



**P.O. Box 30007 RPO Parkgate Village  
North Vancouver, B.C. V7H 2Y8  
[www.stopthebillboards.ca](http://www.stopthebillboards.ca)**

May 9, 2007

Indian and Northern Affairs Canada (INAC)  
Lands and Trusts Services  
600-1138 Melville Street  
Vancouver, B.C. V6E 4S3

Attention: Lisa Webster-Gibson  
Senior Environmental Specialist

Dear Ms. Webster-Gibson;

**Re: Squamish First Nation proposed billboard program  
CEAA Registry # 05-01-8868**

We're pleased to submit our formal comment with respect to the above referenced screening review, and to submit for your consideration a copy of our online petition which currently totals over 5000 names.

As you're aware our organization has been involved in the monitoring of this proposal for almost a year now.

Our purpose today will be to summarize our own findings with respect to the two most overriding considerations with respect to this proposal; (1) traffic safety and (2) negative impact on scenic heritage.

Firstly, our comments today are directly linked to your receipt almost 30 days ago of a "*Screening Level Environmental Assessment Study Report*" (*SLEASR*) by the Squamish First Nation proponent.

The primary purpose of that report was to identify and to address the potential environmental effects and proposed mitigation plans of the proposed billboard project. This review was managed under the auspices of your office and the *Canadian Environmental Assessment Agency (CEAA)*.

It's important that we highlight the fact that the *CEAA* defines environmental effect as:

- (a) any change that the project may cause in the environment, including any change it may cause to a listed wildlife species, its critical habitat or the residences of the individuals of that species, as those terms are defined in subsection 2(1) of the Species at Risk Act, and

- (b) any effect of any change referred to in paragraph (a) on
  - (i) ***health and socio-economic conditions***
  - (ii) ***physical and cultural heritage,***
  - (iii) the current use of lands and resources for traditional purposes by aboriginal persons, or
  - (iv) any structure, site or thing that is of historical, archaeological, paleontological or architectural significance
- (c) any change to the project that may be caused by the environment, whether any such change or effect occurs within or outside Canada.

Our first comment is directed toward the environmental impact as it relates to the projected degradation of “views”, or as the proponent describes in 6.2.12 of the *SLEASR Aesthetics – Viewer perception*.

CROA believe that when we degrade our surroundings, we also degrade our sense of who we are, where we came from and the values we hold in common. Scenic beauty has been a powerful force in shaping our local history, culture, philosophical and spiritual traditions. It should be noted once again, that this environmental component and the effect of the proposed billboards falls well within the definition of environmental effects as described above in (b)(i) & (ii). We believe that the Lower Mainland’s scenic heritage is fundamentally important to the continuation of our individual and collective well-being, to our economic prosperity, to a healthy environment, and to the quality of our everyday life.

The proponent has admitted that its own consultation program revealed an “*overwhelming majority*” of comments received suggested “*significant opposition*” to the proposed billboard project on the basis that the proposed signs would impair the beauty of the landscape. CROA can certainly attest to the proponent’s own findings on this issue. We found that there is an almost universal opposition to the project on the basis of an irreparable impairment of our scenic heritage, which many citizens believe is the foundation of our economic prosperity. Even the proponent admits once again that the “*impact of the project on this VEC (Valued Ecosystem Components) is significant, but most importantly indicated that these effects are not mitigable (Section 6.2.12)*”.

While much of the current debate has focused on the potential for increased visual pollution and its effects on unimpeded vistas of our coastal forested mountains and the inherent reduction in quality of life concerns, we believe that there are significant health and safety factors which continue to be ignored by the proponent.

Common sense, the courts and research all tell us that billboards are a highway safety hazard. In fact, billboards are designed and built for the specific purpose of distracting our attention as motorists. Outdoor advertising depends on the ability of roadside displays to pull the eyes of motorists off the road and onto billboards.

But according to the proponent’s *SLEASR, Section 6.2.14*, their consultant indicates that contrary to public perception the addition of tri-vision billboards as proposed, will not compromise driver safety, and therefore the *SLEASR* concludes “*that the impact of the project on this VEC is not significant*”.

CROA does not agree with this conclusion.

The *SLEASR* refers to a traffic assessment analysis by a consultant James Claus, (Founder and Director of an industry organization called Signage Foundation for Communications Excellence Inc.), in which the consultant declares that “no research has ever shown a causal link between outdoor advertising and traffic accidents”. In fact the consultant opines that “copious research has found the opposite – that signs often improve driver safety by “waking up” tired drivers and by providing guidance information”.( *SLEASR Appendix 4*)

CROA has undertaken much study and research on this issue and while we are aware of the convergence of onboard and in-vehicle technologies with external billboard electronic technologies we’re not aware of anything that might “wake-up” a driver. Furthermore, while CROA accepts the notion that federal and provincial highway signage often provides guidance information, the proposed signs will not. They are entirely for the benefit of advertisers for the off site marketing of services and goods, and have absolutely no benefit for driver guidance information.

Furthermore, contrary to the consultant’s conclusion that there is no evidence of any studies showing any causal link between billboard advertising and traffic safety, CROA respectfully refutes the consultant’s conclusions, and provides the following as evidence that such studies do exist. (See Appendix 1 through 8 hereto attached).

1. *Billboards in the Digital Age Unsafe (and Unsightly) at Any Speed*
2. *100 Car Naturalistic Driving Study*
3. *Transportation Synthesis Report*
4. *External to Vehicle Driving Distraction*
5. *University of North Carolina Highway Safety Research*
6. *Toronto-Billboard and Traffic Safety Issues*
7. *Research Review of Potential Safety Effects*
8. *Milwaukee County Stadium Variable Message Sign Study*

It seems obvious to CROA that the traffic study analysis undertaken by the proponent is, at best, inconclusive, and at the worst serves only to undermine the overall credibility of the *SLEASR* in general.

The fact is drivers can’t ignore billboards. As the Institute of Outdoor Advertising itself says, "Outdoor’s sheer physical size allows for eye stopping, bigger-than-life illustrations. It is virtually impossible not to notice the world’s biggest scoop of ice cream or shiny automobile. At night a billboard encounters no other visual to compete with the motorist’s attention. There is only eye stopping visual display emblazoned across the sky."

US Federal and state courts have long cited traffic safety as a legitimate basis for billboard regulation. For example:

- The U.S. Fourth Circuit Court of Appeals said, ". . . no empirical studies are necessary for reasonable people to conclude that billboards pose a traffic hazard, since by their very nature they are designed to distract drivers and their passengers from maintaining their view of the road." *Major Media of the Southeast v. City of Raleigh* (1987).
- Likewise, the California Supreme Court said: "We hold as a matter of law that an ordinance which eliminates billboards designed to be viewed from streets and highways reasonably relates to traffic safety." *Metromedia v. San Diego*.

In addition to the findings of the courts, a number of studies have been performed which indicate a relationship between billboards and traffic safety. In 1980 the US Federal Highway Administration did an extensive review of the research on the effects of billboards on highway safety. The study, titled *Safety and Environmental Design Considerations in the Use of Commercial Electronic Variable Message Signage* found "there is a positive correlation between the existence of signs and accident rates". Several other studies have found a statistical link between accident rates and billboards. The study that has most successfully isolated the variables is the *Study of the Relationship Between Advertising Signs and Traffic Accidents on U.S. 40 Between Vallejo and Davis* (1961 by D. Jackson Faustman). This study and a follow-up review concluded that advertising signs do have an effect on highway safety and that their existence adjacent to a highway causes accidents.

In 1984 The Wisconsin Department of Transport conducted an analysis of the incidence of accidents along a stretch of I-94 (See Appendix 8) following the installation of an electronic billboard. The analysis compared the crash rates three years before and three years after the installation of a variable message advertising sign. The purpose of the comparison was to assess whether the presence of the sign correlated with a change in the crash history. The results showed a significant increase in crash incidence of 35%. The Wisconsin DOT concluded that the EBB indeed had an effect on traffic safety, and the sign was removed.

Driver inattention is a major contributor to highway crashes according to the AAA Foundation for Traffic Safety. (See Appendix 5) Further, in a recent study the US National Highway Traffic Safety Administration estimated that at least 25% of police-reported crashes involve some form of driver inattention. Driver distraction is one form of inattention and is a factor in over half of these crashes. Distraction occurs when a driver "is delayed in the recognition of information needed to safely accomplish the driving task because some event, activity, object, or person within or outside the vehicle compels or induces the driver's shifting attention away from the driving task."

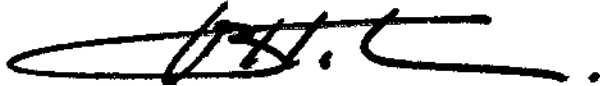
New billboards are being produced that are entirely digitized (using projection and similar techniques), allowing animations and completely rotating advertisements. Even holographic billboards are in use in some places. The point is that once the proposed billboards are in place, the "footprint" has been established, and technology will follow.

It is inevitable that safety problems related to driver inattention and distraction will escalate in the future if the proposed billboard project is approved. The introduction of

new technologies within the billboard industry together with new onboard driver assist systems will only compound the incidence of driver distraction and lead to unnecessary death and injury in our communities.

On behalf of many thousands of our concerned citizens we would respectfully request that such approval be denied, and we recommend once again that the Federal Government commit itself to an updated study of the potential safety effects of electronic billboards on driver attention and distraction on Canada's federal highway system.

Yours sincerely



Wayne Hunter  
Chair  
Citizens For Responsible Outdoor Advertising.  
604-929-0797

Copies

The Honourable Jim Prentice, PC, QC, MP  
Minister of Indian Affairs and Northern Development and  
Federal Interlocutor for Metis and Non Status Indians  
House of Commons  
Parliament Buildings  
Ottawa, Ontario  
K1A 0A6

Hon. Lawrence Cannon, Minister of Transport, Infrastructure & Communities, Canada  
Hon. Kevin Falcon, Minister of Transport, British Columbia  
Don Bell, MP, North Vancouver  
Blair Wilson MP, West Vancouver-Sunshine Coast-Sea to Sky  
Dan Jarvis, MLA, North Vancouver Seymour  
Katherine Whittred, MLA, North Vancouver Lonsdale  
Ralph Sultan, MLA, West Vancouver-Capilano  
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Jennifer Guscott – Regional Director General - INAC Pacific Region