

February 11, 2020

Amy Brendmoen, Council President
Saint Paul City Council
15 Kellogg Blvd. West, 310 City Hall
Saint Paul, MN 55102

Letter of Support for Appeal of Billboard Relocation # 19-103-405

Dear Council Member Brendmoen and Council Members,

I am writing to express my opposition to the replacement of a standard billboard near the intersection of Hwy 94 and Hwy 280 with a dynamic billboard at that location.

The main purpose of a billboard is to try to get drivers to take their eyes off the road in order to read the billboard message. This billboard, if erected, would have a changing message every 12 seconds. The billboard industry tells advertisers “drivers won’t be able to avoid them,” but they tell regulators that “the signs don’t pose a safety hazard.”

Recently released information that city staff may not have considered is found in the following link: <https://www.scenic.org/wp-content/uploads/2019/09/billboard-safety-study-compendium-updated-february-2018.pdf>

Two industry-sponsored studies (from 2007) are often cited by the billboard industry as evidence that the proliferation of digital billboards poses no safety threat to the motoring public and are no more likely to cause traffic accidents than conventional billboards.

The compendium from February 2018 (cited above) is an objective, expert analysis of the two industry sponsored billboard studies prepared for the Maryland State Highway Administration by Jerry Wachtel, a highly regarded traffic safety expert. **His report is extremely critical of the conclusions and methodology of both industry-sponsored studies and effectively debunks them.** (Emphasis added.)

This compendium includes information with a particular bearing for billboards such as the one proposed for the highly confusing highway interchange located at the intersection of Hwy 94 and Hwy 280.

Several of the studies in this compendium suggest that the distraction caused by outdoor advertising signs could be tolerated by experienced drivers ... 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 (sudden lane change or hard braking by a lead vehicle) occurred and the driver had to respond quickly and correctly** (Emphasis added.)

In addition, 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 have more difficulty with rapidly shifting attention, poorer night vision and glare susceptibility, and slower mental processing time).

These concerns are heightened with an increasingly elderly driver population, increased traffic density, more road maintenance/repair (construction and work zones create added risks), **and larger, brighter digital and video roadside advertising signs** competing for the driver's attention.

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.”

In addition, the comments in the compendium about increased risk during road construction also bear emphasizing as MnDOT intends to rebuild the Hwy 94 and Hwy 280 interchange in the not too distant future.

If this dynamic billboard is approved, an irony in this whole issue would be that our government is spending huge amounts of money and law enforcement efforts to stop texting, yet is promoting distracted driving by allowing a dynamic billboard in a very treacherous stretch of Highway 94.

While the appeal of getting rid of 30+ (mostly small billboards) is very compelling, the long-term potential cost to the public in terms of traffic accidents, injuries and fatalities far outweighs the short term gain of the loss of the billboards proposed to be eliminated.

Thank you very much for your consideration of this additional information in opposition to the proposed dynamic billboard at the intersection of Highway 94 and Highway 280.

Thank you,

Keith Hovland
1476 Chelmsford St.
St. Paul, MN 55108