “For example, the TCN Program would aim to improve the bus passengers’ experience by helping to facilitate transit signal priority and bus wi-fi and efficiently relay bus arrival time information to riders. Therefore, the Project would not conflict with the applicable goals and initiatives set forth in the Vision Plan.”

Response to Comment No. 9-27

The Draft EIR analyzes the Project’s environmental impacts independently of the Project’s benefits. The section of the Draft EIR that this comment quotes explains, in part, why the Project would be consistent with the Metro 2028 Vision Plan, which targets LA County’s transportation plan, as discussed on page IV.K-13 of Section IV.K, Transportation, of the Draft EIR. This helps concretely explain how the Project’s objectives comport with the Metro 2028 Vision Plan and thus do not raise any inconsistencies.

Comment No. 9-28

The DEIR does not explain why Metro cannot use intelligent technology components to promote roadway efficiency, improve public safety and augment Metro’s communication capacity without using digital billboards.

Response to Comment No. 9-28

The commenter suggests to incorporate the intelligent technology components without the use of the TCN Structures. As described in Chapter II, Project Description, of the Draft EIR, the underlying purpose of the Project is to provide a network of TCN Structures that would incorporate intelligent technology components to promote roadway efficiency, improve public safety, augment Metro’s communication capacity, provide for outdoor advertising where revenues would fund new and expanded transportation programs consistent with the goals of the Metro 2028 Vision Plan, and result in an overall reduction in static signage displays throughout the City of Los Angeles. The commenter’s suggestion would not meet the underlying purpose of the Project as proposed by Metro.

This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 9-29

According to the Department of City Planning, the City and Metro entered into a Memorandum of Agreement (C-139852) to share revenue generated from the off-site advertising on these signs for 20 years. It is unclear who will pay the costs to erect the TCN, or who will decide who will build the TCN, who may advertise on the TCN and what may be advertised on the TCN. In short, the DEIR is seeking to assess the environmental impacts of a Project that is not yet ready to be evaluated.

Response to Comment No. 9-29

The first part of this comment is unrelated to the environmental review for the Project. In regard to advertising content, as described in Chapter II, Project Description, the digital displays would be in compliance with Metro's System Advertising Content Restrictions which prohibits advertisement of alcohol, smoking, and cannabis, and any content containing violence, obscenities, and other related subject matters. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 9-30

Appendix B: Metro TCN Lighting Study

In Del Rey, we are most concerned about the billboards FF29 [sic] and FF30 [sic] proposed for the intersection of the Marina (90) Freeway and Culver Blvd. because of the proposed location next to the Ballona Wetlands Ecological Reserve. However, light pollution from the digital billboards must be addressed citywide. What will be done to prevent "sky glow" from the billboards? (See "A switch's flip side" from Los Angeles, [sic] Times, September 22, 2022, page 1⁶, and "The Sky Needs Its 'Silent Spring' Moment"⁷ from Scientific American).

The whole point of a digital billboard is for the advertising to be seen, preferably over as wide an area as possible. If there is no "potential visibility" of the sign, its advertising is not effective.

⁶ See attached pdf copy.

⁷ Doi:10.1038/scientificamerican1022-46, article by Joshua Sokol, originally published with the title "Saving the Night Sky" in Scientific American 327,4, 46-55 (October 2022).

Response to Comment No. 9-30

A detailed analysis of potential lighting impacts from the TCN Structures is included in Section IV.A, Aesthetics, of the Draft EIR and in the Lighting Study included as Appendix B to the Draft EIR. As discussed therein, with implementation of mitigation measures, all of the TCN Structures, including TCN Structures at Site Locations FF-29 and FF-30, would not result in significant impacts associated with light or glare, including sky-glow. Specifically, the digital display faces would be designed to provide efficient and effective illumination while minimizing light spill-over, reducing sky-glow, and improving nighttime visibility through glare reduction. The digital display would use LED lighting and the maximum candelas would be up to 6,000 candelas during the daytime and up to 300 candelas during the nighttime. All TCN Structures, including those near the Ballona Wildlife Reserve, will have a light trespass illuminance less than the Los Angeles Municipal Code (LAMC) maximum of 3.0 footcandles (fc) at sensitive use properties, as well as the even more restrictive CALGreen standard of 0.74 fc maximum for Light Zone LZ3. The LED lighting system would direct the light from the display down toward the ground and would also limit up light. Therefore, the displays would not substantially increase "skyglow." In addition, louvers would be installed to shade the LED lights from creating unintentional light spillage, assist in reducing reflection, and in turn would create a sharper image. Further, the digital display faces would be set to refresh every eight seconds and would transition instantly with no motion, moving parts, flashing, or scrolling messages. Illumination of the digital displays would also conform to applicable Federal and State regulations for signs oriented toward roadways and freeways.

With regard to the TCN Structures located in the vicinity of the Ballona Wildlife Reserve, Project Design Feature AES-PDF-1 has been incorporated into the Project as set forth in Chapter II, Revisions, Clarifications and Corrections to the Draft EIR, of this Final EIR. Project Design Feature AES-PDF-1 requires that state of the art louvers or other equivalent design features be incorporated into the design of TCN Structures FF-29 and FF-30 such that the light trespass illuminance at the adjacent residential zoned property and Ballona Wildlife Reserve to the south of the Marina Freeway, west of Culver Boulevard will not exceed 0.02 footcandles (fc). This maximum light trespass of 0.02 fc is well below the most stringent recommendation of 0.09 fc for the LZI Zone for "Special Districts and Government Designated Parks" within the California Administrative Code. Also note that these signs are separated from the reserve by the existing Culver Boulevard off-ramp and the area already includes pole lighting for security and safety. As such, potential impacts to wildlife would be less than significant.

Comment No. 9-31

Appendix B, Part A. Summary, states that "the proposed Project will not introduce a new source of light trespass and or glare at residential properties or other sensitive use properties within the City of Los Angeles." Then the DEIR states that it also monitored

“potential for visibility of the Signs” from residential properties nearby. However, if the digital billboard is visible from residential property or sensitive use property, it will be disruptive, particularly if the display changes every eight seconds, 24 hours a day.

Response to Comment No. 9-31

The Lighting Study within the Draft EIR reviews and analyzes the potential light trespass impact to residential properties adjacent to the Site Locations. Appendix B of the Lighting Study illustrates the locations of the signs, the adjacent residential zoned properties, and the distance from the sign to the location where the sign illuminance (light trespass) is 0.30 fc (10 percent of LAMC threshold). This area is illustrated as a white dashed line radius on the diagram for each of the Site Locations. Residential uses located outside of the diagrammed radiuses in Appendix B cannot receive a light trespass illuminance impact due to the distance from the sign. Furthermore, if the TCN Structures are visible from a sensitive use, the luminance at that distance is not a potential source of glare.

A Lighting Study Supplemental Analysis is included as Appendix B.2. As shown therein, Site Location NFF-20 has been revised to reorient the sign towards Vermont Avenue, and Site Location FF-30 has been moved 25 feet. In addition, in accordance with Project Design Feature PDF-AES-1, the displays for Site Locations FF-13, FF-14, FF-25, F-29 and FF-30 would include state of the art louvers to reduce illuminance to mapped habitat areas including the Ballona Wildlife Reserve to 0.02 fc. The Lighting Study also provides additional analysis that shows that light trespass to Elysian Park sensitive habitat would be 0.075 fc, which is less than the most conservative threshold for set forth in CALGreen for LZ1 that addresses parks and sensitive habitat.

As indicated by the Lighting Study and the Lighting Study Supplemental Analysis, the majority of the 56 signs are not near or are not visible from residential use properties. The distances to residential use properties vary from 60 feet to over 1,000 feet from the signs. Of the 56 signs, 11 Site Locations are located less than 300 feet from a residential use and these signs are analyzed in detail in Section H.1.3 of the Lighting Study and Lighting Study Supplemental Analysis. The Supplemental Analysis demonstrates that the light trespass illuminance from all 56 Signs is less than the threshold established by LAMC (3.0 fc) for residential use properties, and less than the LZ3 standard established by CALGreen (0.74 fc). Furthermore, 54 of the 56 Signs are below the LZ2 standard of 3 lux (0.3 fc, or 10 percent of the LAMC requirement).

With regard to disruption associated with the refresh of the signs, all lighting appliances in the state of California are regulated by Title 20, which stipulates requirements

of flicker rate to eliminate any hazards due to flicker. Flicker is defined as the amplitude modulation of light at frequencies that has effects on human physiology.² In addition, Caltrans regulates a maximum refresh rate of 4 seconds. However, the project signs will operate at reduced refresh rate of 8 seconds.

Based on the above, the signs would not be disruptive to residential properties or other sensitive properties.

Comment No. 9-32

To prepare the Lighting Study, not all of the proposed Project Sites were monitored to determine if there was a “potential for visibility” from residential properties nearby. Further, the DEIR does not explain where the monitoring sites were located. The Project Sites needed to be monitored from the residential properties or other sensitive use properties where the billboards would be visible.

Response to Comment No. 9-32

To evaluate potential lighting impacts, the Lighting Study first studied the radius wherein potential sign illuminance at residential properties is 0.30 fc or ten percent of the threshold for generating an impact. As discussed in Response to Comment No. 9-31, above, Appendix B of the Lighting Study provides this radius for each sign. Sensitive uses located outside of the diagrammed radiuses in Appendix B would not receive a light trespass illuminance impact due to the distance from the sign. Residences within the diagrammed radiuses were further evaluated with a Monitoring Site location that represents potential impacts. As shown in Tables 5 and 6 of the Lighting Study, 14 Monitoring Site locations were selected. The Monitoring Site Locations are representative of the view to the Project from the vicinity of the residential properties to determine impacts. The specific locations of each of the Monitoring Sites and photographs of existing conditions are shown on pages 25 through 46 of the Lighting Study.

Comment No. 9-33

The Initial Study in April 2022 states on page 9 that the “digital display faces would be set to refresh every eight seconds and would transition instantly with no motion, moving parts, flashing, or scrolling messages.” Does that mean that there will be no videos like the ones shown on the digital billboard at Manchester Avenue and the 405 in Inglewood, which announces upcoming entertainment offerings? Where is that regulated? Who decides on the content of the advertising on the billboards?

² Jon McHugh, “Measuring Flicker: California’s JA10 Test Methods and Its Uses.”

Response to Comment No. 9-33

As described in Chapter II, Project Description, the digital displays would be set to refresh every eight seconds and would transition instantly with no motion, moving parts, flashing, or scrolling messages. Illumination of the digital displays would conform to applicable Federal and State regulations for signs oriented towards roadways and freeways including Caltrans. The digital displays would be in compliance with Metro's System Advertising Content Restrictions which prohibits advertisement of alcohol, smoking, and cannabis, and any content containing violence, obscenities, and other related subject matters. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 9-34

Earlier this year, the City Council agreed to the Sidewalk and Transit Amenities Program (STAP) (CF 20-1536 and 20-1536-2) which would allow digital advertising on transit furniture in the public right-of-way. The STAP program will have digital elements in Transit Shelters, Digital Kiosks, Interactive Kiosks, Digital Urban Panels. STAP raises the same issues as the TCN program—energy consumption, light pollution, effects on traffic—and like TCN, it is seen as a revenue source for the City. We believe that the revenues from these digital signage programs do not outweigh the damage caused by the signs.

Response to Comment No. 9-34

The commenter expresses general opposition to the Project due to concerns regarding energy consumption, light pollution, and effects on traffic. For further discussion of aesthetics, energy consumption, and transportation related issues, refer to Sections IV.A. Aesthetics, IV.E. Energy, and IV.K Transportation, respectively, of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not specifically address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 9-35

Attachment 1—Del Rey Residents Association Comment Letter dated August 1, 2022 [4 pages]

Attachment 2—"How Animals Perceive the World," *The Atlantic*, July 2022 [32 pages]

Attachment 3—"Where Has Goose Gone?" *Los Angeles Times*, as posted on *Yahoo News*, October 13, 2022 [3 pages]

Attachment 4—Mike Bonin’s comment letter of June 1, 2022 [2 pages]

Attachment 5—”2 Laws Expand Options for New Housing,” *Los Angeles Times*, September 29, 2022, p. 1 [3 pages]

Attachment 6—”A Switch’s Flip Side,” *Los Angeles Times*, September 20, 2022, p. 1 [4 pages]

Attachment 7—”The Sky Needs Its ‘Silent Spring’ Moment,” *Scientific American*, October 2022 [14 pages]

Response to Comment No. 9-35

Responses to these attachments have been included in the comments above. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 10

Sam Dunlap
Cultural Resource Director
Gabrielino Tongva Tribe
tongvatcr@gmail.com

Comment No. 10-1

The Gabrielino Tongva Tribe requests continued consultation on the proposed Transportation Communication Network Project as the project area is within our traditional tribal territory and may impact our tribal cultural resources.

Please contact me as soon as possible so our tribe may share our concerns.

Response to Comment No. 10-1

This comment requests Native American Tribal Consultation on the Project. Public Resources Code sections 21080.3.1 and 21084.3(c) require CEQA lead agencies to consult with California Native American tribes that have requested notice from such agencies of proposed projects in the geographic area that are traditionally and culturally affiliated with the tribes on projects for which a Notice of Preparation of Notice of Negative Declaration or Mitigated Negative Declaration has been filed on or after July 1, 2015. The lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to section 21080.2.1(d) of the Public Resources Code. Metro provided formal notification to the designated contact of tribal representative of the Gabrielino Tongva Tribe provided by the Native American Heritage Commission. Delivery confirmation was received on May 24, 2022. No response during the 30-day AB52 consultation period was received. Therefore, Metro has fulfilled its AB 52 consultation requirements. However, upon receipt of this comment, Metro staff reached out to the commenter to coordinate with the Gabrielino Tongva Tribe on the Project and met with them to discuss the Project on October 28, 2022. The Gabrielino Tongva Tribe was satisfied with mitigation measures provided in the Draft EIR and Tribal Consultation for the Project was closed on November 11, 2022. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 11

Glassell Park Improvement Assn.
P.O. Box 65881
Los Angeles, CA 90065-0881

Comment No. 11-1

The Glassell Park Improvement Association has taken the following position:

The GPIA is opposed to the Los Angeles Metropolitan Transportation Authority (Metro) proposal to implement the Transportation Communication Network (TCN) Program of digital billboards above our City's freeways. We are strongly opposed to the two Freeway-Facing TCN structures proposed for placement above the 2 Freeway in Glassell Park.

Response to Comment No. 11-1

The commenter expresses general opposition to the Project, specifically, Site Locations FF-13 and FF-14. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not specifically address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 11-2

We further oppose Los Angeles City Council motion CF-0392 that would amend the Zoning Code to permit digital signage such as the TCN structures in Metro's proposal.

Response to Comment No. 11-2

The commenter expresses general opposition to the Project, including the Zoning Ordinance proposed by the City of Los Angeles. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not specifically address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 11-3

Suggesting that these billboards would "promote roadway efficiency" and "improve public safety" is disingenuous at best. The fact is these are advertising billboards that will cause more roadway hazards and light blight than can possibly be offset by Metro's ability to use them for occasional communications.

Response to Comment No. 11-3

The commenter expresses concerns about the Project's impacts to transportation and light blight. Section IV.A, Aesthetics, and Section IV.K, Transportation, of the Draft EIR contains an analysis of impacts related to aesthetics and traffic safety, respectively. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not specifically address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 11-4

Light pollution is a serious problem in our City, and locating these billboards in our neighborhood will affect the quality of life for residents. While Metro specifies that none of the locations where the billboards will be placed are "zoned for residential use", [sic] they don't mention that one of the Glassell Park sites (FF-13 SB 2) is directly across a narrow street from a neighborhood of older, small, single family homes. People who live in the area will have their quality of life greatly diminished. Additionally, the nature of digital billboards is that from elevation, they can be seen—if not actually read—for miles.

Response to Comment No. 11-4

Contrary to what is stated in this comment, as included in Section IV.A, Aesthetics, and Appendix B, Lighting Study, of the of the Draft EIR, detailed modeling including illuminance calculations were performed for the digital displays located near residential uses including Site Location FF-13. The vertical light trespass illuminance at all vertical planes for Site Location FF-13 is below the 3.0 fc limit established by LAMC and therefore does not present a significant light trespass impact. Furthermore, the maximum light trespass illuminance is also less than the maximum recommended by IESNA (0.74 fc) for Site Location FF-13. As set forth in Chapter III. Corrections, Revisions, and Clarifications, of the Final EIR, Section IV.A, Aesthetics, of the Draft EIR was revised to include additional clarifying language regarding the Project meeting CALGreen standards for lighting. Therefore, the proposed digital displays would not introduce a light trespass impact at Site Location FF-13. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 11-5

Furthermore, the site designated for FF-14 NB 2 is at the entrance to the new Bowtie State Park along the Los Angeles River. The river in this area is a haven for native and migrating birds and many varieties of wildlife that will be negatively impacted by this type of light pollution. The State is currently creating a passive recreational space where the community has already held night-time gatherings & nature walks.

For all of these reasons, digital billboards do not belong above the 2 Freeway in our neighborhoods or over our natural space.

Response to Comment No. 11-5

This comment discusses the proposed Bowtie State Park located south of proposed TCN Structure FF-14. As described in Topical Response No. 3, Project Design Feature AES-PDF-1 would install state of the art louvers at TCN Structure FF-14 to reduce lighting levels to 0.02 fc, which is well below the 0.74 fc standard under CALGreen. This maximum light trespass of 0.02 fc is well below the most stringent recommendation of 0.09 fc for the LZI Zone for “Special Districts and Government Designated Parks” within the California Administrative Code. It should be noted that FF-14 conditions at the current site consist of vacant land with very limited vegetation. However, as the park is proposed to have habitat restoration areas, this Site Location is considered to contain sensitive habitat to provide for a conservative analysis. Further, the LA River in this location is concrete lined located approximately 1,000 feet from the proposed TCN Structure, and not expected to support wildlife habitat. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 11-6

The Glassell Park Improvement Association was founded in 1968, and is one of the oldest organizations of its kind in Los Angeles. Our founders described our mission as advocating for quality of life issues and working to improve conditions in Glassell Park. As such, our Board of Directors has voted and unanimously approved sending this statement on behalf of our members.

Response to Comment No. 11-6

This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 12

Patricia McPherson
Grassroots Coalition
patriciamcpherson1@verizon.net

Comment No. 12-1**METRO—**

Two signs are planned for SR 90 East and West (Freeway Facing FF 29 an FF 30) shown in the map of the project EIR.

Here is information about the comment due date: <https://plancheckncla.com/2022/10/05/metros-transportation-communication-network-digital-signage/>

RESPONSE:

DIGITAL SIGNS ARE UNECESSARY [sic] for the FREEWAY 90SR [sic] 90 East and West (Freeway Facing FF 29 an FF 30,DEIR [sic] Map)

AND THEIR LIKELIHOOD OF CAUSING ENVIRONMENTAL HARM IN THIS AREA IS HIGH.

Response to Comment No. 12-1

The commenter expresses general opposition to the Project, specifically for Site Locations FF-29 and FF-30, due to concerns about the Project's environmental impacts. Chapter IV, Environmental Impacts Analysis, of the Draft EIR contains a comprehensive analysis of the Project's environmental impacts. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not specifically address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 12-2

Please be responsive to the scientific studies included below per assessment of creating new lighted signage on SR 90 which is alongside and ending in areas that are sensitive biological, ecological areas.

Response to Comment No. 12-2

As described in Section IV.C, Biological Resources, of the Draft EIR, Project impacts would be less than significant with the implementation of Mitigation Measures BIO-MM-1 through BIO-MM-4. Additionally, as discussed in Topical Response No. 3, Project Design Feature AES-PDF-1, would limit light trespass at the Ballona Wildlife Reserve a maximum of 0.02 foot-candles. This maximum light trespass of 0.02 fc is well below the most stringent recommendation of 0.09 fc for the LZI Zone for “Special Districts and Government Designated Parks” within the California Administrative Code. For further discussion, refer to Topical Response No. 3, further explaining the Project’s less than significant impact from lighting on biological resources. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 12-3**Bright city lights exacerbate air pollution**

<http://cires1.colorado.edu> › science › spheres › lights

Stark’s measurements indicated the energy of the nighttime lights slowed down nighttime *cleansing*by [sic] up to 7 percent and also increased the starting chemicals...

Response to Comment No. 12-3

The air quality analysis include in Section IV.B, Air Quality, of the Draft EIR was performed consistent with SCAQMD CEQA Guidelines. The SCAQMD also establishes numeric significance thresholds to evaluate potential air quality impacts related to Project construction and operational emissions. As shown Table IV.B-9, Table IV.B-10, Table IV.B-11 and Table IV.B-12 of Section IV.B, Air Quality, of the Draft EIR, Project criteria pollutant emissions would remain well below SCAQMD significance thresholds on a regional and localized level. Therefore, the Project would not result in a significant impact with regards to air quality. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 12-4

This area is an environmentally sensitive area that the public has paid over \$200 million for its acquisition and study. Further studies must also be done for full CEQA and federal EIS studies.

Response to Comment No. 12-4

The commenter is referencing an area known as the Ballona Wildlife Reserve. As described in Section IV.C, Biological Resources, of the Draft EIR, Project impacts would be less than significant with the implementation of Mitigation Measures BIO-MM-1 through BIO-MM-4. Additionally, as discussed in Topical Response No. 3, Project Design Feature AES-PDF-1, would limit light trespass at the Ballona Wildlife Reserve a maximum of 0.02 foot-candles. This maximum light trespass of 0.02 fc is well below the most stringent recommendation of 0.09 fc for the LZI Zone for “Special Districts and Government Designated Parks” within the California Administrative Code. For further discussion, refer to Topical Response No. 3, further explaining the Project’s less than significant impact from lighting on biological resources.

Further, the Draft EIR was prepared pursuant to CEQA Guidelines Section 15151, Standards for Adequacy of an EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 12-5

<https://travislongcore.net/research/light-pollution>

LIGHT POLLUTION , Travis Longcore, Catherine Rich

In 2002, the American researchers Travis Longcore and Catherine Rich organized the first conference on the ecological consequences of artificial *lightat* [sic] night.

Ecological light pollution—Travis Longcore—Academia.edu

https://www.academia.edu/Ecological_light_pollution

REVIEWS REVIEWS REVIEWS 191 Ecological *lightpollution* [sic] *Travis Longcoreand* [sic] Catherine Rich Ecologists have long studied the critical role of natural *lightin*... [sic]

Ecological Consequences of Artificial Night Lighting

<https://www.researchgate.net/publication/40777410...>

Jul 5, 2022—Travis Longcore at University of California, Los Angeles... Therefore, *light pollution through its impact on internal clock timewhich*... [sic]

Lighting's Impact on the Animal World with Travis Longcore

<https://www.youtube.com> › watch



Lighting for Safety and CPTED (Crime Prevention Through Environmental Design) with Art Hushen. International Dark-Sk...

YouTube · International Dark-Sky Association · Apr 22, 2020

Response to Comment No. 12-5

Refer to Topical Response No. 3, Biological Resources, for a discussion which further clarifies the Project would meet CALGreen standards for lighting at all Site Locations. Specifically, as described in Topical Response No. 3, Project Design Feature AES-PDF-1 would install state of the art louvers at locations with sensitive habitat (TCN Structures FF-13, FF-14, FF-25, FF-29, and FF-30) to reduce lighting levels to 0.02 fc, which is well below the 0.74 fc standard under CALGreen. This maximum light trespass of 0.02 fc is well below the most stringent recommendation of 0.09 fc for the LZI Zone for “Special Districts and Government Designated Parks” within the California Administrative Code. It should be noted that FF-13 and FF-14 are currently located near a proposed park, and conditions at the current site consist of vacant land with very limited vegetation. However, as the park is proposed to have habitat restoration areas, this area is considered to contain future sensitive habitat to provide for a conservative analysis. The attachments have been reviewed and data relevant to the project has been considered. The Project would add minimal additional light to already disturbed areas in habitat by wildlife habituated to lighting and other human disturbance. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 12-6

Study reveals which outdoor lighting minimizes harm to insects

<https://www.ioes.ucla.edu> › article › study-reveals-whic... [sic]

Mar 17, 2021—UCLA–Smithsonian research confirms *certain LED colors cause less damage* than... [sic] co-authors is UCLA conservation scientist Travis Longcore

Thank you for your time spent in review of this information and please preclude new illuminated signage in all areas that may be negatively impacted.

Response to Comment No. 12-6

Refer to Topical Response No. 3 for a discussion which further clarifies the Project would meet CALGreen standards for lighting at all Site Locations. Specifically, as described in Topical Response No. 3, Project Design Feature AES-PDF-1 would install state of the art louvers at locations with sensitive habitat (TCN Structures FF-13, FF-14, FF-25, FF-29, and FF-30) to reduce lighting levels to 0.02 fc, which is well below the 0.74 fc standard under CALGreen. This maximum light trespass of 0.02 fc is well below the most stringent recommendation of 0.09 fc for the LZI Zone for “Special Districts and Government Designated Parks” within the California Administrative Code. It should be noted that FF-13 and FF-14 are currently located near a proposed park, and conditions at the current site consist of vacant land with very limited vegetation. However, as the park is proposed to have habitat restoration areas, this area is considered to contain future sensitive habitat to provide for a conservative analysis. The referred-to article has been reviewed and while the analysis is applicable, the data provided does not change the determination that lighting effects on wildlife would not be significant. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 13

Theresa Saso
HHPNC Secretary
Historic Highland Park Neighborhood Council
P.O. Box 50791
Los Angeles, CA 90050-0791

Charles Blumsack
President
Historic Highland Park Neighborhood Council
P.O. Box 50791
Los Angeles, CA 90050-0791

Comment No. 13-1

The Historic Highland Park Neighborhood Council (HHPNC) represents over 60,000 Los Angeles stakeholders who reside, own property, or conduct business in the neighborhoods of Highland Park and Garvanza. The HHPNC Board voted at its Board and Stakeholder meeting held on October 11, 2022, to submit this comment letter and CIS regarding the Transportation Communication Network (TCN) Draft Environmental Impact Report (DEIR). The HHPNC opposes the Building of the TCN and supports the NO BUILD ALTERNATIVE.

[PLEASE SEE THE TWO ATTACHED PDFS FOR FULL CIS AND SUPPORTING DOCUMENTS]

The Historic Highland Park Neighborhood Council (HHPNC) represents over 60,000 Los Angeles stakeholders who reside, own property or conduct business in the neighborhoods of Highland Park and Garvanza. The HHPNC Board voted at its Board and Stakeholder meeting held October 11, 2022 to submit this comment letter and CIS regarding the Transportation Communication Network (TCN) Draft Environmental Impact Report (DEIR). The HHPNC opposes the Building of the TCN and supports the NO BUILD ALTERNATIVE.

Response to Comment No. 13-1

The commenter expresses general opposition to the Project and supports Alternative 1—No Project Alternative. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not specifically address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 13-2

According to Metro, the purpose of the proposed project is to “provide a network of TCN Structures that would incorporate intelligent technology components to promote roadway efficiency, improve public safety, increase communication, and provide for outdoor advertising that would be used to fund new and expanded transportation programs consistent with the goals of the Metro Vision 2028 Plan... The Metro TCN Program also includes the removal of existing static signage throughout the City. Implementation of the Project would include the installation of up to 34 Freeway-Facing (FF) TCN Structures and 22 Non-Freeway Facing (NFF) TCN Structures, all on Metro owned property.”

Response to Comment No. 13-2

The commenter summarizes the underlying purpose of the Project and the Project’s design as included in Chapter II. Project Description, of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 13-3

An EIR is an informational document that will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives.

Response to Comment No. 13-3

This comment generally describes the purpose of EIRs. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not specifically address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 13-4

After review of the DEIR, the HHPNC concludes that the DEIR does not provide sufficient evidence that this project is needed or that it will benefit residents of Los Angeles.

Response to Comment No. 13-4

The commenter states that the Draft EIR does not provide sufficient evidence that this project would be needed or beneficial to the City. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 13-5

Further, we are concerned that to the contrary, this project could present a danger to motorists and pedestrians, have a negative impact on our historical resources, and negatively impact the well-being of our residents and wildlife.

If Metro is seeking to raise funds a cost benefit analysis should be prepared analyzing this.

Response to Comment No. 13-5

The commenter expresses general opposition to the Project due to concerns regarding transportation hazards, impacts on historical resources, and impacts on biological resources and on residents. For further discussion of transportation related issues, historical resources, and biological resources, refer to Sections IV.K Transportation, IV.D Cultural Resources, and IV.C Biological Resources, respectively, of the Draft EIR. Additionally, for further discussion with regard to the transportation analysis and biological resources, refer to Topical Response Nos. 1, 2, and 3, above. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not specifically address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 13-6

We are also concerned that the document as prepared is biased in favor of the project and inadequately addresses the significant impacts from it.

Response to Comment No. 13-6

The commenter expresses general opposition to the Project and expresses a concern regarding bias. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. Refer to Topical Response No. 1, Transportation Studies, for additional responses regarding the analysis supporting the EIR's conclusions in regard to transportation safety.

Comment No. 13-7

For example, Appendix K, the Transportation and Traffic Safety Review cherry picks three studies to conclude that drivers overwhelmingly pay attention to the road ahead, regardless of the presence of CEVMS or billboards. Two of the studies included are industry sponsored. Additionally, for no clearly explained reasons, the preparer excludes studies done outside of the United States. In doing this, the preparer seems to disregard the widely used literature reviews prepared by Jerry Wachtel, CPE of the Veridian Group. Wachtel's work is cited extensively by local and state government researchers.

Response to Comment No. 13-7

Refer to Topical Response No. 1, Transportation Studies, for a discussion further justifying the use of the studies that were included in Section IV.K, Transportation, and Appendix K, Transportation and Traffic Safety Review, of the Draft EIR. As described therein, the research selected found that a correlation between digital billboards and traffic collisions was “inconclusive at best.” The comments cited additional research which claim to demonstrate the negative impacts of digital billboards on public safety and should nullify the results of the Draft EIR. Upon further review, none of the additional studies cited in the comments provide conclusive evidence that digital billboards cause traffic collisions. Nor do those studies undermine the conclusions of the Draft EIR and the studies relied on for the Draft EIR analysis.

Comment No. 13-8

Further, for the reasons stated within this letter we believe the EIR is deficient.

Response to Comment No. 13-8

The commenter raises general concerns about the adequacy of the Draft EIR.. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 13-9**I. SAFETY**

The HHPNC is concerned for the safety of motorists and residents in the City of Los Angeles from the TCN. We share the concerns indicated below in Wachtel’s Literature Review.

A. Wachtel’s 2018 Updated Literature Review (See Attached) concludes:

1. Broadly summarized, the more recent studies have tended to find that outdoor advertising signs, particularly Commercial Electronic Variable Message Signs (CEVMS) Commercial Electronic Variable Message Signs, attract drivers’ attention, and that more dramatic and salient signs attract longer and more frequent glances.
2. Several of the reported studies suggested that the distraction caused by outdoor advertising signs could be tolerated by experienced drivers and when attentional or cognitive demands of the driving task were low, but that the risk increased when such signs competed for the driver’s visual attention with more demanding

road, traffic, and weather conditions, when travel speeds were higher, or when an unanticipated event or action (such [sic] as a sudden lane change or hard braking by a lead vehicle) occurred to which the driver had to respond quickly and correctly.

3. In addition, the more recent research continues to show that the drivers most susceptible to unsafe levels of distraction from roadside billboards are the young (who are more prone to distraction and less adept at emergency vehicle response) and the elderly (who [sic] have more difficulty with rapidly shifting attention, poorer night vision and glare susceptibility, and slower mental processing time). As will be seen in this Compendium, these concerns are heightened today, with our elderly driver population growing quickly, traffic increasingly dense, more roads under maintenance or repair (construction [sic] and work zones create added risks), and larger, brighter digital and video roadside advertising signs competing for the driver's attention.
 4. Finally, the most recent epidemiological studies (dating from 2014 and 2015) have begun to demonstrate what has long been suspected but not proven—that roadside billboards are associated with increases in crash rates where such billboards are located.
- B. Appendix K, Transportation and Safety Review as previously indicated cherry picked two industry prepared studies in Ohio from 2007 and one 2012 Federal Highway Administration Study. These studies each have limitations and in our opinion are far from conclusive in determining that CEVMS are safe.
1. The 2012 study was conducted in two cities, one in Richmond, Virginia and the other in Reading, Ohio. In both cities, there was a small sample size, in Reading 31 participants and in Richmond 24 participants. The study author acknowledges that there were issues with the interpretation of the specific contributions made by billboards and the environment to the driver's behavior. The author also found that, "The drivers were generally more likely to gaze at CEVMS than at standard billboards," even though he concluded that drivers spent most of their time gazing at the task at hand. Additionally, the billboard refresh rate was 8-10 seconds. The Metro billboard refresh rate would be 8 seconds less than in the study. Shorter refresh rates could be more distracting.
 2. One of the 2007 studies, looked at driver fixation time with CEVMS and found it to be longer than for regular billboards it was less than 1 second, which they concluded was less than the 2.0 second fixation duration threshold that is considered dangerous by the NHTSA

3. The other 2007 study looked at traffic accidents. A 2009 FHA study, indicates the limitations of such studies, “crashes are rare multicausal events which are difficult to measure.”

C. We are concerned that the studies conducted do not look at cities like Los Angeles.

1. None of the studies cited have studied a large city such as Los Angeles where our traffic is legendary.
2. Additionally, we have a large population whose primary language is not English. None of the studies referenced has looked at multi-lingual populations whose primary language is other than English.

Response to Comment No. 13-9

Refer to Topical Response No. 1, Transportation Studies, for a discussion further justifying the use of the studies that were included in Section IV.K, Transportation, and Appendix K, Transportation and Traffic Safety Review, of the Draft EIR. As described therein, the research selected found that a correlation between digital billboards and traffic collisions was “inconclusive at best.” The comments cited additional research which claim to demonstrate the negative impacts of digital billboards on public safety and should nullify the results of the Draft EIR. Upon further review, none of the additional studies cited in the comments provide conclusive evidence that digital billboards cause traffic collisions. Nor do those studies undermine the conclusions of the Draft EIR and the studies relied on for the Draft EIR analysis.

Comment No. 13-10

- D. The DEIR failed to consider the totality of the circumstances that drivers today face including increasingly complex cars and cell phones. How does that one second distraction along with these other distractions impact drivers. See LATimes [sic] article 2022 July attached. <https://www.latimes.com/business/story/2022-07-06/we-are-killing-people-how-technology-has-made-your-car-a-candy-store-of-distraction>

Response to Comment No. 13-10

The comment notes circumstances for drivers and references an article that does not address digital displays or a correlation between digital displays and traffic collisions. Therefore, this article does not invalidate the results of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 13-11**II. Traffic:**

Our stakeholders have raised the question of what impact these signs will have on traffic. Residents have noticed that where these signs are located on a freeway such as the I-5 in Commerce near the Citadel, traffic slows.

Additionally, while the study authors may find that a one second fixation is not significant, in a city of millions and tens of thousands of drivers passing these signs, those seconds add up. We do not believe this issue was sufficiently addressed in the study.

Response to Comment No. 13-11

Refer to Topical Response No. 1, Transportation Studies, for a discussion further justifying the use of the studies that were included in Section IV.K, Transportation, and Appendix K, Transportation and Traffic Safety Review, of the Draft EIR. As described therein, the research selected found that a correlation between digital billboards and traffic collisions was “inconclusive at best.” The comments cited additional research which claim to demonstrate the negative impacts of digital billboards on public safety and should nullify the results of the Draft EIR. Upon further review, none of the additional studies cited in the comments provide conclusive evidence that digital billboards cause traffic collisions. Nor do those studies undermine the conclusions of the Draft EIR and the studies relied on for the Draft EIR analysis.

Further, the comment requests additional evaluation of potential impacts related to vehicular traffic flow and delay. The commenter is referred to the Supplemental Transportation Study included as Appendix K.2, where there is a supplemental discussion on the analysis for vehicle delay. California State Senate Bill 743 (Steinberg, 2013) (SB 743), made effective in January 2014, required the Governor’s Office of Planning and Research (OPR) to change the California Environmental Quality Act (CEQA) guidelines regarding the analysis of transportation impacts to shift from driver/vehicular delay (level of service [LOS]) to vehicle miles traveled (VMT) in order to reduce greenhouse gas emissions (GHG), create multimodal networks, and promote mixed-use developments. Therefore, changes to driver delay are no longer applicable to identify transportation-related significant impacts under CEQA and were not required to be studied. The analysis of the potential transportation/traffic-related impacts of the Project is detailed in Section IV.K, Transportation, and Chapter VI, Other CEQA Considerations, of the Draft EIR. The Project would not result in an increase in number of trips and therefore would result in no increase in VMT. Therefore, VMT impacts would be determined to be less than significant and mitigation measures would not be required.

Comment No. 13-12**III. Impacts to humans and wildlife**

- A. A recent article in the Los Angeles Times cites the impacts from light pollution on residents and wildlife. In the article, the journalists reflects that animals cannot pull down the blinds to light pollution. (see attached <https://www.latimes.com/science/story/2022-09-20/how-an-effort-to-reduce-fossil-fuel-use-led-to-another-environmental-problem-light-pollution>) [sic]
1. UCLA Urban Ecologist, Travis Longcore, PhD states, “There are many, many species who don’t go out and forage during the full moon because it’s too bright and they know they’re going to be vulnerable to predators,”
 2. The articles states, “According to the National Audubon Society, 80% of North American migratory bird species fly at night, and they’re confounded by city lights.”

Response to Comment No. 13-12

Refer to Topical Response No. 3, for a discussion further explaining the Project’s less than significant impact from lighting on biological resources. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 13-13

3. Further there are impacts on humans as well, “Humans, too, are vulnerable to light pollution. Artificial light blocks the production of melatonin, a hormone that regulates sleep cycles, and disrupted sleep cycles have been linked to an array of health problems. The American Medical Assn. warned in 2016 that high-intensity, blue-rich LED lights were “associated with reduced sleep times, dissatisfaction with sleep quality, excessive sleepiness, impaired daytime functioning, and obesity.”

Response to Comment No. 13-13

Section IV.A, Aesthetics, of the Draft EIR, the Lighting Study included as Appendix B to the Draft EIR and the Lighting Study Supplemental Analysis included as Appendix B.2 to this Final EIR, demonstrate that the light trespass illuminance from all 56 Signs would be less than the threshold established by LAMC (3.0 fc) for residential use properties, and less

than the LZ3 standard established by CALGreen (0.74 fc).³ Furthermore, 54 of the 56 Signs would generate light trespass illuminance that would be below 0.3 fc, or less than 10 percent of the LAMC requirement.

The Lighting Study evaluates the light trespass illuminance at the nearest residential use property line, not within the living areas within a residential structure, consistent with established standards and recommendations from CalGreen and IESNA. Light from the signs within the residential structure would be significantly less than the illuminance at the property line due to the additional distance from the sign, the exponential reduction of light with distance, and losses from window glazing. Therefore, the illuminance within the residential living unit would be extremely low (far less than the threshold), and the impact on human health from the sign illuminance would not be significant. Furthermore, all lighting sources in the state of California are regulated by Title 20, which stipulates requirements of flicker frequency to eliminate any hazards due to flicker. Flicker is defined as the amplitude modulation of light at frequencies that has effects on human physiology.⁴ This conclusion of less than significant human health impacts regarding light trespass and flicker rate includes people with sensitive eye conditions, seizure disorder, and ADHD.

Comment No. 13-14

- B. We are concerned that there are cumulative impacts from this project which have not been fully addressed including light pollution which will impact the poorest residents and our communities of color who often live closest to transportation corridors.

Response to Comment No. 13-14

This comment summarizes the general concerns of the commenter regarding cumulative impacts including light pollution. For a discussion of aesthetics and cumulative impacts, refer to Section IV.A, Aesthetics, of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

³ *The Lighting Study Update addresses the reorientation of Sign Location NFF-20 to Vermont Avenue, relocating Site Location FF-30 25 feet, and incorporation of PDF-AES-1 to provide state of the art louvers or other equivalent features at Site Locations FF-13, FF-14, FF-25, FF-29 and FF-30 such that illuminance from these locations at the nearby mapped biological resources habitat areas would be reduced to 0.02 fc. The Lighting Study also reflects a more specific analyses of light trespass from Sign Locations FF-6 and FF-7 that shows that the light trespass illuminance at mapped habitat areas would be 0.075 fc, which is also less than the most conservative CALGreen threshold for LZ1 of 0.09 fc.*

⁴ *Jon McHugh, "Measuring Flicker: California's JA10 Test Methods and Its Uses."*

Comment No. 13-15

There will also be cumulative impacts to wildlife including migratory wildlife. This project will add to light pollution as will the recently approved bus station LED's. [sic]

Response to Comment No. 13-15

This comment summarizes the general concerns of the commenter regarding cumulative impacts including to wildlife. For a discussion of biological resources impacts, refer to Sections IV.C. Biological Resources of the Draft EIR and Topical Response No. 3. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 13-16

- C. The Biological report is inadequate in addressing the impacts to wildlife. It suggests there could be impacts near the Los Angeles River but fails to even visit the site to see what is there. Additionally, it appears there could be impacts to migratory wildlife that uses these bodies of water on their migrations. It does not study the impact to Hollenbeck Park in Boyle Heights which appears to be near FF-10 and FF-11. At this park, egrets and other water fowl use the park as a stopping ground. FF-06 and FF-07 is located in a particularly sensitive area, between Elysian park, Egret Park, an area of the Los Angeles River that indeed has vegetation near the Los Angeles River Greenway Trail, Confluence Park, below Los Angeles River Center and Gardens. We are concerned that impacts and mitigation to wildlife in these areas and throughout the city were not fully addressed including impacts to birds and bats.

Response to Comment No. 13-16

As described in Section IV.C, Biological Resources, of the Draft EIR, the LA River flows within 300 feet TCN Structures FF-6, FF-7, FF-10 and FF-11. In these locations, the LA River is concrete-lined and is not anticipated to support riparian vegetation. Further, Hollenbeck Park is located over 0.6 mile away from FF-10 and FF-11 and this would not cause light intrusion to Hollenbeck Park. In addition, Confluence Park, Egret Park and the Los Angeles River Greenway Trail are located in urban paved areas that are not anticipated to contain habitat that would support sensitive species. Proposed TCN Structures FF-6 and FF-7 would be located approximately 540 feet away from the Elysian Park where potential sensitive habitat may occur. The Inverse Square Law (see Lighting Study Section C) explains the exponential relationship between illuminance and distance. As given in the Lighting Study Table 7: Project Sign Maximum Light Trespass Illuminance, the light trespass degrades to 0.3 fc at 270 feet away from signs FF-6 and FF-7. Using the Inverse Square Law, it can be calculated that the light trespass illuminance from the TCN

Structures at 540 feet away would be reduced to 25% 0.3 fc, or 0.075 fc, which is less than the most conservative threshold for natural habitats given in CALGreen of 0.09 fc. Therefore, the light trespass illuminance from signs FF-6 and FF-7 would not create a significant impact to potential wildlife that may occur at Elysian Park. Therefore, as stated in Section IV.C, Biological Resources, of the Draft EIR, impacts to Biological Resources would be less than significant with the implementation of Mitigation Measures BIO-MM-1 through BIO-MM-4. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 13-17

IV. Corruption

- A. In the City of Los Angeles we have faced corruption amongst politicians and staff. Billboard companies and commercial digital billboards have also been a problem. We are concerned that this project presents more opportunity for corruption within our city.

See the attached articles regarding this.

- B. According to the indictment of Huizar, the approvals of the sign district for The Reef (Council File 16-1058-S2) and of the redevelopment of the billboard-fronted Luxe Hotel (Council File 17-1009-S2) were allegedly tainted by illegal developer-funded kickbacks to Huizar as chair of the PLUM Committee. The alleged bribery took the form of free trips, concert tickets, nepotism, and campaign contributions.

Response to Comment No. 13-17

This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 13-18

V. Impacts to Historical Resources

- A. Visual Impacts to Fourth Street Bridge. We are concerned about the visual impacts to this historic bridge. A look at the location of the sign NFF-21 reveals no urgent need for signage except to obtain advertising dollars. This sign is not needed for safety. It is not replacing anything. It should be removed from consideration.

- B. NFF-13 and NFF-16 are likewise not replacing anything but will have visual impacts to historical resources, Little Tokyo Historic Village and Japanese Village Plaza. The 30 foot structures would have a significant impact on the communities and the large senior populations. They could also impact senior housing nearby.
- C. NFF-2 will have significant visual impacts to the Spring Street bridge. Again, there is no need for signage at this location as none exists now. This is just another opportunity for revenue at the cost of a beautiful historic view that will be greatly diminished by a 30 foot sign.

Response to Comment No. 13-18

The Commenter summarizes the significant and unavoidable impacts to historical resources and the related aesthetic and land use impacts associated with Site Locations NFF-2, NFF-3, NFF-16, and NFF-21. Alternative 2—Elimination of Impacts Relating to Historical Resources and Alternative 3—Elimination of All Project Significant and Unavoidable Impacts would eliminate TCN Structures at Site Locations NFF-2, NFF-3, NFF-16, and NFF-21 proposed by the Project. Under Alternative 2 and Alternative 3, impacts to historical resources and the related aesthetic and land use impacts associated with Site Locations NFF-2, NFF-3, NFF-16, and NFF-21 would be eliminated. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 13-19

VI. Disproportionate Impacts to Communities of Color and Low Income Communities

We are concerned that this project will have disproportionate impacts to lower income communities and communities of color. Metro properties, freeways and public transportation is more often in these communities. Therefore these communities will have more of these unsightly signs with their light pollution and traffic safety impacts. Additionally, there is housing located near to some of these signs. The residents living nearby will have their health impacted by increased pollution from traffic pausing to read the signs, the light pollution and increased traffic safety risks.

Response to Comment No. 13-19

The commenter expresses general opposition to the Project due to light pollution and traffic safety risks. For further discussion of the Project's lighting and traffic safety, see Section IV.A, Aesthetics, and IV.K, Transportation, of the Draft EIR, respectively. As discussed therein, potential lighting and traffic safety impacts were found to be less than significant. This comment is noted for the record and will be forwarded to the decision-

makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 13-20

Thank you for the opportunity to comment.

Response to Comment No. 13-20

This comment concludes the comment letter. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not specifically address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 13-21

Attachment—Select pages from Sidewalk and Transit Amenities Program Initial Study/Mitigated Negative Declaration [38 pages]

Attachment—Preliminary Investigation: Effects of Outdoor Advertising Displays on Driver Safety, Caltrans Division of Research and Innovation, October 11, 2012 [51 pages]

Attachment—The Effects of Commercial Electronic Variable Message Signs (CEVMS) on Driver Attention and Distraction: An Update, Publication No. FHWA-HRT-09-018 February 2009 [96] pages

Attachment—“We are killing people”: How technology has made your car “a candy store of distraction,” *Los Angeles Times*, July 6, 2022 [15 pages]

Attachment—“Big Sign Firm Accused of Corruption,” *Los Angeles Times*, October 23, 2015 [26 pages]

Response to Comment No. 13-21

Responses to these attachments have been included in the comments above. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 14

Benjamin J. Hanelin
Latham & Watkins
355 S. Grand Ave., Ste. 100
Los Angeles, CA 90071-1560

Comment No. 14-1

Please see that attached comment letter on Metro's Draft EIR for its TCN program.

Please let us know if you have any problems accessing the document.

Thank you for the opportunity to comment on Metro's Draft EIR for its Transportation Communication Network ("TCN"). We are writing on behalf of our client, Clear Channel Outdoor, to provide these comments on the Draft EIR and also look forward to participating when the City moves forward to consider its implementation actions in connection with the TCN program.

We and Clear Channel appreciate that Metro and the City of Los Angeles are working to create meaningful opportunities for the reduction of existing off-site signage and provision of public benefits to local communities through traffic improvements funded by new digital signage. Clear Channel has worked with the City over many years in connection with the City's ongoing efforts to update the City's signage regulations to be consistent with dozens of other cities across California that have embraced sign reduction and modernization. Doing so will allow the City and its residents to see the benefits of a modern, forward looking ordinance—one that protects residential communities while modernizing the City's signage infrastructure. Community benefits from digital signs are manifest—from supporting small and local businesses through cost effective advertising, to support for local non-profits, and emergency and safety messaging. Moreover, allowing digital signs and realizing the revenue generated from such signs directly supports both small businesses and communities still recovering from the pandemic.

The proposed TCN builds on a tried and true method for reducing the numbers of existing, aging signs by requiring a two to one square footage take-down ratio, which would lead to the reduction of a significant number of existing non-digital off-premise displays. While beneficial when applied to Metro's signs alone, the true, comprehensive benefits will be far greater if a similar program is adopted City-wide. This approach mirrors that of relocation agreements, authorized by state law, that dozens of California cities have used to achieve the reduction of existing billboards.

Specifically, section 5412 of California's Outdoor Advertising Act states in relevant part that

Cities, counties, cities and counties, and all other local entities are **specifically empowered to enter into relocation agreements on whatever terms are agreeable to the display owner and the city, county, city and county, or other local entity, and to adopt ordinances or resolutions providing for relocation of displays.**

The City process proposed under this limited Transportation Communication Network program would constitute rules allowing the placement of new digital signs on Metro-owned property while requiring that existing signs be removed and "relocated" to the new sign's location. This is the heart of what a "relocation agreement" is. **When the City continues this program we look forward to discussing the potential for the City to adopt such a policy for the entire City and not just for Metro-owned property.**

Response to Comment No. 14-1

This comment expresses general support for the Project but is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not specifically address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 14-2

Regarding the Draft EIR's conclusions, we believe this analysis is similar to the conclusions reached by many other cities, recognizing the many safety requirements incorporated into the design and operation of modern digital signage. The conclusions are very reasonable in that the Draft EIR identifies no significant impacts in the areas of transportation (i.e., traffic safety and hazards), no light or glare impacts that would adversely affect day or nighttime views, and only limited impacts regarding aesthetics as related to the placement of new signage proximate to historic resources. In fact, the Draft EIR concludes that the program would have no aesthetic impacts, save for a few signs located near historic resources.

Similarly, we agree with the Draft EIR's conclusion that the program would not conflict with the majority of the City's local plans adopted to avoid or mitigate environmental impacts. The only potential land use impacts are site-specific and mitigations can address issues such as potential impacts from proximity to historic resources in four locations, and the goals and policies related to these resources, and two sites in a Community Plan area that prohibits off-site advertising. Otherwise, the Draft EIR correctly concludes that there are no land use impacts.

That said, we believe there are some areas where the Draft EIR could be improved and provide a fuller and more complete assessment of both potential project impacts and of a more complete policy to encourage meaningful sign reduction and modernization.

Response to Comment No. 14-2

This comment summarizes the Draft EIR's impact conclusions, as discussed in Chapter IV. Environmental Impact Analysis, of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 14-3

Project Alternatives. The Draft EIR assesses three alternatives to the project: (i) a no project alternative; (ii) an alternative that eliminates impacts to historic resources; and (iii) an alternative that eliminates all significant and unavoidable impacts.

We recommend that the EIR also consider an alternative that would result in additional reduction of existing non-digital signage through the implementation of relocation agreements to non-Metro owned property within the City. Not only would this improve aesthetics through the reduction of existing billboards, it would create additional funding for transportation improvements.

Response to Comment No. 14-3

The commenter recommends the consideration of additional reduction of static displays as a Project alternative. As indicated in Section V. Alternatives of the Draft EIR, the intent of Draft EIR alternatives is to avoid or substantially lessen any of the significant effects of a project while still feasibly obtaining most of the basic project objectives. The reduction of existing static displays is not required to mitigate any significant environmental impacts of the proposed TCN Program, and therefore would not qualify as a feasible alternative. As part of the TCN Program, a take-down component would be implemented that would include the removal of at least 110,000 square feet (2 to 1 square footage take-down ratio) of existing static displays. Signage to be removed would include, at a minimum, approximately 200 static displays located within the City. The final takedown ratio will be determined as part of the establishment of City's Zoning Ordinance. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 14-4

Analysis Under the Outdoor Advertising Act. The placement of off-site signage visible from freeways is also regulated by the State's Outdoor Advertising Act administered by Caltrans.

The Outdoor Advertising Act sets various standards for locating off-site signs along freeways. These include prohibiting the placement of off-site signs along landscaped freeway segments and setting spacing and size requirements, and the City has its own regulations addressing similar issues. The Outdoor Advertising Act's spacing requirements provide the following.

- Signs must be 500 feet from any other permitted display on same side of any highway that is a freeway.
- Signs must be 300 feet from any other permitted display on same side of any primary highway that is not a freeway in an unincorporated area.
- Signs must be 100 feet from any other permitted display on same side of any primary highway that is not a freeway and is within the limits of an incorporated city.
- Signs must be 500 feet from an interchange; intersection at grade or safety roadside rest if the highway is a freeway and the location is outside the limits of an incorporated city and outside the limits of an urban area.

Regarding a sign's size, the maximum area is 25 feet in height and 60 feet in length with an overall maximum of 1,200 square feet.

We bring these limitations to your attention because it is not clear that the Draft EIR's analysis considered fully the project's consistency with the Outdoor Advertising Act. While the Draft EIR says that the project would comply with the Outdoor Advertising Permit requirements (IV.K-16), there does not appear to be an analysis of the Act's requirements on a location-by-location basis.

For example, Metro properties are located on landscaped freeways. These include locations the Draft EIR identifies as FF-04, FF-05, FF-08, FF-09, FF-15 through FF-20, and FF-26 to FF-30. The Draft EIR states that the new signs would be 500 feet from any scenic highway or landscaped segment of a freeway. (IV.K-21.) It is unclear how this is possible if the signs are intended to be viewed from the freeway. Further, under the Outdoor Advertising Act, outdoor advertising signs require a permit from Caltrans if they are within 660 feet from the edge of the right-of-way and viewed primarily by persons traveling on the main-traveled way of the freeway. The suggestion in the EIR that this distance is 500 feet, rather than 660 feet, should be clarified.

Similarly, other locations are located within 300 and 500 feet of existing off-site signs. For example, locations FF-12, FF-27, FF-29, and FF-30 are located within close proximity of existing signs. Yet the Draft EIR states that "at Project completion, none of the TCN Structures would be located within 500 feet of an existing sign..." (IV.K-21.) How is this

guaranteed? Existing signs are secured by leasehold or ownership interests and cannot merely be removed by the City or Metro. As such, it is not clear that signs would be permitted at these locations under the Outdoor Advertising Act.

Response to Comment No. 14-4

The commenter reiterates that the Project must be consistent with the State of California's Outdoor Advertising Act administered by Caltrans and includes the requirements under the act. As included in Comment Letter No. 1, a letter from Caltrans states the Project would be consistent with Caltrans guidelines for digital signage locations near freeways. Additionally, Metro would continue to coordinate with Caltrans on the Project and understands the Project would require an Outdoor Advertising License. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 14-5

Precise Location of Signs on Metro Property Should be Identified. While the Draft EIR identifies the locations of Metro's properties on which the digital signs could be located, the Draft EIR does not identify specifically on each property where the signs would be located. Similarly, the Draft EIR does not state how tall the signs would need to be to be visible from adjacent freeways. This information will be helpful in understanding the potential scope of the impacts. For Metro properties along surface streets, will signage be permitted to overhang the public right-of-way? This information should be provided to inform the environmental analysis as well as consistency with the Outdoor Advertising Act and other laws governing the location of off-site signage.

Response to Comment No. 14-5

Contrary to what is stated in this comment, the Draft EIR provided the specific locations and height from grade of each of the proposed TCN Structure in Tables II-1 and II-2 of Chapter II, Project Description, of the Draft EIR. Additionally, aerial and ground level views of each Site Location are included in Figures III-1 through III-15 and Figures IV.A-1 through IV.A-15, in Sections III. Environmental Setting and IV.A. Aesthetics of the Draft EIR, respectively. Further, placement of the Non Freeway Facing TCN Structures would be coordinated with the Los Angeles Department of Transportation. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 14-6

Thank you for your attention to these issues. We look forward to working with the City and Metro on crafting a sign ordinance that benefits all of the City's communities and residents

through the reduction of existing signage, community benefits, and the advent of modern signage capable of delivering real-time safety, transportation, and community messaging.

Response to Comment No. 14-6

This comment concludes the comment letter. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not specifically address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 15

Travis Longcore
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Los Angeles, CA 90041-8301

Comment No. 15-1

Please see attached letter from Los Angeles Audubon Society.

The Draft Environmental Impact Report (DEIR) for the Transportation Communications Network (TCN) acknowledges that the facilities would be constructed in locations that would impact sensitive species, including federally and state listed endangered species, and sensitive bat species (see Biological Resources Technical Report, All Vision LLC, August 2022).

Response to Comment No. 15-1

For a discussion of biological resources, refer to Sections IV.C. Biological Resources of the Draft EIR and Topical Response No. 3 above. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 15-2

The analysis of biological impacts does not include a description of or even an attempt to quantify the effects of light pollution on these sensitive species.

Response to Comment No. 15-2

Contrary, to this comment, as described in Section IV.A, Aesthetics, of the Draft EIR, no mitigation measures are required to reduce lighting levels during project operations to a less than significant level. Further, refer to Topical Response No. 3 for a discussion which further clarifies the Project would meet CALGreen standards for lighting at all Site Locations. Specifically, as described in Topical Response No. 3, Project Design Feature AES-PDF-1 would install state of the art louvers at locations with nearby sensitive habitat (TCN Structures FF-13 FF-14, FF-25, FF-29, and FF-30) to reduce lighting levels to 0.02 fc, which is well below the 0.74 fc standard under CALGreen. This maximum light trespass of 0.02 fc is well below the most stringent recommendation of 0.09 fc for the LZI Zone for “Special Districts and Government Designated Parks” within the California Administrative

Code. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 15-3

The environmental impacts of light pollution on sensitive species are well-documented. See attached reports and papers for an introduction to these issues.

The lighting study for the DEIR only addresses impacts to humans, not to sensitive wildlife. Notwithstanding existing light pollution, its impacts on wildlife are cumulative and must be evaluated under CEQA. Therefore, the DEIR must be revised and recirculated so that the impacts to sensitive wildlife are evaluated, and the U.S. Fish and Wildlife Service must be consulted because of the potential adverse impacts to species listed under the U.S. Endangered Species Act at the Ballona Wetlands Ecological Reserve.

Response to Comment No. 15-3

Contrary, to this comment, as described in Section IV.A, Aesthetics, of the Draft EIR, no mitigation measures are required to reduce lighting levels during project operations to a less than significant level. Further, refer to Topical Response No. 3 for a discussion which further clarifies the Project would meet CALGreen standards for lighting at all Site Locations. Specifically, as described in Topical Response No. 3, Project Design Feature AES-PDF-1 would install state of the art louvers at locations with sensitive habitat (TCN Structures FF-13, FF-14, FF-25, FF-29, and FF-30) to reduce lighting levels to 0.02 fc, which is well below the 0.74 fc standard under CALGreen. This maximum light trespass of 0.02 fc is well below the most stringent recommendation of 0.09 fc for the LZI Zone for “Special Districts and Government Designated Parks” within the California Administrative Code. It should be noted that FF-13 and FF-14 are currently located near a proposed park, and conditions at the current site consist of vacant land with very limited vegetation. However, as the park is proposed to have habitat restoration areas, this area is considered to contain future sensitive habitat to provide for a conservative analysis.

For a discussion on cumulative environmental impacts, refer to Page IV.C-40 of Section IV.C, Biological Resources, of the Draft EIR. Additionally, a takedown ration of at least 2 to 1 of existing static displays would be removed throughout the City. When an agency determines that the combined effects from the proposed project and related projects would not result in a potentially significant cumulative impact, the EIR only briefly needs to indicate why the cumulative impact is not significant and is not discussed in further detail. (CEQA Guidelines, § 15130.) This is what the Draft EIR did in the context of biological resources because of the site-specific nature of the Project.

Further, the Final EIR does not include significant new information” as defined by CEQA Guidelines Section 150088.5 that would require recirculation. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 15-4

Attachment—Review of Biological Impacts Analysis in Mitigated Negative Declaration for State Route 78 Digital Sign, City of Oceanside, California, Land Protection Partners, June 22, 2015 [8 pages]

Attachment—Determining the Effects of Artificial Light at Night on the Distributions of Western Snowy Plovers (*Charadrius nivosus nivosus*) and California Grunion (*Leuresthes tenuis*) in Southern California; *Journal of Coastal Research*, 38(2):302–309 (2021) [8 pages]

Attachment—Salt Lake City Street Lighting Master Plan, May 2020, Appendix D, Nocturnal Infrastructure for Ecological Health [45 pages]

Attachment—Ecological and Organismic Effects of Light Pollution, eLS, 2016 [8 pages]

Response to Comment No. 15-4

Refer to Topical Response No. 3 for a discussion which further clarifies the Project would meet CALGreen standards for lighting at all Site Locations. Specifically, as described in Topical Response No. 3, Project Design Feature AES-1 would install state of the art louvers at locations with sensitive habitat (TCN Structures FF-13, FF-14, FF-25, FF-29, and FF-30) to reduce lighting levels to 0.02 fc, which is well below the 0.74 fc standard under CALGreen. This maximum light trespass of 0.02 fc is well below the most stringent recommendation of 0.09 fc for the LZI Zone for “Special Districts and Government Designated Parks” within the California Administrative Code. It should be noted that FF-13 and FF-14 are currently located near a proposed park, and conditions at the current site consist of vacant land with very limited vegetation. However, as the park is proposed to have habitat restoration areas, this area is considered to contain future sensitive habitat to provide for a conservative analysis. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 16

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Comment No. 16-1**Executive Summary:**

The Metro Transportation Communications Network (TCN) plan to install 34 freeway-facing and 22 non-freeway facing digital billboards within the City of Los Angeles will harm drivers, and is bad policy for the City. The Draft Environmental Impact Report (DEIR) is flawed and does not account for the harms caused by digital signs, nor does it fully account for the City of Los Angeles' ban on billboards that was adopted in 2002 to reduce visual blight and improve community aesthetics and traffic safety.

As the only national nonprofit dedicated to protecting and enhancing America's visual character, Scenic America actively supports local efforts to preserve scenic beauty and oppose visual blight in cities throughout the United States. Our organization has identified billboards as a particularly harmful form of scenic blight, with significant negative impacts, and for almost 40 years we have worked with national, state, and local officials to ensure that outdoor advertising is properly regulated.

We have learned of Metro TCN's plan to install digital signs on Metro-owned property within the City of Los Angeles, and we have reviewed the project's DEIR, published September 9, 2022. Based on the experiences of cities which have completed similar projects, as well as robust research evidence, Scenic America recommends that Metro and the City halt this project. The DEIR is flawed and incomplete, omitting key information about the impacts of digital signs.

Response to Comment No. 16-1

The commenter expresses general opposition to the Project due to concerns regarding aesthetics and transportation hazards. For further discussion of aesthetics and transportation related issues, refer to Sections IV.A. Aesthetics and IV.K Transportation, respectively, of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 16-2

The TCN project would increase scenic blight throughout the city, and create hazards to human health, natural environment, and quality of life.

Response to Comment No. 16-2

The commenter expresses general opposition to the Project due to concerns regarding human health, natural environment, and quality of life. For further discussion of aesthetics, biological resources, and transportation related issues, refer to Section IV.A, Aesthetics; Section IV.C, Biological Resources; and Section IV.K, Transportation, respectively, of the Draft EIR. Additionally, the commenter should refer to Topical Responses No. 1, 2, and 3 above, which provide further clarifying information with regard to transportation safety and biological resources. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 16-3

To begin, on page IV.A-49, in the Aesthetics section, the DEIR concludes:

“...the Project would conflict with plan polices regarding scenic quality. To the extent that there are related projects that also would result in inconsistencies with plan policies regarding scenic quality, cumulative impacts associated with scenic views would be significant.”

This is accurate, and the DEIR includes details about specific scenic impacts to residences and businesses at certain proposed sign locations. The DEIR also includes a review of potential for mitigation related to alternative proposals, and concludes that allowing any digital signs will have negative aesthetic impacts.

Response to Comment No. 16-3

Contrary to what is stated in this comment, aesthetics impacts are only related to a subset of TCN Structures. The Draft EIR determined that impacts would be limited to historical resources impacts associated with impacting the integrity of setting of historical resources and related aesthetic and land use impacts due to Site Locations NFF-2, NFF-3, NFF-16, and NFF-21, and land use policy impacts associated with placing off-site commercial signage (Site Locations FF-29 and FF-30) in the coastal area. All other impacts including potential aesthetic impacts were concluded to be less than significant based on the detailed analysis in the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 16-4

This section of the report clearly acknowledges the ways in which the proposal will conflict with the City of Los Angeles General Plan, but does not sufficiently account for the Mobility Element, specifically regarding Scenic Highways. The DEIR mentions the historic Arroyo Seco Parkway, but dismisses potential impacts to the scenic quality of the route. In light of the General Plan, these potential harms must be reevaluated.

Regarding Scenic Highways, the General Plan Mobility Element states:¹

“2.16 Scenic Highways: Ensure that future modifications to any scenic highway do not impact the unique identity or characteristic of that scenic highway. Scenic Highways include many of the City’s iconic streets. Preservation and enhancement of these streets and their scenic resources need to be preserved per the Scenic Highways Guidelines in Appendix B of this Plan.”

Appendix B includes the following provisions;

“Appendix B: Inventory of Designated Scenic Highways and Guidelines

4. Signs/Outdoor Advertising

- a. Only traffic, informational, and identification signs shall be permitted within the public right-of-way of a Scenic Highway.
- b. Off-site outdoor advertising is prohibited in the public right-of-way of, and on publicly-owned land within five hundred feet of the center line of, a Scenic Highway.
- c. A standard condition for discretionary land use approvals involving parcels zoned for non-residential use located within five hundred feet of the center line of a Scenic Highway shall be compliance with the sign requirements of the CR zone.
- d. Designated Scenic Highways shall have first priority for removal of nonconforming billboards or signs. Such priority extends to properties located along, or within five hundred feet of the center line of, designated Scenic Highways.”

To ensure the above was appropriately implemented, the following language was adopted by City Council at the request of CM Rosendahl when the bus bench contract came up for renewal in 2011:

“(6) CONTRACTOR’s site preference. New Bus Benches will be installed in a manner that is consistent with all local zoning codes, including restrictions on off-site advertising set forth in the General Plan, Community Plans, Specific Plans as enacted by City Ordinance, the California Coastal Act, and all other applicable law.”

¹ <https://planning.lacity.org/plans-policies/initiatives-policies/mobility>

Response to Comment No. 16-4

Page IV.I-20 of Section IV.I, Land Use Planning, and page 17 of Appendix I, Table 5, of the Draft EIR specifically describe the Project’s consistency with the Mobility Plan 2035—or the “Mobility Element.” The Draft EIR explains that two of the Project’s site locations (NFF-7 and NFF-12) would be inconsistent with a guideline of Appendix B of the Mobility Plan due to advertising adjacent to two segments of scenic highways, but that the Project overall would not conflict with the Mobility Plan. The EIR found the Project to be largely consistent with applicable plans, but inconsistent with a few policies that ultimately led to a determination that the Project’s impacts related to conflicts with applicable plans, policies, and regulations would be significant and unavoidable.

Under applicable law and the express language of the City’s plans, strict conformity with all aspects of a general plan is not required, and a project would be considered consistent with the land use policies if it furthers one or more policies and does not obstruct other policies. The City’s determination on consistency with its own plans generally has deference. The City will review the guidelines provided in the Mobility Plan when it reviews the Project overall and will reach its own conclusion regarding the Project’s consistency with its plans.

Finally, an inconsistency between a proposed project and an applicable plan is a legal determination, not a physical impact on the environment as required to be analyzed under CEQA. The comment does not provide any evidence that any alleged inconsistency with land use policies directly relate to mitigating or avoiding environmental impacts. The comment refers to a general guideline, as opposed to a mandatory element, in the Mobility Plan, and the commenter does not identify any specific aesthetic or other environmental impacts from lack of consistency with the Mobility Plan policy or any other provision that would have been mitigated or avoided by the guidelines in Appendix B.

In fact, the Mobility Plan guidelines do not relate to environmental effects. Rather, according to the City of Los Angeles, they were policy choices, as no part of the Mobility Plan or past related plans (i.e., 1978 Scenic Highway Plan and 1999 Transportation Element) addressed such environmental effects. Moreover, the CEQA environmental analysis for those plans did not address such environmental effects and did not find any significant aesthetic impact (or other impact related to advertising) as a result of the plans,

or any significant environmental effect that any plan provision was addressing related to advertising, particularly in Scenic Highways.

Comment No. 16-5

Regarding the traffic safety portion of the DEIR raises other concerns:

Contrary to the findings of the DEIR, there is a preponderance of evidence demonstrating the negative impacts digital billboards have on public safety by altering driver behavior. In brief, digital billboards create dangerous and unavoidable driver distractions, by design and for the purpose of drawing driver attention away from the road and toward the advertisements. Human error is the leading cause of traffic accidents, and lawmakers have come to recognize the importance of reducing driver distraction by enacting laws to ban cell phone use while driving. As digital billboards have become more common, an emerging body of research indicates that digital billboards create similar distraction conditions. For an extensive list of the dangers which digital billboards pose to drivers, please refer to this compendium of research studies which describe the hazards at length.² Also note that the illumination standards, hours of operation and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ May 2021.

The latest research demonstrates that even changing electronic signs erected solely for public information purposes create hazards for drivers, indicating that the medium of digital signs is inherently dangerous.³

The Traffic Safety section of the DEIR fails to account for this evidence. The report contains no original analysis of the relationship between signs and driver safety, and relies on a literature review of stale and inadequate research. This review was itself limited to three studies. First, it cites a FHWA 2013 report on digital signs which is badly flawed, as explained at length in the 2015 report “A Peer-Reviewed Critique of the Federal Highway Administration (FHWA) Report Titled: “*Driver Visual Behavior in the Presence of Commercial Electronic Variable Message Signs (CEVMS)*” The other two studies in the report were sponsored by the outdoor advertising industry.⁴ The other two studies were sponsored by the outdoor advertising industry, and should not be taken at face value.

This is not a sufficiently robust research design for concluding that digital signs will not harm drivers. The compendium of research cited above contains a thorough meta-analysis of dozens of studies, including tests of individual driver behavior, and concluded that digital signs draw driver attention to a dangerous degree.

² Compendium of Recent Research Studies on Distraction from Commercial Electronic Variable Message Signs (CEVMS), Jerry Wachtel, CPE President, The Veridian Group, Inc. Berkeley, California, Feb., 2016 (October 2020 edition), <https://www.scenic.org/wp-content/uploads/2021/10/Billboard-Safety-Study-Compendium-10-16-2020.pdf>

- ³ <https://www.scenic.org/blog/research-shows-that-digital-traffic-safety-messages-contribute-to-highway-accidents-and-fatalities/>
- ⁴ <https://www.scenic.org/wp-content/uploads/2021/06/Critique-of-FHWA-2013-Billboard-Safety-Final-Report.pdf>

Response to Comment No. 16-5

Refer to Topical Response No. 1, Transportation Studies, for a discussion further justifying the use of the studies that were included in Section IV.K, Transportation, and Appendix K, Transportation and Traffic Safety Review, of the Draft EIR. As described therein, the research selected found that a correlation between digital billboards and traffic collisions was “inconclusive at best.” The comments cited additional research which claim to demonstrate the negative impacts of digital billboards on public safety and should nullify the results of the Draft EIR. Upon further review, none of the additional studies cited in the comments provide conclusive evidence that digital billboards cause traffic collisions. Nor do those studies undermine the conclusions of the Draft EIR and the studies relied on for the Draft EIR analysis.

TCN Structures would be permitted within a City adopted Sign District, Specific Plan, or Supplemental Use District. Refer to Response to Comment No. 9-18 regarding the proposed Zoning Ordinance for the TCN Structures.

Comment No. 16-6

The DEIR acknowledges that the City of Los Angeles has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. However, regarding this program, the draft concludes:

“The TCN Structures would be located outside of the public right-of-way on Metro-owned property. Thus, the TCN Structures would not preclude the City from installing Vision Zero improvements to enhance the safety of the High Injury Network and, therefore, would not conflict with the Vision Zero Program.”

Essentially, Metro states that hazards created by installing digital signs are a problem which the rest of the city must mitigate. However, the dangers posed by Metro’s signs would not be limited to its property. The City’s roadway users would suffer the consequences, which would undermine the Vision Zero Program.

Response to Comment No. 16-6

The comment claims that the danger posed by the digital billboards would create additional roadway hazards and undermine the City’s ability to achieve its Vision Zero program goals. Please review the Topical Response No. 1, Transportation Studies for a

detailed discussion of the Project's consistency with local and state guidelines as well as applicable research supporting the conclusion that the Project impacts with regard to hazards due to a geometric design feature or incompatible use would be less than significant. Further, Refer to Topical Response No. 2, City of Los Angeles Vision Zero, for a discuss of the Project's consistency with LADOT's Vision Zero policies aimed at eliminating traffic deaths by 2025. Additionally, Metro would continue to coordinate with Caltrans and LADOT on all necessary approvals for Project.

Comment No. 16-7

The DEIR and related TCN communications cite the advantages of digital signs as an opportunity to remove static billboards. This tactic has been employed by other cities and its implications are significant, because it acknowledges that billboards are undesirable, and that reduction in the total number of billboard structures or faces can serve as a compromise to expediate the approval of digital billboards. If they were to accept a compromise like this, Los Angeles should understand the exchange ratios which other cities have negotiated.

For example, Tampa, FL accepted a deal for a ten to one ratio. Kansas City, MO considered a proposal for an equivalent seven to one conversion agreement. Gulfport, MS had an agreement for a six to one conversion ratio. The terms in the Los Angeles plan are uncompetitive, with a two to one ratio. Once again, the basis of these provisions is an understanding that billboards in general are bad for communities. Further, the LA City Planning Commission recommended a take-down ratio of ten static billboards for every digital billboard.

Response to Comment No. 16-7

Refer to Response to Comment No. 9-25 regarding the take-down of existing static displays as part of the Project.

Comment No. 16-8

Finally, evidence indicates that all billboards, including digital billboards, can reduce property values by more than \$30,000 for individual homes.⁵ Because of the high visibility of digital billboards, many homeowners would be impacted by the TCN plan.

⁵ https://www.scenic.org/wp-content/uploads/2019/09/Beyond_Aesthetics1.pdf

Response to Comment No. 16-8

This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their

review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 16-9

In addition, while the TCN plan notes that no sign structures are to be erected on residentially-zoned [sic] land, recent housing programs are incentivizing the placement of residential housing units on commercial and other zoned lots. Thus increasing the likelihood of direct impacts of these signs in and around residential dwelling units and all of those who live within them.

Response to Comment No. 16-9

Refer to Response to Comment No. 9-21 regarding the evaluation of existing and future residential uses in the vicinity of the proposed TCN Structures.

Comment No. 16-10

In light of these concerns, which the DEIR fails to address, we strongly recommend that neither Metro nor the City move forward with the installation of digital signs on its property within the City of Los Angeles.

Thank you for your consideration, and we will be available to answer your questions and provide guidance as needed.

Response to Comment No. 16-10

The commenter expresses general opposition to the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 17

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Comment No. 17-1

Please include the attached letter from the Coalition for a Scenic Los Angeles to the record in response to Metro's TCN Draft EIR. We look forward to reviewing Metro's responses. Please add rosenfree@aol.com, wncluc@gmail.com, and patrick.frank@scenic.org to the notification list for this Project.

The Coalition for a Scenic Los Angeles ("Scenic LA")¹ submits the following comments and questions (see Question Appendix) in response to the Los Angeles County Metropolitan Transportation Authority ("Metro") Transportation Communications Network ("TCN") Program ("Project or TCN Program") Draft Environmental Impact Report ("DEIR" or "Draft EIR") on behalf of our 20,000 members. Scenic LA is the leading voice dedicated to the enhancement and protection of the visual environment of the greater Los Angeles area.

¹ The Coalition for a Scenic Los Angeles, formerly the Coalition to Ban Billboard Blight, is a non-profit organization dedicated to protecting and enhancing the city's visual environment. A chapter of the national non-profit organization, Scenic America, the Coalition for a Scenic Los Angeles advocates through education and political action on behalf of many important issues, including: reducing visual blight from billboards and other forms of commercial signage to promote traffic safety and improve public health; preserving urban forest and open space; establishing federally-recognized Scenic Byways; undergrounding utility lines; treating our scenic resources as treasures to be passed on to future generations; promoting equitable public policies to accomplish those goals.

Response to Comment No. 17-1

This commenter has been added to the distribution list for Project updates. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not specifically address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 17-2

According to the Draft EIR, Metro proposes to implement the TCN Program, which would provide a network of structures with digital displays (“TCN Structures”) that would incorporate intelligent technology components to promote roadway efficiency, improve public safety, augment Metro’s communication capacity, and provide for outdoor advertising revenues. Implementation of the Project would include the installation of up to 34 Freeway-Facing TCN Structures and 22 Non-Freeway Facing TCN Structures all on Metro-owned property. The total maximum amount of digital signage associated with the TCN Structures would be up to approximately 55,000 square feet. As part of the TCN Program, a takedown component would be implemented at a 2 to 1 square footage takedown ratio of existing off-premise static displays. Signage to be removed would include, at a minimum, approximately 200 off-premise static displays located within the City of Los Angeles (“City”).

Response to Comment No. 17-2

The commenter generally summarizes the Project as included in Chapter II, Project Description, of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-3

Metro’s TCN Program promises to improve traffic safety and congestion, reduce the amount of outdoor advertising in the City, and raise revenue to fund new Metro programs. These goals may appear laudable, but the first two are unsupported by fact-based evidence, and the efficacy of the third is both uncertain and far outweighed by the negative impacts of the Project, which include creating traffic hazards, degrading the City’s visual environment, and greatly increasing the exposure of a captive audience of children and adults to commercial advertising of products and services that studies have shown have deleterious effects on physical and mental health.

Response to Comment No. 17-3

The commenter expresses general opposition to the Project due to concerns regarding transportation hazards, aesthetics, and advertising content. For further discussion of aesthetics and transportation related issues, refer to Sections IV.A. Aesthetics and IV.K Transportation, respectively, of the Draft EIR. In addition, the digital displays would be in compliance with Metro’s System Advertising Content Restrictions which prohibits advertisement of alcohol, smoking, and cannabis, and any content containing violence, obscenities, and other related subject matters as described in Chapter II, Project Description, of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment

does not specifically address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 17-4

The DEIR fails to adequately examine these impacts and arrives at faulty conclusions regarding their significance. The DEIR is inadequate because its conclusions are not supported by substantial evidence. The City of Los Angeles and Metro must therefore reject these conclusions, for the reasons that follow:

Response to Comment No. 17-4

The commenter raises general concerns about the adequacy of the Draft EIR.. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-5

IV.A. Aesthetics

The Project proposes to place 34 digital billboard structures along eight Los Angeles freeways. All but one are 672 sq. ft., the size of a standard full-sized billboard. Most are double-sided. The heights of the signs range up to 95 ft. above grade, and 50 ft. above the adjacent roadway. The result is 62 freeway-facing sign faces with a total of 42,192 sq. ft. of advertising and public message space. The Project also proposes to place 22 primarily double-sided digital billboard structures along 16 different commercial streets. These signs range in size from 300 sq. ft. to 672 sq. ft. and from 30 to 65 ft. above grade. The result is an additional 35 non-freeway-facing sign faces with a total of 12,732 sq. ft. of advertising and message space.

Response to Comment No. 17-5

The commenter generally summarizes the Project as included in Chapter II, Project Description, of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-6

By any measure, Metro's proposed digital signs are an assault on the visual landscape of the City, which is a public resource and not "owned" by commercial advertisers. As a comparison, between 2006 and 2008, two billboard companies were allowed to convert 101 full-sized conventional billboards on City streets to digital. The result was a public outcry over the intrusion of bright, distracting, ever-changing advertisements in

communities that had successfully fought for the City's 2002 ban on new off-site advertising signs. The City Council recognized that digital billboards were uniquely intrusive visual elements, and banned any new digital billboard conversions. All but two of the digital billboards were turned off by court order, a state in which they remain today.

Response to Comment No. 17-6

TCN Structures would be permitted within a City adopted Sign District, Specific Plan, or Supplemental Use District. Refer to Response to Comment No. 9-18 regarding the proposed Zoning Ordinance for the TCN Structures.

Comment No. 17-7

The DEIR ignores this history in concluding that the visual impact of the Project would be less than significant, with the exception of five cases where the billboards are close to or within historic resources and/or districts. The billboard locations are only shown through aerial renderings (there are no photographs or drawings/maps specific enough to show the setting or exact location of structure placement), which provide almost no information about the visual impact on the near and distant landscape, including residential properties. The DEIR is therefore inadequate as an informational document, as it fails to provide sufficient information to allow decisionmakers and members of the public to fully and accurately evaluate visual impacts of the Project.

Response to Comment No. 17-7

TCN Structures would be permitted within a City adopted Sign District, Specific Plan, or Supplemental Use District. Refer to Response to Comment No. 9-18 regarding the proposed Zoning Ordinance for the TCN Structures.

In response to this comment requesting conceptual renderings, Chapter II, Project Description, of the Draft EIR has been revised to include Figure II-6 and II-7 as described in Chapter III, Revisions, Clarifications, and Corrections to the Draft EIR, of this Final EIR. These conceptual renderings are for informational purposes only and provide a realistic estimation of what the TCN Structures may look like within the City. Additionally, aerial and ground level views of each Site Location are included in Figures III-1 through III-15 and Figures IV.A-1 through IV.A-15, in Chapter III, Environmental Setting and Section IV.A, Aesthetics, of the Draft EIR, respectively. A site specific evaluation for each individual TCN Structure was performed and took into account each individual Site Location's environmental setting as well as attributes such as dimensions, digital display angles, height, and nearby sensitive uses including residential uses. Further, impact conclusions within the Draft EIR remain unchanged based on these renderings. This comment is noted

for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-8

Even more egregious, the renderings of actual billboards are shown in the daylight (when contrast between the sign and its background is least evident) against a backdrop of blue sky with a few scattered clouds. One is left to guess how such a sign would appear against a backdrop of buildings or the trees and parks and mountains that make up such a notable part of the Los Angeles landscape.

Response to Comment No. 17-8

In response to this comment requesting conceptual renderings, Chapter II, Project Description, of the Draft EIR has been revised to include Figure II-6 and II-7 as described in Chapter III, Revisions, Clarifications, and Corrections to the Draft EIR, of this Final EIR. These conceptual renderings are for informational purposes only and provide a realistic estimation of what the TCN Structures may look like within the City. Further, impact conclusions within the Draft EIR remain unchanged based on these renderings. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-9

The DEIR asserts in its “Impact Analysis” that views of the Santa Monica, Verdugo, and San Gabriel Mountains from the freeways slated for new digital billboards are “intermittently available.” There is no effort to define “intermittent” or to explain why a billboard rising 50 ft. into the air above the roadway would not intrude upon such views, regardless of how long such views were available. In fact, anyone familiar with travel on these freeways can attest that views of mountains and other natural features of the landscape are “available” to people in vehicles for extended periods of time. The conclusion that a full-sized digital billboard high in the air with commercial ads changing every 8 seconds has a less than significant impact on the surrounding natural landscape of the City is completely unwarranted.

Response to Comment No. 17-9

As defined in Merriam-Webster Dictionary the definition of intermittent is as follows: coming and going at intervals: not continuous. A site specific evaluation for each individual TCN Structure was performed and took into account each individual Site Location’s environmental setting as well as attributes such as dimensions, digital display angles, height, and nearby sensitive uses including residential uses. As demonstrated in Section IV.A, Aesthetics, of the Draft EIR, views of the digital displays would indeed be

intermittent. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-10

As a specific example, the DEIR asserts that impacts on views of the Ballona Wetlands adjacent to the SR-90 freeway wouldn't be significantly impacted by two, double-sided digital billboards 80 feet above grade because such views would be transitory. This apparently assumes that a view has value only if the viewer is stationary, but the DEIR presents no evidence or argument in support of this assumption.

Response to Comment No. 17-10

As shown in Figure IV.A-8 in Section IV.A, Aesthetics, of the Draft EIR, Site Locations FF-29 and FF-30 are located on Metro properties immediately adjacent to SR-90 that are within a chain link fenced area. As discussed in Section IV.C, Biological Resources, of the Draft EIR, these Site Locations occur approximately 150 feet from the northeastern edge of the Ballona Wildlife Reserve, within an area mapped as non-wetland habitat. Site Location FF-29 is separated from the Ballona Wildlife Reserve by the SR-90 Freeway off-ramp and Site Location FF-30 is separated from the Ballona Wildlife Reserve by the SR-90 Freeway and the off-ramp. Given the orientation of the digital displays to the SR-90 and the size of the displays, public views of the displays would primarily be from the SR-90 Freeway. In addition, given the location and size of the two TCN Structures, the intermittent and transitory views of the Ballona Wildlife Reserve from the SR-90 and other more distant public locations would be obstructed on a very limited basis. The analysis assumes both moving and stationary viewers in the analysis. Thus, potential impacts to views of the Ballona Wildlife Reserve would be less than significant. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-11

The DEIR also asserts that impacts of views of concrete-lined sections of the Los Angeles River are insignificant because the City of Los Angeles doesn't consider that section of river a scenic resource. This statement displays either ignorance or willful disregard of the City's Los Angeles River Revitalization project, which envisions park space, trees, and other amenities along that part of the river, and will clearly make it an important visual resource. Full-sized, digital billboards within 300 ft. of that channel would clearly impact the scenic views of that section of the river once that project becomes reality. The correct environmental baseline for the Project is the future condition including park-related amenities.

Response to Comment No. 17-11

Section IV.A, Aesthetics, of the Draft EIR considers the Los Angeles River a scenic resource with the exception the concrete-lined portions of the Los Angeles River that are not typically considered by the City to be a scenic resource. Regardless, a field survey of all of the Site Locations was conducted to establish existing conditions. These include the existing conditions for Site Locations FF-3, FF-6, FF-7, FF-10, FF-11, and NFF-2 located within 300 feet of the Los Angeles River. As discussed in the Draft EIR, these Site Locations are urban in nature. Existing utility lines, roadway infrastructure, rail lines, and buildings are the primary visual elements at these locations. With implementation of the Project, these predominant urban visual elements would remain. The TCN Structures would also be constructed such that the digital displays would be at a substantially higher grade than the Los Angeles River. Thus, based on their location and size, and existing urban visual elements to remain, the TCN Structures at Site Locations FF-3, FF-6, FF-7, FF-10, FF-11, and NFF-2 would not substantially obstruct views of the Los Angeles River from public locations or have a substantial adverse effect on the existing visual character of the area.

Comment No. 17-12

The DEIR concludes that impacts of light and glare from the proposed billboards are less than significant. The conclusion is based on a prediction that light trespass from a particular digital sign on the nearest residential property will not exceed the 3.0 footcandles limit set forth in the Los Angeles municipal Sign Ordinance. This measure is widely considered outmoded when applied to digital signs, because it doesn't adequately reflect the visual impact of such signs. When digital billboard conversions started appearing in Los Angeles in 2007, the City began receiving complaints from residents about the effect of the signs near their homes and apartments, especially at night. Yet, in almost every case when the City responded to such complaints, the light from the sign measured at that residential property line was under the 3.0 foot-candles limit. This phenomenon is related to the brightness of the surface of the sign as viewed from a distance, as well as the effect of advertisements changing (typically, every 8 seconds). This creates a flickering effect that many residents likened to that of a TV in a darkened room, the brightness changing every time the advertisement changes. This phenomenon is highly disturbing to affected residents even when signs don't rise to the level of a violation of a city ordinance.

Response to Comment No. 17-12

Section IV.A, Aesthetics, of the Draft EIR, the Lighting Study included as Appendix B to the Draft EIR and the Lighting Study Supplemental Analysis included as Appendix B.2 to this Final EIR demonstrate that the light trespass illuminance from all 56 Signs would be

less than the threshold established by LAMC (3.0 fc) for residential use properties, and less than the LZ3 standard established by CALGreen (0.74 fc).⁵ Furthermore, the light trespass illuminance from 54 of the 56 Signs would be below 0.3 fc, or less than 10 percent of the LAMC requirement. In addition, with regard to glare, the Lighting Study demonstrates that the glare from the signs would be less than the threshold that would be deemed uncomfortable by the IESNA.

The Lighting Study evaluates the light trespass illuminance at the nearest residential use property line, not within the living areas within a residential structure. Light from the signs within the residential structure would be significantly less than the illuminance at the property line due to the additional distance from the sign, the exponential reduction of light with distance, and losses from window glazing. Therefore, the illuminance within the residential living unit would be extremely low (far less than the threshold), and the impact on human health from the sign illuminance would not be significant. Furthermore, all lighting sources in the state of California are regulated by Title 20, which stipulates requirements of flicker frequency to eliminate any hazards due to flicker. Flicker is defined as the amplitude modulation of light at frequencies that has effects on human physiology.⁶ In addition, Caltrans regulates a maximum refresh rate of 4 seconds. The Project signs would operate at a reduced refresh rate of 8 seconds.

Comment No. 17-13

As one example in the TCN Program, a full-sized, double-sided sign along the I-405 freeway at Exposition Blvd. would be within 100 ft. of a large, 4-story apartment building. Residents of apartments with windows oriented toward that sign would certainly suffer from the light effects, and may have to resort, as some residents did in the past, to buying blackout curtains. The DEIR makes no attempt to analyze such impacts on that residential property or any other that may afford views of the TCN signs, but simply dismisses any light and glare impacts as insignificant.

⁵ *The Lighting Study Update addresses the reorientation of Sign Location NFF-20 to Vermont Avenue, relocating Site Location FF-30 25 feet, and incorporation of PDF-AES-1 to provide state of the art louvers or other equivalent features at Site Locations FF-13, FF-14, FF-25, FF-29 and FF-30 such that illuminance from these locations at the nearby mapped biological resources habitat areas would be reduced to 0.02 fc. The Lighting Study also reflects a more specific analyses of light trespass from Sign Locations FF-6 and FF-7 that shows that the light trespass illuminance at mapped habitat areas would be 0.075 fc, which is also less than the most conservative CALGreen threshold for LZ1 of 0.09 fc.*

⁶ *Jon McHugh, "Measuring Flicker: California's JA10 Test Methods and Its Uses."*

Response to Comment No. 17-13

The majority of the 56 signs are not near or are not visible from residential use properties. The distances to residential use properties vary from 60 feet to over 1,000 feet from the signs. The eleven 11 Signs located less than 300 feet from a residential zoned property are analyzed in detail in the Lighting Study. As demonstrated therein, illumination from all eleven signs would be less than the LAMC threshold (3.0 fc) as well as the CALGreen standard (0.74 fc) which is derived from the maximum light trespass recommendations from IESNA for residential properties in Light Zone LZ3, which is the light zone the signs are located within. Furthermore, light from 54 of the 56 Signs would be below 0.3 fc, or 10 percent of the LAMC requirement. In particular, light from Site Location FF-26, which appears to be referred to in this comment, would be 0.2 fc at the property line, well below the significance threshold or the CALGreen standard of 0.74 fc. In addition as shown on page 31 of Appendix B of the Lighting Study, the displays for Site Location FF-26 would face north and south and not towards the residential building and the lighting would be less than 0.2 at the residential building since the calculation is at the property line. Furthermore, any light from the signs within the residential structure would be significantly less than the calculated illuminance due to the exponential reduction of light with distance, and light reduction from window glazing.

Comment No. 17-14

It is notable that the digital sign standards for brightness originally enacted by the City in 2009 were part of an ordinance initially considered entirely exempt from review.² Ordinance number 180,841, which sets the City's regulatory standards for digital billboard brightness was ultimately adopted based on a negative declaration (ENV-2009-0009-ND) that simply assumed the brightness regulations were sufficient to avoid any environmental impacts. Moreover, in recommending the adoption of the negative declaration to justify the ordinance including the brightness limitations, then-Director of City Planning S. Gail Goldberg, AICP, noted that "**The proposed new citywide sign regulations included a ban on new off-site signs, including new off-site digital displays...**"³ The digital sign brightness standards adopted as part of LA Ordinance 180,841 were thus never intended to apply to the present situation, and the potentially significant impact of digital signage at or near freeways and other roadways, particularly where they impact a visual resource such as a park or river have never been reviewed by the City. The City has not adequately justified its use of the chosen threshold, which was never studied to determine whether it is sufficient to avoid potentially significant environmental impacts.

² See ENV 2009-0009-CE, available as part of City of Los Angeles Council File 08-2020, available at <https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=08-2020>.

³ Los Angeles Director of Planning S. Gail Goldberg, Aug. 5, 2009 letter to Los Angeles City Attorney Carmen Trutanich, p. 2, included as an exhibit to LA City Attorney Carmen Trutanich's August 5, 2009 report to the City Council, available at: https://clkrep.lacity.org/onlinedocs/2008/08-2020_rpt_atty_8-5-09.pdf (see pdf p. 8).

Response to Comment No. 17-14

The Lead Agency for this Project is Metro and the City of Los Angeles is a Responsible Agency. As the Lead Agency, Metro has the authority to use significance thresholds it deems appropriate. (CEQA Guidelines, § 15064.7, subd. (b).) The threshold used in the analysis is from the LAMC and is specific to signs and associated lighting impacts. In addition, the analysis also compares Project impacts with the more stringent standard set forth by CALGreen. Illuminance levels have been demonstrated to be well below both the LAMC threshold and the CALGreen standard. Furthermore, 54 of the 56 Signs would generate light trespass illuminance below 0.3 fc, or 10 percent of the LAMC threshold.

Comment No. 17-15

The DEIR concludes that the TCN Program will improve aesthetics in the City because it will require the removal of existing billboards at a 2:1 ratio to the new digital signs, calculated on the square footage of the signage space. This conclusion is totally unwarranted. The DEIR provides no information about the location of the signs, only stating that many “are in a state of disrepair.” In the first place, comparing a brand-new, full-sized digital billboard on a freeway or commercial corridor to an existing static billboard is an extreme case of comparing apples and oranges.

Beyond the difference in light effects already discussed, a digital billboard generates much more revenue than a static billboard and thus is much more valuable. That revenue is related to the volume of traffic, or potential “eyeballs” on a given advertisement. Thus, a TCN sign on the I-405 freeway, which carries more than 300,000 vehicles a day, would have an aesthetic impact far greater and be many multiples more valuable than a static billboard likely in a state of disrepair at some unknown location on a city street.

These disparities have been recognized by the Los Angeles City Planning Commission, which adopted a revised Sign Ordinance (currently pending with the City Council) that allows new digital off-site signs in special sign districts only if existing static billboards in the City are removed at a ratio of 10:1, based on square footage of signage area. Other cities in the country have imposed similar “takedown” ratios as part of allowing new digital billboards. Thus, for the TCN Program to have anything approaching a meaningful positive impact on the City’s aesthetic environment, the takedown ratio would have to be dramatically increased.

Response to Comment No. 17-15

Refer to Response to Comment No. 9-25 regarding the take-down of existing static displays as part of the Project. Further, the Draft EIR determined that impacts would be

limited to historical resources impacts associated with impacting the integrity of setting of historical resources and related aesthetic and land use impacts due to Site Locations NFF-2, NFF-3, NFF-16, and NFF-21, and land use policy impacts associated with placing off-site commercial signage (Site Locations FF-29 and FF-30) in the coastal area. Contrary to the comment, impacts were determined to be less than significant at Site Locations proposed along Interstate 405. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-16

Additionally, the DEIR is silent on the issue of the legality of the billboards to be removed as part of the TCN Program. In 2013, an inventory by the Los Angeles Department of Building and Safety revealed that more than 800 existing billboards had either been erected without permits, or altered (typically enlarged, raised, or had a second face added) in violation of their permits. In 2015, City Attorney Mike Feuer wrote a formal letter to the City Council's Planning and Land Use Management Committee stating his office's readiness to bring legal action against the owners of those billboards, but the Committee never approved a request by Building and Safety for inspectors and funding to proceed with that enforcement effort. It would be a travesty for unlawful billboards to be counted against the TCN Program's takedown requirement, regardless of the ratio. Unless billboards in those categories are excluded from the Project's takedown of existing billboards, the DEIR's conclusions about the billboard takedown's impact on aesthetics are based on fallacious information and an improper environmental baseline and cannot be relied upon.

Response to Comment No. 17-16

TCN Structures would be permitted within a City adopted Sign District, Specific Plan, or Supplemental Use District. Refer to Response to Comment No. 9-18 regarding the proposed Zoning Ordinance for the TCN Structures.

The baseline used in the Draft EIR includes the existing static displays. As discussed in Section IV.A, Aesthetics, of the Draft EIR, CEQA is concerned with the physical environment, so whether or not existing signs were properly erected following City requirements does not affect the analysis of the impacts of the Project. Aesthetic impacts of each TCN Structure were analyzed fully in the Draft EIR for each Site Location. As described above, the City, as a Responsible Agency, will consider the proposed takedown ratio when it considers the Zoning Ordinance for the Project.

The remainder of this comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-17**IV.E. Energy**

The conclusion that cumulative impacts related to energy use are less than significant is not supported by substantial evidence. The total electricity consumption of the TCN Program is estimated to be 3,288,690 kWh per year. In comparison, the U.S. Energy Information Administration estimates the average household's electricity use at 11,000 kWh per year. Thus, the Project's electricity use would be the equivalent of 298 households. The DEIR estimates a savings of 1,000,000 kWh per year from the takedown of existing billboards, but provides no evidence, such as DWP utility charges, to support this. In any case, the assertion that electricity used to illuminate 110,000 sq. ft. of static billboard space in nighttime hours is nearly one-third the amount used to operate 55,000 sq. ft. of digital signage operating 24 hours per day is unsupported by substantial evidence and may not be relied upon.

Response to Comment No. 17-17

Energy calculation details are provided in Appendix F, Energy Calculations, of the Draft EIR. Detailed electricity bills were not available for existing static displays to be removed. Instead, existing energy usage was estimated based on extrapolation from several existing static displays currently in operation. Additionally, existing static displays are currently lit using older and inefficient metal halide floodlights. The TCN digital displays will be lit using LED which is more efficient in terms of energy usage in comparison to metal halide lights, resulting in lower energy consumption per square foot when compared to existing static displays. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-18

The conclusion that the Project's annual increase of 514 metric tons of carbon dioxide is less than significant is also doubtful. The U.S. Environmental Protection Agency estimates the average greenhouse gas emission by an average gasoline powered passenger car to be 4.6 metric tons, meaning the TCN Program's emissions would be equivalent to that of 111 cars. However, the DEIR relies on questionable assumptions. It asserts that overall vehicle emissions would be reduced because messages on the signs regarding traffic conditions and alternate routes in the event of traffic jams would reduce congestion. However, it cites no studies nor does it provide other evidence to support this assertion, which means it must be regarded as guesswork, not substantial evidence.⁴

⁴ CEQA Guidelines 15384 defines "substantial evidence" as "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion."

Response to Comment No. 17-18

As shown on Table IV.G-7 in Section IV.G, Greenhouse Gas Emissions, of the Draft EIR, the Project would result in a reduction in maintenance vehicle trips due to the reduction in the number of signs. Please refer to page IV.G-62 which references the Project providing traffic data and alternative routes which states, “While the Project would not directly reduce VMT, features such as providing real-time traffic data and alternative routes would help improve traffic flow and reduce vehicle delay time.” The GHG emissions inventory prepared for the Project conservatively does not quantify nor take credit for any VMT reduction resulting from providing real-time traffic data.

In addition, as discussed in Section IV.G, Greenhouse Gas Emissions, of the Draft EIR, the Project would comply with the SCAG 2020–2045 RTP/SCS which is required to achieve VMT reductions under SB 375. In order to achieve a VMT reduction throughout the region, SCAG has proposed measures to include implementation of traveler information systems and deployment of other intelligent transportation systems such as the TCN digital displays. Assumptions used in calculating Project GHG emissions are provided in Section IV.G Greenhouse Gas of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-19

In fact, amber alert signs on major Los Angeles freeways currently display messages regarding traffic conditions and travel times, calling into question the efficacy of TCN signs for the same purpose. The DEIR also assumes a reduction in emissions due to the fact that static signs slated for takedown require monthly maintenance trips by trucks, whereas changes of messages on the TCN signs can be done remotely. Again, there are no facts and figures to accompany this assertion. Furthermore, the DEIR’s statement that many static signs slated for takedown are in a state of disrepair would seem to imply that no maintenance is currently being performed on those billboards. If that is true, the DEIR’s calculations regarding emissions are faulty and its conclusion invalid.

Response to Comment No. 17-19

The commenter has not provided any supporting information as to why the assumptions used in the Draft EIR analysis would not be accurate. The commenter is also providing an inaccurate assumption in that existing static displays are not being maintained. The TCN Structures as part of the Project are digital and updates would be performed electronically and not require physically changing out the advertisement as done with static displays. Based on this information, the reduction in maintenance vehicle trips were accurate and did not result in an underestimate of pollutant emissions as purported in this comment. Further, the GHG emissions inventory prepared for the Project conservatively does not quantify nor take credit for any VMT reduction resulting from

providing real-time traffic data. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-20

IV.I. Land Use and Planning

The DEIR correctly concludes that two freeway-facing billboards and four non-freeway-facing billboards in the TCN network conflict with official land use policies and thus their impacts are significant in the absence of mitigations, which include relocation and/or removal from the Project.

Response to Comment No. 17-20

The commenter generally summarizes the significant and unavoidable land use impacts due to conflicts with applicable plans, policies, and regulations from a subset of the Site Locations as included in Section IV.I, Land Use, of the Draft EIR. However, refer to Section V, Alternatives, of this Draft EIR, where for a discussion of Alternative 3 that would eliminate Site Locations NFF-2, NFF-3, NFF-16, NFF-21 and eliminate or relocate Site Locations FF-29, and FF-30 in order to eliminate these land use plan inconsistency impacts. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-21

However, the TCN Program in its entirety is in serious conflict with land use policies, for the following reasons:

The TCN Program would violate the City's 2002 prohibition of new off-site advertising signs in letter and spirit. That ban was approved after public outcry over the proliferation of billboards and their negative impacts on the City's visual environment. The City's off-site sign ban was repeatedly attacked in court by billboard companies, but the City ultimately prevailed, with courts holding that the City could limit this form of speech in the interest of improving traffic safety and the City's aesthetic qualities. As previously discussed, billboard companies tried to circumvent this ban by converting static billboards to digital, but the City's right to prohibit those conversions was also upheld by the courts.

Response to Comment No. 17-21

TCN Structures would be permitted within a City adopted Sign District, Specific Plan, or Supplemental Use District. Refer to Response to Comment No. 9-18 regarding the proposed Zoning Ordinance for the TCN Structures.

Comment No. 17-22

In 2009, the City undertook a revision of its Sign Ordinance to strengthen community protections against outdoor advertising and, most importantly, to insure that it would stand up against future legal challenges. After numerous public hearings, the City Planning Commission ultimately approved a revision that restricted any new off-site signs, including digital, to sign districts in 22 intensive commercial areas. As previously stated, that revision is now pending before the Los Angeles City Council.

Response to Comment No. 17-22

This comment acknowledges that the Zoning Ordinance for the Project is being developed. This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-23

Because legal questions are so closely entwined with the City's billboard history, it is necessary to look at those questions in light of the Project's land-use impacts. In 2009, the Ninth Circuit Court of Appeals ruled in *Metrolights v. City of Los Angeles* that the City's ad-supported Street Furniture Program was lawful because it was consistent with the goals of enhancing aesthetics and traffic safety. However, the court also said that making exceptions to the off-site sign ban for the primary purpose of raising revenue would render it unconstitutional. The essence of that ruling was reiterated in a number of subsequent lawsuits by sign companies seeking to overturn the off-site sign ban.

This is a critically important point, because it can be persuasively argued that the primary purpose of the Metro TCN Program is to raise revenue, and there is scant evidence that the Project will have a positive effect on traffic safety and aesthetics.

Response to Comment No. 17-23

As discussed in the in Chapter II, Project Description, of the Draft EIR, on Pages II-3 and II-4, under Project Objectives, one of the primary purposes of the Project is to improve public safety by notifying the public of roadway improvements and hazards, Earthquake Early Warning System notifications, Amber Alerts, and emergency situations.

It should be noted that the case this commenter cites—*Metrolights v. City of Los Angeles* (2009) 551 F.3d 898 is a First Amendment case, and does not involve any CEQA claims. This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their

review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 17-24

The issue of traffic safety will be discussed below; suffice it to say that the studies cited in Section IV.K. Transportation lack credibility, and ample evidence exists to show that large, digital billboards in the line of sight of freeway drivers are distracting and potentially dangerous.

Response to Comment No. 17-24

Refer to Topical Response No. 1, Transportation Studies, for a discussion further justifying the use of the studies that were included in Section IV.K, Transportation, and Appendix K, Transportation and Traffic Safety Review, of the Draft EIR. As described therein, the research selected found that a correlation between digital billboards and traffic collisions was “inconclusive at best.” The comments cited additional research which claim to demonstrate the negative impacts of digital billboards on public safety and should nullify the results of the Draft EIR. Upon further review, none of the additional studies cited in the comments provide conclusive evidence that digital billboards cause traffic collisions. Nor do those studies undermine the conclusions of the Draft EIR and the studies relied on for the Draft EIR analysis.

Comment No. 17-25

As for aesthetic impacts, the DEIR’s deficiencies in its analysis have previously been discussed. But in the context of the aforementioned court rulings, one might compare the aesthetic impact of a static advertisement in a street-level bus shelter with a full-sized, brightly-lighted digital billboard 50 feet above the freeway surface and visible for long distances to upwards of 300,000 vehicle drivers and passengers every day. Once again, the proverbial comparison of apples and oranges.

Response to Comment No. 17-25

This comment raises general concerns about the Project’s aesthetic impacts. Section IV.A, Aesthetics, of the Draft EIR contains an analysis of the Project’s aesthetic impacts. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-26

City history shows that the policy of Los Angeles in the past 20 years has been to severely limit new static and digital billboards. It is likewise obvious that the Metro TCN Program

would seriously undermine this policy, and thus its negative impact on land use policies is therefore highly significant and needs to be properly evaluated.

Response to Comment No. 17-26

TCN Structures would be permitted within a City adopted Sign District, Specific Plan, or Supplemental Use District. Refer to Response to Comment No. 9-18 regarding the proposed Zoning Ordinance for the TCN Structures.

Comment No. 17-27

Other land-use goals and policies are undermined by the TCN Program. On September 28, 2022, California Governor Gavin Newsom signed two bills that would essentially allow the building of by-right housing on property zoned for commercial use. Debate on such measures was taking place before and during the preparation of the DEIR, but doesn't include a single word of discussion about how any of the 62 freeway-facing billboards and 35 non-freeway-facing billboards on major commercial corridors might impact future residential developments and their residents. This is a serious omission, and undermines the conclusion that the Project's impacts on residential property would be less than significant.

The DEIR also fails to acknowledge the fact that the City has existing policies to incentivize the construction of housing on commercial corridors. Both the Transit Oriented Communities Program (TOC) and projects built under the Residential Accessory Services Zone Program (RAS) have resulted in additional housing units constructed on some of the City's busiest corridors—some of which are targeted for non-freeway-facing billboards.

Response to Comment No. 17-27

Refer to Response to Comment No. 9-21 regarding the evaluation of existing and future residential uses in the vicinity of the proposed TCN Structures.

Comment No. 17-28

Finally, the DEIR asserts that the TCN Program would reduce air pollution by reducing traffic congestion and raising revenue for Metro programs. However, it is silent on the well-documented negative effects of billboard advertising on public health and wellness, which is the subject of the City's "Plan for a Healthy Los Angeles," officially adopted by the City Council in 2015 as an Element of the City's General Plan—part of the City's long-range planning goals.

Response to Comment No. 17-28

Contrary to what is stated in this comment, the Project would support applicable goals and objectives of the Health and Wellness Element (Plan for a Healthy Los Angeles) of the Los Angeles General Plan, including reducing air pollution from stationary and mobile sources and reducing per capita GHG emissions, as discussed in Section IV.G, Greenhouse Gas Emissions, of this Draft EIR. Specifically, the Project would create advertising revenue that would be utilized by both Metro and the City to fund new and expanded transportation programs that promote a decrease in VMT, reduction of traffic congestion, and improvement of air quality. Further, the Health and Wellness Element does not include documented negative effects of billboard advertising. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-29

According to the DEIR, the TCN signs would not carry ads for alcohol, tobacco, or cannabis products, and any content containing violence, obscenities, and “other related subject matters.” This leaves such categories as fast food, sugary drinks, and gambling, all of which have been shown to have a deleterious effect on physical and mental health. A 2020 study of billboard advertising in Los Angeles by AdQuick found that McDonald’s was the top billboard advertiser in the city. Other fast food purveyors are frequent billboard advertisers, as well as Coca-Cola and other soft-drink brands. Consumption of these products has been shown to contribute to unhealthy levels of obesity throughout the United States.

A 2013 study titled “Outdoor advertising, obesity, and soda consumption: A cross-sectional study,” by UCLA researchers found a strong correlation between the percentage of outdoor advertising promoting unhealthy food and beverages and the rate of obesity among residents of 220 census tracts in Los Angeles and New Orleans. Another study titled, “A Cross-Sectional Prevalence Study of Ethnically Targeted and General Audience Outdoor Obesity-Related Advertising” by researchers at UCLA and four other universities, plus the California Department of Public Health, found that low-income and ethnic minority communities in Los Angeles and three other major cities were disproportionately exposed to outdoor advertising for fast food, soda, and other products that can promote obesity. A third study, titled “Clustering of unhealthy outdoor advertisements around child-serving institutions: A comparison of three cities,” found that unhealthy ads, including those for junk food, were clustered around child-serving institutions in Los Angeles and Philadelphia. The study, conducted by the UCLA School of Public Health, the University of Pennsylvania, the University of Texas, and American University, concluded that zoning and land use regulations should protect children from unhealthy commercial messages, particularly in neighborhoods with racial/ethnic minority populations.

Response to Comment No. 17-29

This comment is unrelated to the environmental review for the Project. However, the commenter correctly states, the digital displays would be in compliance with Metro's System Advertising Content Restrictions which prohibits advertisement of alcohol, smoking, and cannabis, and any content containing violence, obscenities, and other related subject matters as described in Chapter II, Project Description, of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 17-30

The audience for the TCN Program freeway-facing signs will be everyone in vehicles traveling those freeways, which means people of all ages, ethnicities, and economic status. The audience for the Project's non-freeway-facing signs will be those same persons, plus people traveling by City bus or taxi, people riding bicycles, and pedestrians. A number of those digital billboards are in lower-income/ethnic minority neighborhoods, and some are near schools and parks. As one example, Non-Freeway-Facing Sign 07 on Venice Blvd. just west of Robertson Blvd. is less than 1/3 mile from Hamilton High School. And this 300 sq. ft. digital sign is near a major transit stop, which means a large number of students could be passing it on their way to and from school. Because all the proposed signs are on Metro property, many are near transit stops where younger persons tend to congregate.

Response to Comment No. 17-30

This comment concerns the identity of the audience for the TCN Structures and is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 17-31

The DEIR is incomplete without an analysis of the Project's public health impacts in the context of City policies such as the "Plan for a Healthy Los Angeles." The DEIR acknowledges significant impacts from four non-freeway-facing signs and two freeway-facing signs, but a thorough analysis must examine the potential public health impact of each and every one of the 98 digital billboards that will be advertising commercial products to millions of people, including vulnerable young people and those in communities where access to healthy food, medical care, and other factors, including outdoor advertising, have led to obesity and other unhealthy outcomes.

Response to Comment No. 17-31

Contrary to what is stated in this comment, the Project would support applicable goals and objectives of the Health and Wellness Element (Plan for a Healthy Los Angeles) of the Los Angeles General Plan as described in Section IV.I, Land Use, of the Draft EIR. Additionally the digital displays would be in compliance with Metro's System Advertising Content Restrictions which prohibits advertisement of alcohol, smoking, and cannabis, and any content containing violence, obscenities, and other related subject matters as described in Chapter II, Project Description, of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 17-32**IV.K. Transportation**

The environmental analysis concludes that the TCN Program would not create any significant road hazards. In support of this conclusion, three studies are cited, one by the Federal Highway Administration (FHWA) in 2012, and two by the Foundation for Outdoor Advertising Research and Education (FOARE) in 2007. The FHWA study has been widely criticized as flawed in its methodology and conclusions, and the two FOARE studies cannot be considered credible, since the foundation is an arm of the outdoor advertising industry and has billboard company executives on its Board of Directors.

Scientifically sound studies conducted by independent bodies have found that digital billboards are indeed a distraction to drivers, with statistical evidence showing an increase in accidents in their proximity. These studies are summarized in "Compendium of Recent Research Studies on Distraction from Commercial Electronic Variable Message Signs" by Jerry Wachtel of the Veridian Group, an independent human factors research firm. In addition to ignoring studies from places such as Florida and Alabama that call into question the safety of digital billboards on highways, the DEIR flatly dismisses any studies outside the United States, including ones conducted in Sweden and Australia that indicate the hazardous potential of digital signs on highways.

Rather than look at these studies for possible information relevant to analysis of the TCN Program, the DEIR simply dismisses them out of hand on the grounds that the United States has unique roadway characteristics. No evidence is included to support this assertion. Instead, the public is apparently expected to assume that the experience of driving outside the United States is so fundamentally different that even looking at these studies would be a waste of time. This calls into question the conclusions in this section, and the fundamental credibility of the analysis.

The analysis, once again, ignores history. In 2008, former Gov. Arnold Schwarzenegger proposed allowing commercial advertising on “amber alert” message boards on freeways and state highways. The Los Angeles City Council, citing the potential for driver distraction and potential safety hazards, unanimously approved a resolution to oppose the plan, which was eventually dropped. The message boards are closer to motorists’ line of sight than the proposed TCN signs, but it’s certainly relevant that traffic safety concerns were raised by the City’s major legislative body as well as many others.

For these reasons, the traffic safety analysis and the conclusion that impacts are less than significant should be completely rejected.

Response to Comment No. 17-32

Refer to Topical Response No. 1, Transportation Studies, for a discussion further justifying the use of the studies that were included in Section IV.K, Transportation, and Appendix K, Transportation and Traffic Safety Review, of the Draft EIR. As described therein, the research selected found that a correlation between digital billboards and traffic collisions was “inconclusive at best.” The comments cited additional research which claim to demonstrate the negative impacts of digital billboards on public safety and should nullify the results of the Draft EIR. Upon further review, none of the additional studies cited in the comments provide conclusive evidence that digital billboards cause traffic collisions. Nor do those studies undermine the conclusions of the Draft EIR and the studies relied on for the Draft EIR analysis. Further, the comment references a resolution by the City of Los Angeles City Council directed specifically to the concerns about the use of Changeable Message Signs (CMS) within the public ROW for advertising, which does not apply to digital displays outside of the public ROW as proposed by the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-33

V. Alternatives

The only alternative that addresses the serious environmental issues discussed above is Alternative 1: No Project Alternative.

According to the analysis, this alternative would mean that none of eight project goals would be realized.

Response to Comment No. 17-33

The commenter expresses support for Alternative 1—No Build Alternative. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 17-34

A number of those goals concern the broadcasting of information and data to motorists concerning traffic conditions, hazards, and other public safety matters, such as natural disasters. But this data is already being broadcast on CalTrans [sic] “amber alert” message boards on major freeways, and that network could be expanded and updated at a fraction of the cost of the proposed TCN Program. The DEIR provides no analysis of the problems that could arise from the mixing of rapidly-changing, brightly-lighted, colorful digital advertisements for products and services with important messages about traffic issues and public safety. During the public debate on the Schwarzenegger proposal, many people said that they tended to tune out billboard advertising, meaning that ads on message boards might have caused them to miss any traffic information and public safety messages. While this is anecdotal evidence, it would certainly seem to warrant consideration and further analysis into the wisdom of mixing two entirely different forms of information. However, the DEIR is silent on this issue.

Response to Comment No. 17-34

As discussed on page II-1 of Chapter II, Project Description, and page 3 of Appendix B, Lighting Study, of the Draft EIR, the Project features do not include rapidly changing displays, but rather displays with an eight second refresh rate and maximum lighting levels below the Los Angeles Municipal Code’s standards and 82% below those permitted by the California Vehicle Code. The Draft EIR’s detailed lighting analysis further explains the Project’s lighting levels and concludes that it will not introduce a new source of glare for drivers. The Draft EIR also includes a detailed traffic safety analysis in Appendix K, Transportation and Traffic Safety Review, that concluded that the Project’s average driver fixation was well below the National Highway Traffic Safety Administration’s 2.0 second threshold for dangerous driver distraction. Refer to Topical Responses No. 1 and 2 above for a further discussion on transportation safety.

This remainder of this comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 17-35

The most significant goal that would go unrealized by the No Project Alternative is the raising of revenue for Metro and the City of Los Angeles. Indeed, it is clear from the scope of this Project and the amount of commercial advertising it would beam at motorists on Los Angeles streets and freeways that the revenue source has been, from the very beginning, the major goal of the TCN Program. But should the city put its off-site sign ban in legal jeopardy for the sake of revenue? Should it potentially turn the city freeways and streets over to thousands of new billboards? Should it allow motorists and residents to suffer the adverse effects of distracting signs and the light they emit? Should public health be put at risk in the city's most vulnerable communities? Should public property be used to sell products and services for private businesses? The answer is NO, meaning that the No Project Alternative is the only alternative.

Thank you for your consideration,

Response to Comment No. 17-35

The commenter expresses general opposition to the Project and supports Alternative 1—No Project Alternative. In particular, the comment raises concerns about the project's transportation and aesthetic impacts. Section IV.A, Aesthetics, and Section IV.K, Transportation, of the Draft EIR analyze the Project's aesthetic and transportation impacts, respectively. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not specifically address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 17-36**Question Appendix****IV.A. Aesthetics**

Q: Without full disclosure of total ad faces in the Project Description, the Project Description is inadequate. Please update the Project Description and fully analyze all ad faces proposed.

Response to Comment No. 17-36

Contrary to what is stated in this comment, the Draft EIR provided the specific number of digital display faces for each of the proposed TCN Structure in Tables II-1 and II-2 of Chapter II, Project Description, of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-37

Q: The City Planning Commission has recommended 10 to 1 takedown ratio for sign removal and Metro recommends 2 to 1. What is the basis for the decision to adopt a 2:1 ratio? Why aren't you complying with the City Planning Commission's recommendation?

Response to Comment No. 17-37

Refer to Response to Comment No. 9-25 regarding the take-down of existing static displays as part of the Project.

Comment No. 17-38

Q: Provide renderings, both day and night to demonstrate impact of signage and distance of light passage.

Response to Comment No. 17-38

In response to this comment requesting conceptual renderings, Chapter II, Project Description, of the Draft EIR has been revised to include Figure II-6 and II-7 as described in Final EIR Chapter III. Revisions, Clarifications, and Corrections of the Draft EIR. These conceptual renderings are for informational purposes only and provide a realistic estimation of what the TCN Structures may look like within the City. Further, impact conclusions within the Draft EIR remain unchanged based on these renderings. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-39

Q: In addition to the list of sign locations and map drawings provided in the DEIR, please provide renderings of each sign face in its exact location using photographs that demonstrate the setting, direction, projected light trespass, and location of the proposed structures, the distance from the center of the roadway, the zone for adjacent properties to each sign, and a description of adjacent properties. Please provide site-specific analysis.

Response to Comment No. 17-39

In response to this comment requesting conceptual renderings, Chapter II, Project Description, of the Draft EIR has been revised to include Figure II-6 and II-7 as described in Final EIR Chapter III. Revisions, Clarifications, and Corrections of this Final EIR. These conceptual renderings are for informational purposes only and provide a realistic estimation of what the TCN Structures may look like within the City. Additionally, aerial and ground level views of each Site Location are included in Figures III-1 through III-15 and Figures

IV.A-1 through IV.A-15, in Chapter III, Environmental Setting and Section IV.A, Aesthetics, of the Draft EIR, respectively. A site specific evaluation for each individual TCN Structure was performed and took into account each individual Site Location's environmental setting as well as attributes such as dimensions, digital display angles, height, and nearby sensitive uses including residential uses. Further, impact conclusions within the Draft EIR remain unchanged based on these renderings. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-40

Q: Please explain why there has been no disclosure of the total number of ad faces proposed? The total number of proposed sign faces is not referred to in the DEIR anywhere. Why not?

Response to Comment No. 17-40

Contrary to what is stated in this comment, the Draft EIR provided the specific number of digital display faces for each of the proposed TCN Structure in Tables II-1 and II-2 of Chapter II, Project Description, of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-41

Q: Please define intermittent and please explain why a billboard rising 50 feet above the roadway would not intrude upon the near and distant views from each sign.

Response to Comment No. 17-41

As defined in Merriam-Webster Dictionary the definition of intermittent is as follows: coming and going at intervals: not continuous. A site specific evaluation for each individual TCN Structure was performed and took into account each individual Site Location's environmental setting as well as attributes such as dimensions, digital display angles, height, and nearby sensitive uses including residential uses. In particular, views of the Santa Monica Mountains, the Verdugo and San Gabriel Mountains, the Kenneth Hahn State Recreation Area, and the Downtown Los Angeles Skyline, are intermittently available along portions of the freeways and major roadways where the Site Locations are proposed. More focal views include views of the Los Angeles River, the Ballona Wildlife Reserve, and views of historic resources. Based on the locations, size and heights of the proposed structures, the proposed displays would not block views of long range scenic vistas, such as the mountains or downtown skyline. Rather, the TCN Structures would be oriented to the freeway and roadway, where views of the digital displays would be brief and transitory. In addition, given their size and height, any obstruction of long-range scenic views from a

public area, such as a sidewalk, would be limited. Furthermore, long-range views of the TCN Structures themselves would be limited due to surrounding development.

Based on their location and size, and existing urban visual elements to remain, the TCN Structures at Site Locations FF-3, FF-6, FF-7, FF-10, FF-11, and NFF-2 would not substantially obstruct views of the Los Angeles River from public locations. Thus, potential impacts to views of these more focal views of the Los Angeles River would be less than significant. In addition, given the location and size of the proposed TCN Structures at Site Locations FF-29 and FF-30, the intermittent and transitory views of the Ballona Wildlife Reserve from the SR-90 and other more distant public locations would be obstructed on a limited basis and potential impacts would be less than significant.

Further, as discussed in detail in Section IV.D, Cultural Resources, of this Draft EIR, the proposed TCN Structures at Site Locations NFF-2, NFF-3, NFF-16 and NFF-21 are located in close proximity to five historical resources, including the North Spring Street Bridge (Caltrans Bridge No. 53C0859), Lankershim Depot, the Little Tokyo Historic District, the Japanese Village Plaza, and the Fourth Street Bridge (Caltrans Bridge No. 53C0044). While the TCN structures would not physically impact these historical resources, the TCN structures would impede visibility of and thus detract from the character defining features of these five historical resources. While these historical resources are located within urban areas where public views of these historical resources are affected by existing infrastructure and buildings, for purposes of providing a conservative analysis, impacts on the scenic vistas of these historical resources are concluded to be significant as the proposed TCN Structures would further contribute to the urban visual components surrounding the historical resources. As such, the Project would result in a substantial adverse effect on a scenic vista, and impacts would be significant.

Elimination of approximately 200 static displays that range in size from approximately 8-foot by 8-foot to approximately 10-foot by 30-foot and the reduction ratio of 2 square feet of existing displays for each square foot of new displays would also result in a net decrease in signage across the City. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-42

Q: The DEIR appears to assume that “freeway-facing” digital billboards will not have an impact on nearby residential properties and fails to evaluate such impacts. Please disclose potential significant impact from freeway-facing sign locations to residential properties and the natural environment nearby.

Response to Comment No. 17-42

Refer to Response to Comment No. 9-21 regarding the evaluation of existing and future residential uses in the vicinity of the proposed TCN Structures. Further, as included in Section IV.C, Biological Resources, of the Draft EIR potential impacts to biological resources would be less than significant with Mitigation Measures BIO-MM-1 through BIO-MM-4 incorporated.

Comment No. 17-43

Q: Please provide research regarding the health impacts of 24/7 light trespass and changing light intensities on nearby residences, people with light sensitive eye conditions, seizure disorders, ADHD, open space, insects and birds.

Response to Comment No. 17-43

As discussed in Response to Comment No. 17-2, above, illuminance from all 56 Signs would be less than the threshold established by LAMC (3.0 fc) for residential use properties, and less than the LZ3 standard established by CALGreen (0.74 fc). Furthermore, light illuminance from 54 of the 56 Signs would be below 0.3 fc, or 10 percent of the LAMC requirement. In addition, with regard to glare, the Lighting Study demonstrates that the glare from the signs would be less than the threshold that would be deemed uncomfortable by the IESNA.

Refer to Topical Response No. 3 for a discussion regarding the Project's less than significant impacts on biological resources from lighting.

Refer to Response to Comment No. 13-13 regarding the less than significant human health impacts associated with lighting from the signage displays.

With regard to impacts from lighting on biological resources, please refer to Response to Comment No. 24-24. As discussed therein, potential lighting impacts to biological resources would also be less than significant.

Comment No. 17-44

Q: How can Metro justify a 2:1 takedown in light of the City's recommended 10:1 ratio. Please analyze the difference of Metro's small takedown ratio in contrast to the City's much higher recommended takedown ratio.

Response to Comment No. 17-44

Refer to Response to Comment No. 9-25 regarding the take-down of existing static displays as part of the Project.

Comment No. 17-45

Q: How many of the 200 Metro static signs are in a state of disrepair?

Q: How many of the 200 Metro static signs have current permits? How many have no permits on file? How many have been altered and are out of compliance with their existing permits?

Response to Comment No. 17-45

Removal of existing signs is not required to mitigate any significant environmental impacts of the proposed TCN Program. This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 17-46**IV.E. Energy**

Q: Please provide facts and figures to explain the reduction in emissions claimed.

Q: Given the volume of our freeways, what proof can you present that freeway messaging will result in the reduction in greenhouse gasses related to congestion? Might it merely transfer congestion to nearby streets?

Response to Comment No. 17-46

As shown on Table IV.G-7 in Section IV.G, Greenhouse Gas Emissions, of the Draft EIR, the Project would result in a reduction in maintenance vehicle trips due to the reduction in the number of signs. In addition, TCN Structures would be updated remotely and do not require vehicle trips to change advertising that is currently done with the existing static displays. While the Project would reduce vehicle trips related to change out of advertisements and maintenance, the Draft EIR does not take credit for reducing VMT as a result of providing real-time traffic data. Please refer to page IV.G-62 which references the Project providing traffic data and alternative routes for road closures which states, "While the Project would not directly reduce VMT, features such as providing real-time traffic data and alternative routes would help improve traffic flow and reduce vehicle delay time." The

GHG emissions inventory prepared for the Project conservatively does not quantify nor take credit for any VMT reduction resulting from providing real-time traffic data.

In addition, as discussed in Section IV.G, Greenhouse Gas Emissions, of the Draft EIR, the Project would comply with the SCAG 2020–2045 RTP/SCS which is required to achieve VMT reductions under SB 375. In order to achieve a VMT reduction throughout the region, SCAG has proposed measures to include implementation of traveler information systems and deployment of other intelligent transportation systems such as the TCN digital displays. Assumptions used in calculating Project GHG emissions are provided in Section IV.G, Greenhouse Gas, of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-47

Q: What energy savings would be experienced should the digital billboards be shut off nightly between the hours of midnight and 7:00 A.M.?

Response to Comment No. 17-47

The energy analysis assumes that digital displays would be operating during nighttime hours. As discussed in Chapter II, Project Description, digital displays would be limited to 6,000 candelas during the day time and 300 candelas during night time hours. If digital displays would be shut off during nighttime hours (midnight–7 A.M.), energy usage would be less than what is presented in the DEIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-48

Q: What studies exist to provide evidence of greenhouse gas reductions as a result of freeway messaging signs?

Response to Comment No. 17-48

As shown on Table IV.G-7 in Section IV.G, Greenhouse Gas Emissions, of the Draft EIR, the Project would result in a reduction in maintenance vehicle trips due to the reduction in the number of signs. Please refer to page IV.G-62 which references the Project providing traffic data and alternative routes which states, “While the Project would not directly reduce VMT, features such as providing real-time traffic data and alternative routes would help improve traffic flow and reduce vehicle delay time.” The GHG emissions inventory prepared for the Project conservatively does not quantify nor take credit for any VMT reduction resulting from providing real-time traffic data.

In addition, as discussed in Section IV.G, Greenhouse Gas Emissions, of the Draft EIR, the Project would comply with the SCAG 2020–2045 RTP/SCS which is required to achieve VMT reductions under SB 375. In order to achieve a VMT reduction throughout the region, SCAG has proposed measures to include implementation of traveler information systems and deployment of other intelligent transportation systems such as the TCN digital displays. Assumptions used in calculating Project GHG emissions are provided in Section IV.G, Greenhouse Gas, of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-49

Q: Please provide data to corroborate the assertion that electricity used to illuminate 110,000 sq. ft. of static billboard space in nighttime hours is nearly one-third the amount used to operate 55,000 sq. ft. of digital signage operating 24 hours per day.

Response to Comment No. 17-49

Energy calculation details are provided in Appendix F of the DEIR. Detailed electricity bills were not available for all 200 existing static displays to be removed. Instead, existing energy usage was estimated based on extrapolation from several static displays currently in operation. Existing static displays are currently lit using older and inefficient metal halide floodlights. The TCN digital displays will be lit using LED which is more efficient in terms of energy usage in comparison to metal halide lights, resulting in lower energy consumption per square foot when compared to existing static displays. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-50

IV.I. Land Use and Planning

Q: You have not taken scenic or natural resources in the siting of these billboards into consideration. There will be impacts to Ballona Wetlands, Sepulveda Basin, etc. Have you analyzed these impacts?

Response to Comment No. 17-50

Section IV.A, Aesthetics, of the Draft EIR provides a detailed analysis of potential scenic resources and demonstrates that the Project would not result in significant aesthetic impacts. In addition, refer to Section IV.C, Biological Resources, of the Draft EIR for a review of sensitive habitat and species located in the vicinity of the Site Locations located near the Ballona Wildlife Reserve and Sepulveda Basin. As described therein, impacts to biological resources are found to be less than significant with the implementation of

Mitigation Measures BIO-MM-1 through BIO-MM-4. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-51

Q: Will you be going to the Coastal Commission for permitting the signs that are located in and will impact the Coastal zone?

Response to Comment No. 17-51

The Draft EIR conservatively assumes that Site Locations FF-29 and FF-30 are located within the jurisdiction of the Coastal Commission. Metro is pursuing a formal boundary determination from the Coastal Commission for the Site Locations FF-29 and FF-30. Should it be determined that these Site Locations are within the Coastal Zone, a Coastal Development Permit would be required for Site Locations FF-29 and FF-30 as described in Chapter II, Project Description, of the Draft EIR. Further as described in IV.I Land Use of the Draft EIR, the Project would not conflict with the applicable goals and policies of the Coastal Act. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-52

Q: How can you prohibit violent and other content (open to interpretation)? That would be a violation of the 1st amendment. The billboard industry is very litigious as the City of LA has experienced.

Response to Comment No. 17-52

The digital displays would be in compliance with Metro's System Advertising Content Restrictions which prohibits advertisement of alcohol, smoking, and cannabis, and any content containing violence, obscenities, and other related subject matters. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-53

Q: How do these placements comply with the Highway Beautification Act?

Response to Comment No. 17-53

On October 22, 1965, President Lyndon B. Johnson signed the Highway Beautification Act (HBA). The HBA allows for billboards in commercial and industrial areas along highways subject to Federal funding and requires individual states to maintain

“effective control” of outdoor advertising along those same highways or else be subject to a loss of 10% of their Federal-aid highway funds. As part of the HBA, each state was required to enter into a mandatory agreement with the Federal government that set forth outdoor advertising sign controls in commercial and industrial areas based on customary usage within the individual state at the time the agreement was signed. The HBA set the minimum requirements for regulations the states must adhere to maintain “effective control” of outdoor advertising signs, but a state can enact regulations greater than those required by the HBA.

On February 15, 1968, the State of California entered into an agreement titled, “Agreement for Carrying Out National Policy Relative to Control of Outdoor Advertising in Areas Adjacent to the National Highway System of Interstate and Defense Highways and the Federal-Aid Primary System” with the United State of America in conjunction with the requirements of the HBA. Shortly thereafter, the State of California enacted its own Outdoor Advertising Act (OAA). The OAA meets and exceeds the minimum requirements of the HBA and vests regulation and enforcement of the OAA with the California Department of Transportation (Caltrans). Thus, Caltrans regulates the placement of outdoor advertising displays visible from California highways. Caltrans performs regular reviews of freeways and highways identified on the National Highway System to enforce outdoor advertising requirements under the Federal HBA and the State’s OAA. As included in Comment No. 1-1 a letter from Caltrans states the Project would be consistent with Caltrans guidelines for digital signage locations near freeways. Additionally, Metro would continue to coordinate with Caltrans on the Project and understands the Project would require an Outdoor Advertising License. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-54

Q: Some of the proposed locations are also proposed for adjacent or nearby housing development? How will the proposed signs impact these future projects and existing residentially zoned areas?

Response to Comment No. 17-54

Refer to Response to Comment No. 9-21 regarding the evaluation of existing and future residential uses in the vicinity of the proposed TCN Structures.

Comment No. 17-55

Q: The City of LA has a billboard ban. How will this approval impact the ban and will it make it so the ban cannot be defended in court?

Response to Comment No. 17-55

TCN Structures would be permitted within a City adopted Sign District, Specific Plan, or Supplemental Use District. Refer to Response to Comment No. 9-18 regarding the proposed Zoning Ordinance for the TCN Structures. The remainder of this comment regarding how the approval of this Project will impact the ban's effectiveness is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 17-56

Q: Please provide information about future housing developments that have been and may be proposed for adjacent properties. Please provide information about current housing that will be within the viewshed of proposed signs.

Response to Comment No. 17-56

Refer to Response to Comment No. 9-21 regarding the evaluation of existing and future residential uses in the vicinity of the proposed TCN Structures.

Comment No. 17-57

Q: Housing bills recently signed into law by the Governor permitting by-right housing development on commercial corridors, and the City's TOC and RAS programs must be analyzed in relationship to future development in areas where Metro intends to place digital billboards. Housing development is being placed on commercial corridors. The DEIR failed to acknowledge this important fact. Current and future cumulative impacts must be analyzed and the information provided in a recirculated Supplemental EIR.

Response to Comment No. 17-57

Refer to Response to Comment No. 9-21 regarding the evaluation of existing and future residential uses in the vicinity of the proposed TCN Structures.

As discussed in the CEQA Guidelines § 15125, CEQA is concerned with the existing conditions of the physical environment, not future conditions, so whether or not housing developments will be constructed in commercial corridors at some uncertain future date does not affect the analysis of the impacts of the Project. As explained on page IV.I-11 of Section IV.I, Transportation, of the Draft EIR, the TCN structures will be implemented in non-residential areas via a Sign District Zoning Ordinance by the City, as excepted from the 2002 ban. The Project's site locations are within commercial/industrial areas, and no

site locations are currently zoned for residential use. As discussed in Chapter II, Project Description, of the Draft EIR, the Draft EIR analyzed the Project in the context of these existing baseline conditions.

Moreover, as discussed in Appendix B, Lighting Study, of the Draft EIR, the Draft EIR did consider existing residential uses—regardless of zoning—in the vicinity of the Site Locations, as well as reasonably foreseeable residential projects.

Comment No. 17-58

Q: What legal analysis has been done to assess whether this Project will exceed the court's standard for the City's ability to uphold the 2002 Sign Ordinance and the City's ability to regulate off-site signage. Will the TCN Program undermine or jeopardize the 2002 sign ban in any way?

Response to Comment No. 17-58

TCN Structures would be permitted within a City adopted Sign District, Specific Plan, or Supplemental Use District. Refer to Response to Comment No. 9-18 regarding the proposed Zoning Ordinance for the TCN Structures.

The remainder of this comment regarding how the approval of this Project will impact the ban's effectiveness is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 17-59

Q: How will the City, Metro and/or outdoor advertising partners operating the TCN Program define the appropriateness or representations of acceptable violence, obscenities, and "other related subject matters" related to the expression of free speech, especially in light of how litigious the billboard industry is?

Response to Comment No. 17-59

The digital displays would be in compliance with Metro's System Advertising Content Restrictions which prohibits advertisement of alcohol, smoking, and cannabis, and any content containing violence, obscenities, and other related subject matters. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-60

Q: Do the proposed sign locations all comply with existing Specific Plans, Community Plans and Scenic Roadway designations as noted in the Mobility Element of the City's General Plan?

Response to Comment No. 17-60

Refer to Response to Comment No. 16-4 regarding a discussion of how overall the Project would not conflict with the applicable goals, objectives, and policies in the City's Mobility Plan.

Comment No. 17-61

Q: The DEIR fails to address cumulative impacts of the TCN Program in the context of other off-site advertising programs currently approved or seeking approval in the City. Cumulative impacts need to be addressed in conjunction with the recently adopted new City Street Furniture Program ("STAP"), and the proposed Interactive Kiosk Experience ("IKE") promoted by the Tourism and Convention Board.

Response to Comment No. 17-61

As included in Chapter III, Environmental Setting, of the Draft EIR, the Sidewalk and Transit Amenities Program (STAP) is a related project to the TCN Program. STAP's potential cumulative impacts with the Project are discussed in within the Draft EIR. Further, as shown in Final EIR Chapter III, Corrections, Clarifications, and Revisions to the Draft EIR, the proposed Interactive Kiosk Experience (IKE) have been included to the related projects list. Further, the conclusions for the Project's cumulative analyses in Section IV.A, Aesthetics, through Section IV.M, Utilities—Electric Power, of the Draft EIR, do not change with the incorporation of the IKE Smart City Program. Therefore, inclusion of the IKE Smart City Program does not change the conclusions of the cumulative analyses of the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 17-62**IV.K. Transportation**

Q: The traffic safety studies you rely on in the Draft EIR have been debunked. Will you update studies to include those that are relied on by experts in the field?

Q: Please provide accident rates at the proposed billboard locations and if you don't have them, please request necessary studies.

Q: Do any of the proposed sign locations appear at or near locations identified in the LAPD/Vision Zero—High Injury Network?

Q: Please provide evidence to corroborate your statement that vehicle emissions will be reduced as stated. Please review recent traffic study that notes the impact of digital changing traffic safety messaging on traffic indicating that signs tend to slow traffic and contribute to accidents (which also slow traffic). The typical freeway driver in Los Angeles knows well the fact that when a CalTrans [sic] digital messaging board has a message posted that drivers slow and often brake thus contributing to traffic slowdowns and artificially created congestion.

Q: Please provide accident records for all locations targeted for digital messaging signs.

Q: Did Metro consider the dangers of placing freeway-facing digital billboards at locations in close proximity to freeway interchanges where drivers are required to change lanes and merge from one route to another?

Response to Comment No. 17-62

Refer to Topical Response No. 1, Transportation Studies, for a discussion further justifying the use of the studies that were included in Section IV.K, Transportation, and Appendix K, Transportation and Traffic Safety Review, of the Draft EIR. As described therein, the research selected found that a correlation between digital billboards and traffic collisions was “inconclusive at best.” The comments cited additional research which claim to demonstrate the negative impacts of digital billboards on public safety and should nullify the results of the Draft EIR. Upon further review, none of the additional studies cited in the comments provide conclusive evidence that digital billboards cause traffic collisions. Nor do those studies undermine the conclusions of the Draft EIR and the studies relied on for the Draft EIR analysis. Additionally, refer to Topical Response No. 2, for a discussion of the Project’s consistency with LADOT’s Vision Zero policies aimed at eliminating traffic deaths by 2025. Additionally, Metro would continue to coordinate with Caltrans and LADOT on all necessary approvals for Project. Further, this comment requests additional information about collision rates at the Site Locations of the proposed TCN Structures and is noted for the record and will be forwarded to the decision makers for review and consideration.

Comment No. 17-63

Q: Do the proposed sign locations comply with the Highway Beautification Act?

Response to Comment No. 17-63

Refer to Response to Comment No. 17-53 regarding the Project's compliance with the Highway Beautification Act.

Comment No. 17-64

Q: Please review additional studies that evaluate driver distraction resulting from the viewing of digital changing messaging on billboards.

Response to Comment No. 17-64

Refer to Topical Response No. 1, Transportation Studies, for a discussion further justifying the use of the studies that were included in Section IV.K, Transportation, and Appendix K, Transportation and Traffic Safety Review, of the Draft EIR. As described therein, the research selected found that a correlation between digital billboards and traffic collisions was "inconclusive at best." Upon further review of additional research studies that were submitted during the Draft EIR comment period, none of the additional studies cited provided conclusive evidence that digital billboards cause traffic collisions. Nor do those studies undermine the conclusions of the Draft EIR and the studies relied on for the Draft EIR analysis.

Comment Letter No. 18

Celinda Jungheim
Secretary
Villa Marina Council
4777 La Villa Marina
Marina del Rey, CA 90292-7006

Comment No. 18-1

I'm writing on behalf of 685 families who live in the Villa Marina community in Marina Del Rey, represented collectively by the Villa Marina Council. We have learned about the proposed Metro Transit Network Communication Program putting up digital billboards, including two at the intersection of the 90 Freeway and Culver Boulevard, in close proximity to our homes.

Councilmembers should be aware that of all the residents who have commented on this idea not a single one has expressed any support for the proposal. The response has been universally negative among our homeowners and renters, who have reviewed the suggested benefits and find that none stands up to scrutiny except the desire for revenue—and strongly object to selling off the environment surrounding the Ballona Wetlands for a share of advertising dollars.

Response to Comment No. 18-1

The commenter expresses general opposition to the Project due to concerns regarding the Project as a source of revenue. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 18-2

Digital billboards along the freeway are very poor media for sharing information about road conditions or emergencies. There are other, safer and less disruptive methods already in place for doing so, including cell phone texts and emails that can be read and digested in more than an instant, when one is not driving at freeway speeds.

Response to Comment No. 18-2

The commenter suggests other information sharing measures that do not require the use of the TCN Structures. As described in Chapter II, Project Description, of the Draft

EIR, the underlying purpose of the Project is to provide a network of TCN Structures that would incorporate intelligent technology components to promote roadway efficiency, improve public safety, augment Metro's communication capacity, provide for outdoor advertising where revenues would fund new and expanded transportation programs consistent with the goals of the Metro 2028 Vision Plan, and result in an overall reduction in static signage displays throughout the City of Los Angeles. The commenter's suggestion would not meet the underlying purpose of the Project as proposed by Metro. Further, please refer to Section IV.K Transportation, of the Draft EIR where transportation safety impacts were found to be less than significant. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 18-3

Because of their brightness and changing imagery, digital billboards are far more distracting to drivers than stationary billboards, and high speed makes a lapse in attention more dangerous. When the 90 Freeway comes to an intersection a few hundred feet further, cars run the light, causing accidents with the traffic on Mindanao Way. The greater distraction caused by a digital billboard would take an increased toll in accident victims and make our neighborhood less safe for drivers, passengers, and pedestrians.

The 90 Freeway is a poor choice of location for other reasons. The traffic moves very quickly, but the 90 is really a short stretch of roadway. Cars headed southwest at the proposed location are just about to exit the freeway, while those headed northeast frequently turn off after brief local trips. Digital billboards are distracting and uninformative over any freeway, but they seem particularly ill suited to the 90 at Culver Boulevard.

Response to Comment No. 18-3

The comment expresses an opinion regarding digital displays being far more distracting than stationary displays and expresses specific safety concerns about the proposed TCN Structures along SR 90. Refer to Topical Response No. 1, Transportation Studies, for a discussion further justifying the use of the studies that were included in Section IV.K, Transportation, and Appendix K, Transportation and Traffic Safety Review, of the Draft EIR. As described therein, the research selected found that a correlation between digital billboards and traffic collisions was "inconclusive at best." The comments cited additional research which claim to demonstrate the negative impacts of digital billboards on public safety and should nullify the results of the Draft EIR. Upon further review, none of the additional studies cited in the comments provide conclusive evidence that digital billboards cause traffic collisions. Nor do those studies undermine the conclusions of the Draft EIR and the studies relied on for the Draft EIR analysis.

The specific TCN Structures referenced along SR 90 would be Freeway Facing. As discussed in the Draft EIR, these billboards would meet Caltrans Outdoor Advertising Permit Requirements for digital billboards as they would not be located within 500 feet of any freeway designated as a Scenic Highway, within 500 feet of a landscaped freeway, within 500 feet of an existing sign, or within 1,000 ft of an existing digital billboard on the same side of the freeway. As included in Comment Letter No. 1 a letter from Caltrans states the Project would be consistent with Caltrans guidelines for digital signage locations near freeways. Additionally, Metro would continue to coordinate with Caltrans on the Project and understands the Project would require an Outdoor Advertising License. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 18-4

Light pollution in the city is an issue that will have to be addressed eventually by the Council, and the best time to address it is before additional electronic media are allowed on the skyline. A digital billboard creates constant visual “noise” that cannot be dialed down. We have seen what they have done to the look of rapidly developing cities or entertainment centers. Picture those changing images blinking through your curtains as you try to sleep, casting a digital glow over the Ballona Wetlands from a height above the freeway.

Response to Comment No. 18-4

As discussed in Response to Comment No. 13-13, above, the light trespass illuminance from all 56 Signs would be less than the threshold established by LAMC (3.0 fc) for residential use properties, and less than the LZ3 standard established by CALGreen (0.74 fc). Furthermore, 54 of the 56 Signs would generate light trespass illuminance below 0.3 fc, or 10 percent of the LAMC requirement. Furthermore, as part of TCN Program, a take-down component would be implemented including the removal of at least 110,000 square feet (2 to 1 square footage take-down ratio) of existing static displays that are generally illuminated 24 hours a day, 7 days a week. Thus, the Project would result in an overall reduction of illuminated signage.

Refer to Response to Comment No. 13-13 regarding the less than significant human health impacts associated with light and glare from the Project. With regard to the less than significant lighting impacts at the Ballona Wildlife Reserve, refer to Response to Comment No. 9-30.

Comment No. 18-5

We are not alone in objecting to billboards in this proposed location. In his letter to Shine Ling of June 1, 2022, Councilmember Mike Bonin refers to these billboards (FF-29 and FF-30) and expresses concern over their proximity to the Ballona Wetlands, which he calls

“the only State Ecological Reserve in Los Angeles County. Metro should seek input... and analyze the aesthetic and biological impacts to visitors and wildlife of having illuminated advertising in such close proximity to the Ecological Reserve. The Ballona Wetlands are also a critical coastal resource under the jurisdiction of the California Coastal Commission. Both the resources themselves and the views of those resources from public roads are protected.”

Response to Comment No. 18-5

The commenter expresses general opposition to the Project due to concerns regarding aesthetics and biological resources. For further discussion of aesthetics and biological resources specific to the locations of FF-29 and FF-30, refer to Sections IV.A. Aesthetics and IV.C Biological Resources, respectively, of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 18-6

We have read and endorsed the letter of August 2022 submitted by the Del Rey Residents Association, objecting to the plan to post digital billboards in our neighborhood. They have articulated a series of concerns raised by the project that have been echoed by our residents.

Response to Comment No. 18-6

The commenter expresses endorsement for the Del Rey Residents Association letter, included as Comment Letter No. 9 above. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 18-7

We would add that exchanging digital billboards for static one is not an appropriate solution, nor a trade-off to be negotiated. Our residents oppose the two digital billboards proposed for our vicinity and believe that people living in other communities of the city are likely to feel just as strongly about billboards proposed for their neighborhoods. When static billboards come down, they should not be replaced with digital ones.

Response to Comment No. 18-7

Refer to Response to Comment No. 9-25 regarding the take-down of existing static displays as part of the Project.

Comment No. 18-8

For the sake of safety, aesthetic concerns, and the landscape of our neighborhood, we urge the City Council to refrain from allowing digital billboards along the 90 freeway. On behalf of the 685 families comprising our residential community, the Villa Marina Council has voted to share with you the thoughts and feelings expressed in this letter.

Response to Comment No. 18-8

This comment expresses general opposition to the Project due to safety, aesthetic concerns, and the landscape of the neighborhood, specifically for Site Locations FF-29 and FF-30. The Project's impacts are analyzed thoroughly in Chapter IV, Environmental Impacts Analysis, of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 19

Karl Eggers
Walk Bike Long Beach
5437 Cherry Ave., Apt. B
Long Beach, CA 90805-5550

Comment No. 19-1

I believe that the project proponents need to reconsider the impacts to Energy,. [sic] Specifically, the proposed digital signs will use electricity 24 hrs a day. 7 days a week. 365 days per year. Los Angeles, and California as a whole, has just gone through a period of daily power emergency events. These signs, while individually may place little additional load on the electrical grid, in their totality, along with other digital displays added by others, will add a significant load. If this program is pursued, then there should be mitigation measures designed to turn them off during declared power emergencies.

Response to Comment No. 19-1

As presented in on page IV.E-31 of Section IV.E, Energy, of the Draft EIR, the TCN digital display network would represent 0.01 percent of LADWP base peak load conditions. Project operational activities would have a negligible effect on peak load conditions of the power grid. However, if needed, TCN digital displays are controlled remotely and may be turned off in the event of a power emergency. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration

Comment Letter No. 20

Jay Ross
Secretary
West LA Sawtelle Neighborhood Council
1645 Corinth Ave., Ste. 201
Los Angeles, CA 90025-3150

Comment No. 20-1

Can you extend your public comment period to Oct. 30.

Our West LA Sawtelle Neighborhood Council meets on Wed., Oct. 26, which is after your Oct. 24 comment deadline.

Your meetings were Oct. 6 and 7, I believe, and less than a month is insufficient time for NCs to schedule meetings and vote on comments to submit.

Metro also presented at our Planning Cmte meeting last night, and our Board's next regular meeting is Oct. 26.

I cc:ed Los Angeles Council District #11.

Thank you,

Response to Comment No. 20-1

The commentor requests an extension for the Draft EIR public comment period. The public comment period began on September 9, 2022, and concluded on October 24, 2022, for a minimum of 45 days consistent with Section 15105 of the CEQA Guidelines. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 21

Barbara Broide
President
Westwood South of Santa Monica Boulevard HOA
P.O. Box 64213
Los Angeles, CA 90064-0213

Westside NC Land Use/Mobility Committee
wncluc@gmail.com

Comment No. 21-1

Attached please find our comment letter sent on behalf of Westwood South of Santa Monica Blvd. HOA.

Please acknowledge receipt to:
bbroide@hotmail.com
info@wssmhoa.org
wncluc@hotmail.com

This letter is submitted on behalf of Westwood South of Santa Monica Blvd. Homeowners Association (WSSM) in response to the Draft Environmental Impact Report issued by the Los Angeles County Metropolitan Transportation Authority (Metro) for its proposed Metro Transit Communications Network Program (TCN).

WSSM represents 3800 single family and condominium households located in the area between Santa Monica and Pico Blvds. on the north and south, and between Beverly Glen and Sepulveda Blvds. on the east and west.

Response to Comment No. 21-1

This introductory comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 21-2

We submit this letter as a community that has had significant experience living with a number of full-sized digital billboards that were erected in our neighborhood between 2006 and 2008 as a result of a legal settlement agreement between the City of Los Angeles (the

City) and two outdoor advertising companies, Clear Channel and CBS Outdoor (now Outfront Media). With three digital billboards in the immediate vicinity of Santa Monica and Westwood Blvds. and two digital billboards on Westwood Blvd. (one between Pico and Olympic Blvds. and one north of Santa Monica Blvd.) as well as an additional sign just east of Beverly Glen on Santa Monica Blvd., we have first-hand experience with the many negative impacts of these signs on aesthetics, neighborhood character and viewshed, energy, land use and planning, transportation, public safety, and the quality of life of those living and passing within the area of these signs. Those signs were all later removed as a result of a successful legal challenge that saw the court ordering them to be shut down (Summit Media vs. the City of Los Angeles).

Response to Comment No. 21-2

This comment acknowledges that history of digital billboards in the City of Los Angeles. This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 21-3

The TCN DEIR fails to acknowledge the many negative impacts that these proposed signs will have on those living in their vicinity. You ignore the fact that housing is now being built and housing construction is being incentivized on commercial arterials—the very place where you propose to have digital off-site signs.

Response to Comment No. 21-3

Refer to Response to Comment No. 9-21 regarding the evaluation of existing and future residential uses in the vicinity of the proposed TCN Structures.

Comment No. 21-4

These signs have significant negative impacts on the health of those who are forced to live within the scope of the 24/7 “digital sunrise” that come with them. The light pollution emitted by these signs creates a strobe effect visible in adjacent properties (inside structures and outside) in both daylight and at night. The renderings of the sign structures do not illustrate how the structures will halt the light trespass from these signs to nearby neighbors—both commercial and residential. How will that be accomplished? What will be the change in intensity and will the flickering or strobe light effect that come with changing messaging be neutralized and not seen by those across from or below any signage? What will the impacts be on night sky and the upward transmission of light?

Response to Comment No. 21-4

As discussed in Response to Comment No. 13-13, above, the light trespass illuminance from all 56 Signs would be less than the threshold established by LAMC (3.0 fc) for residential use properties, and less than the LZ3 standard established by CALGreen (0.74 fc). Furthermore, 54 of the 56 Signs would generate light trespass illuminance that would be less than 0.3 fc, or less than 10 percent of the LAMC requirement. These conclusions are based on detailed documentation of existing conditions and detailed calculations of illuminance and glare provided in the Lighting Study included as Appendix B to the Draft EIR.

With regard to the less than significant impacts associated with lighting in the interior of residential structures and human health, refer to Response to Comment No. 12-13. With regard to the less than significant lighting impacts associated with sky glow and the Ballona Wildlife Reserve, refer to Response to Comment No. 9-30.

Comment No. 21-5

How will this light affect insect and bird populations in their vicinity? The presence of bright lights at night not only affects the health and quality of sleep of humans (where are your citations about the studies documenting these affects and recognition that you cannot fully mitigate against this impact?), but it can affect the behavior of the natural environment. Studies have shown that lighting at night affects insects who would normally feed and pollinate plants during the night (<https://www.npr.org/sections/thetwo-way/2017/08/03/541383664/study-suggests-artificial-light-deters-nocturnal-pollinators>) [sic] What impacts would changes of behavior in insects have on the bird population that might rely upon these insects as a food source? Will bright lights affect the behavior of other naturally occurring wildlife, birds, insects?

Response to Comment No. 21-5

Refer to Topical Response No. 3, for a discussion further explaining the Project's less than significant impact from lighting on biological resources. LED lighting systems are more efficient than all previous known sources of light, which means LED sources deliver more light per watt of energy input, and therefore produce correspondingly less heat and UV radiation. It is not expected that light from the TCN Structures would attract insects, including pollinators. While there is some potential for change in insect behavior as a result of the additional lighting from the Project, studies are inconclusive as to whether LED lighting attracts or deters insects due to the lack of UV rays and emitting less heat than other forms of lighting. Additionally, while there is potential for nighttime pollinators to be deterred from inhabiting locations near lighting, there is no indication that these species would not relocate to another nearby area, thereby making the overall impact to insect

populations less than significant. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 21-6

In addition to our very relevant experience, there is, in addition, significant factual data that could and should have been included in the Metro DEIR that was ignored in an effort to downplay the impacts of the proposed 56 billboard structures that are proposed to be erected and operated and that will house 62 full-sized digital billboards in freeway facing locations and another 35 changing digital sign in non-freeway facing locations.

Response to Comment No. 21-6

The commenter has not provided any supporting information in this comment as to what significant factual data was not included as part of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 21-7

It should be noted that while the DEIR attempts to separate the signs according to these two designations (freeway facing and non-freeway facing), the impacts of freeway facing signs will be seen beyond their freeway locations and the non-freeway facing signs will be visible from beyond the local area adjacent to their installation.

Response to Comment No. 21-7

As described in Chapter II, Project Description, of the Draft EIR, Freeway Facing TCN Structures would include signage that can be viewed from the highway, while Non-Freeway Facing TCN Structures would be viewed from major arterial streets. The digital display faces would be designed to provide efficient and effective illumination while minimizing light spill-over, reducing sky-glow, and improving nighttime visibility through glare reduction. Louvers would be installed to shade the LED lights from creating unintentional light spillage, assist in reducing reflection, and in turn would create a sharper image. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 21-8

The DEIR fails to do the due diligence that is warranted for a program of this nature. The DEIR gives short shrift to evaluating the impacts of the proposed signage in an effort to advance the program under the guise of improving traffic safety and congestion. Yet there is no proof that it will accomplish these goals. Metro's efforts to present this program as a

“Transportation Communication Network” is a disingenuous effort to package this initiative by downplaying its main purpose—to generate advertising revenues. Less costly alternatives designed to promote roadway efficiency and augment Metro’s communication capacity with far fewer negative impacts were not adequately explored. Where are the alternatives to meet these goals?

Response to Comment No. 21-8

The commenter asserts that the Draft EIR has not adequately evaluated the Project’s impacts, but provides no specific information to support this assertion. Chapter IV, Environmental Impacts Analysis, contains a comprehensive analysis of the Project’s environmental impacts. The commenter additionally questions whether the Project will achieve its stated goals. As described in Chapter II, Project Description, of the Draft EIR, the underlying purpose of the Project is to provide a network of TCN Structures that would incorporate intelligent technology components to promote roadway efficiency, improve public safety, augment Metro’s communication capacity, provide for outdoor advertising where revenues would fund new and expanded transportation programs consistent with the goals of the Metro 2028 Vision Plan, and result in an overall reduction in static signage displays throughout the City of Los Angeles. Finally, the comment asserts that the Draft EIR did not sufficiently consider alternatives to the Project. However, Chapter V, Alternatives, of the Draft EIR contains an analysis of alternatives to the Project, including the impacts of the alternatives and their ability to meet the Project’s goals and objectives. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 21-9

What partnerships could be forged with other agencies and jurisdictions to better coordinate meeting these goals?

Response to Comment No. 21-9

The TCN Structures would be equipped with Metro’s Regional Integration of Intelligent Transportation Systems RIITS, which provides comprehensive, timely, and real-time information among freeway, traffic, transit, and emergency systems, and across various agencies, including Caltrans District 7, the City of Los Angeles Department of Transportation, California Highway Patrol CHP, Foothill Transit, Los Angeles County Department of Public Works, and other local and regional transit agencies, to improve traffic and transportation systems, and to disseminate information regarding roadway improvements, and during emergency events. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 21-10

In addition to the physical, public health and public safety negative impacts of the program, many of which cannot be mitigated and are considered to be significant, there are major policy implications that approval and implementation of the TCN program will bring. None of these have been addressed in the DEIR.

Response to Comment No. 21-10

The commenter expresses general opposition to the Project. The Draft EIR determined that impacts would be limited to historical resources impacts associated with impacting the integrity of setting of historical resources and related aesthetic and land use impacts due to Site Locations NFF-2, NFF-3, NFF-16, and NFF-21, and land use policy impacts associated with placing off-site commercial signage (Site Locations FF-29 and FF-30) in the coastal area. Please refer to Section V. Alternatives for a discussion of Alternative 3 which eliminates all significant and unavoidable impacts of the Draft EIR. Further, the commenter has not provided any supporting information in this comment as to what major policy implications that approval and implementation of the TCN program will bring. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 21-11

Where is the discussion related to the City of Los Angeles' 2002 Sign Ordinance and the court cases that challenged it and sought to nullify the City's ability to regulate off-site signage? A discussion of the legal challenges and the guidelines issued by the courts in the Summit, Metrolights and other relevant litigation is needed. Metro must acknowledge the courts' guidance provided to the City as to the permissible limits of permitted off-site advertising. The Metro TCN program does not meet the standards issued by the courts. Implementation of this program will serve to undermine the City's authority to regulate off-site signage and open the door to new litigation challenging those rights. What is the possible outcome of such a challenge?

Response to Comment No. 21-11

The purpose of CEQA is to analyze a project's impacts against existing physical conditions, including consistency with existing land uses. As explained in Chapter II, Project Description, of the Draft EIR, new off-premise signage would be located within an adopted Sign District, Specific Plan, or Supplemental Use District, as excepted from the 2002 ban. As part of the Zoning Ordinance, the City would establish an "SN" Sign District designation for the TCN Structures. (The Project would therefore not violate the City's 2002 ban of new off-site advertising signs. Further, refer to Response to Comment No. 9-18 regarding the proposed Zoning Ordinance for the TCN Structures.

This remainder of this comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 21-12

The TCN program will jeopardize the City's right to regulate off-site signage opening up the entire City to a barrage of new off-site advertising signage. (That signage, by the way, will result in the dilution of the value of any existing and future signage as advertisers have a set amount of revenue to spend on advertising and more signs do not necessarily generate more revenues for those chasing after "out-of-home" advertising income.)

Response to Comment No. 21-12

As explained in Chapter II, Project Description, of the Draft EIR, new off-premise signage would be located within an adopted Sign District, Specific Plan, or Supplemental Use District, as excepted from the 2002 ban. As part of the Zoning Ordinance, the City would establish an "SN" Sign District designation for the TCN Structures. (The Project would therefore not violate the City's 2002 ban of new off-site advertising signs. Further, refer to Response to Comment No. 9-18 regarding the proposed Zoning Ordinance for the TCN Structures.

This remainder of this comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 21-13

From a policy perspective, any new signage programs proposed for implementation in the City should conform with the 2002 Sign Ordinance and with the City Planning Commission's (CPC) recommendations presented to the City Council and now referred to as "Version B+." The adoption of the CPC's measures designed to clarify and strengthen the Sign Ordinance are currently pending at Council and were crafted following multiple public hearings. Their adoption was slowed by the efforts of now disgraced former Councilmembers and PLUM Committee members, Chair Jose Huizar and Mitch Englander.

Response to Comment No. 21-13

The purpose of CEQA is to analyze a project's impacts against existing physical conditions, including consistency with existing land uses. As explained in Chapter II, Project Description, of the Draft EIR, new off-premise signage would be located within an

adopted Sign District, Specific Plan, or Supplemental Use District, as excepted from the 2002 ban. As part of the Zoning Ordinance, the City would establish an “SN” Sign District designation for the TCN Structures. (The Project would therefore not violate the City’s 2002 ban of new off-site advertising signs. Further, refer to Response to Comment No. 9-18 regarding the proposed Zoning Ordinance for the TCN Structures.

This remainder of this comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 21-14

One important aspect of sign regulation has to do with any required takedown ratios associated with the placement of new signage such that the City will experience an overall reduction in signage and the impact of those signs. The replacement of static billboard square footage with digital billboard space clearly represents an unequal trade—even at the Metro TCN requested 2 to 1 ratio. There are many cities that require a much higher takedown ratio. Where is your research to show why your selected a 2:1 ratio is a reasonable one? The CPC recommendation is set at 10:1. We support that policy and believe that anything less is not acceptable. Where is your survey of takedown ratios?

As we presented to the CPC and PLUM, it is important that in ordering the takedown of any signs, that it be documented that the signs to be removed be legally permitted signs that are currently in conformity with their permits. Those signs that do not have permit documentation or that have been altered to be out of compliance with their permits should be removed and not be considered eligible to be included as takedown credits. Placement of new signage in LA should be considered to be a privilege [sic] and one that results in significant community benefits that reduce existing sign blight. If Metro does not own billboards to reach the 10:1 removal ratio, it should explore purchasing permitted billboards from other companies in Los Angeles so that it can comply with reducing blight. The proposed 2:1 ratio is, in short, completely insufficient. The value of the static signs is so insignificant in comparison with the value and impact of new digital signage.

Response to Comment No. 21-14

Refer to Response to Comment No. 9-25 regarding the take-down of existing static displays as part of the Project.

Comment No. 21-15

The impact of commercial advertising, particularly on vulnerable populations and youth, is something that has not been addressed in the DEIR. This is especially important understanding that these signs will likely carry messaging related to sugar-laden beverages, junk foods, fast food and other unhealthy products. The ability of Metro to limit the types of product advertisements placed on its message boards is limited understanding free speech rights. The refer"ences [sic] made to Metro's attempts to limit advertising is difficult to grasp as terms used in the DEIR are likely to be viewed as subjective rather than objective. How will Metro protect vulnerable populations from advertisements that promote unhealthy lifestyles and obesity? In addition, "the commercial messaging may contribute to excessive consumption of advertised products, shopping addiction, consumption of unhealthy and fast food which leads toward obesity and a series of diseases." (<http://science-gate.com/IJAAS/Articles/2021/2021-8-9/1021833ijaas202109013.pdf>)

Response to Comment No. 21-15

This comment is unrelated to the environmental review for the Project. However, as the commenter correctly states, the digital displays would comply with Metro's System Advertising Content Restrictions, which prohibit advertisement of alcohol, smoking, and cannabis, and any content containing violence, obscenities, and other related subject matters as described in Chapter II, Project Description, of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 21-16

The commercialization of the public and Metro right-of-way is inconsistent with sound urban planning and the fostering of pedestrian-friendly neighborhood, and great streets. When tourists come to Los Angeles, they come to see the Hollywood sign, not billboards littering our landscape and obstructing the views of our more attractive attributes—our mountains, palm trees, green winters, beaches, etc. The DEIR fails to address the impact that these signs will have on the character of our City and on the neighborhoods in which they will be visible. This can be expressed as disruption of identity of place. Impacts on historical resources, Ballona wetlands and plain old neighborhoods are underplayed. These signs are seen from considerable distance.

Response to Comment No. 21-16

This comment expresses general opposition to the Project specifically with regard to visual character. As described in Section IV.A, Aesthetics, of the Draft EIR, the majority of the Site Locations are located on vacant land with limited vegetation and are generally inaccessible to the public. The Site Locations are located within property owned and

operated by Metro along freeways and major streets within the City. the Site Locations are within urban areas that have already been developed with roadway infrastructure, with surrounding buildings, sources of light, and in many cases existing signage. Other than the removal of existing static displays at several of the Site Locations, no structures or trees would be removed to construct the TCN Structures. In addition, no natural open space areas would be graded or developed. Furthermore, based on the Site Location of the proposed TCN Structure next to a freeway or major roadway, their size and height, and the existing urban setting of the Site Locations and surroundings, the TCN Structures would not substantially contrast with existing aesthetics features, such as trees, landscaping, and open space areas. Nonetheless, as discussed in Section IV.D, Cultural Resources, of this Draft EIR, the proposed TCN Structures at Site Locations NFF-2, NFF-3, NFF-16 and NFF-21 are located in close proximity to five historical resources, including the North Spring Street Bridge (Caltrans Bridge No. 53C0859), Lankershim Depot, the Little Tokyo Historic District, the Japanese Village Plaza, and the Fourth Street Bridge (Caltrans Bridge No. 53C0044). While the TCN Structures would not physically impact the historical resources, the TCN Structures would detract from the character defining features of these five historical resources. Overall, for purposes of providing a conservative analysis, impacts on the existing visual character or quality of public views in the vicinity of these five historical resources are concluded to be significant.

Comment No. 21-17

We know that the sign erected on Westwood Blvd. just north of Rochester Avenue could be clearly seen (at day and night) from the bridge across Westwood Blvd. just south of Pico at Westside Pavilion. It completely altered the landscape of the area looking north to the Santa Monica Mountains and the distance from the intersection of Westwood and Rochester to Westwood and Pico is 1.36 miles. How far will these signs be visible? How will this affect nearby properties and all others that will see them?

Response to Comment No. 21-17

The sign referred to in this comment is not a part of the Project and appears to be of a vastly larger size, with a different function than the TCN Structures proposed by the Project. As discussed in Chapter II, Project Description, of the Draft EIR, the digital display faces of the TCN Structures would 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 Site Location. Louvers would be installed to shade the LED lights from creating unintentional light spillage, assist in reducing reflection, and in turn would create a sharper image. The digital displays would be in compliance with Metro's System Advertising Content Restrictions which prohibits advertisement of alcohol, smoking, and cannabis, and any content containing violence, obscenities, and other related subject matters.

Comment No. 21-18

The DEIR does not provide sufficient descriptions of each proposed sign location and exactly where it will be placed. It does not provide adequate information about nearby uses and how they might be impacted.

Response to Comment No. 21-18

Contrary to what is stated in this comment, the Draft EIR provided the specific locations and height from grade of each of the proposed TCN Structure in Tables II-1 and II-2 of Chapter II, Project Description, of the Draft EIR. Additionally, aerial and ground level views of each Site Location are included in Figures III-1 through III-15 and Figures IV.A-1 through IV.A-15, in sections III. Environmental Setting and IV.A. Aesthetics of the Draft EIR, respectively. A site specific evaluation for each individual TCN Structure was performed and took into account each individual Site Location's environmental setting as well as attributes such as dimensions, digital display angles, height, and nearby sensitive uses including residential uses. Further, placement of the Non Freeway Facing TCN Structures would be coordinated with the Los Angeles Department of Transportation. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 21-19

The Seattle traffic study concludes that no changing messaging signs should be placed within 120 feet upstream of intersections or driveway entrance/exits from businesses, commercial parking lots or garages. This because of the need to take into account a reasonable driver perception-reaction time assuming that an average driver will take his/her eyes off the road for two seconds. What recommendations are to be sought for this program?

Response to Comment No. 21-19

Refer to Topical Response No. 1, Transportation Studies, for a discussion further justifying the use of the studies that were included in Section IV.K, Transportation, and Appendix K, Transportation and Traffic Safety Review, of the Draft EIR. As described therein, the research selected found that a correlation between digital billboards and traffic collisions was "inconclusive at best." The comments cited additional research which claim to demonstrate the negative impacts of digital billboards on public safety and should nullify the results of the Draft EIR. Upon further review, none of the additional studies cited in the comments provide conclusive evidence that digital billboards cause traffic collisions. Nor do those studies undermine the conclusions of the Draft EIR and the studies relied on for the Draft EIR analysis

Comment No. 21-20

The DEIR completely fails to acknowledge current land use policies that incentivize the construction of residential housing on commercial corridors. The signs on commercial corridors will directly impact residences and the quality of life of those who live in them. These impacts have not been assessed. How can aesthetics be adequately evaluated without such information?

Response to Comment No. 21-20

Refer to Response to Comment No. 9-21 regarding the evaluation of existing and future residential uses in the vicinity of the proposed TCN Structures.

Comment No. 21-21

When explaining the nature of this program to our constituents, the response most commonly given is a simple and direct one: These signs are ugly. One member recited the Ogden Nash poem as follows:

I think that I shall never see
A billboard lovely as a tree
Perhaps unless the billboards fall,
I'll never see a tree at all.

Response to Comment No. 21-21

This comment raises general aesthetic concerns about the Project. Section IV.A, Aesthetics, of the Draft EIR, contains an analysis of the Project's aesthetic impacts. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 21-22

Scenic vistas from each sign need to be assessed. The City is said to recognize the value of preserving sightlines (view access) to designated scenic resources or subjects of visual interest from public vantage points. The subjects may be focal or panoramic. Existing views affected may be a single feature (a building, garden, panoramic view). While the DEIR notes impacts on five historic structures, there does not appear to be an assessment of landscaping, natural trees or landforms with aesthetic value. These are important when they are located within the viewshed of a proposed digital billboard.

Response to Comment No. 21-22

Refer to Response to Comment No. 17-41 for a discussion regarding analysis of focal and panoramic views of scenic resources.

Comment No. 21-23

The cumulative impact of all these signs in total is also something to be assessed. Currently there are no digital billboards adjacent to freeways in Los Angeles. One can clearly “feel” the difference when traveling south on the 405 when one sees the digital signs that have been placed in smaller municipalities. The aesthetics markedly change. The scenic quality of an area is important and refers to the visual appeal of an area. The addition of digital billboards to an area would add a new feature that detracts from the overall aesthetic character. How could this be mitigated? Could it be mitigated?

Response to Comment No. 21-23

Refer to Response to Comment No. 21-16, above and Section IV.A, Aesthetics, of the Draft EIR regarding the less than significant aesthetic impacts of the Project. The aesthetics analysis accounts for the TCN Structures in their entirety as well as the cumulative impacts of the signs at a given location.

Comment No. 21-24

The City has policies that assess scenic quality and requires specifications /requirements [sic] for street trees, building heights, setbacks, exterior lighting and signage. The City has no requirements for billboards.

Response to Comment No. 21-24

TCN Structures would be permitted within a City adopted Sign District, Specific Plan, or Supplemental Use District. Refer to Response to Comment No. 9-18 regarding the proposed Zoning Ordinance for the TCN Structures.

Comment No. 21-25

Why would these signs be considered to be an asset to the City? This program must be evaluated in conjunction with other sign programs now under consideration in LA and those recently approved to assess the full cumulative impact of this program coupled with others.

When a DEIR is done for a development project, all nearby projects must be listed and cumulative impacts considered. This DEIR should be no different and the STAP program,

and IKE program as well as any additional signage programs currently being contemplated at City Hall must be included.

Response to Comment No. 21-25

As described in Chapter II, Project Description, of the Draft EIR, the Project would provide a network of TCN Structures that would incorporate intelligent technology components to promote roadway efficiency, improve public safety, increase communication, and provide for outdoor advertising that would be used to fund new and expanded transportation programs consistent with the goals of the Metro Vision 2028 Plan.

As included in Chapter III. Environmental Setting of the Draft EIR, the STAP is a related project to the TCN Program. STAP's potential cumulative impacts with the Project are discussed in within the Draft EIR. Further, as shown in Final EIR Chapter III. Corrections, Clarifications, and Revisions to the Draft EIR, the proposed IKE Smart City have been included to the related projects list. Further, the conclusions for the Project's cumulative analyses in Sections IV.A Aesthetics through IV.M Utilities –Electric Power do not change with the incorporation of the IKE Smart City Program. Therefore, inclusion of the IKE Smart City Program does not change the conclusions of the cumulative analyses of the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

This remainder of this comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 21-26

The amount of visual information on streets and highways can cause distractions and traffic accidents that can put the lives of pedestrians, bike/scooter riders and drivers and their passengers at risk.

Response to Comment No. 21-26

Refer to Topical Response No. 2, City of Los Angeles Vision Zero, for a discussion of the Project's consistency with LADOT's Vision Zero policies aimed at eliminating traffic deaths by 2025. Additionally, Metro would continue to coordinate with Caltrans and LADOT on all necessary approvals for Project.

Comment No. 21-27

Billboards are viewed as neighborhood disruptions and contribute to a decline in resident perception of life, street-facing activity, sidewalk interaction, residential property values. (Appleyard (1981); Pikoraa et al (2003); Cao et al (2005). Cities of Menlo Park, Los Angeles, and Palo Alto) “The clutter caused by visual pollution is more than just an eyesore though. It not only robs a person of the pleasure of a beautiful landscape but also affects one’s mental and emotional health. Exposure to unpleasant visuals has reportedly caused stress, anxiety, exhaustion, distraction, accidents, eye fatigue among other effects. Continuous exposure to visual pollution is also believed to cause lack of sleep, mental irritability and psychological disturbances in children as well as adults.

Response to Comment No. 21-27

As discussed in Response to Comment No. 13-13, the Project would not result in significant impacts to human health. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 21-28

Distracting advertisements and bright lights on billboards can also cause traffic accidents or lead to an increase in stress levels among drivers.” (<https://byjus.com/question-answer/what-is-visual-pollution/>) The DEIR needs to evaluate these impacts as billboards are considered to be an important contributor to visual pollution.

Response to Comment No. 21-28

The commenter expresses general concerns regarding transportation safety. For further discussion of transportation safety, refer to Section IV.K, Transportation, of the Draft EIR. As discussed therein, impacts to transportation safety were found to be less than significant. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 21-29

The negative health consequences of digital billboards have not been adequately addressed. The role of billboards as “urban stressors” has been cited in research studies and is related to a growing environmental clutter around us. A Texas A&M University study determined that main commuter roads cluttered with strip malls, billboards, and garish on-premise signs contribute to “commuter stress.”

Response to Comment No. 21-29

As discussed in Response to Comment No. 13-13, the Project would not result in significant impacts to human health. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 21-30

While Metro's TCN Program promises to improve traffic safety and congestion, we would contend that it is just as likely to diminish traffic safety and instead will contribute to traffic congestion! Digital billboards with their changing messaging are proven driver distractions. There are countless studies that document this fact. Yet, the DEIR relies upon a widely criticized and unverified study by the FHWA and two studies that were sponsored by outdoor industry interests. This is hardly an acceptable effort to evaluate the dangers presented by digital billboards. Metro must seek a full review of the studies available.

Response to Comment No. 21-30

Refer to Topical Response No. 1, Transportation Studies, for a discussion further justifying the use of the studies that were included in Section IV.K, Transportation, and Appendix K, Transportation and Traffic Safety Review, of the Draft EIR. As described therein, the research selected found that a correlation between digital billboards and traffic collisions was "inconclusive at best." Upon further review of additional research studies that were submitted during the Draft EIR comment period, none of the additional studies cited provided conclusive evidence that digital billboards cause traffic collisions. Nor do those studies undermine the conclusions of the Draft EIR and the studies relied on for the Draft EIR analysis.

Comment No. 21-31

We can tell you that based upon our experience both watching and sitting in traffic at intersections where digital signs were in operation that the following was true:

- a) When left turn arrows would appear at SM/Westwood intersection, instead of responding to the signal and initiating a left turn, drivers would remain motionless—watching the changing billboard messages. Oftentimes this would result in an entire lane of cars waiting to turn being unable to do so. Traffic would then overflow from the left turn lane into the traffic lanes and all would be affected while waiting for the following signal sequence. When patience frays, drivers often respond poorly thus contributing to poor roadway behavior. Collision rates are sometimes correlated with automobile delays. Delay is particularly predictive of safety for left turn movements where delay influences signal timing and phasing designs [sic] that, in turn, influence safety. (Zhang & Prevedouros, 2002)

Response to Comment No. 21-31

The comment requests additional evaluation of potential impacts related to vehicular traffic flow and delay. It should be noted that California State Senate Bill 743 (Steinberg, 2013) (SB 743), made effective in January 2014, required the Governor's Office of Planning and Research (OPR) to change the California Environmental Quality Act (CEQA) guidelines regarding the analysis of transportation impacts to shift from driver/vehicular delay (level of service [LOS]) to vehicle miles traveled (VMT) in order to reduce GHG emissions, create multimodal networks, and promote mixed-use developments. Therefore, changes to driver delay are no longer applicable to identify transportation-related significant impacts under CEQA and were not required to be studied.

The analysis of the potential transportation/traffic-related impacts of the Project is detailed in Section IV.K, Transportation, and Chapter VI, Other CEQA Considerations, of the Draft EIR. Further, Refer to Appendix K.2 Supplemental Transportation Analysis, for a discussion on VMT. The Project would not result in an increase in number of trips and therefore would result in no increase in VMT. Therefore, VMT impacts would be determined to be less than significant and mitigation measures would not be required. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 21-32

- b) When drivers are watching billboards instead of the roadway, it is the most vulnerable roadway users who are at highest risk. Pedestrians and bike riders who do not have the luxury of a steel protective coat suffer the greatest dangers from distracted drivers. What are the accident rates at the locations selected for digital signage?

- c) Why has Metro sought to locate digital billboards on freeways often in proximity to interchanges—the very places where drivers need to focus on making safe lane changes and merges into traffic?

Response to Comment No. 21-32

The comment requests the traffic collision rates at the locations selected for digital signage and is noted for the record and will be forwarded to the decision makers for review and consideration. Refer to Topical Response No. 2, City of Los Angeles Vision Zero, for a discussion of the Project's consistency with LADOT's Vision Zero policies aimed at eliminating traffic deaths by 2025. Additionally, Metro would continue to coordinate with Caltrans and LADOT on all necessary approvals for Project.

Comment No. 21-33

Billboards are a safety hazard. Even the Outdoor Advertising Association of America boasts, “You can’t zap it. You can’t ignore it.” Billboards are designed to distract motorists’ attention from the road. Thus, it is no surprise that a 1980 Federal Highway Administration study found a positive correlation between billboards and accident rates. Moreover, federal and state courts have long cited traffic safety as a legitimate basis for billboard regulation. It is troubling to find that Metro is attempting to portray digital billboards (ever more distracting than the static signs of 1980) as tools to improve traffic safety.

In a study by Luomo [sic] (cited in <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7923428/>), Luoma developed and tested a simulation method that found billboards distract and reduce the conscious perception of traffic signs. Clark and Davies found that non-driving-related signs delay the responses to road signs in a simulated driving task. Bendak and Al-Saleh found that driving performance (lane drifting and recklessly crossing dangerous intersections) was worse on a road with advertising signs compared with no advertising signs. A recent study found both content of advertising and billboard location to drivers’ viewing field have high influence on driver distraction. This information, again, suggests that the traffic safety studies in the DEIR are inadequate and that the ability to mitigate has not been evaluated.

It is likely that many will comment on the clear and present dangers that distracting digital signage has on roadway safety. We contend that the negative impacts of these signs will far outweigh any positive impacts that traffic warning signage may bring. In fact, a recent study from Texas documents that the simple traffic safety warning message broadcast on a message sign resulted in an increase in traffic accidents in proximity to the sign.

While many traffic studies focus on distractions caused by in-vehicle distractions, there is a healthy body of studies that focus on outside-the-vehicle distractions (such as billboards). It is important to recognize that outside-the-vehicle distractions are seen as dangerous, if not more so, than in-vehicle distractions. According to a study done for the City of Seattle, (<https://www.scenic.org/wp-content/uploads/2021/12/SEATTLE-STREET-FURNITURE-FINAL-REPORT.pdf>) “This is because, with in-vehicle distractions, the driver is aware that he has taken his eyes off the road, whereas, when attending to an outside distractor such as a sign or billboard, the driver tends to think that he maintains a view of the road in his peripheral vision and can therefore respond to incidents that may arise; this research, however, demonstrates that such response is compromised.” By relying upon faulty and biased studies, the DEIR fails to evaluate the true dangers posed to roadway users by digital billboards. That assessment is needed.

Response to Comment No. 21-33

Refer to Topical Response No. 1, Transportation Studies, for a discussion further justifying the use of the studies that were included in Section IV.K, Transportation, and Appendix K, Transportation and Traffic Safety Review, of the Draft EIR. As described therein, the research selected found that a correlation between digital billboards and traffic collisions was “inconclusive at best.” The comments cited additional research which claim to demonstrate the negative impacts of digital billboards on public safety and should nullify the results of the Draft EIR. Upon further review, none of the additional studies cited in the comments provide conclusive evidence that digital billboards cause traffic collisions. Nor do those studies undermine the conclusions of the Draft EIR and the studies relied on for the Draft EIR analysis. Further, the portion of the comment referencing the 1980 Federal Highway Administration study was superseded by the FHWA Study referenced in Appendix K, Transportation and Traffic Safety Review, of the Draft EIR. The study referenced which claimed that “both content of advertising and billboard location to drivers’ viewing field have high influence on driver distraction” was not cited in the comment, and therefore, it is unknown which specific study is being referenced. However, based on the comment, it does not appear to conclude there is a correlation between traffic collisions and digital billboards. Refer to Topical Response No. 2, City of Los Angeles Vision Zero, for a discussion of the Project’s consistency with LADOT’s Vision Zero policies aimed at eliminating traffic deaths by 2025. Additionally, Metro would continue to coordinate with Caltrans and LADOT on all necessary approvals for Project.

Comment No. 21-34

On the topics of energy and lighting, there is no discussion in the DEIR pertaining to the impacts of light-emitting diodes (LEDs). A group in Monterey County (“Turn Down the Lights”) addressed the harmful nature of LEDs. While the typical Californian may believe that LED fixtures are a welcome technological advancement by providing better light at lower cost, upon installation of LED street lights in Monterey County, some residents noted impacts on their vision: “Their eyes were now hurting.” They noted that LED lights were dangerous for drivers (because of glare and shadows), and residents (because of sleep deprivation). A study from the Northwestern University’s Center for Circadian and Sleep Medicine found that sleeping, even with a little bit of light isn’t good for your health. That study, published in the Proceedings of the National Academy of Sciences documented elevated heart rates during the night and increased insulin resistance in the morning from those sleeping with exposure with a moderate amount of artificial light. It also noted that light can disrupt metabolism and increase the risk of chronic illness. The health impacts of the proposed digital signage were not adequately evaluated (in part because the DEIR fails to acknowledge proximity to residential housing and those who live there).

Response to Comment No. 21-34

The lighting analysis included in Section IV.A, Aesthetics, of the Draft EIR and in the Lighting Study included as Appendix B to the Draft EIR provides a comprehensive analysis of the Project's less than significant impacts from glare. Specifically refer to pages 55–57 of the Lighting Study for an analysis of glare impacts to both residential use properties and drivers. As discussed in Chapter II, Project Description, of the Draft EIR, the TCN signs would operate at a maximum luminance of 300 candelas per square meter at night and 6,000 candelas per meter during the day. The Lighting Study demonstrates that the glare from the sign would have contrast ratios of well below threshold that would be deemed uncomfortable by the IESNA. In particular, the contrast ratio for sensitive uses would be less than 30:1 for all signs and most signs would have a contrast ratio of less than 5 to 1. With regard to roadway glare, the Lighting Study concludes that glare from the displays would be well below the criteria for glare set forth in the California Vehicle Code. With regard to the less than significant human health impacts associated with the Project, refer to Response to Comment No. 13-13.

Comment No. 21-35

Residences are considered light-sensitive since they are typically occupied by persons who have an expectation of darkness and privacy during evening hours and who can be disturbed by bright light sources. It was our experience that condo, home and apartment residences all reported significant negative impacts from nearby digital sign light. As was previously mentioned, the flickering or strobe light effect of the changing messaging was a cause of great discomfort—even if the intensity of light was within accepted brightness range. Certain kinds of LED lights, while being more energy efficient, actually will dramatically increase light pollution, according to representatives of the International Dark-Sky Association.

Response to Comment No. 21-35

Refer to Response to Comment No. 13-13 regarding the less than significant impacts of the Project on interior lighting and human health.

Comment No. 21-36

Light pollution is now gaining in recognition as a form of pollution, and the DEIR must assess how it will avoid adding light trespass on the built environment, but also as it contributes to the night sky light pollution of our metropolitan basin. If not, we may come to a time where no stars will be visible in the nighttime sky here. Nighttime natural scenery needs protection just like daytime scenery.

Response to Comment No. 21-36

As discussed above in Response to Comment No. 9-30, the digital display faces would be designed to provide efficient and effective illumination while minimizing light spill-over, reducing sky-glow, and improving nighttime visibility through glare reduction. Thus, the night sky would not be significantly impacted by the TCN Structures.

Comment No. 21-37

In addition to issues related to intensity of light, digital billboards are associated with glare—both in daytime and nighttime. The broad expanse of brightly lit panels creates glare. Activities, including driving and uses such as parks and residences, are considered glare sensitive as the presence of glare could interfere with vision and/or result in an irritant to these activities//uses. How has glare been evaluated for each sign location?

Response to Comment No. 21-37

Refer to the detailed analysis of glare in the Lighting Study and Response to Comment No. 21-24 regarding the Project's less than significant glare impacts.

Comment No. 21-38

We know that the line of sight to the Westwood Rochester billboard from south of Pico Blvd. was crisp and clear and overshadowed all other elements within view.

Response to Comment No. 21-38

The commenter notes their familiarity with a billboard on Westwood and Rochester. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 21-39

The DEIR fails to acknowledge the health impacts that these changing LED lights have on people with seizure disorders, ADHD, cataracts and other eye conditions. How can these signs be used without causing negative impacts on those with these conditions?

Response to Comment No. 21-39

Refer to Response to Comment No. 13-13 regarding the Project's less than significant impacts on human health.

Comment No. 21-40

There is no discussion in the DEIR about the need to address visual pollution as part of the aesthetic evaluation. Visual pollution is [sic]

There is no rationale presented for the selection of an 8-second refresh rate. What studies were used to justify such a rotation rate?

One could easily argue that no driver should be able to watch multiple changing images and that if digital signage is used as a mechanism for the posting of messaging, that those messages should appear to be static in nature. One Canadian study developed proposed guidelines that suggest that digital signs “emulate” static billboards which meant that they should be no brighter than conventional billboards (which rarely exceed 100 nits at night), and that they should appear static to the extent possible, to any given motorist.) This also suggests that the refresh rate should be established based upon the speed of traffic passing. Has this been explored in the research that went into drafting the DEIR? It should be evaluated.

Response to Comment No. 21-40

Contrary to what is stated in this comment, for a discussion with regard to aesthetics consistent with Appendix G of the CEQA Guidelines, please refer to Section IV.A, Aesthetics, and Appendix B, Lighting Study, of the Draft EIR. Further, as described in Chapter II, Project Description, as proposed by Metro, the digital display faces would be set to refresh every eight seconds and would transition instantly with no motion, moving parts, flashing, or scrolling messages. Illumination of the digital displays would conform to applicable Federal and State regulations for signs oriented towards roadways and freeways. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 21-41

While it has been mentioned that individual frames will not have ads with movements, there has been nothing said about forbidding serial messaging whereby one ad related to another that was screened before it. Such messaging should not be permitted.

Response to Comment No. 21-41

The digital displays would be in compliance with Metro’s System Advertising Content Restrictions which prohibits advertisement of alcohol, smoking, and cannabis, and any content containing violence, obscenities, and other related subject matters. Illumination of the digital displays would conform to applicable Federal and State regulations for signs oriented towards roadways and freeways. This comment is noted for the record and will be

forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 21-42

The EIR is not meant to evaluate the financial aspects of the current proposal. However, we cannot help but comment as to the apparent desire of those promoting this program and the new commercial advertising programs at the City level by saying that it would be a far better strategy for the City and Metro to consider developing a strategy that seeks to MINIMIZE sign blight while maximizing potential revenues from those signs. The apparent strategy to blanket the City with all forms of digital commercial messaging signage on our public right-of-way is folly. It compromises the City's aesthetics, wastes energy, and ignores the importance of preserving our shared open space. Whether that space is on the ground or in the air, it is ever more important in a City that seeks to build taller and denser to accommodate significant numbers of new housing units in coming years.

Response to Comment No. 21-42

This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 21-43

With reduced building setbacks, increased building heights and added population, the open space that we share should not be occupied with ad structures on our street, on our sidewalks and in our airspace. Those spaces should be treated as valuable shared public resources and important to the health and well-being of all who share this City.

Response to Comment No. 21-43

The majority of the Site Locations are located on vacant land with limited vegetation and are generally inaccessible to the public. Further, the proposed Site Locations are used primarily for Metro operations which include rail corridors, stations, parking, bus depots, and equipment lots. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 21-44

We conclude that the TCN DEIR is inadequate as an informational document, as it fails to provide sufficient information to allow decisionmakers and members of the public to fully

and accurately evaluate the visual impacts, public health and safety aspects and other impacts of the proposed project. Levels of significance of impacts cannot be adequately assessed nor can potential mitigations, if any.

Thank you for your consideration.

Response to Comment No. 21-44

This comment does not provide any specific supporting information as to why the analysis in the EIR would be inadequate. Further, the Draft EIR was prepared pursuant to CEQA Guidelines Section 15151, Standards for Adequacy of an EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 22

FORM LETTER

(multiple signatures—see list below)

Comment No. 22-1

I urge you to halt plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

Response to Comment No. 22-1

The commenter expresses general opposition to the Project due to its environmental impacts and interaction with the City's sign ordinance. Additionally, the comment alleges that the Draft EIR is inadequate. This comment does not provide any specific supporting information as to why the analysis in the EIR would be inadequate. Further, the Draft EIR was prepared pursuant to CEQA Guidelines Section 15151, Standards for Adequacy of an EIR. Chapter IV, Environmental Impacts Analysis, of the Draft EIR, contains a comprehensive analysis of the Project's environmental impacts. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 22-2

Contrary to the findings of in the DEIR, there is a preponderance of evidence demonstrating the negative impacts digital billboards have on public safety by altering 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 distraction by enacting 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 distraction conditions. A comprehensive compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

Recent research demonstrates that even changing electronic signs erected solely for public information purposes create hazards for drivers, indicating that the medium of digital signs is inherently dangerous. The Traffic Safety section of the DEIR fails to account for this evidence. The report contains no original analysis of the relationship between signs and driver safety and relies on a literature review of stale and inadequate research.

Response to Comment No. 22-2

Refer to Topical Response No. 1, Transportation Studies, for a discussion further justifying the use of the studies that were included in Section IV.K, Transportation, and Appendix K, Transportation and Traffic Safety Review, of the Draft EIR. As described therein, the research selected found that a correlation between digital billboards and traffic collisions was “inconclusive at best.” The comments cited additional research which claim to demonstrate the negative impacts of digital billboards on public safety and should nullify the results of the Draft EIR. Upon further review, none of the additional studies cited in the comments provide conclusive evidence that digital billboards cause traffic collisions. Nor do those studies undermine the conclusions of the Draft EIR and the studies relied on for the Draft EIR analysis.

Comment No. 22-3

Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

Response to Comment No. 22-3

As explained in Chapter II, Project Description, of the Draft EIR, new off-premise signage would be located within an adopted Sign District, Specific Plan, or Supplemental Use District, as excepted from the 2002 ban. As part of the Zoning Ordinance, the City would establish an “SN” Sign District designation for the TCN Structures. (The Project would therefore not violate the City’s 2002 ban of new off-site advertising signs. Further, refer to Response to Comment No. 9-18 regarding the proposed Zoning Ordinance for the TCN Structures.

Comment No. 22-4

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. However, Metro essentially states in this program that hazards created by installing digital signs are a problem that the rest of the city must mitigate. However, the dangers posed by Metro’s signs would not be limited to its property. The City’s roadway users would suffer the consequences, which would undermine the Vision Zero Program.

Response to Comment No. 22-4

Refer to Topical Response No. 2, City of Los Angeles Vision Zero, for a discussion of the Project’s consistency with LADOT’s Vision Zero policies aimed at eliminating traffic

deaths by 2025. Additionally, Metro would continue to coordinate with Caltrans and LADOT on all necessary approvals for Project.

Comment No. 22-5

Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan.

Response to Comment No. 22-5

This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 22-6

Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

Response to Comment No. 22-6

As described in Section IV.A, Aesthetics, of the Draft EIR the only designated Historic Parkway within the City of Los Angeles, the Arroyo Seco Parkway (California State Route 110) runs northeasterly from the four-level interchange with US-101 just outside of downtown Los Angeles (mile post 23.69) to East Glenarm Street in the City of Pasadena (mile post 31.89). There are no TCN structures proposed along this designated Historic Parkway, and, thus, no further discussion of the Project's consistency with this regulation is required. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 22-7

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

Response to Comment No. 22-7

The commenter expresses general opposition to the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and

consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Sharifa Abdul-Wahid	Andrea Bonnett	Daniel Costa
Julie Adelson	Michael Bourke	Georgianne Cowan
Katherine Aker	Candy Bowman	Stacie Cox
Janet Albaugh	Renee Bradford	Russell Curl
Peter Alexander	Victoria Brandon	Casey Danson
Jon Amsden	Blaise Brockman	Barbara Dave
Eic Anches	Jacqueline Broulard	Jill Davine
Frank and Mary Jane Anderson	Damon Brown	Erika Davis
Judith S. Anderson	Sandy Brown	Sylvia De Baca
Nicole Antoine	Hali Burton	Javier Del Valle
Stephanie Aston	Sharon Byers	Marie DiMassa
Cheryl Auger	Laurel Cameron	Renate Dolin
Charles B.	Patricia Carlson	Lee Doolan
Sherry Barnett	Mixhael Casey	L.L. Dored
Lisa Battista	Gary Charles	Ann Dorsey
Malissa D. Beeson	Andrew Charlton	Paulette Doulatshahi
Ann Bein	Norma Chavez	Su Du
Karen Berger	Mark Chernack	B. E.
Abbie Bernstein	Robert Chirpin	Lurlie Edgecomb
Barbara Betlem-Ringuette	Calvin Christopher	Karen Emanuel
Andrea Birnbaum	Sandra Christopher	Barbara Epstein
Martha Bissell	William J. Cleary Jr.	Sa Er
Bruce Block	Allen Clement	Vanessa Escamilla
Ellen Blum	Jennie Cohen	Judith Esposito
Danielle Bond	Lynda Cook	Carlos Etcheverry

Helen Fallon	Jeff Gould	Scott Jung
Tom Feldman	Stephanie Greenwald	Saran K.
Alexander Fierro-Clarke	Maria Gritsch	Batsheva Kasdan
Jeffrey Findeis	Natalie Haddad	Robert Kent
Michael Fishbein	Brenda Haig	Mha A. S. Khalsa
Mayra Flores	Lisa Hammermeister	Christina Kirk
Joyce Foster	John Hammond	Renee Klein
Nick Fotiadis	Tim Hanson	George Kleiman
Darren Frale	Lynda Harris	Cordi Koga
Patrick Frank	Karen Hellwig	Susan Kornfeld
Joe Gallagher	Vikki Helperin	Cathy Kraus
Rob Gallinger	Carrie Henderson	David Kristy
Glenda Ganis	Lynette K. Henderson	April Kullis
David Garfinkle	Dena G. Henriquez	Bonita Lacy
Steve Geddis	Laura Herndon	John Lamb
Inez Gelfand	Celeste Hong	Venetia Large
Mark Giordani	Judith R. Howard	Janet Laur
Mark Glasser	Della Howarth	Harlan Lebo
Kim Glann	Kathryn W. Howe	Brenda Lee
Frances Goff	Ken Hughes	Mary Lou Leo
Fred Golan	Tayfur Ingalls	O. Lewis
Greg Goldin	Joel Isaacs	Suzanne Licht
Leslie Gonzales	Julie S. Jacobson	Elaine Livesey-Fassel
Linda Gonzales	Audrey Jin	Diane L. London
Beth Goode	Amelia Jones	Michael Lueras
Luna Gooding	David Jones	Tulse Luper, Jr.
Carol Gordon	Stanleigh Jones	Kare M.
Dara Gorelick	Alena Jorgensen	Donald S. Mackay

Janet MacLeod	Diana Nave	Barbara Ringuette
Janet Maker	Alex Nevil	Lee Ringuette
Arax Maksoudian	Chris Nevil	Laurie Rittenberg
Mitzi Malet	Sandra Noah	Patricia Ritter
Hayley Marcus	Carlos Nunez	Jim Robertson
Melissa Marote	Michelle Oberman	Mary Robinson
Tyson Martin	Tim O'Brien	Joel Rochlin
Linda Martinez	Diane Olson	Martha Ronk
Maria Mastroyannis	Polly O'Malley	Charlene Rothstein
Casee Maxfield	Gary Osterhout	Christine Rowe
Suellen Mayfield	Hillary Ostrow	Carol Royce-Wilder
Colleen McCaskey	Katherine Otis	Lynn Ryan
Karen McCaw	Cinzia Paganuzzi	Susan Ryan
Maureen McDonald	Elvira Paglici	Faye Rye
Rosemary Mcmillan	John Paladin	Judy Sachter
Gail McMullen	Heather Parker	Dalia Salgado
Susan Meals	Christopher Parsons	Cindy Sanders
Frank Mendoza	Marian P. Pasternack	Jollee Saphier
Barbara Mesney	Karen Pedersen	Jerry Schneider
Ken Milbrand	Marilyn Perna	Carolyn Seeman
John Miller	Steven Pickering	Ellen Segal
Victoria Miller	Susan Porter	Donald Seligman
Cory Misek	Zach Rasmussen	Lonnie Sheinart
Kelly Misek	Sa Re	AmirAli Siassi
Kim Moise	Sa Rei	Tracy Silverman
Karin Morris	Allison Rensch	Ray Simmons
Erica Munn	Michael Reppenhagen	Nicole Siskind
Keith Nakata	Robert Ricewasser	Stacey Smith-Clark

Madeleine Smith-Lawrence	Tia Triplett	Donna Williams
Susan Smith	Gina Truex	Ken Windrum
Pamela Smyth	Michael Tullius	Laura Winikow
Alan P. Socol	Ellen Turner	Joie Winnick
Kristi Somers-Kawas	Kimberly Turner	Sheila Winston
Crystal M. Soria	Marilyn Tusher	Michael Wisniewski
Daryl Spafford	Evelyn Valdez	Marc Woerschling
Darren Spurr	Richard Valencia	Leslie Wood
Barbara St. John	Chris Van Hook	Matthew Wright
Beth Stein	Sherry Vatter	Jennifer Yamamoto
Alice Stek	William Visevich	Noah Youngelson
Evelyn Stern	Suellen Wagner	J. Yudell
Angela Stewart	Lynne Weiske	Molly Zalman
Tara Strand	Dorcia White-Brake	Tim Zemba
Julie Svendsen	Ree Whitford	Christine Zembal
Janice Tarr	Michael Wiles	John Zuehlke
Alison Taylor	Daniel Wilkinson	
Warren TenHouten	Dorothy Wilkinson	
Meghan Tracy	Sheila Willens	

Comment Letter No. 23

Patricia Allinson

Comment No. 23-1

I am interested in the proposed TCN program, and am requesting 2 things:

- 1) please add me to your email list

- 2) I'd like info on how to e-attend the Public Hearings on Oct 6 and 7 2022 (as mentioned at the Del Rey Neighborhood Council's Land Use and Planning Committee meeting).

Thank you ! [sic]

Response to Comment No. 23-1

This commenter has been added to the Project's email list. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 24

Patricia Allinson

Comment No. 24-1

Apologies if you are receiving duplicates of my email, I'm sure it's user error on my part; but I am sending it one more time 'just in case'. [sic]

Attached is my comment letter pdf file. I would appreciate a 'message received' response from Metro.

fyi, I did try to send this directly to Shine.Ling@metro.net, but that e-address was rejected, and the operator at metro said the tcn@metro.net was the only e-address for the TCN project.

Thank you for your efforts on the proposed project, [sic]

I am writing in response to the TCN's DEIR. The TCN project proposes establishing 56 structures for digital billboards within the City of Los Angeles, a proposal that is contrary to the City's current rules regarding digital billboards.

Response to Comment No. 24-1

This comment expresses concern about the Project's consistency with the City's rules regarding digital billboards. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not specifically address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 24-2

My general concerns:

- The stated benefits of the project are presented as mitigating factors, yet they are vague and have no benchmarks. These unspecified 'benefits' should not be considered in evaluating the environmental impact of this project.

Response to Comment No. 24-2

The Draft EIR analyzes the Project's environmental impacts independently of the Project's benefits. (See Response to Comment No. 24-3.) As discussed in Chapter I, Executive

Summary, of the Draft EIR, the Draft EIR does not include the benefits of the Project in any of the mitigation measures. Each of the mitigation measures in the Draft EIR provides clear benchmarks for implementation. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 24-4

- The method of selecting locations for the project was not specified. It is easy to believe locations were proposed based almost entirely on expected ad revenue.

Response to Comment No. 24-4

The CEQA process is primarily designed to identify and disclose to decision makers and the public the significant environmental impacts of a proposed project prior to its consideration and approval. As described in Chapter II, Project Description, of the Draft EIR, the underlying purpose of the Project as proposed by Metro is to provide a network of TCN Structures that would incorporate intelligent technology components to promote roadway efficiency, improve public safety, augment Metro's communication capacity, provide for outdoor advertising where revenues would fund new and expanded transportation programs consistent with the goals of the Metro 2028 Vision Plan, and result in an overall reduction in static signage displays throughout the City of Los Angeles. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 24-5

- The project considers it appropriate to install digital billboards on/near environmentally sensitive sites, and/or near possible future residential properties.

Response to Comment No. 24-5

The CEQA process is primarily designed to identify and disclose to decision makers and the public the significant environmental impacts of a proposed project prior to its consideration and approval. Further please refer to Section IV.C, Biological Resources, of the Draft EIR where potential impacts were found to be less than significant with mitigation. Additionally, refer to Response to Comment No. 9-21 regarding the evaluation of future residential uses in the vicinity of the proposed TCN Structures. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 24-6

- The DEIR was prepared prior to finalizing the required changes to the City's digital billboard rules, and those rule changes should be available to the public as part of the evaluation of the project.

Response to Comment No. 24-6

As discussed on page II-1 in Chapter II, Project Description, of the Draft EIR and page IV.I-11, Section IV.I, Land Use and Planning, of the Draft EIR, the City's ban on new off-premise signs prohibits new signs on residentially zoned properties and requires any new signs to be within an adopted Sign District, Specific Plan, or Supplemental Use District. As part of the Project, adopt a Zoning Ordinance to create a new class of signage for the TCN Structures due to their unique attributes. The amendment would be strictly limited to the proposed 56 TCN Structures.

The City and the public will have an opportunity to review the City's Zoning Ordinance prior to the City's approval of the Project. Although the complete text of the Zoning Ordinance has not been finalized, the Draft EIR fully analyzes the impacts of the proposed Zoning Ordinance. As noted in the Section IV.I, Land Use and Planning, of the Draft EIR, the Zoning Ordinance would create a mechanism for the review and approval of the TCN Structures and would not authorize new signage other than the TCN Structures.

The remainder of this comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 24-7

- Additional comments should have been solicited, received and made public prior to the issuance of the DEIR. Only seven Comment Letters are included in Appendix A.3, indicating a lack of effective outreach and/or relevant responses. The seven letters include only one City Councilmember's response, a response from the County's Fire Department but not the City's Fire Department, etc. It is unclear if the relatively few specific comments in the seven letters were addressed in the DEIR. There were no comments from CALTRANS, or the Department of Fish and Wildlife, or the City Attorney.

Response to Comment No. 24-7

A Notice of Preparation of an Environmental Impact Report for the Project was published on April 18, 2022, followed by two public scoping meetings that were held on

May 19, 2022 and May 21, 2022. Pursuant to CEQA Guidelines Section 15082, the Notice of Preparation was filed with the Office of Planning and Research and sent to all responsible and trustee agencies. Additionally, over 17,000 scoping meeting notices were sent to owners and occupants within a 750-foot radius of each proposed TCN Structure. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 24-8

- Drivers, residents, and wildlife deserve a thorough and complete evaluation.

Response to Comment No. 24-8

This comment does not provide any specific supporting information as to why the analysis in the EIR would be inadequate. Further, the Draft EIR was prepared pursuant to CEQA Guidelines Section 15151, Standards for Adequacy of an EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 24-9

- More concerns are included in my letter via the following additional comments and attachments.

Response to Comment No. 24-9

The commenter expresses general opposition to the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 24-10

While some of the stated goals of the program are promising, it does appear they could be accomplished in ways other than building massive digital billboards.

As a resident of Los Angeles, I am concerned with anything that increases the visual blight and driving dangers within the City. I am also concerned with anything that has a negative impact on sensitive ecological areas. The benefits of this project have not been detailed, leaving it unclear if they are truly beneficial or not. The potential harm from proceeding with this project and committing to a 20 year contract for massive billboard structures should be thoroughly examined prior to any vote on the project.

Response to Comment No. 24-10

The commenter expresses general opposition to the Project due to concerns regarding aesthetics, transportation hazards, and biological resources. For further discussion of aesthetics, transportation related issues, and biological resources, refer to Section IV.A, Aesthetics; Section IV.K, Transportation; and Section IV.C, Biological Resources, respectively, of the Draft EIR. Additionally, the comment asserts that it is unclear whether the Project will provide benefits. Chapter II, Project Description, of the Draft EIR, contains a discussion of the goals and objectives that the Project seeks to accomplish. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not specifically address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 24-11

Alternative I [sic] is the only alternative that is acceptable. Thank you for your attention to this project.

Response to Comment No. 24-11

The commenter expresses general opposition to the Project and supports Alternative 1—No Project Alternative. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not specifically address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 24-12**Attachment 1—Additional Comments**

1. Executive Summary, Alternatives, Project Description
 - a. Page 1-5: ‘No Site Locations are zoned for residential use.’ No site locations zoned for residential use does not mean the locations are not near zoning classifications which allow residential use (see zoning rules, Housing Plan, Community Plans). Which site locations are within a half mile of any zoning that may be used now and/or in the future for residential facilities?

Response to Comment No. 24-12

Refer to Response to Comment No. 9-21 regarding the evaluation of existing and future residential uses in the vicinity of the proposed TCN Structures.

Comment No. 24-13

- b. The 2:1 ratio must be explained. Which specific static billboards are slated for removal and where are they located? What logic was used to determine 2:1 was the 'correct' ratio? How many of the selected static billboards are slated for removal and/or maintenance in the next 5 years? Add a link and/or chart showing which billboards would be removed, and their current repair status.

Response to Comment No. 24-13

Refer to Response to Comment No. 9-25 regarding the take-down of existing static displays as part of the Project.

Comment No. 24-14

- c. What other revenue raising alternatives were evaluated by Metro? Were the results of these evaluations shared with the public? Were the results shared with the City Council and/or City Planning Department?

Response to Comment No. 24-14

For a discussion of the Project's alternatives, please refer to Chapter V, Alternatives of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 24-15

- d. What is the impact of the STAP Program? Will this program provide any features of Intelligent Technology, Roadway Efficiency, and Features to Promote Public Safety & Communication? What parts of STAP can be modified to assist with the TCN program?

Response to Comment No. 24-15

As included in Chapter III. Environmental Setting of the Draft EIR, the Sidewalk and Transit Amenities Program (STAP) is a related project to the TCN Program. STAP's potential cumulative impacts with the Project are discussed in within the Draft EIR. The remainder of this comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 24-16

- e. List the 'unique attributes' of the TCN technology. Are these attributes unique to Los Angeles? Are they unique to one vendor? What makes them 'unique' ?
- f. Page 11-5: "...the TCN Program would be designed to support future innovations such as autonomous vehicles, smart energy grids, and high-speed wireless cameras'. List the unique attributes of the TCN Program that would require digital billboards as opposed to updating existing methods of informing drivers. List the specific future abilities that will be supporting (stay in your lane? Merging? etc). [sic]

Response to Comment No. 24-16

As described in Chapter II, Project Description, of the Draft EIR, the underlying purpose of the Project is to provide a network of TCN Structures that would incorporate intelligent technology components to promote roadway efficiency, improve public safety, augment Metro's communication capacity, provide for outdoor advertising where revenues would fund new and expanded transportation programs consistent with the goals of the Metro 2028 Vision Plan, and result in an overall reduction in static signage displays throughout the City of Los Angeles.

The TCN Structures would be equipped with Metro's Regional Integration of Intelligent Transportation Systems (RIITS), which provides comprehensive, timely, and real-time information among freeway, traffic, transit, and emergency systems, and across various agencies, including Caltrans District 7, the City of Los Angeles Department of Transportation (LADOT), California Highway Patrol (CHP), Foothill Transit, Los Angeles County Department of Public Works, and other local and regional transit agencies, to improve traffic and transportation systems, and to disseminate information regarding roadway improvements, and during emergency events. The additional intelligent technology components of the TCN Program would assist Metro in increasing the quantity and speed of data collection of real time travel/traffic data, processing, and transmission to transportation agencies. Further, the TCN Structures may include live video and security feeds to supplement Caltrans' limited number of existing cameras on the freeway and street corridors for public safety. All information received from these additional cameras would only be used for mass traffic data, and no personal or private information would be collected or used. Additionally, the TCN Program would be designed to support future innovations such as autonomous vehicles, smart energy grids, and high-speed wireless cameras. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 24-17

What is the cost comparison to adding transit signals etc [sic] to a structure that does Not have digital billboards?

Response to Comment No. 24-17

This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 24-18

2. Page 11-4: "Locate the TCN Structures at sites, elevations, and angles that would not increase distraction to motorists while still efficiently relaying information to commuters."
 - a. Add a specific explanation for each site explaining why the distraction to motorists would not increase.
 - b. In particular, for sites FF-29 and FF-30 explain why going from ground level at Mindanao/ 0, driving up ~30 feet (on a curve) towards 2 massive digital billboards (placed at the site where the 90 goes over Culver Boulevard, and then remains 'high' to cross Ballona Creek), will not distract drivers. Show the exact spot each billboard will be directed at, and the circumference of the light once it reaches that location (a flashlight directed to a wall will have a larger/smaller diameter of light depending on how close you are). In addition, do the same for drivers coming from the opposite direction which is basically a wide curve. Also do the same for drivers using the four on/off ramps at the Culver/90 intersection.

Response to Comment No. 24-18

Refer to Topical Response No. 2, City of Los Angeles Vision Zero, for a discussion of the Project's consistency with LADOT's Vision Zero policies aimed at eliminating traffic deaths by 2025. Additionally, Metro would continue to coordinate with Caltrans and LADOT on all necessary approvals for Project.

Comment No. 24-19

- c. Page 11-6 "The Zoning Ordinance would not authorize new signage other than the TCN Structures." Provide an opinion by the City Attorney that the proposed zoning ordinance change would not provide a basis for other billboard operators to challenge the new ordinance in an attempt to allow digital billboards on private

property as long as these private billboards meet the same criteria as the TCN project billboards.

Response to Comment No. 24-19

Metro carried forth extensive coordination efforts with the City of Los Angeles on the preparation of the Draft EIR. Further, the City of Los Angeles is a Responsible Agency under CEQA. As explained in Chapter II, Project Description, of the Draft EIR, new off-premise signage would be located within an adopted Sign District, Specific Plan, or Supplemental Use District, as excepted from the 2002 ban. As part of the Zoning Ordinance, the City would establish an “SN” Sign District designation for the TCN Structures. (The Project would therefore not violate the City’s 2002 ban of new off-site advertising signs. Further, refer to Response to Comment No. 9-18 regarding the proposed Zoning Ordinance for the TCN Structures. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 24-20

- d. Page 11-6 ‘The digital display faces would be designed to provide efficient and effective illumination while minimizing light spill-over, reducing sky-glow, and improving nighttime visibility through glare reduction.’ Note there is no eliminating all light spill-over, sky-glow, and/or glare reduction. Define ‘minimizing’ as it relates to this project.

Response to Comment No. 24-20

The Project includes numerous features that reduce light and glare. As discussed on page II-7 of Chapter II, Project Description, of the Draft EIR, these features include use of LED lighting, louvers, a refresh rate of eight seconds, and the prohibition of flashing or scrolling messages. In addition, with the implementation of Project Design Features and Mitigation Measures, lighting impacts would be well below the LAMC threshold (3.0 fc) and below the CALGreen standards (0.74 fc). As such, lighting impacts would be minimized based on these specific quantitative parameters such that they would not result in significant impacts.

Comment No. 24-21

- e. Page 11-7 ‘The digital display faces of the TCN Structures would 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 Site Location.’ Would the effect of these lighting benchmarks be doubled or quadrupled with two TCN Structures and four digital billboards at essentially one location (e.g. [sic] FF-29 and FF-30 at Culver/90)?

Response to Comment No. 24-21

With regard to cumulative glare impacts, luminance is not additive. The methodology for determining light trespass illuminance is defined in the Lighting Study in Section F, Methodology of the Lighting Study (refer to pages 17 through 20). In addition, as discussed in the Lighting Study, the calculated light trespass is cumulative and includes all nearby signs within 1,000 feet of any location. As such, the cumulative impacts of signs FF-29 and FF-30 have been accounted for and such impacts would be less than significant with implementation of the project design features and mitigation measures. Furthermore, as part of TCN Program, a take-down component would be implemented including the removal of at least 110,000 square feet (2 to 1 square footage take-down ratio) of existing static displays that are generally illuminated 24 hours a day, 7 days a week. Thus, the Project would result in an overall reduction of illuminated signage that would also address cumulative impacts.

Comment No. 24-22

- f. Page 11-15 Conceptual Design. Are there any similar digital billboards located in California? In the U.S.? If so, add photos. Will the TCN project be the first of its kind? If so, how will Metro monitor the costs so Los Angeles is not paying while serving as a test subject and/or beta tester?

Response to Comment No. 24-22

Chapter II, Project Description, of the Draft EIR has been revised to include Figure II-6 and II-7 as described in Final EIR Chapter III. Revisions, Clarifications, and Corrections to the Draft EIR. These conceptual renderings are for informational purposes only and provide a realistic estimation of what the TCN Structures may look like within the City. Additionally, aerial and ground level views of each Site Location are included in Figures III-1 through III-15 and Figures IV.A-1 through IV.A-15, in Chapter III, Environmental Setting and Section IV.A, Aesthetics, of the Draft EIR, respectively. A site specific evaluation for each individual TCN Structure was performed and took into account each individual Site Location's environmental setting as well as attributes such as dimensions, digital display angles, height, and nearby sensitive uses including residential uses. Further, impact conclusions within the Draft EIR remain unchanged based on these renderings. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 24-23

- g. Page 11-17 "The TCN Structures would be constructed with the use of a drill rig that would drill a hole up to 50 feet in depth on an approximately 10-foot by 10-foot area, depending on soil conditions and size of the digital display." What additional steps

will be taken when building structures near wetlands where the water level may be much closer to the surface than 50 feet (e.g. FF29 [sic] and FF30)? [sic] How close to the surface is the water level at Culver/Marina? How does this project impact the flow of water into the Ballona Wetlands and Ballina Creek?

Response to Comment No. 24-23

As described in Section IV.C, Biological Resources, of the Draft EIR, Mitigation Measures BIO-MM-1 through BIO-MM-4 would ensure that potential impacts during construction of the TCN Structures would remain less than significant. In addition, the proposed Site Locations of TCN Structures and the Ballona Wildlife Reserve are separated by the 90 freeway off ramp as well as existing fencing securing the TCN Structures. Further, as described in Section IV.F, Geology and Soils, of the Draft EIR, groundwater is expected at a depth between 10 and 20 feet below grade. As described Project Design Feature GEO-PDF-1, all development activities conducted on the Site Locations will incorporate the professional recommendations contained in the Geology and Soils Evaluation and associated recommendations set forth in a site location-specific, design-level geologic and geotechnical investigation(s) approved by the Metro Capital Engineering Group and/or the Los Angeles Department of Building and Safety (LADBS). This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration

Comment No. 24-24

3. Appendix B: Lighting

- a. Per the DEIR: “This study concludes the proposed project will not introduce a new source of light trespass and or glare at residential use properties or other sensitive use properties within the City of Los Angeles, California.”
To a non-technical person, this is obviously not true.

- i. Detail and explain the formula modifier that was included in the calculation for

1. Double-sided billboards on two sites within feet of each other (e.g. FF-29 and FF-30).
2. Light seen across wetlands vs light seen with buildings in between.

Response to Comment No. 24-24

Refer to Response to Comment No. 24-20 regarding the cumulative light and glare impacts that were evaluated in the Draft EIR and determined to be less than significant.

Also refer to Response to Comment No. 9-30 regarding the less than significant impacts to the Ballona Wildlife Reserve.

Comment No. 24-25

- ii. Detail and explain the formula modifier and/or change in evaluation method that was included in the calculation to determine the acceptable impact on nearby wildlife, during various times and conditions (e.g. [sic] dawn, early evening, fog, etc). [sic]

Response to Comment No. 24-25

Refer to Response to Comment No. 9-30 regarding the Project's less than significant lighting impacts to the Ballona Wildlife Reserve. Also refer to Topical Response No. 3 for a discussion of the Project's less than significant impacts from light on biological resources.

In addition, there are also six (6) signs within 300 feet of the Los Angeles River. These include FF-3, FF-6, FF-7, FF-10, FF-11, and NFF-2. In these locations, the Los Angeles River is concrete-lined and is not anticipated to support riparian vegetation. Therefore, these signs would not impact wildlife within the Los Angeles River.

Comment No. 24-26

- b. Page IV.A-28: 'Note that since the TCN Structures are located in urban areas...'. [sic] The structures may be located in 'urban' areas, but the light from the structures is not. FF29 [sic] and FF30 [sic] are:
 - i. Across the road from the Ballona Wetlands (not an urban area),
 - ii. Near the Ballina Creek,
 - iii. Not far from the Tule Wetlands,
 - iv. And because of the above, close to wildlife habitats (e.g. birds and butterflies that do not recognize lines on maps).

Response to Comment No. 24-26

As described in Section IV.C, Biological Resources, of the Draft EIR, Project impacts would be less than significant with the implementation of Mitigation Measures BIO-MM-1 through BIO-MM-4. Additionally, as discussed in Topical Response No. 3, Project Design Feature AES-PDF-1, would limit light trespass at the Ballona Wildlife Reserve a maximum of 0.02 foot-candles. This maximum light trespass of 0.02 fc is well below the most

stringent recommendation of 0.09 fc for the LZI Zone for “Special Districts and Government Designated Parks” within the California Administrative Code. For further discussion, refer to Topical Response No. 3, further explaining the Project’s less than significant impact from lighting on biological resources. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 24-27

- c. Detail the light limitations guidelines and the effect on the DEIR for:
 - i. Non-urban areas,
 - ii. Wetland Reserves, and
 - iii. Wildlife and/or Riparian Corridors.

Response to Comment No. 24-27

Refer to Response to Comment Nos. 9-30 and 24-24, above regarding the Project’s less than significant impacts to wildlife. Also refer to Topical Response No. 3 for a discussion of the Project’s less than significant impacts from light on biological resources.

Comment No. 24-28

- d. Page IV.A-34 “Many of these static displays to be removed are in a state of disrepair.” The removal of static billboards is mentioned often in this DEIR. List the alternatives for removing static billboards if the TCN project is not completed.

Response to Comment No. 24-28

As part of TCN Program, a take-down component would be implemented including the removal of at least 110,000 square feet (2 to 1 square footage take-down ratio) of existing static displays. Signage to be removed would include at minimum approximately 200 static displays located within the City. As described in Chapter V, Alternatives, of the Draft EIR, Alternative 1 assumes that the Project would not be approved, no new permanent development would occur within the Site Locations, and the existing environment would be maintained. No existing static signs would be removed under this alternative. Static display removals under Alternatives 2 and 3 would be similar to static display removals under the proposed Project.

Comment No. 24-29

- d. Detail the disrepair, and which City Department is responsible for maintaining the static billboards. Will the cost of removal of the static billboards be part of the TCN

project? Would normal repair costs and removal be paid for by a particular City Department (if so, which one/s)?

Response to Comment No. 24-29

This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 24-30

- e. Detail how removal of static billboards contributes to each of the 4 stated components of the TCN project. List the purposes served by removal of static billboards as part of the TCN program.

Response to Comment No. 24-30

As part of TCN Program, a take-down component would be implemented including the removal of at least 110,000 square feet (2 to 1 square footage take-down ratio) of existing static displays. Signage to be removed would include at minimum approximately 200 static displays located within the City. Removal of existing signs is not required to mitigate any significant environmental impacts of the proposed TCN Program. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 24-31

4. The DEIR declares Biological mitigation measures are beneficial.
 - a. What specific mitigation measures will be implemented that will be beneficial to the Ballona Wetlands throughout the life of the digital billboards, and not just during construction of the structures?

Response to Comment No. 24-31

As described in Section IV.C, Biological Resources, of the Draft EIR, Project impacts would be less than significant with the implementation of Mitigation Measures BIO-MM-1 through BIO-MM-4. Additionally, as discussed in Topical Response No. 3, Project Design Feature AES-PDF-1, would limit light trespass at the Ballona Wildlife Reserve a maximum of 0.0 foot-candle. This maximum light trespass of 0.02 fc is well below the most stringent recommendation of 0.09 fc for the LZI Zone for "Special Districts and Government Designated Parks" within the California Administrative Code. For further discussion, refer

to Topical Response No. 3, further explaining the Project's less than significant impact from lighting on biological resources. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 24-32

- b. What specific steps will be taken to ensure migratory wildlife is not adversely impacted by these structures and the digital billboards (note the recent 'hard landing' of a goose in the middle of a Dodger playoff game)?
- c. What specific mitigation measures will be implemented to ensure birds using the Ballona and Centinela Creeks will not be adversely impacted?

Response to Comment No. 24-32

Refer to Topical Response No. 3 for a discussion which further clarifies the Project would meet CALGreen standards for lighting at all Site Locations. Specifically, as described in Topical Response No. 3, Project Design Feature AES-PDF-1 would install state of the art louvers at locations with sensitive habitat (TCN Structures FF-13, FF-14, FF-25, FF-29, and FF-30) to reduce lighting levels to 0.02 fc, which is well below the 0.74 fc standard under CALGreen. This maximum light trespass of 0.02 fc is well below the most stringent recommendation of 0.09 fc for the LZI Zone for "Special Districts and Government Designated Parks" within the California Administrative Code. It should be noted that FF-13 and FF-14 are currently located near a proposed park, and conditions at the current site consist of vacant land with very limited vegetation. However, as the park is proposed to have habitat restoration areas, this area is considered to contain future sensitive habitat to provide for a conservative analysis. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 24-33

5. The entire DEIR as presented assumes digital billboards are the answer, without addressing the basic 'other alternatives' question. Additional questions must be asked and answered when considering this project.
 - a. How were the selected sites evaluated? Provide a chart showing how each site is rated for i) installation of the intelligent technology, ii) roadway efficiency, and iii) features to promote public safety and communication. Explain for each structure location why that location is better than any random location that is owned by Metro and has the required footprint.
 - b. In particular, detail how 4 digital billboards (at FF29 [sic] and FF30) [sic] were evaluated on anything other than their ability to host ads; keep in mind that the 90

freeway is approximately 3 miles in length, and public service messages might be better placed 'elsewhere' (e.g. [sic] at either end of the 90, and read by drivers as they sit at stoplights).

- c. Prepare a report listing the alternatives to Digital billboards that were considered (e.g. [sic] utilizing STAP? Having mobile message boards available? installing unknown future technology on a structure without a digital billboard? etc); [sic] and detail why these alternatives were rejected.

Response to Comment No. 24-33

The CEQA process is primarily designed to identify and disclose to decision makers and the public the significant environmental impacts of a proposed project prior to its consideration and approval. As described in Chapter II, Project Description, of the Draft EIR, the underlying purpose of the Project as proposed by Metro is to provide a network of TCN Structures that would incorporate intelligent technology components to promote roadway efficiency, improve public safety, augment Metro's communication capacity, provide for outdoor advertising where revenues would fund new and expanded transportation programs consistent with the goals of the Metro 2028 Vision Plan, and result in an overall reduction in static signage displays throughout the City of Los Angeles. Further, for a discussion of the Project's alternatives, please refer to Section V. Alternatives of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 24-34

6. For What It's Worth:

- a. It was impossible for me to read the entire DEIR in the time allotted. It seems to be typical to release a long report late in the year and request a quick response. This is not conducive to a complete response.

Response to Comment No. 24-34

The public comment period began on September 9, 2022, and concluded on October 24, 2022, for a minimum of 45 days consistent with Section 15105 of the CEQA Guidelines. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 24-35

- b. How is the TCN project being paid for? Will a bond issue be proposed? Which budget will the cost of the DEIR/EIR preparation be charged to? Which budget will

the construction costs be charged to? Fyi, the internet says a monopole structure with two LED faces can cost up to \$1,000,000.

Response to Comment No. 24-35

This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 24-36

- c. References in the TCN DEIR to the recent Ballona Wetlands EIR should also include mention of the on-going (I think) lawsuits challenging that EIR. The TCN DEIR must have the Department of Fish and Wildlife on record about the TCN proposal. Please add a current letter from the Department of Fish and Wildlife that indicates it has read the TCN DEIR and either approves of the TCN project or does not; including specific references to the FF-29 and FF-30 sites.

Response to Comment No. 24-36

The Department of Fish and Wildlife received notice of the Project and were sent the Notice of Preparation on April 18, 2022 and the Notice of Availability on September 9, 2022. This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 24-37

- d. How will Metro's TCN program interact with the State's message boards along the freeways? Will the State have fewer structures along the freeway as a result of the TCN program? Please add a current letter from the State that indicates it has read the TCN DEIR and either approves of the TCN project or does not.

Response to Comment No. 24-37

As described in Chapter II, Project Description, of the Draft EIR, Metro proposes to implement the TCN Program, which would provide a network of TCN Structures that would incorporate intelligent technology components to promote roadway efficiency, improve public safety, increase communication, and provide for outdoor advertising that would be used to fund new and expanded transportation programs consistent with the goals of the Metro Vision 2028 Plan. As part of the Project the State would not be required to have

fewer structures as a result of the TCN Program. However, TCN Structures would be equipped with Metro's Regional Integration of Intelligent Transportation Systems, which provides comprehensive, timely, and real-time information among freeway, traffic, transit, and emergency systems, and across various agencies, including Caltrans District 7, the LADOT, CHP, Foothill Transit, Los Angeles County Department of Public Works, and other local and regional transit agencies, to improve traffic and transportation systems, and to disseminate information regarding roadway improvements, and during emergency events. The additional intelligent technology components of the TCN Program would assist Metro in increasing the quantity and speed of data collection of real time travel/traffic data, processing, and transmission to transportation agencies. Further, the TCN Structures may include live video and security feeds to supplement Caltrans' limited number of existing cameras on the freeway and street corridors for public safety. As included in Comment Letter No. 1 a letter from Caltrans states the Project would be consistent with Caltrans guidelines for digital signage locations near freeways. Additionally, Metro would continue to coordinate with Caltrans on the Project and understands the Project would require an Outdoor Advertising License. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 24-38

- e. I am unable to find any response to my prior email (attached) nor receipt of any email notices related to the TCN DEIR. If I missed something, or should be directing emails elsewhere, please let me know.

Response to Comment No. 24-38

The commenter's prior comment letter is included as Comment Letter No. 23 above. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 24-39

- f. I agree with Councilmember Benin's June 1, 2022 Comment Letter; in particular:
 - i. "...the scope and intent of the project is clear: install large digital billboards at highly visible Metro-owned locations for revenue generation purposes."
 - ii. Re digital billboards: "Proof of their danger is self-evident: if they did not effectively pull drivers' eyes off the road ahead, they would not be valuable for advertising."
 - iii. "Metro should seek input from the Department of Fish and Wildlife..."

Response to Comment No. 24-39

This comment supports Councilmember Bonin's June 1, 2022 Comment Letter on the Notice of Preparation and expresses general opposition to the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not specifically address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 24-40

7. Thank you ! [sic]

Attachment 2—Mike Bonin letter dated June 1, 2022 [2 pages]

Attachment 3—Email dated 9/19/22 [1 page]

I am interested in the proposed TCN program, and am requesting 2 things:

- 1) please add me to your email list
- 2) I'd like info on how to e-attend the Public Hearings on Oct 6 and 7 2022 (as mentioned at the Del Rey Neighborhood Council's Land Use and Planning Committee meeting).

Attachment 4—Screenshots of TCN Presentation [2 pages]

Response to Comment No. 24-40

This commenter has been added to the Project's email list. Responses to these attachments have been included in the comments above. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 25

Hector Alonzo

Comment No. 25-1

everyone [sic] iv'e [sic] spoken to is oppossed [sic] to any digital or lighted signage. Few were even aware of this action. even [sic] less will respond. On behalf of my family, myself, and many others. [sic] please do not allow them.

Response to Comment No. 25-1

The commenter expresses general opposition to the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 25-2

The ones already along the freeways are disturbing to drive past. They are a blight on our community and pose a safety hazard, as they are a distraction to drivers. They disturb mental wellbeing; light pollution.

Response to Comment No. 25-2

The commenter expresses general opposition to the Project due aesthetic and transportation safety concerns. For further discussion of aesthetics and transportation related issues, refer to Sections IV.A. Aesthetics and IV.K Transportation, respectively, of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 25-3

Please, put People Before Profits!

Thank you,

Response to Comment No. 25-3

The commenter expresses general opposition to the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and

consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 26

Robert Aronson

Comment No. 26-1

I am strongly opposed to any Metro STAP/TCN program which includes advertising. It's selling our outdoor space to the highest bidder who will create visual blight by installing clutter and distracting signage. Studies show that digital billboards are unsafe. They are a menace to drivers, who then injure pedestrians. How does the STAP Program reconcile with the City's ban on off-site outdoor advertising?

The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

Contrary to the findings of in the DEIR, there is a preponderance of evidence demonstrating the negative impacts digital billboards have on public safety by altering 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 distraction by enacting 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 distraction conditions. A comprehensive compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

Recent research demonstrates that even changing electronic signs erected solely for public information purposes create hazards for drivers, indicating that the medium of digital signs is inherently dangerous. The Traffic Safety section of the DEIR fails to account for this evidence. The report contains no original analysis of the relationship between signs and driver safety and relies on a literature review of stale and inadequate research.

The illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. However, Metro essentially states in this program that hazards created by installing digital signs are a problem that the rest of the

city must mitigate. However, the dangers posed by Metro's signs would not be limited to its property. The City's roadway users would suffer the consequences, which would undermine the Vision Zero Program.

The [sic] DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

Thank you for considering my opinion.

Response to Comment No. 26-1

The commenter expresses general concerns the Project mainly in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 27

George Ball

Comment No. 27-1

Distracting driver's [sic] from their purpose—driving safely—and contributing to light pollution in a time to cutback. No! No!

I urge you to halt plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

Contrary to the findings of in the DEIR, there is a preponderance of evidence demonstrating the negative impacts digital billboards have on public safety by altering 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 distraction by enacting 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 distraction conditions. A comprehensive compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

Recent research demonstrates that even changing electronic signs erected solely for public information purposes create hazards for drivers, indicating that the medium of digital signs is inherently dangerous. The Traffic Safety section of the DEIR fails to account for this evidence. The report contains no original analysis of the relationship between signs and driver safety and relies on a literature review of stale and inadequate research.

Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. However, Metro essentially states in this program that hazards created by installing digital signs are a problem that the rest of the city must mitigate. However, the dangers posed by Metro's signs would not be limited to its

property. The City's roadway users would suffer the consequences, which would undermine the Vision Zero Program.

Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

Response to Comment No. 27-1

The commenter expresses general concerns the Project mainly in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 28

Wejeha Bilal

Comment No. 28-1

Hi. My name is Wejeha Bilal. My telephone number is [REDACTED]. I'm calling for Shine Ling. Uh, I'm calling about that EIA [sic], ah, impact report, uh, for the Transportation Community [sic] Network. And, um, we are in the old historical train station on 103rd and, in Watts. We have five historical buildings there and, um, ah, you know, we would like to be a part of this, you know?

My telephone number again is [REDACTED]. Thank you.

Response to Comment No. 28-1

While the comment does not address the content or adequacy of the Draft EIR, the commenter's support for development of the Project is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment Letter No. 29

Ron Bitzer

Comment No. 29-1

Please accept my response and attached illustrations to your draft **EIR-SCH #20220400363** Transportation Communication Network.

The use of off-site digital billboards including what the State has termed “changeable message signs”—is not settled public policy in the US as reported by Scenic America (e.g. [sic] recent city action by Cape May, New Jersey to ban freeway-facing digital billboards).

THIS YEAR the City of Los Angeles and LA METRO have been joined by City Tourism and StreetsLA departments in anticipation of (a) new municipal rules for digital billboards on the public right of way and (b) revenue sharing with community offices of City Council, etc. from commercial advertising.

- City Council approval of a Board of Public Works Sidewalk and Transit Amenities Program (STAP) (CF 2001536-S2) to include installation of hundreds of digital billboards at bus transportation stops was anticipated *by 5 days* in a Board of City Tourism Commissioners’ recommendation to “explore proposed piggyback agreement with IKE Smart City, LLC (IKE) with the City of Houston, Texas, for the installation and maintenance of interactive kiosks—Board Report 22-004,” September 15, 2022 (emphasis added).
- The October 6, 2022, approval by Mayor Garcetti of Municipal Ordinance 187635 was also anticipated by City Tourism and LA METRO in your draft EIR (Exhibit A—Ordinance 187635). To quote—

The provisions of Subsection (a) of this section shall not apply to any advertising structure associated with an outdoors advertising program for the public right-of-way that is approved by the Board of Public Works, Amendment to Section 2 Section 67.02(b) of the LA Municipal Code (emphasis added).

I observe that City Tourism’s description of an “Approval Process” for digital kiosks begins with a report on the Municipal Code amendment to 67.02(b) and ends with no *detailed* accounting for public comment or review. CEQA is referred to as follows:

CEQA—this project will be required to comply with statues (their spelling) and provisions under the California Environmental Quality Act (CEQA), Board of

City Tourism Commissions, September 15, 2022, Recommendation, p.3.
[sic]

Response to Comment No. 29-1

This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 29-2

In view of *prima facie* evidence that the City and the County are embarking on a coordinated effort to build off-site, freeway & street facing digital billboards—to include precedent-setting commercial advertising on the public right of way—I request that a comprehensive CEQA-qualified Environmental Impact Report be prepared for all of the following sources of digital billboards and signs in different City and County departments or agencies:

1. Transportation Communication Network (LA METRO & LA City)
2. Sidewalk and Transit Amenities Program (LA City)
3. Tourism Kiosks (LA City)

Response to Comment No. 29-2

The Draft EIR for the TCN Program was prepared pursuant to CEQA Guidelines Section 15151, Standards for Adequacy of an EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 29-3

Misleading Conceptual Designs

Your draft EIR provides conceptual designs of the freeway-facing and non freeway-facing digital billboards more suitable to a sales promotional program than a good faith effort to educate the public and others about the visual impact of this proposed program.

Specifically, I request substitutions for the renderings of freeway-facing and non-freeway facing signs provided on appendix pages II-16 and II-17 of the draft EIR for TCN (Exhibit B). Your conceptual designs fail to provide *any* reference to typical surrounding landscapes and improvements—most of which will be impacted by the TCN program. Clouds are not sufficient for this comparison.

Please consider:

- How CALTRANS illustrated the Changeable Message Signs in a March 2018 report to the State, “Outdoor Advertising Report” (Exhibit C).
- How an off-site digital billboard currently operating at NoHo West in North Hollywood was represented in a CEQA document / sales promotion at ENV-2015-888-EIR for this project (Exhibit D).

Developers have also installed markers for the outline of a project, which then the public can view at their convenience over a period of weeks, Signs 30-50 feet above grade merit this type of review.

Response to Comment No. 29-3

In response to this comment requesting conceptual renderings, Chapter II, Project Description, of the Draft EIR has been revised to include Figure II-6 and II-7 as described in Final EIR Chapter III. Revisions, Clarifications, and Corrections to the Draft EIR. These conceptual renderings are for informational purposes only and provide a realistic estimation of what the TCN Structures may look like within the City. Additionally, aerial and ground level views of each Site Location are included in Figures III-1 through III-15 and Figures IV.A-1 through IV.A-15, in Chapter III, Environmental Setting and Section IV.A, Aesthetics, of the Draft EIR, respectively. A site specific evaluation for each individual TCN Structure was performed and took into account each individual Site Location’s environmental setting as well as attributes such as dimensions, digital display angles, height, and nearby sensitive uses including residential uses. Further, impact conclusions within the Draft EIR remain unchanged based on these renderings. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 29-4

I appreciate this opportunity to share observations with you.

Exhibit A—Ordinance No. 187635 [2 pages]

Exhibit B—Figure II-5 and Figure II-4 of the Draft EIR [2 pages]

Exhibit C—Page 24 of Outdoor Advertising Report, Caltrans, March 2018 [2 pages]

Exhibit D—Figure 4B-8 of the NoHo West Project, ENV-2015-888-EIR [2 pages]

Response to Comment No. 29-4

Responses to these attachments have been included in the comments above. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 30

Tony Butka

Comment No. 30-1

I would like to be put on the update list for this project. I live in Glassell Park, and it appears that two billboards will be in our area off the 2 freeway. However I can't see anything about what they will look like and exactly where they will be placed. It also appears that they will be two sided.

Response to Comment No. 30-1

This commenter has been added to the distribution list for Project updates. Please refer to Chapter II, Project Description, of the Draft EIR for information regarding the dimensions, locations, and conceptual designs of the proposed TCN Structures. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 31

Greg Cahill

Comment No. 31-1

I urge you to halt plans to move forward with the Metro TCN Program. This is contrary to everything that makes a city livable and instead trends toward the nightmare of Bladerunner. May we have no relief from relentless commercial harassment?

Response to Comment No. 31-1

The commenter expresses general opposition to the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 32

Matthew Canchola

Comment No. 32-1

I urge you to halt plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

Contrary to the findings of in the DEIR, there is a preponderance of evidence demonstrating the negative impacts digital billboards have on public safety by altering 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 distraction by enacting 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 distraction conditions. A comprehensive compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

Recent research demonstrates that even changing electronic signs erected solely for public information purposes create hazards for drivers, indicating that the medium of digital signs is inherently dangerous. The Traffic Safety section of the DEIR fails to account for this evidence. The report contains no original analysis of the relationship between signs and driver safety and relies on a literature review of stale and inadequate research. Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. However, Metro essentially states in this program that hazards created by installing digital signs are a problem that the rest of the city must mitigate. However, the dangers posed by Metro's signs would not be limited to its property. The City's roadway users would suffer the consequences, which would undermine the Vision Zero Program. Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan.

Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

Response to Comment No. 32-1

The commenter expresses general concerns the Project mainly in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 32-2

As an avid cyclist, I am strongly opposed to the distractions digital signs can pose to drivers.

Response to Comment No. 32-2

The commenter expresses general opposition to the Project due to concerns regarding transportation safety. For further discussion of transportation related issues, refer to Section IV.K, Transportation, of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 33

Dawn M. Coulson

Comment No. 33-1

Hearing for what? What project? Who is sending out these emails without specific information for recipients to see?

Oh wait—let me take the time to go open the PDF and try to figure out what you're supposed to be presenting. Oh—halfway down it appears that it's some sort of signage public hearing? Really?

Recommendation: hire someone with communications background. This email communication is not effective.

Response to Comment No. 33-1

This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 34

Suzanne Danziger

Comment No. 34-1

This weekend, I was driving on Sunset Blvd in West Hollywood and was blinded by a giant electronic billboard playing video.

I urge you to halt plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

Contrary to the findings of in the DEIR, there is a preponderance of evidence demonstrating the negative impacts digital billboards have on public safety by altering 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 distraction by enacting 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 distraction conditions. A comprehensive compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

Recent research demonstrates that even changing electronic signs erected solely for public information purposes create hazards for drivers, indicating that the medium of digital signs is inherently dangerous. The Traffic Safety section of the DEIR fails to account for this evidence. The report contains no original analysis of the relationship between signs and driver safety and relies on a literature review of stale and inadequate research.

Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. However, Metro essentially states in this program that hazards created by installing digital signs are a problem that the rest of the city must mitigate. However, the dangers posed by Metro's signs would not be limited to its

property. The City's roadway users would suffer the consequences, which would undermine the Vision Zero Program.

Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

Response to Comment No. 34-1

The commenter expresses general opposition to the Project, specifically in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. Further, the digital display faces would be set to refresh every 8 seconds and would transition instantly with no motion, moving parts, flashing, or scrolling messages. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 35

Elizabeth East

Comment No. 35-1

I urge you to halt plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

Contrary to the findings of in the DEIR, there is a preponderance of evidence demonstrating the negative impacts digital billboards have on public safety by altering 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 distraction by enacting 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 distraction conditions. A comprehensive compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

Recent research demonstrates that even changing electronic signs erected solely for public information purposes create hazards for drivers, indicating that the medium of digital signs is inherently dangerous. The Traffic Safety section of the DEIR fails to account for this evidence. The report contains no original analysis of the relationship between signs and driver safety and relies on a literature review of stale and inadequate research.

Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. However, Metro essentially states in this program that hazards created by installing digital signs are a problem that the rest of the city must mitigate. However, the dangers posed by Metro's signs would not be limited to its property. The City's roadway users would suffer the consequences, which would undermine the Vision Zero Program.

Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program. The handling of this matter has been shocking and a most unfortunate reflection of public priorities, [sic]

Response to Comment No. 35-1

The commenter expresses general opposition to the Project, specifically in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 36

Thomas Fukuman

Comment No. 36-1

I urge you to halt plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

Contrary to the findings of in the DEIR, there is a preponderance of evidence demonstrating the negative impacts digital billboards have on public safety by altering 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 distraction by enacting 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 distraction conditions. A comprehensive compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

Recent research demonstrates that even changing electronic signs erected solely for public information purposes create hazards for drivers, indicating that the medium of digital signs is inherently dangerous. The Traffic Safety section of the DEIR fails to account for this evidence. The report contains no original analysis of the relationship between signs and driver safety and relies on a literature review of stale and inadequate research.

Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. However, Metro essentially states in this program that hazards created by installing digital signs are a problem that the rest of the city must mitigate. However, the dangers posed by Metro's signs would not be limited to its property. The City's roadway users would suffer the consequences, which would undermine the Vision Zero Program.

Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

Response to Comment No. 36-1

The commenter expresses general opposition to the Project, specifically in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 36-2

Has anyone the EMF exposure to workers and people living close to the signs including children in nearby schools?

Response to Comment No. 36-2

The proposed TCN Structures would be required to adhere to specific FCC regulations regarding electric magnetic fields (EMFs). All digital displays would meet all necessary FCC regulations and have the necessary certifications on file. The digital displays are entirely safe and will not create interference or “electrical noise” to the surrounding area including construction workers, residents and children in schools. Furthermore, an agency is not required to conduct every study requested by the public. (Laurel Heights Improvement Assn. v. Regents of University of California (1988) 47 Cal.3d 374, 415.) This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 37

Frances Goff

Comment No. 37-1

I urge you to halt plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would jeopardize the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

Contrary to the findings of in the DEIR, there is a preponderance of evidence of the negative impacts digital billboards have on public safety by drawing driver attention away from the roadway and toward the advertisements. Lawmakers have come to recognize the importance of reducing driver distraction by enacting 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 distraction conditions. A compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

Recent research demonstrates that even changing electronic signs erected solely for public information purposes create hazards for drivers, indicating that the medium of digital signs is inherently dangerous. The Traffic Safety section of the DEIR fails to account for this evidence. The report contains no original analysis of the relationship between signs and driver safety and relies on a literature review of stale and inadequate research.

Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. Metro essentially states in this program that hazards created by installing digital signs are a problem that the rest of the city must mitigate; however, the dangers posed by Metro's signs would not be limited to its property. The City's roadway users would suffer the consequences, which would undermine the Vision Zero Program.

Evidence indicates that all billboards reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

In light of these concerns, we all must stand with Scenic Los Angeles in recommending that neither Metro nor the City move forward with the installation of digital signs as described in this program.

Response to Comment No. 37-1

The commenter expresses general opposition to the Project, specifically in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 38

Nancy Goldberg

Comment No. 38-1

I urge you to halt plans for the Metro TCN Program. The Draft Environmental Impact Report (DEIR) omits key information about the impacts of digital signs. The TCN program would increase scenic blight, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

Contrary to the findings of the DEIR, there is a preponderance of evidence of the negative impacts digital billboards have on public safety by drawing driver attention away from the roadway and toward the ads. Human error is the leading cause of traffic accidents, and lawmakers have recognized the importance of reducing driver distraction by enacting laws banning cell phone use while driving. An emerging body of research indicates that digital billboards create similar distraction conditions. A comprehensive compendium of digital billboard safety studies is at www.scenic.org/compendium.

Recent research demonstrates that even changing electronic signs erected solely for public information create hazards for drivers, indicating that the medium of digital signs is inherently dangerous. The Traffic Safety section of the DEIR fails to account for this. The report has no original analysis of the relationship between signs and driver safety and relies on a literature review of stale and inadequate research.

Also, the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance (May 2021).

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths, but Metro essentially states that hazards created by installing digital signs are a problem that the rest of the city must mitigate. However, the dangers posed by Metro's signs would not be limited to its property. The City's roadway users would suffer the consequences, which would undermine the Vision Zero Program.

Evidence indicates that all billboards can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Also, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

Response to Comment No. 38-1

The commenter expresses general opposition to the Project, specifically in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 39

Amy Gustincic

Comment No. 39-1

Plans to move forward with the Metro TCN Program must STOP. The DEIR leaves out important information about the negative impacts of digital signs: increasing scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs), and creating hazards to human health, the natural environment, and quality of life.

Response to Comment No. 39-1

The commenter expresses general opposition to the Project, citing the Project's potential environmental impacts. The comment also asserts that the Draft EIR is inadequate, but does not cite specific information that has been omitted. Chapter IV, Environmental Impacts Analysis, of the Draft EIR contains a comprehensive analysis of the Project's environmental impacts. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 39-2

Evidence shows that digital billboards draw driver attention away from the roadway and toward the advertisements—which is exactly what they're designed to do—but this distraction can increase accidents, putting drivers and pedestrians at risk. This is the same type of distraction caused by cell phones, the use of which while driving has been outlawed.

The Traffic Safety section of the DEIR fails to account for the evidence of the hazards caused even by changing electronic signs erected solely for public information purposes. The report contains no original analysis of the relationship between signs and driver safety and relies on a literature review of stale and inadequate research.

Response to Comment No. 39-2

Refer to Topical Response No. 1, Transportation Studies, for a discussion further justifying the use of the studies that were included in Section IV.K, Transportation, and Appendix K, Transportation and Traffic Safety Review, of the Draft EIR. As described therein, the research selected found that a correlation between digital billboards and traffic collisions was "inconclusive at best." Upon further review of additional research studies that were submitted during the Draft EIR comment period, none of the additional studies

cited provided conclusive evidence that digital billboards cause traffic collisions. Nor do those studies undermine the conclusions of the Draft EIR and the studies relied on for the Draft EIR analysis.

Comment No. 39-3

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. However, Metro essentially states in this program that hazards created by installing digital signs are a problem that the rest of the city must mitigate. However, the dangers posed by Metro's signs would not be limited to its property. The City's roadway users would suffer the consequences, which would undermine the Vision Zero Program.

Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

Response to Comment No. 39-3

The commenter expresses general opposition to the Project, specifically in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 40

Amber Hernandez

Comment No. 40-1

I love metro [sic]

Response to Comment No. 40-1

This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 41

Jill Holden

Comment No. 41-1

No more BILLBOARDS. REALLY. Are we selling everything in our lives? I am constantly distracted by the billboards that are already in place. Stop. There was not enough time to find out what folks really want screaming at them as they drive and walk. You know that this is a bad idea. Please, I urge you to halt plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

Contrary to the findings of in the DEIR, there is a preponderance of evidence demonstrating the negative impacts digital billboards have on public safety by altering 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 distraction by enacting 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 distraction conditions. A comprehensive compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

Recent research demonstrates that even changing electronic signs erected solely for public information purposes create hazards for drivers, indicating that the medium of digital signs is inherently dangerous. The Traffic Safety section of the DEIR fails to account for this evidence. The report contains no original analysis of the relationship between signs and driver safety and relies on a literature review of stale and inadequate research.

Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. However, Metro essentially states in this program that hazards created by installing digital signs are a problem that the rest of the city must mitigate. However, the dangers posed by Metro's signs would not be limited to its property. The City's roadway users would suffer the consequences, which would undermine the Vision Zero Program.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

Response to Comment No. 41-1

The commenter expresses general opposition to the Project, specifically in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 42

Nancy Hubbs-Chang

Comment No. 42-1

I urge you to halt plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

Contrary to the findings of in the DEIR, there is a preponderance of evidence demonstrating the negative impacts digital billboards have on public safety by altering 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 distraction by enacting 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 distraction conditions. A comprehensive compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

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Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. However, Metro essentially states in this

program that hazards created by installing digital signs are a problem that the rest of the city must mitigate. However, the dangers posed by Metro's signs would not be limited to its property. The City's roadway users would suffer the consequences, which would undermine the Vision Zero Program.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

Response to Comment No. 42-1

The commenter expresses general opposition to the Project, specifically in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 43

Janice Hynek

Comment No. 43-1

Please! Please! Please!! I urge you to halt plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

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Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

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Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

Response to Comment No. 43-1

The commenter expresses general opposition to the Project, specifically in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 44

Stephanie Jackel

Comment No. 44-1

With respect, I am totally appalled by your plan to install these new digital billboards.

I urge you to halt plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

Contrary to the findings of in the DEIR, there is a preponderance of evidence demonstrating the negative impacts digital billboards have on public safety by altering 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 distraction by enacting 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 distraction conditions. A comprehensive compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

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Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. However, Metro essentially states in this program that hazards created by installing digital signs are a problem that the rest of the city must mitigate. However, the dangers posed by Metro's signs would not be limited to its property. The City's roadway users would suffer the consequences, which would undermine the Vision Zero Program.

Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program [sic]

Response to Comment No. 44-1

The commenter expresses general opposition to the Project, specifically in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 45

Laurie Kelson

Comment No. 45-1

I urge you to halt plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

Contrary to the findings of in the DEIR, there is a preponderance of evidence demonstrating the negative impacts digital billboards have on public safety by altering 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 distraction by enacting 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 distraction conditions. A comprehensive compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

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Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

There are already many accidents! Do not add to this problem.

Response to Comment No. 45-1

The commenter expresses general opposition to the Project, specifically in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 46

Julie Klabin

Comment No. 46-1

LA residents don't want further distractions for already distracted drivers, light pollution, or unsightly digital signs. I urge you to halt plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

Contrary to the findings of in the DEIR, there is a preponderance of evidence demonstrating the negative impacts digital billboards have on public safety by altering 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 distraction by enacting 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 distraction conditions. A comprehensive compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

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Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

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Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

Response to Comment No. 46-1

The commenter expresses general opposition to the Project, specifically in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 47

Tony Knight

Comment No. 47-1

This proposal is beyond irresponsible. The people of this city want to see you fund the metro stops with money that is already in [sic]

I urge you to halt plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

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Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. However, Metro essentially states in this program that hazards created by installing digital signs are a problem that the rest of the city must mitigate. However, the dangers posed by Metro's signs would not be limited to its

property. The City's roadway users would suffer the consequences, which would undermine the Vision Zero Program.

Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

Response to Comment No. 47-1

The commenter expresses general opposition to the Project, specifically in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 48

Cindy Koch

Comment No. 48-1

WHAT ARE YOU THINKING?!

I urge you to halt plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

Contrary to the findings of in the DEIR, there is a preponderance of evidence demonstrating the negative impacts digital billboards have on public safety by altering 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 distraction by enacting 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 distraction conditions. A comprehensive compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

Recent research demonstrates that even changing electronic signs erected solely for public information purposes create hazards for drivers, indicating that the medium of digital signs is inherently dangerous. The Traffic Safety section of the DEIR fails to account for this evidence. The report contains no original analysis of the relationship between signs and driver safety and relies on a literature review of stale and inadequate research.

Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. However, Metro essentially states in this program that hazards created by installing digital signs are a problem that the rest of the city must mitigate. However, the dangers posed by Metro's signs would not be limited to its property. The City's roadway users would suffer the consequences, which would undermine the Vision Zero Program.

Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

Response to Comment No. 48-1

The commenter expresses general opposition to the Project, specifically in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 49

Scott Levine

Comment No. 49-1

Can I please be added to the distribution list for news/updates on this project?

Response to Comment No. 49-1

This commenter has been added to the distribution list for Project updates. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 50

John Lorick

Comment No. 50-1

Los Angeles has enough eyesores. Please do not add to the problem with these digital billboards. These signs will enrich a few billboard companies at the expense of many. Once approved and installed they will be in place for decades.

I urge you to halt plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

Contrary to the findings of in the DEIR, there is a preponderance of evidence demonstrating the negative impacts digital billboards have on public safety by altering 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 distraction by enacting 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 distraction conditions. A comprehensive compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

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Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. However, Metro essentially states in this program that hazards created by installing digital signs are a problem that the rest of the city must mitigate. However, the dangers posed by Metro's signs would not be limited to its

property. The City's roadway users would suffer the consequences, which would undermine the Vision Zero Program.

Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

Response to Comment No. 50-1

The commenter expresses general concerns the Project mainly in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 51

Zachariah Love

Comment No. 51-1

The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

Human error is the leading cause of traffic accidents, and lawmakers have come to recognize the importance of reducing driver distraction by enacting 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 distraction conditions. A comprehensive compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

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Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

Response to Comment No. 51-1

The commenter expresses general concerns the Project mainly regarding aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 52

Steven Luftman

Comment No. 52-1

Please rethink the plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

Contrary to the findings of in the DEIR, there is a preponderance of evidence demonstrating the negative impacts digital billboards have on public safety by altering 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 distraction by enacting 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 distraction conditions. A comprehensive compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

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Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

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Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

Response to Comment No. 52-1

The commenter expresses general concerns the Project mainly in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 53

Patricia Mace

Comment No. 53-1

I WAS HORRIFIED 2 DAYS AGO TO SEE THE SHOCKING NEW 30FT?NEON [sic] MASSIVE SPORTS? SIGN FACING THE JOINING TRAFFIC ON THE 10 FWY ONTO THE 110 FWY N TO PASADENA !!! [sic] I COULD NOT BELIEVE THE LEVEL OF BRIGHT DISTRACTING LIGHTS AT THIS DANGEROUS POINT IN TRAFFIC !!!!!!! [sic] SUBSEQUENTLY I URGE YOU TO HALT ALL PLANS FOR THESE DREADFUL UGLIFICATION PLANS YOU HAVE AND ARE INSISTING ON PUSHING ONTO / FOR [sic] OUR LOVELY CITY OF LOS ANGELES !! [sic] YOU HAVE NO RIGHT TO UGLIFY OUR CITY FOR EVERYONE, WITH THESE SIGNS FOR A FEW BUSINESS OWNERS !!! [sic] YOU NEED TO HALT ALL PLANS TO MOVE FORWARD WITH THESE HIDEOUS SIGNS YOU HAVE PLANNED !!! [sic] I MEAN, HOW DARE YOU THINK YOU HAVE THIS RIGHT TO UGLIFY OUR LOS ANGELES ??? [sic] YOU NEED TO HALT ALL PLANS TO MOVE FORWARD WITH THIS HIDEOUS METRO TCN PROGRAM !!! [sic] WE WANT OUR LOVELY LOS ANGELES, NOT THIS TCN PROGRAM OF UGLY BLIGHT !!!!!!!!!!! [sic] The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

Contrary to the findings of in the DEIR, there is a preponderance of evidence demonstrating the negative impacts digital billboards have on public safety by altering 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 distraction by enacting 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 distraction conditions. A comprehensive compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

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Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

rogram. [sic]

All billboards can reduce property values. With high visibility of digital billboards, many properties would be impacted by this plan. Not to mention the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in thi [sic]

Response to Comment No. 53-1

The commenter expresses general concerns the Project mainly in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 54

Patricia Mace

Comment No. 54-1

PLEASE HALT ALL PLANS FOR THESE UGLY NEON SIGNS IN OUR LOVELY CITY OF LOS ANGELES. WE DO NOT NEED OR WANT THIS UGLIFICATION OF LOS ANGELES !!! YOU SHOULD NEVER HAVE THIS POWER TO PUT THESE SIGNS UP IN OUR CITY, EVER !!!! [sic] I urge you to halt plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

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Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. However, Metro essentially states in this program that hazards created by installing digital signs are a problem that the rest of the city must mitigate. However, the dangers posed by Metro's signs would not be limited to its property. The City's roadway users would suffer the consequences, which would undermine the Vision Zero Program.

Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with this installation.

Response to Comment No. 54-1

The commenter expresses general concerns the Project mainly in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 55

Casey Maddren

Comment No. 55-1

I'd like to submit the attached comments on the Metro TCN DEIR.

Could you please send a brief response to confirm you received this?

Could you also please add me to the distribution list for further communications related the [sic] this project?

I would like to submit the following comments on the DEIR for the Transportation Communication Network.

Response to Comment No. 55-1

This commenter has been added to the distribution list for Project updates. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not specifically address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 55-2**Biological Resources**

The DEIR fails to adequately assess cumulative light impacts from the TCN project on avian wildlife, in particular, migratory birds. As the DEIR acknowledges, the billboards will be installed in urban areas where substantial light pollution already exists. Research has shown that urban light can have significant negative impacts on avian wildlife. The DEIR makes no effort to assess cumulative impacts, let alone mitigate them.

Bright Lights, Big City:

Why Light Pollution Threatens Migratory Birds, from Yale Environment Review

<https://environment-review.yale.edu/bright-lights-big-city-why-light-pollution-threatens-migratory-birds>

Migratory birds may not fly directly into cities, but their proximity to urban areas can still have a grave impact on their health. Birds that stop near cities at night forgo the opportunity to eat and rest at more suitable, forested stopover sites. They are also more likely to die or be injured from encountering urban hazards like roads and buildings.

Consequently, birds that land in urban areas could become less fit for the remainder of their migration and arrive in poorer condition.

Response to Comment No. 55-2

For a discussion on cumulative environmental impacts, refer to Page IV.C-40 of Section IV.C, Biological Resources, of the Draft EIR. Additionally, a takedown ration of at least 2 to 1 of existing static displays would be removed throughout the City. When an agency determines that the combined effects from the proposed project and related projects would not result in a potentially significant cumulative impact, the EIR only briefly needs to indicate why the cumulative impact is not significant and is not discussed in further detail. (CEQA Guidelines, § 15130.) This is what the Draft EIR did in the context of biological resources because of the site-specific nature of the Project.

Comment No. 55-3

Energy

The analysis of energy consumption only appears to assess energy used by the individual digital billboards, and does not appear to assess energy consumed by necessary network infrastructure. For this reason, the analysis of impacts related to energy is inadequate.

Response to Comment No. 55-3

Energy usage for the Project is presented in Table IV.E-2 in Section IV.E, Energy, of the Draft EIR. This energy usage presented represents all TCN Structures including maintenance and remote updates to the digital displays. Therefore, the energy analysis takes into account the full “network infrastructure”. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 55-4

Greenhouse Gas Emissions

The analysis of GHG emissions only appears to assess emissions related to the individual digital billboards, and does not appear to assess GHG emissions from necessary network infrastructure. For this reason, the analysis of impacts related to GHG emissions is inadequate.

Response to Comment No. 55-4

Energy usage for the Project is presented in Section IV.E, Energy, Table IV.E-2 on page IV.E-36 of the Draft EIR. This energy usage presented represents all TCN structures

including maintenance and remote updates to the digital displays. GHG emissions associated with Project energy consumption is presented in Section IV.G, Greenhouse Gas Emissions, Table IV.G-7, page IV.G-53 of the Draft EIR. Therefore, the GHG analysis takes into account the full “network infrastructure”. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 55-5

Transportation

FHWA MUTCD

While the DEIR briefly mentions FHWA’s Manual on Uniform Traffic Control Devices, there is no indication that an assessment of the project’s compliance with the MUTCD has been completed. This is crucial. If the program fails to meet the standards set by the MUTCD, or if aspects of the program are in conflict with the MUTCD, this clearly opens the door to litigation initiated by the Federal government.

Response to Comment No. 55-5

The comment claims that the Project fails to meet the standards of the Manual on Uniform Traffic Control Devices (MUTCD). The MUTCD provides standards for roadway design and signage throughout the United States. While regulatory signs such as speed limit signs, changeable message signs (CMS), and other signs within the roadway right-of-way are regulated by the MUTCD, these regulations do not apply to static or digital billboards located outside of the roadway right-of-way. Thus, the Project is not in conflict with the MUTCD. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 55-6

Studies Used for Review

It’s hard to believe that the authors of the DEIR are basing their analysis on the following three studies:

Driver Visual Behavior in the Presence of Commercial Electronic Variable Message Signs, U.S. Department of Transportation Federal Highway Administration, September 2012 (FHWA Study);

Driving Performance and Digital Billboards, Foundation for Outdoor Advertising Research and Education, 2007 (Driving Performance Study)

A Study of the Relationship Between Digital Billboards and Traffic Safety in Cuyahoga County, Ohio, Foundation for Outdoor Advertising Research and Education, 2007 (Cuyahoga County Study).

Really?! The authors choose to use a FHWA study that other researchers assert is seriously flawed, and two other studies prepared by an outdoor advertising industry group? Regarding the first study, please see the following critique, which raises serious questions about the report's validity.

A Peer-Reviewed Critique of the FHWA Report: "Driver Visual Behavior in the Presence of Commercial Electronic CEVMS", Jerry Wachtel, Veridian Group, January 2015
<https://www.scenic.org/wp-content/uploads/2021/06/Critique-of-FHWA-2013-Billboard-Safety-Final-Report.pdf>

Here's an excerpt:

The present report, which was subjected to independent peer review, reviews these three FHWA documents, and concludes that the final report is seriously flawed due to confounding methodological issues, substantive factual discrepancies between the draft and final reports, failure to incorporate advances in the state of knowledge in the field from recent research, serious oversights in experimental procedures, and significant equipment constraints.

As for the second and third studies cited, do the authors really think that an outdoor advertising industry group is a reliable source for objective analysis? The authors even acknowledge that there is extensive literature on the subject, and instead of taking advantage of the wealth of research, they rely on TWO reports by the SAME industry group. Relying on these reports for their analysis calls into question not only the authors' competence, but also their integrity.

Response to Comment No. 55-6

Refer to Topical Response No. 1, Transportation Studies, for a discussion further justifying the use of the studies that were included in Section IV.K, Transportation, and Appendix K, Transportation and Traffic Safety Review, of the Draft EIR. As described therein, the research selected found that a correlation between digital billboards and traffic collisions was "inconclusive at best." The comments cited additional research which claim to demonstrate the negative impacts of digital billboards on public safety and should nullify the results of the Draft EIR. Upon further review, none of the additional studies cited in the comments provide conclusive evidence that digital billboards cause traffic collisions. Nor do those studies undermine the conclusions of the Draft EIR and the studies relied on for the Draft EIR analysis.

Comment Letter No. 56

Jonny Pray

Comment No. 56-1

I urge you to IMMEDIATELY halt plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

Contrary to the findings of in the DEIR, there is a preponderance of evidence demonstrating the negative impacts digital billboards have on public safety by altering 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 distraction by enacting 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 distraction conditions. A comprehensive compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

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Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. However, Metro essentially states in this program that hazards created by installing digital signs are a problem that the rest of the city must mitigate. However, the dangers posed by Metro's signs would not be limited to its property. The City's roadway users would suffer the consequences, which would undermine the Vision Zero Program.

Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

Response to Comment No. 56-1

The commenter expresses general opposition to the Project, specifically in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 57

Leslie A. Ridings

Comment No. 57-1

As a native angeleno [sic] and resident, I write in full-throated support of your proposal to replace/reduce current static billboards with new, electronic displays in order to increase revenue for transit funding.

Response to Comment No. 57-1

While the comment does not address the content or adequacy of the Draft EIR, the commenter's support for development of the Project is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment No. 57-2

Of your three proposed alternatives, I support "Alternative Two"—which would allow for the most static billboards to be replaced with electronic ones. The best future for Los Angeles County is one that relies not on cars to get around, but transit and active mobility. To that end, the more funds Metro can acquire via these new displays, the better. Indeed, if there were an alternative to expand the program, notwithstanding the broadly defined "environmental impacts" you outline in the Draft EIR, I would support that option. However, since "Alternative Two" is the most expansive of your three proposals, I would like to cast my vote for it, for what it's worth!

Response to Comment No. 57-2

The commenter addresses support for Alternative 2 of the Draft EIR as well as support for and expanded TCN Program to fund transit and active mobility. It should be noted that Alternative 2 does not include more TCN Structures than the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 57-3

I do have one suggestion: ear-marking the funds acquired via these new displays for specific mass transit purposes—ie, [sic] Heavy Rail, Light Rail, BRT expansion, speeding up the EIR process, etc. Or, In the alternative, **simply bar the funds being used for freeway expansion.**

We must move away from increasing personal passenger car usage and expanding highway/street capacity. Instead, we should utilize extant space for bus-only lanes, protected bicycle lanes and other active mobility updates, bus bulb-outs, and surface/aerial LRT on the common right of way—you get the idea.

Response to Comment No. 57-3

This comment provides suggestions for use of the revenue generated from the TCN Program. The advertising revenue created by the TCN Program would be utilized by both Metro and the City to fund new and expanded transportation programs. For example, the TCN Program would improve bus passengers experience by helping to facilitate transit signal priority and bus wi-fi and efficiently relay bus arrival time information to riders. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 57-4

Thank you for your time, and your continued leadership in building a more cohesive, accessible, and equitable Los Angeles.

Response to Comment No. 57-4

While the comment does not address the content or adequacy of the Draft EIR, the commenter's support for development of the Project is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment Letter No. 58

Judith Roach

Comment No. 58-1

I urge you to halt plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

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Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

Please don't pollute our visual enjoyment of our city with this digital blight.

Response to Comment No. 58-1

The commenter expresses general opposition to the Project, specifically in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 59

Judith Roach

Comment No. 59-1

I urge you to halt plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

Contrary to the findings of in the DEIR, there is a preponderance of evidence demonstrating the negative impacts digital billboards have on public safety by altering 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 distraction by enacting 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 distraction conditions. A comprehensive compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

Recent research demonstrates that even changing electronic signs erected solely for public information purposes create hazards for drivers, indicating that the medium of digital signs is inherently dangerous. The Traffic Safety section of the DEIR fails to account for this evidence. The report contains no original analysis of the relationship between signs and driver safety and relies on a literature review of stale and inadequate research.

Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. However, Metro essentially states in this program that hazards created by installing digital signs are a problem that the rest of the city must mitigate. However, the dangers posed by Metro's signs would not be limited to its property. The City's roadway users would suffer the consequences, which would undermine the Vision Zero Program.

Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

Please stop this visual blight.

Response to Comment No. 59-1

The commenter expresses general opposition to the Project, specifically in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 60

Linda Rosenthal

Comment No. 60-1

I urge you to halt plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

Contrary to the findings of in the DEIR, there is a preponderance of evidence demonstrating the negative impacts digital billboards have on public safety by altering 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 distraction by enacting 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 distraction conditions. A comprehensive compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

Recent research demonstrates that even changing electronic signs erected solely for public information purposes create hazards for drivers, indicating that the medium of digital signs is inherently dangerous. The Traffic Safety section of the DEIR fails to account for this evidence. The report contains no original analysis of the relationship between signs and driver safety and relies on a literature review of stale and inadequate research.

Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. However, Metro essentially states in this program that hazards created by installing digital signs are a problem that the rest of the city must mitigate. However, the dangers posed by Metro's signs would not be limited to its property. The City's roadway users would suffer the consequences, which would undermine the Vision Zero Program.

Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

NO MORE BILLBOARDS AND NEVER ANY DIGITAL ONES!!!

End the toxic blight and actual safety danger!

Response to Comment No. 60-1

The commenter expresses general opposition to the Project, specifically in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 61

Jay Ross

Comment No. 61-1

I oppose especially the two FF signs on the 405 in West LA, and the 2 NFF signs on Pico Blvd in West LA.

I urge you to halt plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

Contrary to the findings of in the DEIR, there is a preponderance of evidence demonstrating the negative impacts digital billboards have on public safety by altering 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 distraction by enacting 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 distraction conditions. A comprehensive compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

Recent research demonstrates that even changing electronic signs erected solely for public information purposes create hazards for drivers, indicating that the medium of digital signs is inherently dangerous. The Traffic Safety section of the DEIR fails to account for this evidence. The report contains no original analysis of the relationship between signs and driver safety and relies on a literature review of stale and inadequate research.

Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. However, Metro essentially states in this program that hazards created by installing digital signs are a problem that the rest of the city must mitigate. However, the dangers posed by Metro's signs would not be limited to its

property. The City's roadway users would suffer the consequences, which would undermine the Vision Zero Program.

Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

Response to Comment No. 61-1

The commenter expresses general opposition to the Project, specifically in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 62

Robin Rudisill

Comment No. 62-1

I urge you to halt plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

Response to Comment No. 62-1

The commenter expresses general opposition to the Project, citing the Project's environmental impacts. Additionally, the comment asserts that the Draft EIR is inadequate, but does not cite any specific information that has been omitted from the document. Chapter IV, Environmental Impacts Analysis, of the Draft EIR contains a comprehensive analysis of the Project's environmental impacts. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 62-2

In addition, adverse cumulative impacts together with other City or DPW programs have not been considered, a gross violation of CEQA.

Response to Comment No. 62-2

Chapter III, Environmental Setting, of the Draft EIR describes the related projects in the area that might have a cumulative impact on the Project. The Draft EIR analyzes the Project's cumulative impacts in each impact chapter.

Comment No. 62-3

Contrary to the findings of in the DEIR, there is a preponderance of evidence demonstrating the negative impacts digital billboards have on public safety by altering 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 distraction by enacting 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 distraction

conditions. A comprehensive compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

Recent research demonstrates that even changing electronic signs erected solely for public information purposes create hazards for drivers, indicating that the medium of digital signs is inherently dangerous. The Traffic Safety section of the DEIR fails to account for this evidence. The report contains no original analysis of the relationship between signs and driver safety and relies on a literature review of stale and inadequate research.

Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. However, Metro essentially states in this program that hazards created by installing digital signs are a problem that the rest of the city must mitigate. However, the dangers posed by Metro's signs would not be limited to its property. The City's roadway users would suffer the consequences, which would undermine the Vision Zero Program.

Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

Response to Comment No. 62-3

The commenter expresses general opposition to the Project, specifically in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 63

Lisa M. Schumacher

Comment No. 63-1

I learned the City plans to install large digital billboards at several locations, including at the 90 freeway intersection with Culver Boulevard.

I agree with Mike Bonin's June 1, 2022 Comment Letter: The proposed project is clearly for revenue generation purposes, digital billboards are self-evidently dangerous, and the Ballona Wetlands are a critical coastal resource.

I am strongly opposed to this idea

Response to Comment No. 63-1

This comment supports Councilmember Bonin's June 1, 2022 Comment Letter on the Notice of Preparation and expresses general opposition to the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not specifically address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 63-2

Having lived in this area for the past 28 years, the wetlands are a vital part of our ecosystem. Any light pollution that disrupts the delicate balance for animals and plants is bad for our environment. I would hope that we have learned something about the importance of considering our impact on the world around us with all of the evidence of climate change. Placing digital signs to make money at the risk to our environment is a bad decision.

Response to Comment No. 63-2

The commenter expresses general opposition to the Project, specifically in regard to potential light pollution. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. For further discussion with regard to biological resources, refer to Topical Response No. 3, above. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 63-3

I am urging the City Council to say no to the currently proposed Metro Transit Communication Network.

Los Angeles deserves better.

Response to Comment No. 63-3

The commenter expresses general opposition to the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 64

Eric Sheehan

Comment No. 64-1

Cancel this entire project.

Response to Comment No. 64-1

The commenter expresses general opposition to the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 64-2

We don't need more moving distractions on our highways.

Response to Comment No. 64-2

The commenter expresses general opposition to the Project due to moving distractions on the highways. For further discussion of the Project's hazards due to a geometric design feature or incompatible use, see Section IV.K, Transportation, of the Draft EIR. As described therein, the digital displays would transition instantly with no motion, moving parts, flashing, or scrolling messages. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 64-3

Light pollution and electricity usage are not worth the ad dollars.

Stop it.

Response to Comment No. 64-3

The commenter expresses general opposition to the Project due to concerns about light pollution and electricity. For further discussion of the Project's lighting and electricity usage, see Sections IV.A, Aesthetics, and IV.M, Utilities—Electric Power, of the Draft EIR, respectively. This comment is noted for the record and will be forwarded to the decision-

makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 65

Dan Silver

Comment No. 65-1

I am appalled by this proposed action. You would sacrifice public safety and the public space.

I urge you to halt plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

Contrary to the findings of in the DEIR, there is a preponderance of evidence demonstrating the negative impacts digital billboards have on public safety by altering 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 distraction by enacting 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 distraction conditions. A comprehensive compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

Recent research demonstrates that even changing electronic signs erected solely for public information purposes create hazards for drivers, indicating that the medium of digital signs is inherently dangerous. The Traffic Safety section of the DEIR fails to account for this evidence. The report contains no original analysis of the relationship between signs and driver safety and relies on a literature review of stale and inadequate research.

Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. However, Metro essentially states in this program that hazards created by installing digital signs are a problem that the rest of the city must mitigate. However, the dangers posed by Metro's signs would not be limited to its

property. The City's roadway users would suffer the consequences, which would undermine the Vision Zero Program.

Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

Response to Comment No. 65-1

The commenter expresses general opposition to the Project, specifically in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 66

Ed and Bee Simpson

Comment No. 66-1

We oppose Metro TCN Program. It omits key information about the impacts of digital signs and would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life. Drivers are already extremely at risk with increasing numbers of people, drugs, alcohol, speeding, etc. In light of the many stated concerns by Scenic Los Angeles, we support them and urge you do the same.

Response to Comment No. 66-1

The commenter expresses general opposition to the Project. The comment also asserts that the Project's impacts were not adequately analyzed. Further, the Draft EIR was prepared pursuant to CEQA Guidelines Section 15151, Standards for Adequacy of an EIR. Chapter IV, Environmental Impacts Analysis, of the Draft EIR, contains a comprehensive analysis of the Project's environmental impacts. Additionally, the commenter supports the Scenic Los Angeles letter included as Comment Letter No. 17. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 67

Clara Solis

Comment No. 67-1

I am opposed to this project. I support the no build alternative.

1. We don't need it.

Response to Comment No. 67-1

The commenter expresses general opposition to the Project and supports Alternative 1—No Project Alternative. The comment asserts that the Project is unnecessary. Chapter II, Project Description, of the Draft EIR discusses the goals and objectives that the Project would seek to achieve. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 67-2

2. It will cause more corruption in an already corrupt City.

Response to Comment No. 67-2

This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 67-3

3. It will be dangerous to drivers [sic]

Response to Comment No. 67-3

The commenter expresses general opposition to the Project due to traffic safety concerns. For further discussion of transportation related issues, refer to Section IV.K, Transportation, of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 67-4

4. It will impact historic resources [sic]

Response to Comment No. 67-4

The commenter correctly notes that the Project would have significant impacts with regard to historical resources. The Project would result in significant and unavoidable visual impacts on five historical resources, including the North Spring Street Bridge (Caltrans Bridge No. 53C0859), the Lankershim Depot, the Little Tokyo Historic District, the Japanese Village Plaza, and the Fourth Street Bridge (Caltrans Bridge No. 53C0044) as a result of Site Locations NFF-2, NFF-3, NFF-16, and NFF-21. These Site Locations are within immediate proximity of their associated historical resources, and the Project would likely result in permanent and unavoidable visual impacts by fundamentally affecting the integrity of setting and feeling. Although these resources are within an urban setting subjected to the visual, atmospheric, and audible effects of the environment on a regular basis, the TCN Structures at these Site Locations would likely detract from the character-defining features and affect the viewsheds of the resources. No feasible mitigation measures have been identified to address the impacts at Site Locations NFF-2, NFF-3, NFF-16, and NFF-21. Therefore, no mitigation measures were proposed or included, and the impact level remains significant and unavoidable. However, refer to Section V, Alternatives, of this Draft EIR, where Alternative 2 and Alternative 3 would avoid the Project's significant and unavoidable historical resources impacts and related aesthetics and land use consistency impacts associated with Site Locations NFF-2, NFF-3, NFF-16, and NFF-21. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 67-5

5. It will be harmful to biological resources. It will hurt an already at risk bat population. It will hurt our bird population.

Response to Comment No. 67-5

The commenter expresses general opposition to the Project due to concerns regarding biological resources. For further discussion of biological resources, refer to Section IV.C, Biological Resources, of the Draft EIR where impacts on biological resources are found to be less than significant with the implementation of Mitigation Measures Bio-MM-1 through BIO-MM-4. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 67-6

6. It will impact communities of color disproportionately because there are more freeways and public transportation project in these communities.

Response to Comment No. 67-6

As explained in the Draft EIR in Chapter II. Project Description, the TCN Structures would be implemented in non-residential areas via a Zoning Ordinance by the City, as excepted from the 2002 ban. The proposed Site Locations are within commercial/industrial areas, and no Site Locations are zoned for residential use. Further, as discussed in the Chapter II, Project Description, of the Draft EIR, the Project would result in an overall reduction in signage displays throughout the City.

This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 68

David L. Swartz

Comment No. 68-1

Metros [sic] goal should be for creating a safe environment to access your exposition line. There is no security. Anyone can get on this line and not pay which means that we have homeless sleeping, eating, screaming ,urinating [sic] and smoking on the train. The revenue raised due to these signs in the expo area should pay for this level of security. Secure each entry. Most metro areas you cannot just get on without security.

Response to Comment No. 68-1

This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 69

Christina Turbeville

Comment No. 69-1

I urge you to halt plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

Contrary to the findings of in the DEIR, there is a preponderance of evidence demonstrating the negative impacts digital billboards have on public safety by altering 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 distraction by enacting 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 distraction conditions. A comprehensive compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

Recent research demonstrates that even changing electronic signs erected solely for public information purposes create hazards for drivers, indicating that the medium of digital signs is inherently dangerous. The Traffic Safety section of the DEIR fails to account for this evidence. The report contains no original analysis of the relationship between signs and driver safety and relies on a literature review of stale and inadequate research.

Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. However, Metro essentially states in this program that hazards created by installing digital signs are a problem that the rest of the city must mitigate. However, the dangers posed by Metro's signs would not be limited to its property. The City's roadway users would suffer the consequences, which would undermine the Vision Zero Program.

Response to Comment No. 69-1

The commenter expresses general opposition to the Project, specifically in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 69-2

I live in the West LA Sawtelle Neighborhood, and it is unclear how close NFF-14 & NFF-15 to be located on Pico Boulevard will be to the West LA Animal Shelter. Changing light from these signs could also disrupt to well-being of animals housed at the shelter. The DEIR fails to address this issue.

Response to Comment No. 69-2

The commenter expresses general opposition to the Project due to concerns regarding the potential for impacts related to aesthetics. For further discussion of aesthetics issues, refer to Sections IV.A Aesthetics of the Draft EIR, where impacts were found to be less than significant at locations NFF-14 and NFF-15. Further, refer to Topical Response No. 3 for a discussion on the Project's compliance with CALGreen lighting standards. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 69-3

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

Response to Comment No. 69-3

The commenter expresses general opposition to the Project. Additionally, the commenter supports the Scenic Los Angeles letter included as Comment Letter No. 16. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not specifically address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 70

Tina Turbeville

Comment No. 70-1

I oppose the project and feel we should not have digital signage, particularly with moving images. My concerns follow:

Response to Comment No. 70-1

The commenter expresses general opposition to the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 70-2

- Billboards are dangerous. They contribute to distracted driving, putting pedestrians and motorists at risk.
- Billboards damage the scenic qualities of our city and our scenic byways.
- As a West LA Sawtelle neighborhood resident, I am concerned about the proximity of the NFF-14 and NFF-15 signs proposed for Pico Boulevard to the West LA Animal Shelter located on Pico between Corinth and Purdue. I foresee continuous changes in light as damaging to the animals.

Response to Comment No. 70-2

The commenter expresses general opposition to the Project due to concerns regarding the potential for impacts related to aesthetics and transportation safety. For further discussion of aesthetics and transportation safety related issues, refer to Sections IV.A Aesthetics and IV.K Transportation, respectively, of the Draft EIR where impacts were found to be less than significant at locations NFF-14 and NFF-15. Additionally, the commenter should refer to Topical Response No. 3 above for a discussion on the Project's compliance with CALGreen lighting standards. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 70-3

I urge you to stop this project.

Response to Comment No. 70-3

The commenter expresses general opposition to the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 71

Kent Vinson

Comment No. 71-1

I learned the City plans to install large digital billboards at several locations, including at the 90 freeway intersection with Culver Boulevard.

I agree with Mike Bonin's June 1, 2022 Comment Letter:

The proposed project is clearly for revenue generation purposes, digital billboards are self-evidently dangerous, and the Ballona Wetlands are a critical coastal resource.

Response to Comment No. 71-1

The commenter expresses general opposition to the Project due to concerns regarding the Project as a source of revenue, transportation safety, and biological resources. For further discussion of transportation safety related issues and biological resources, refer to Sections IV.K Transportation and IV.C Biological Resources, respectively, of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not specifically address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 71-2

When regularly driving to SoFi stadium, I exit the Manchester exit, and there is a large digital billboard that is assaulting to the eyes, distracting to the drivers, and out of place for the area.

I most definitely to [sic] not want that light pollution and driving distraction at the highway 90/Culver Blvd. area.

Response to Comment No. 71-2

This comment expresses general opposition to the Project due to light pollution and driving distraction, specifically for Site Locations FF-29 and FF-30. Sections IV.A, Aesthetics, and IV.K, Transportation, include analyses of the Project's aesthetic and transportation impacts, respectively. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment

does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 71-3

I urge you to say no to the currently proposed Metro Transit Communication Network.

Los Angeles deserves better.

Response to Comment No. 71-3

The commenter expresses general opposition to the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 72

Jeanette Vosburg

Comment No. 72-1

I am a Board Member of Grassroots Coalition. I support Patricia McPherson and Travis Longcore's statements:

Response to Comment No. 72-1

The commenter expresses general opposition to the Project and supports Patricia Mcpherson and Travis Longcore's comments included below. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 72-2**METRO—**

Two signs are planned for SR 90 East and West (Freeway Facing FF 29 an FF 30) shown in the map of the project EIR.

Here is information about the comment due date: <https://plancheckncla.com/2022/10/05/metros-transportation-communication-network-digital-signage/>

RESPONSE:

DIGITAL SIGNS ARE UNECESSARY [sic] for the FREEWAY 90SR [sic] 90 East and West (Freeway Facing FF 29 an FF 30,DEIR [sic] Map)

AND THEIR LIKELIHOOD OF CAUSING ENVIRONMENTAL HARM IN THIS AREA IS HIGH.

Response to Comment No. 72-2

The commenter expresses general opposition to the Project, specifically for Site Locations FF-29 and FF-30, due to concerns about the Project's environmental impacts. Chapter IV, Environmental Impacts Analysis, of the Draft EIR contains a comprehensive analysis of the Project's environmental impacts. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this

comment does not specifically address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 72-3

Please be responsive to the scientific studies included below per assessment of creating new lighted signage on SR 90 which is alongside and ending in areas that are sensitive biological, ecological areas.

Response to Comment No. 72-3

As described in Section IV.C, Biological Resources, of the Draft EIR, Project impacts would be less than significant with the implementation of Mitigation Measures BIO-MM-1 through BIO-MM-4. Additionally, as discussed in Topical Response No. 3, Project Design Feature AES-PDF-1, would limit light trespass at the Ballona Wildlife Reserve a maximum of 0.02 foot-candles. This maximum light trespass of 0.02 fc is well below the most stringent recommendation of 0.09 fc for the LZI Zone for “Special Districts and Government Designated Parks” within the California Administrative Code. For further discussion, refer to Topical Response No. 3, further explaining the Project’s less than significant impact from lighting on biological resources. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 72-4

Bright city lights exacerbate air pollution

<http://cires1.colorado.edu> › science › spheres › lights

Stark’s measurements indicated the energy of the nighttime lights slowed down nighttime *cleansing* by [sic] up to 7 percent and also increased the starting chemicals...

Response to Comment No. 72-4

The air quality analysis include in Section IV.B, Air Quality, of the Draft EIR was performed consistent with SCAQMD CEQA Guidelines. The SCAQMD also establishes numeric significance thresholds to evaluate potential air quality impacts related to Project construction and operational emissions. As shown Table IV.B-9, Table IV.B-10, Table IV.B-11 and Table IV.B-12 of Section IV.B, Air Quality, of the Draft EIR, Project criteria pollutant emissions would remain well below SCAQMD significance thresholds on a regional and localized level. Therefore, the Project would not result in a significant impact with regards to air quality. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 72-5

This area is an environmentally sensitive area that the public has paid over \$200 million for its acquisition and study. Further studies must also be done for full CEQA and federal EIS studies.

Response to Comment No. 72-5

The commenter is referencing an area known as the Ballona Wildlife Reserve. As described in Section IV.C, Biological Resources, of the Draft EIR, Project impacts would be less than significant with the implementation of Mitigation Measures BIO-MM-1 through BIO-MM-4. Additionally, as discussed in Topical Response No. 3, Project Design Feature AES-PDF-1, would limit light trespass at the Ballona Wildlife Reserve a maximum of 0.02 foot-candles. This maximum light trespass of 0.02 fc is well below the most stringent recommendation of 0.09 fc for the LZI Zone for “Special Districts and Government Designated Parks” within the California Administrative Code. For further discussion, refer to Topical Response No. 3, further explaining the Project’s less than significant impact from lighting on biological resources.

Further, the Draft EIR was prepared pursuant to CEQA Guidelines Section 15151, Standards for Adequacy of an EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 72-6

<https://travislongcore.net/research/light-pollution>

LIGHT POLLUTION , Travis Longcore, Catherine Rich

In 2002, the American researchers Travis Longcore and Catherine Rich organized the first conference on the ecological consequences of artificial *light*at [sic] night.

Ecological light pollution—Travis Longcore—Academia.edu

https://www.academia.edu/Ecological_light_pollution

REVIEWS REVIEWS REVIEWS 191 Ecological *light*pollution [sic] *Travis Longcore*and [sic] Catherine Rich Ecologists have long studied the critical role of natural *light*in... [sic]

Ecological Consequences of Artificial Night Lighting

<https://www.researchgate.net/publication/40777410...>

Jul 5, 2022—Travis Longcore at University of California, Los Angeles... Therefore, *light pollution through its impact on internal clock timewhich...* [sic]

Lighting's Impact on the Animal World with Travis Longcore

<https://www.youtube.com> › watch



Lighting for Safety and CPTED (Crime Prevention Through Environmental Design) with Art Hushen. International Dark-Sk...

YouTube · International Dark-Sky Association · Apr 22, 2020

Response to Comment No. 72-6

Refer to Topical Response No. 3, Biological Resources, for a discussion which further clarifies the Project would meet CALGreen standards for lighting at all Site Locations. Specifically, as described in Topical Response No. 3, Project Design Feature AES-PDF-1 would install state of the art louvers at locations with sensitive habitat (TCN Structures FF-13, FF-14, FF-25, FF-29, and FF-30) to reduce lighting levels to 0.02 fc, which is well below the 0.74 fc standard under CALGreen. This maximum light trespass of 0.02 fc is well below the most stringent recommendation of 0.09 fc for the LZI Zone for “Special Districts and Government Designated Parks” within the California Administrative Code. It should be noted that FF-13 and FF-14 are currently located near a proposed park, and conditions at the current site consist of vacant land with very limited vegetation. However, as the park is proposed to have habitat restoration areas, this area is considered to contain future sensitive habitat to provide for a conservative analysis. The attachments have been reviewed and data relevant to the project has been considered. The Project would add minimal additional light to already disturbed areas in habitat by wildlife habituated to lighting and other human disturbance. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 72-7

Study reveals which outdoor lighting minimizes harm to insects

<https://www.ioes.ucla.edu> › article › study-reveals-whic... [sic]

Mar 17, 2021—UCLA–Smithsonian research confirms *certain LED colors cause less damage* than... [sic] co-authors is UCLA conservation scientist Travis Longcore

Thank you for your time spent in review of this information and please preclude new illuminated signage in all areas that may be negatively impacted.

Patricia McPherson, Grassroots Coalition

Response to Comment No. 72-7

Refer to Topical Response No. 3 for a discussion which further clarifies the Project would meet CALGreen standards for lighting at all Site Locations. Specifically, as described in Topical Response No. 3, Project Design Feature AES-PDF-1 would install state of the art louvers at locations with sensitive habitat (TCN Structures FF-13, FF-14, FF-25, FF-29, and FF-30) to reduce lighting levels to 0.02 fc, which is well below the 0.74 fc standard under CALGreen. This maximum light trespass of 0.02 fc is well below the most stringent recommendation of 0.09 fc for the LZI Zone for “Special Districts and Government Designated Parks” within the California Administrative Code. It should be noted that FF-13 and FF-14 are currently located near a proposed park, and conditions at the current site consist of vacant land with very limited vegetation. However, as the park is proposed to have habitat restoration areas, this area is considered to contain future sensitive habitat to provide for a conservative analysis. The referred-to article has been reviewed and while the analysis is applicable, the data provided does not change the determination that lighting effects on wildlife would not be significant. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 73

Suellen Wagner

Comment No. 73-1

I urge you to halt plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, THREATENED WILDLIFE AND HABITAT, PUBLIC PARKLANDS, and quality of life.

Contrary to the findings of in the DEIR, there is a preponderance of evidence demonstrating the negative impacts digital billboards have on public safety by altering 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 distraction by enacting laws banning cell phone use while driving. VENTURA BLVD. IN STUDIO CITY IS PART OF THE HIGH INJURY NETWORK! As digital billboards have become more common, an emerging body of research indicates that digital billboards create similar distraction conditions. A comprehensive compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

Recent research demonstrates that even changing electronic signs erected solely for public information purposes create hazards for drivers, indicating that the medium of digital signs is inherently dangerous. The Traffic Safety section of the DEIR fails to account for this evidence. The report contains no original analysis of the relationship between signs and driver safety and relies on a literature review of stale and inadequate research.

Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. However, Metro essentially states in this program that hazards created by installing digital signs are a problem that the rest of the city must mitigate. However, the dangers posed by Metro's signs would not be limited to its property. The City's roadway users would suffer the consequences, which would undermine the Vision Zero Program.

Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address impacts on hillside neighborhoods or scenic highways Laurel Canyon, Coldwater Canyon.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

Response to Comment No. 73-1

The commenter expresses general opposition to the Project, specifically in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 74

Diana Waters

Comment No. 74-1

I urge you to halt plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

WE DO NOT WANT FURTHER INEVITABLE TRAFFIC ACCIDENT DEATHS FROM DISTRACTED DRIVERS.

Contrary to the findings of in the DEIR, there is a preponderance of evidence demonstrating the negative impacts digital billboards have on public safety by altering 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 distraction by enacting 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 distraction conditions. A comprehensive compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

Recent research demonstrates that even changing electronic signs erected solely for public information purposes create hazards for drivers, indicating that the medium of digital signs is inherently dangerous. The Traffic Safety section of the DEIR fails to account for this evidence. The report contains no original analysis of the relationship between signs and driver safety and relies on a literature review of stale and inadequate research.

Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. However, Metro essentially states in this program that hazards created by installing digital signs are a problem that the rest of the city must mitigate. However, the dangers posed by Metro's signs would not be limited to its

property. The City's roadway users would suffer the consequences, which would undermine the Vision Zero Program.

Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

Response to Comment No. 74-1

The commenter expresses general opposition to the Project, specifically in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 75

Diana Waters

Comment No. 75-1

I urge you to halt plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

Contrary to the findings of in the DEIR, there is a preponderance of evidence demonstrating the negative impacts digital billboards have on public safety by altering 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 distraction by enacting 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 distraction conditions. A comprehensive compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

Recent research demonstrates that even changing electronic signs erected solely for public information purposes create hazards for drivers, indicating that the medium of digital signs is inherently dangerous. The Traffic Safety section of the DEIR fails to account for this evidence. The report contains no original analysis of the relationship between signs and driver safety and relies on a literature review of stale and inadequate research.

Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. However, Metro essentially states in this program that hazards created by installing digital signs are a problem that the rest of the city must mitigate. However, the dangers posed by Metro's signs would not be limited to its property. The City's roadway users would suffer the consequences, which would undermine the Vision Zero Program.

Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

DANGEROUS, WILL CAUSE DEATHS. UGLY—WILL MAKE OUR CITY LESS BEAUTIFUL AND HAVE A NEGATIVE EFFECT ON DOLLARS FROM TOURISM.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

Response to Comment No. 75-1

The commenter expresses general opposition to the Project, specifically in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 76

Eric Wrobbel

Comment No. 76-1

Why are you hellbent to turn this city into a cesspool of hucksterism? STOP this madness with digital billboards. Say NO!

Please STOP plans to move forward with the Metro TCN Program. The Draft Environmental Impact Report (DEIR) is flawed and incomplete, omitting key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

Contrary to the findings of in the DEIR, there is a preponderance of evidence demonstrating the negative impacts digital billboards have on public safety by altering 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 distraction by enacting 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 distraction conditions. A comprehensive compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

Recent research demonstrates that even changing electronic signs erected solely for public information purposes create hazards for drivers, indicating that the medium of digital signs is inherently dangerous. The Traffic Safety section of the DEIR fails to account for this evidence. The report contains no original analysis of the relationship between signs and driver safety and relies on a literature review of stale and inadequate research.

Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021).

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. However, Metro essentially states in this program that hazards created by installing digital signs are a problem that the rest of the city must mitigate. However, the dangers posed by Metro's signs would not be limited to its

property. The City's roadway users would suffer the consequences, which would undermine the Vision Zero Program.

Evidence indicates that all billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

In light of these concerns, I stand with Scenic Los Angeles in recommending that neither Metro nor the City moves forward with the installation of digital signs as described in this program.

Response to Comment No. 76-1

The commenter expresses general opposition to the Project, specifically in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 77

Hilary Young

Comment No. 77-1

Unbelievable!!

I URGE you to IMMEDIATELY HALT plans to move forward with the Metro TCN Program!!

The Draft Environmental Impact Report (DEIR) is Flawed and INCOMPLETE!! It omits key information about the impacts of digital signs. The TCN program would increase scenic blight throughout the city, jeopardizing the City's 2002 sign ordinance (and authority to regulate off-site signs) while creating hazards to human health, the natural environment, and quality of life.

YOU METRO PEOPLE ARE DUPLICITOUS !! [sic]

CONTRARY to the findings of in the DEIR, there is a preponderance of evidence demonstrating the NEGATIVE impacts digital billboards have on public safety by altering driver behavior, drawing driver attention away from the roadway and toward the advertisements.

We all know human error is the leading cause of traffic accidents, and lawmakers have come to recognize the importance of reducing driver distraction by enacting 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 distraction conditions. A comprehensive compendium of digital billboard safety studies can be found at www.scenic.org/compendium.

Recent research demonstrates that even changing electronic signs erected solely for public information purposes create hazards for drivers, indicating that the medium of digital signs is INHERENTLY DANGEROUS. The Traffic Safety section of the DEIR fails to account for this evidence!! The report contains NO original analysis of the relationship between signs and driver safety and relies on a literature review of stale and inadequate research.

Also note that the illumination standards, hours of operation, and take-down rate of the TCN proposal do not match those recommended by the LA City Planning Commission in Version B+ of the revised City Sign Ordinance, (May 2021) !! [sic]

The DEIR acknowledges that the City of LA has committed to the Vision Zero program, with the goal of eliminating pedestrian deaths. However, Metro essentially states in this program that hazards created by installing digital signs ARE A PROBLEM that the rest of the city must mitigate. However, the dangers posed by Metro's signs would NOT be limited to its property. The City's roadway users would suffer the consequences, which would undermine the Vision Zero Program.

Evidence indicates that ALL billboards, including digital billboards, can reduce property values. Because of the high visibility of digital billboards, many properties would be impacted by this plan. Additionally, while the DEIR notes the scenic impacts on residences and businesses, it does not address the impact on the scenic qualities of byways such as the Arroyo Seco Parkway.

In light of these concerns, I STAND WITH SCENIC LOS ANGELES in recommending that NEITHER Metro nor the City moves forward with the installation of digital signs as described in this program !! [sic]

Response to Comment No. 77-1

The commenter expresses general opposition to the Project, specifically in regard to aesthetics and safety. Please refer to Comment Letter No. 22, as the contents in this comment are substantially the same. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 78

TCN Community Meeting—October 6, 2022
Verbal Comments

Comment No. 78-1

Wendy-Sue Rosen: I am Wendy Sue-Rosen, I'm with Scenic Los Angeles, and my question is, the City of Los Angeles banned billboards in 2002, and the courts have been very clear about the requirement that all billboards be allowed only in commercial districts. Um, these are not in commercial districts, uh, not ones designated by City of LA. So how do you defend this as not impacting the ban on billboards in the City of Los Angeles. And how, uh, can that be defended in court? Because the industry is incredibly litigious.

Response to Comment No. 78-1

As explained in Chapter II, Project Description, of the Draft EIR, new off-premise signage would be located within an adopted Sign District, Specific Plan, or Supplemental Use District, as excepted from the 2002 ban. As part of the Zoning Ordinance, the City would establish an "SN" Sign District designation for the TCN Structures. (The Project would therefore not violate the City's 2002 ban of new off-site advertising signs. Further, refer to Response to Comment No. 9-18 regarding the proposed Zoning Ordinance for the TCN Structures.

Comment No. 78-2

Wendy-Sue Rosen: Oh, am I the only person raising my hand? I have another question for you, and that is um, the City of LA has a takedown recommendation of 10:1, and yours is basically 2:1. I understand that it's square footage, but that's quite a difference. So I would just like that responded to.

Response to Comment No. 78-2

Refer to Response to Comment No. 9-25 regarding the take-down of existing static displays as part of the Project.

Comment No. 78-3

Wendy-Sue Rosen: And then one more question that I have, um, and I'll put my hand down, and hopefully other people will raise their hand hands, um, is that the safety studies that you've relied on have been debunked. They're out of date, and they've been debunked, and it's known. The studies that are relied on you have not quoted or put in your, um, Draft EIR at all. So we'd like to see you do an update on the studies that have

actually been used that are relied on by the industry and by experts, and also ask that, um, that you provide traffic data and all kinds of information about, um, accident rates, pedestrian deaths in those areas, and if that hasn't been done that a study be conducted. Thank you.

Response to Comment No. 78-3

Refer to Topical Response No. 1, Transportation Studies, for a discussion further justifying the use of the studies that were included in Section IV.K, Transportation, and Appendix K, Transportation and Traffic Safety Review, of the Draft EIR. As described therein, the research selected found that a correlation between digital billboards and traffic collisions was "inconclusive at best." Upon further review of additional research studies that were submitted during the Draft EIR comment period, none of the additional studies cited provided conclusive evidence that digital billboards cause traffic collisions. Nor do those studies undermine the conclusions of the Draft EIR and the studies relied on for the Draft EIR analysis.

Comment No. 78-4

Wendy-Sue Rosen: I just have a question. Does it show you how many people are on this call, and you could tell us how many people are on?

Response to Comment No. 78-4

This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment Letter No. 79

TCN Community Meeting—October 6, 2022
Chat Comments

Comment No. 79-1

Wendy-Sue Rosen: The traffic safety studies you rely on in the Draft EIR have been debunked. Will you update studies to include those that are relied on by experts in the field?

Response to Comment No. 79-1

Refer to Topical Response No. 1, Transportation Studies, for a discussion further justifying the use of the studies that were included in Section IV.K, Transportation, and Appendix K, Transportation and Traffic Safety Review, of the Draft EIR. As described therein, the research selected found that a correlation between digital billboards and traffic collisions was “inconclusive at best.” The comments cited additional research which claim to demonstrate the negative impacts of digital billboards on public safety and should nullify the results of the Draft EIR. Upon further review, none of the additional studies cited in the comments provide conclusive evidence that digital billboards cause traffic collisions. Nor do those studies undermine the conclusions of the Draft EIR and the studies relied on for the Draft EIR analysis.

Comment No. 79-2

Wendy-Sue Rosen: The City Planning Commission has recommended 10 to 1 removal and you only recommend 2 to 1. That is not enough.

Response to Comment No. 79-2

Refer to Response to Comment No. 9-25 regarding the take-down of existing static displays as part of the Project.

Comment No. 79-3

Wendy-Sue Rosen: You have not taken scenic or natural resources in the siting of these billboards into consideration. There will be impacts to Ballona Wetlands, Sepulveda Basin, etc. Have you analyzed these impacts?

Response to Comment No. 79-3

Refer to Section IV.C, Biological Resources, of the Draft EIR for a review sensitive habitat and species located in the vicinity of the Site Locations located near the Ballona Wildlife Reserve and Sepulveda Basin. As described therein, impacts to biological resources are found to be less than significant with the implementation of Mitigation Measures BIO-MM-1 through BIO-MM-4. Refer to Response to Comment No. 17-41 for a discussion regarding analysis of focal and panoramic views of scenic resources. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 79-4

Wendy-Sue Rosen: Will you go to the Coastal Commission for permitting for the signs that will impact the Coastal zone.

Response to Comment No. 79-4

The Draft EIR conservatively assumes that Site Locations FF-29 and FF-30 are located within the jurisdiction of the Coastal Commission. Metro is pursuing a formal boundary determination from the Coastal Commission for the Site Locations FF-29 and FF-30. Should it be determined that these Site Locations are within the Coastal Zone, a Coastal Development Permit would be required for Site Locations FF-29 and FF-30 as described in Chapter II, Project Description, of the Draft EIR. Further as described in IV.I Land Use of the Draft EIR, the Project would not conflict with the applicable goals and policies of the Coastal Act. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 79-5

Wendy-Sue Rosen: How can you prohibit violent and other content (open to interpretation)? That would be a violation of the 1st amendment. The billboard industry is very litigious as the City of LA has experienced.

Response to Comment No. 79-5

The digital displays would be in compliance with Metro's System Advertising Content Restrictions which prohibits advertisement of alcohol, smoking, and cannabis, and any content containing violence, obscenities, and other related subject matters. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 79-6

Wendy-Sue Rosen: The City of LA has a billboard ban. How will this approval impact the ban and will it make it so the ban cannot be defended in court?

Response to Comment No. 79-6

As explained in Chapter II, Project Description, of the Draft EIR, new off-premise signage would be located within an adopted Sign District, Specific Plan, or Supplemental Use District, as excepted from the 2002 ban. As part of the Zoning Ordinance, the City would establish an “SN” Sign District designation for the TCN Structures. The Project would therefore not violate the City’s 2002 ban of new off-site advertising signs. Further, refer to Response to Comment No. 9-18 regarding the proposed Zoning Ordinance for the TCN Structures. The remainder of this comment regarding how the approval of this Project will impact the ban’s effectiveness is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 79-7

Wendy-Sue Rosen: How do these placements comply with the Highway Beautification Act?

Response to Comment No. 79-7

Refer to Response to Comment No. 17-53 regarding the Project’s compliance with the Highway Beautification Act.

Comment No. 79-8

Wendy-Sue Rosen: Some of the proposed locations are also proposed for adjacent or nearby housing development? How will the proposed signs impact these future projects and existing residentially zoned areas?

Response to Comment No. 79-8

Refer to Response to Comment No. 9-21 regarding the evaluation of existing and future residential uses in the vicinity of the proposed TCN Structures.

Comment Letter No. 80

TCN Community Meeting—October 7, 2022
Verbal Comments

Comment No. 80-1

Barbara Broide: Hello, Yes. Hi, Hi there! How are you? I'm good. I'm good. I'm good.

Because this program is called the Transportation Communication Network people don't realize what it intends to do. They don't know that they are digital billboards, and I think this is terribly disingenuous.

I don't know you know you're going through a process. That is kind of like the wolf in sheep's clothing, and it's very troubling. I also get tons of messaging from Metro, and going back to the EIR process, I sent a letter in after the fact. I was never notified of the scoping process, nor was anyone I spoke with uh, at neighborhood councils, plan, check and all over. So I get the impression that this process is an expedited process that seeks to avoid public comment and participation. And um, and this is, uh again a politically driven uh exercise to, to figure out how to generate revenue without engaging the public in an open and transparent manner. It concerns me.

Response to Comment No. 80-1

A Notice of Preparation of an Environmental Impact Report for the Project was published on April 18, 2022, followed by two public scoping meetings that were held on May 19, 2022 and May 21, 2022. Pursuant to CEQA Guidelines Section 15082, the Notice of Preparation was filed with the Office of Planning and Research and sent to all responsible and trustee agencies. Additionally, over 17,000 scoping meeting notices were sent to owners and occupants within a 750-foot radius of each proposed TCN Structure.

The Notice of Availability of a Draft EIR for the Project was published on September 9, 2022, followed by two public meetings on October 6, 2022 and October 7, 2022. Pursuant to CEQA Guidelines Section 15087, the Notice of Availability was published in the Los Angeles Times on September 9, 2022, as well as filed with the Office of Planning and Research and sent to all responsible and trustee agencies. Additionally, over 17,000 postcards containing the Notice of Availability were sent to owners and occupants within a 750-foot radius of each proposed TCN Structure.

The comment suggests that the Project is described in misleading terms. Chapter II, Project Description, of the Draft EIR, contains a description of the TCN Structures and their

purpose. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 80-2

Blue Falcon: Oh, hello, yeah. My name is Junior. I'm a resident of Southgate. I received an email to inform me about this meeting today, and I, I quickly jumped on, but I think I might have jumped on late. I just, I joined it around 1:08pm. Could you clarify for me? What time did the meeting start? And what is the purpose of this meeting? Is it just to address, uh, signage, uh, along the uh, I-7, -10 uh, uh, freeway, or can I ask, uh, other questions outside of that?

Response to Comment No. 80-2

This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 80-3

Kurt: Uh, Barbara had said, which, uh, like this, uh, notification to join this meeting kind of came out of nowhere, and I guess there was—I guess there was one yesterday. Um, but I, I did. I was not aware of that at all. So it does kind of seem a little shady.

Response to Comment No. 80-3

Refer to Response to Comment No. 80-1 regarding public notification on the CEQA process.

Comment No. 80-4

Kurt: Uh, you know that I, I, you guys are trying to get more funding and trying to diversify your funding sources, and you know the fewer questions that you have to answer the better. But at the same time, you know. Um, I really want Metro to be something that people associate positively, and you know ultimately freeway billboards isn't [sic] necessarily something that people feel very good about, uh, at all at the best of times, and I worry that uh Metro's logo being on them is going to negatively associate Metro to people who are in vehicles, uh, which you know.

Response to Comment No. 80-4

The commenter expresses general opposition to the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 80-5

Kurt: Obviously the, the goal is to get people out of their cars and onto some trains and buses. Um, and I don't know that this is necessarily going to help people do that. But, hey, you know, if it, if it's another few million dollars of the expected revenue per year. Um, and that improves service significantly. You know, I don't know. Maybe it'll be worth it.

Response to Comment No. 80-5

This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 80-6

Kurt: But uh, yeah, I guess my questions are in relation to how much, uh, money you guys expect to make from the sale of the billboards. Obviously, that'll change once the Olympics come around. But uh, how much you guys expect to make, you know, during a year off of these billboards, and then, you know, just kind of how much they cost in terms of revenue. I, I don't know anything about billboards, so you know, like, I, I'm wondering what the what the actual profits for Metro would be for, for this, because I mean if the billboards are expensive to build and to run—I don't know. I, I guess it's got to be worth it, right? It's still a sign. Um, but yeah, those are those are my questions.

Response to Comment No. 80-6

This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 80-7

Barbara Broide: Uh, thank you. I, I wondered, in terms of the presentation that was made, whether the speaker could address how this program relates to the full TCN program broader than L.A. City, because we don't really have a picture of the entire program. This

is just the L.A. City piece. Uh, yeah. I, I had read something a while ago about a three hundred, um, signed program.

Response to Comment No. 80-7

Implementation of the Project would include the installation of up to 34 Freeway-Facing TCN Structures and 22 Non-Freeway Facing TCN Structures all on Metro-owned property. The total maximum amount of digital signage associated with the TCN Structures would be up to approximately 55,000 square feet. As part of TCN Program, a take-down component would be implemented including the removal of at least 110,000 square feet (2 to 1 square footage take-down ratio) of existing off-premise static displays. The anticipated development from the Zoning Ordinance would be limited to the 56 TCN Structures, as well as the take-down of approximately 200 static displays located within the City.

Comment No. 80-8

Barbara Broide: We've got about three hundred static boards that will be coming down right? That I understand. I, I, You know, L.A. City has a recommendation from the city planning commission for a 10:1 takedown ratio for digital billboards and a 5:1 for statics. If you erect a static billboard they want five statics to remove the removed. So, um, I'll, I'll submit a comment about the takedown ratio as being inadequate the revenue that's generated.

Response to Comment No. 80-8

Refer to Response to Comment No. 9-25 regarding the take-down of existing static displays as part of the Project.

Comment No. 80-9

Barbara Broide: I'm sure you have revenue figures for how much the static billboards generate in a comparison between static and digital and the, the, the comparison market value is nowhere near, so that's [what] I mean. It's very nice to remove some billboards.

Response to Comment No. 80-9

This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 80-10

Barbara Broide: But also do you have a map that shows where the static billboards are being removed versus where the impacts are from the new billboards? I may have missed that I, I wanted to. Thank you. Thank you.

Response to Comment No. 80-10

As part of TCN Program, a take-down component would be implemented including the removal of at least 110,000 square feet (2 to 1 square footage take-down ratio) of existing off-premise static displays. The takedown locations would be located within the City of Los Angeles. The Zoning Ordinance would address the time, manner, and place aspects of the TCN Program, including the allowable locations, size and height limitations, urban design requirements, and applicable community benefits including take-down requirements for the removal of existing static off-premise signs. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 80-11

Call-In User 1: Good afternoon. Yes, I'm a stakeholder, and I have some issue that I hope, and perhaps you could at least direct me to advise if they are in the EIR. But some issues first, when I was notified of this, and just by the presentation, the pictures first thing it reminded me was of Las Vegas.

Response to Comment No. 80-11

This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 80-12

Call-In User 1: Um, I hope that there will be elements to make it not accessible, because that is an issue also regarding accessibility of the electricity. I know when riding Metro Subway, when I'm down in the underground and the platforms many of the billboard automatic billboards. I believe they're used for information for the Metro also, but there are advertisements.

Many of the people experiencing homelessness, they've removed the panels from the bottom, and there are chargers connected. I mean it's amazing once you're able to leave the actual train, to go up to the escalator sometimes can be an obstacle course trying to avoid these chargers. But is, is those type of—are those type of mechanisms going to be

considered for access at the bottom portion to avoid encampments being created around these structures?

Response to Comment No. 80-12

As described in Chapter II, Project Description, of the Draft EIR, each TCN Structure would include security features, including elevated ladders at surface grade that would only be accessible for maintenance purposes. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 80-13

Call-In User 1: Also regarding the advertisement, let me go back to the statement that the TCN Structures would comply with state and federal guidelines. Currently, ah, federal guidelines indicate that people like me assigned female at birth have no reproductive rights. So I really am concerned with what federal guidelines are regarding the, the advertisements will not include violence or obscene, uh, personal, personal comments. This whole project is obscene. So therefore it would not, uh, go forward regarding the advertisement.

Response to Comment No. 80-13

The digital displays would comply with Metro's System Advertising Content Restrictions, which prohibit advertisement of alcohol, smoking, and cannabis, and any content containing violence, obscenities, and other related subject matters. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 80-14

Call-In User 1: What is the ratio of actual traffic information that will be displayed to advertisements? For instance, in one hour. Could it be 10 minutes of actual, factual traffic information with 50 minutes of advertisements? What is the screen of this company? Brings you the following traffic report is that considered advertisement, or is that considered traffic information? I hope these issues will be addressed in future public arenas to allow public ____.

Response to Comment No. 80-14

As described in Chapter II, Project Description, of the Draft EIR, the digital display faces would be set to refresh every eight seconds and would transition instantly with no

motion, moving parts, flashing, or scrolling messages. The digital displays would comply with Metro's System Advertising Content Restrictions, which prohibit advertisement of alcohol, smoking, and cannabis, and any content containing violence, obscenities, and other related subject matters. Further, the Zoning Ordinance would address the time, manner, and place aspects of the TCN Program, including the allowable locations, size and height limitations, urban design requirements, and applicable community benefits including take-down requirements for the removal of existing static off-premise signs. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. 81

TNC Community Meeting—October 7, 2022
Chat Comments

Comment No. 81-1

Hutch Topikian: Good afternoon. I'm inquiring about making The Glendale Train Station a quiet zone or grade separated. This train station generates five times the public nuisance [sic] and noise pollution from train horns disrupting the peace and quiet to the residents of Atwater Village. This noise pollution is continual everyday 24 hours a day. This train station should at the top of the list of revamping. If your prime directive is public safety then you need to prioritize to give the residence the peace and quiet

Response to Comment No. 81-1

This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 81-2

Barbara Broide: As Metro currently yields income from the existing static inherited signs you are aware of their value in generating revenues. Digital signs generate significantly higher revenues and the City Planning Commission has recommended a 10:1 takedown for new signage in the City. 2:1? How was that determined? It is insufficient.

Response to Comment No. 81-2

Refer to Response to Comment No. 9-25 regarding the take-down of existing static displays as part of the Project.

Comment No. 81-3

Barbara Broide: You mention a partner for the program. Was there an RFP issued for this project?

Response to Comment No. 81-3

This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their

review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 81-4

Barbara Broide: What determined the 8 second refresh rate? CHanging [sic] messaging distracts drivers and are a cause of accidents. The project fails to acknowledge traffic safety studies done worldwide that demonstrate the dangers associated with digital changing messaging. The study which the DEIR cites has been criticized by traffic safety professionals and is not respected. METRO should review the recent study related to Texas traffic safety warnings on highways that demonstrated that even those signs (without commercial changing ads) cause traffic accidents. What has Metro done to assess not only the traffic safety dangers, but to evaluate the impact on the flow of traffic and the creation of delay?

Response to Comment No. 81-4

As described in Chapter II, Project Description, of the Draft EIR, the digital displays would be set to refresh every eight seconds and would transition instantly with no motion, moving parts, flashing, or scrolling messages. Illumination of the digital displays would conform to applicable Federal and State regulations for signs oriented towards roadways and freeways including Caltrans.

Refer to Topical Response No. 1, Transportation Studies, for a discussion further justifying the use of the studies that were included in Section IV.K, Transportation, and Appendix K, Transportation and Traffic Safety Review, of the Draft EIR. As described therein, the research selected found that a correlation between digital billboards and traffic collisions was “inconclusive at best.” Upon further review of additional research studies that were submitted during the Draft EIR comment period, none of the additional studies cited provided conclusive evidence that digital billboards cause traffic collisions. Nor do those studies undermine the conclusions of the Draft EIR and the studies relied on for the Draft EIR analysis.

Further, the comment requests additional evaluation of potential impacts related to vehicular traffic flow and delay. It should be noted that California State Senate Bill 743 (Steinberg, 2013) (SB 743), made effective in January 2014, required the Governor’s Office of Planning and Research (OPR) to change the California Environmental Quality Act (CEQA) guidelines regarding the analysis of transportation impacts to shift from driver/vehicular delay (level of service [LOS]) to vehicle miles traveled (VMT) in order to reduce greenhouse gas emissions (GHG), create multimodal networks, and promote mixed-use developments. Therefore, changes to driver delay are no longer applicable to

identify transportation-related significant impacts under CEQA and were not required to be studied.

The analysis of the potential transportation/traffic-related impacts of the Project is detailed in Section IV.K, Transportation, of the Draft EIR. The Project would not result in an increase in number of trips and therefore would result in no increase in VMT. Therefore, VMT impacts would be determined to be less than significant and mitigation measures would not be required. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 81-5

Barbara Broide: What reviews were done to evaluate the currently proposed locations vis a vis the City's high injury network? What were the criteria used to select the locations? Were factors such as the intricacies of traffic movements considered? The levels of congestion?

Response to Comment No. 81-5

Refer to Topical Response No. 2, City of Los Angeles Vision Zero, for a discussion of the Project's consistency with LADOT's Vision Zero policies aimed at eliminating traffic deaths by 2025. Additionally, Metro would continue to coordinate with Caltrans and LADOT on all necessary approvals for Project.

Comment No. 81-6

Kurt2: How much money does Metro expect to earn from selling advertisements of these new digital billboards?

Response to Comment No. 81-6

This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 81-7

Anonymous Attendee: One train because of an archaic infrastructure generates more public nuisance [sic] than 100 buses. Can't commission trains like buses. You're priority is to identify and recognize these areas and grade separate the Right of Way. Recognize that these horn cause serious health concerns to citizens and their peace and quiet [sic]

Response to Comment No. 81-7

This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 81-8

Barbara Broide: What has been done to assess the impacts that this program will have on the overall value (in advertising revenues) of other outdoor advertising programs in the City? While some might think that more signs equal more money, that is not necessarily the case. There are only so many advertising dollars to be spent in a marketplace (Disney will not produce more movies to take advantage of additional billboard availability) and at some point (what point is that), the Metro signs will devalue the City's transit shelter signage. Add to that the proposed IKE program public right-of-way signage proposed. Where is the evaluation of the cumulative impacts not only economically in terms of ad revenue yield, but in aesthetics and quality of life?

Response to Comment No. 81-8

As shown in Final EIR Chapter III. Corrections, Clarifications, and Revisions to the Draft EIR, the proposed Interactive Kiosk Experience (IKE) have been included to the related projects list. Further, the conclusions for the Project's cumulative analyses in Sections IV.A Aesthetics through IV.M Utilities–Electric Power do not change with the incorporation of the IKE Smart City Program. Therefore, inclusion of the IKE Smart City Program does not change the conclusions of the cumulative analyses of the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

The remainder of this comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 81-9

Barbara Broide: When it is stated that the signage is not to be placed in residential zones, that ignores the fact that the City (and State) have advanced programs to accelerate the development of residential housing on commercial corridors. Likewise, even industrially zoned land has been and will continue to be used for housing. The large 600 unit housing development adjacent to the Sepulveda EXPO line stop was light manufacturing land before that project was built. So, the claim that these signs are not near residences or will

not be near residences is not truthful and the nature of housing and housing development in LA must be acknowledged and addressed.

Response to Comment No. 81-9

Refer to Response to Comment No. 9-21 regarding the evaluation of existing and future residential uses in the vicinity of the proposed TCN Structures.

Comment No. 81-10

Hutch Topikian: Or at the least make these areas a Quiet Zone.

Response to Comment No. 81-10

This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 81-11

Barbara Broide: Some signs are to be placed in areas that fall within Coastal Commission authority. What has been done to assess the ability to obtain permits for the signs that you seek to place in environmentally sensitive [sic] locations? Impacts on the Wetlands in Ballona Creek watershed? Sepulveda Basin?

Response to Comment No. 81-11

The Draft EIR conservatively assumes that Site Locations FF-29 and FF-30 are located within the jurisdiction of the Coastal Commission. Metro is pursuing a formal boundary determination from the Coastal Commission for the Site Locations FF-29 and FF-30. Should it be determined that these Site Locations are within the Coastal Zone, a Coastal Development Permit would be required for Site Locations FF-29 and FF-30 as described in Chapter II, Project Description, of the Draft EIR. Further as described in IV.I Land Use of the Draft EIR, the Project would not conflict with the applicable goals and policies of the Coastal Act. In addition refer to Section IV.C, Biological Resources, for a review sensitive habitat located in the vicinity of the Site Locations. As described therein, impacts to biological resources are found to be less than significant with the implementation of mitigation. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 81-12

Barbara Broide: While other agencies have successfully restricted signage related to alcohol (and federal law restricts tobacco advertising, marijuana although it may be necessary to call out vaping, etc.), it is difficult to restrict other types of signage as the definition as to what constitutes, for example violence, is open to interpretation [sic]

Response to Comment No. 81-12

The digital displays would comply with Metro's System Advertising Content Restrictions, which prohibit advertisement of alcohol, smoking, and cannabis, and any content containing violence, obscenities, and other related subject matters. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 81-13

Barbara Broide: PLEASE EXPLAIN IN THIS PROGRAM HOW THE LA PROGRAM RELATES TO THE ADDITIONAL SIGNS IN THE COUNTY /BEYOND LA CITY. Total of 300 signs? Where is that in the environmental review process?

Response to Comment No. 81-13

As described in Chapter II, Project Description, of the Draft EIR, implementation of the Project would include the installation of up to 34 Freeway-Facing TCN Structures and 22 Non-Freeway Facing TCN Structures all on Metro-owned property. The total maximum amount of digital signage associated with the TCN Structures would be up to approximately 55,000 square feet. As part of TCN Program, a take-down component would be implemented including the removal of at least 110,000 square feet (2 to 1 square footage take-down ratio) of existing off-premise static displays. The anticipated development from the Zoning Ordinance would be limited to the 56 TCN Structures, as well as the take-down of approximately 200 static displays located within the City.

Comment No. 81-14

Barbara Broide: The Federal Highway Administration is responsible for administering the Highway Beautification Act. What involvement have they had in the review of these proposed signs? Do these signs comply with the Highway Beautification distancing requirements?

Response to Comment No. 81-14

Refer to Response to Comment No. 17-53 regarding the Project's compliance with the Highway Beautification Act.

Comment No. 81-15

Kurt2: How much does Metro expect installations of the billboards to cost?

Response to Comment No. 81-15

This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 81-16

Barbara Broide: I request a release of renderings of each proposed sign and its placement and how it will appear to communities and drivers passing by.

Response to Comment No. 81-16

In response to this comment requesting conceptual renderings, Chapter II, Project Description, of the Draft EIR has been revised to include Figure II-6 and II-7 as described in Final EIR Chapter III. Revisions, Clarifications, and Corrections of the Draft EIR. These conceptual renderings are for informational purposes only and provide a realistic estimation of what the TCN Structures may look like within the City. Additionally, aerial and ground level views of each Site Location are included in Figures III-1 through III-15 and Figures IV.A-1 through IV.A-15, in Chapter III, Environmental Setting, and Section IV.A, Aesthetics, of the Draft EIR, respectively. A site specific evaluation for each individual TCN Structure was performed and took into account each individual Site Location's environmental setting as well as attributes such as dimensions, digital display angles, height, and nearby sensitive uses including residential uses. Further, impact conclusions within the Draft EIR remain unchanged based on these renderings. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 81-17

Anonymous Attendee: Have any environmental impact studies been performed on your railroad regarding noise, public nuisance, [sic] noise pollution of the commissioning and operations of trains for commuter, passenger and freight?

Response to Comment No. 81-17

This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 81-18

Kurt2: Will Metro use these digital billboards to advertise travel times using Metro during peak traffic hours?

Response to Comment No. 81-18

As described in Chapter II, Project Description, of the Draft EIR, the TCN Structures would incorporate real time data collection to aid in traffic signal timing, micro-transit data, and Metro vanpool on-demand services. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 81-19

Barbara Broide: What has been done to request an analysis of the implications this program may have on the City's future ability to regulate signage? The courts have ruled to support the City's right to regulate signage via its 2002 sign ordinance. This program fails to meet qualifications for a sign district and thus could be used by outdoor advertising companies to challenge the City's right to continue to regulate offsite signage. What assesement [sic] has been done to determine the likelihood of that?

Response to Comment No. 81-19

As explained in Chapter II, Project Description, of the Draft EIR, new off-premise signage would be located within an adopted Sign District, Specific Plan, or Supplemental Use District, as excepted from the 2002 ban. As part of the Zoning Ordinance, the City would establish an "SN" Sign District designation for the TCN Structures. (The Project would therefore not violate the City's 2002 ban of new off-site advertising signs. Further, refer to Response to Comment No. 9-18 regarding the proposed Zoning Ordinance for the TCN Structures. The remainder of this comment regarding how the approval of this Project will impact the ban's effectiveness is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 81-20

Barbara Broide: What legal liability will Metro have if METRO has been warned that these digital billboards distract drivers and then there is an accident that causes a fatal accident or one with serious injury and the victims of those accidents go after Metro as having created an unsafe situation.

Response to Comment No. 81-20

Refer to Topical Response No. 1, Transportation Studies, for a discussion further justifying the use of the studies that were included in Section IV.K, Transportation, and Appendix K, Transportation and Traffic Safety Review, of the Draft EIR. As described therein, the research selected found that a correlation between digital billboards and traffic collisions was “inconclusive at best.” The comments cited additional research which claim to demonstrate the negative impacts of digital billboards on public safety and should nullify the results of the Draft EIR. Upon further review, none of the additional studies cited in the comments provide conclusive evidence that digital billboards cause traffic collisions. Nor do those studies undermine the conclusions of the Draft EIR and the studies relied on for the Draft EIR analysis. The remainder of this comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 81-21

Blue Falcon: Hello, my name is Mario Dominguez, Jr. thank you very much for repeating the overview. Now it all makes sense. Thanks again. Good job.

Response to Comment No. 81-21

This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 81-22

Anonymous Attendee: What is the estimated revenue to be generated by the advertisements? What is the percentage of Metro communications on display and commercial advertisements? Who reviews the advertisements?

Response to Comment No. 81-22

This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 81-23

Anonymous Attendee: How many comments has Metro' received thus far on this Draft EIR? Have comments received thus far been supportive of the propose "digital displays"?

Response to Comment No. 81-23

As shown in this section, a total of 81 comments on the Draft EIR have been received for this Project, some of which have been supportive. This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 81-24

Anonymous Attendee: Will Metro operate/maintain the billboards or hire out a billboard company to operate and maintain it, with the intent of Metro receiving a percentage of revenues? Please provide this information.

Response to Comment No. 81-24

This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 81-25

Barbara Broide: Comparisons of removed billboard locations vs. proposed billboards is needed.

Response to Comment No. 81-25

As part of TCN Program, a take-down component would be implemented including the removal of at least 110,000 square feet (2 to 1 square footage take-down ratio) of

existing off-premise static displays. The takedown locations would be located within the City of Los Angeles. The Zoning Ordinance would address the time, manner, and place aspects of the TCN Program, including the allowable locations, size and height limitations, urban design requirements, and applicable community benefits including take-down requirements for the removal of existing static off-premise signs. Further, the Site Locations of the proposed TCN Structures are included in Figures II-1 through II-3 in Chapter II, Project Description, of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 81-26

Anonymous Attendee: Who is the vendor that Metro intends to hire to operate/maintain the billboards? Will a procurement be issued to select the vendor?

Response to Comment No. 81-26

This comment is unrelated to the environmental review for the Project. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 81-27

Barbara Broide: Given the difference in income yield between static and digital signage and the hoped for revenues from the proposed signs, removal of the 200 static signs is not adequate.

Response to Comment No. 81-27

Refer to Response to Comment No. 9-25 regarding the take-down of existing static displays as part of the Project.

Comment No. 81-28

Barbara Broide: Is LA's General Plan and provisions to protect Scenic Roadways being respected or are any of these signs in conflict?

Response to Comment No. 81-28

Refer to Response to Comment No. 16-4 regarding a discussion of how overall the Project would not conflict with the applicable goals, objectives, and policies in the City's Mobility Plan.

Comment No. 81-29

Barbara Broide: Will these signs comply with all zoning requirements in the areas where located, such as height limits?

Response to Comment No. 81-29

The TCN Program is contingent on the adoption of a Zoning Ordinance by the City. The proposed Zoning Ordinance would amend the City's sign regulations in Chapter I of the LAMC to authorize the TCN Structures. The Zoning Ordinance would create a mechanism for the review and approval of the TCN Structures. The Zoning Ordinance would not authorize new signage other than the TCN Structures. The Zoning Ordinance would address the time, manner, and place aspects of the TCN Program, including the allowable locations, size and height limitations, urban design requirements, and applicable community benefits including take-down requirements for the removal of existing static off-premise signs. The Zoning Ordinance would not otherwise change the existing regulations for signs, including off-site and digital signage, in the City. Based on the above, the anticipated development from the Zoning Ordinance would be limited to the 56 TCN Structures, as well as the take-down of approximately 200 static displays located within the City. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. 81-30

Anonymous Attendee: Will political advertisement be permitted as well? Metro funding sources are usually public funds and are not permitted to be used for political campaigns.

Response to Comment No. 81-30

The digital displays would comply with Metro's System Advertising Content Restrictions, which prohibit advertisement of alcohol, smoking, and cannabis, and any content containing violence, obscenities, and other related subject matters. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration. As this comment does not address the contents or adequacy of the Draft EIR, no further response is warranted.

Comment No. 81-31

Barbara Broide: What efforts will be made to study proposed locations, to gather information about traffic flow and current conditions and accident data to then bear the responsibility to document continuing impacts and to remove signage if negative impacts related to public safety are seen? What process will be defined and how will it be

implemented and monitored? What assurances does the public have to travel safely on our streets?

Response to Comment No. 81-31

Refer to Topical Response No. 2, City of Los Angeles Vision Zero, for a discuss on of the Project's consistency with LADOT's Vision Zero policies aimed at eliminating traffic deaths by 2025. Additionally, Metro would continue to coordinate with Caltrans and LADOT on all necessary approvals for Project.