

August 21, 2006

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

Dear Honourable Minister;

**Re: Squamish First Nation proposed billboard program
North Vancouver.**

I am writing today with regards to the proposed installation of several electronic billboards (EBBs) by the Squamish First Nation immediately adjacent to the Trans Canada Highway including all exits and entrances and the surrounding communities of the District of North Vancouver, the City of North Vancouver and the District of West Vancouver including bridge thoroughfares in the City of Vancouver. There is almost universal opposition to the introduction of these EBBs in our communities.

While much of the current debate has focused on the potential for increased visual pollution in an almost pristine environment with unimpeded vistas of our coastal forested mountains and the inherent reduction in quality of life concerns, I believe that there are significant health and safety factors which are being ignored.

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.

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 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. 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.


Interaction is an emerging theme in electronic billboards, with Britain at the forefront: in Piccadilly Circus the Coca-Cola billboard responds to the weather and responds with an animated wave when passersby wave at it. London movie theatres are experimenting with billboards which contain an embedded computer chip which can interact with the web browser found in many cell phones to provide more information on the subject of the advertisement. In the spring of 2004 in Times Square in New York City, a Yahoo! Autos promotion displayed on an LED billboard allowed one to call a phone number with a cell phone and play a two-person racing game where the cars appeared on the billboard. There are also upcoming billboard technologies that will synchronize with advertisements on radio stations.

It is inevitable that safety problems related to driver inattention and distraction will escalate in the future. 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.

Sir, your Ministry is now engaged in the oversight of an Environmental Review Process leading to a decision regarding the proposed installation of certain billboards in our

community. On behalf of many of our concerned citizens I would respectfully request that such approval be denied, and 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

A handwritten signature in black ink, appearing to read 'W. Hunter', with a large, sweeping flourish at the end.

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

Copies

Hon. Lawrence Cannon, Minister of Transport, Infrastructure & Communities, Canada
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