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Metro Board of Directors

January 25, 2023

via email

Re: Item #7 TCN Program - OPPOSE

Dear Metro Board:

The Hillside Federation, representing 46 resident and homeowner associations spanning the Santa Monica Mountains, opposes Metro's Transportation Communications Network program (TCN).

TCN is not about either transportation or communications. It's about digital advertising — on 97 huge billboards located along freeways and commercial corridors. It jeopardizes the City of Los Angeles 2002 Sign Ordinance which has been upheld in the courts numerous times.

Item #7 TCN must be pulled from the consent agenda and sent to the City of Los Angeles for properly noticed public hearings. Since all of the billboards are to be installed in the City of Los Angeles, it is the proper venue for approval.

Furthermore Los Angeles has many newly elected officials who must be give time to review the proposal and evaluate the impact it will have on their communities so that they can make an informed decision.

The Final Environmental Impact Report (FEIR) is fatally flawed and cannot be approved. It will never hold up in court. The City of Los Angeles and Metro entered into a Memorandum of Agreement (MOA) before the completion of CEQA analysis. The MOA also grants Metro the right to modify structures at a later time. CEQA requires a definite project description before the impact of a project can be properly analyzed in an EIR. Allowing changes to be made constitutes piecemealing which is illegal under CEQA.

The EIR did not adequately analyze the impact of billboards in areas of heavy traffic. Numerous studies have shown that accidents increase at intersections that have digital billboards with their constantly changing flashing lights.

The Hillside Federation urges you to reject this ill-conceived TCN project.

Sincerely,

Charley Mims

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