



Citizens for a Scenic Florida

Affiliate of Scenic America

President: William C. Jonson, 2694 Redford Court West, Clearwater, Florida 33761 (727) 786-3075

October 28, 2009

Ms. Juanice Hagan
Florida Department of Transportation
Office of Right of Way
605 Suwannee Street, Mail Station 22
Tallahassee, Florida 32399-0450

Dear Ms. Hagan:

The following comments are submitted in response to the email invitation sent by Wendy Deckerhoff on October 13, 2009 relating to the I-75 Pilot Project. They are based on a copy of the proposal that was posted on the Departments web site at <http://www.dot.state.fl.us.rightofway/documents/I75PILOTPROJECT1005209.pdf>.

1. Tri-visions: We respectfully, but strongly, object to the option of including tri-vision panels in the pilot project on nonconforming sign upgrades. Recently there has been a great deal of concern raised over driver distractions including a national conference sponsored by US Transportation Secretary LaHood this month. Tri-vision signs like digital billboards contain changing messages that distract the driver. Tri-vision signs unlike digital billboards require longer time to rotate from one message to another, and in this way are more motion distracting than digital billboards. We note that the South Carolina Department of Transportation pilot project does not include the option of tri-vision billboards.
2. Lighting: It is inappropriate to add lighting to signs as part of the program especially in otherwise unlighted areas along the highway. This would seem inappropriate for environmental reasons. We note that the South Carolina Department of Transportation pilot project does not include the option of lighting nonconforming billboards.

3. Steel Sunset: The upgrade of a nonconforming sign from wooden supports to steel supports is problematic for us as it significantly increases the lifetime of a nonconforming structure. At least there should be a time certain for removal of these structures using the OPPAGA Study lifetime. The City of Stuart utilized a time certain removal period as part of an agreement that allowed digital signs for a time certain period of 40 years. See <http://www.tcpalm.com/news/2009/may/18/stuart-approves-settlement-over-lamar-advertising-/>
4. Additional Incentive Suggestion: In order to create and maintain billboard free zones, we suggest an additional incentive credit be given to the removal of nonconforming billboards within jurisdictions that have outright billboard prohibitions in place in their communities.
5. Hamilton County: Hamilton County is at the gateway into this beautiful state. We believe that the first ten miles from the state line traveling south through Hamilton County should receive special attention as the focus of an enhanced beautification effort that would lead to the removal of all nonconforming billboards along that ten-mile stretch. Certainly existing nonconforming billboards in this initial section of the gateway entrance into Florida should not be enhanced or have their life span extended through conversion from wood to steel.
6. Removal Costs: We continue to be troubled by the inconsistent information on the cost of removal of billboards through the acquisition program within Priority One and Priority two sign areas. We observe multiple references to the lack of funds to accomplish the removal through acquisition of these boards. Yet we received evidence of FDOT negotiating deals for approx. \$10,000 acquisitions for 5 billboards, \$10k each. Now we observe reports that FDOT is paying as much as 5 to 12 times the amounts that were paid for the \$10K signs. All priority One and Two signs could be removed if the original acquisition prices were maintained; and by the way FDOT had appraised those signs at \$6K. Now FDOT is using a Gross Income Multiplier approach that has serious flaws, especially with the “multiplier” in the formula. We are concerned with the fiduciary responsibilities aspect of such different multipliers. If FDOT was not using inflated multipliers, the current rationale for the pilot program would vanish. FDOT has also used these funds to acquire Priority 3 signs, and thereby taking those funds away from removal of the targeted billboards.
7. Attrition: As part of the Pilot Project proposal FDOT is assuming zero attrition in perpetuity. This is unbelievable! Billboards that would be lost due to attrition over the next five years will now be used to enhance other nonconforming billboards along this 144-mile strip because of the pilot project.

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8. Procedural Matters: We have reviewed the Draft Proposal and the Department's Responses to Issues Raised at Public Meetings. We are particularly concerned with the inaccuracies in the proposal document with regard to procedural NEPA matters, and those inaccuracies should be corrected. We do not believe that the July 21 and 22, 2009 public meetings met the new statutory requirements that became effective on July 1, 2009 (Chapter 2009-187, §3, Laws of Florida), and there have been no public meetings since that time. If FDOT proposes to move forward without any further public meeting, the failure to comply with the provisions added to Section 120.525, Florida Statutes (2009), should be disclosed in the document sent to FHWA,

Thank you for the opportunity to comment on this proposal.

Sincerely,

William Jonson

CC: CSF Executive Board
Ms. Mary Tracy, President Scenic America