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Vista Sheriff's Department

University of CA San Diego
...and various community members

July 1, 2013

Kevin Ham, Economic Development Director
City of Vista
200 Civic Center Drive
Vista, CA 92084

Dear Mr. Ham:

On behalf of the North Coastal Prevention Coalition, we are responding to the Draft Initial Study/Mitigated Negative Declaration Report (the 'Report') regarding digital message boards published on June 3, 2013. As stated in the Report, comments from interested parties ***"should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the proposed project would be avoided or mitigated (p. 3)."***

The attached document includes NCPC's comments to specific sections of the Report. In general, we believe the Report is overly narrow in its discussion of 'environmental' impacts and lacks discussion and analysis of potential impacts of commercial advertising on the residents of Vista and surrounding communities.

NCPC has shared its concerns about the impacts of alcohol advertising on underage drinking on several occasions. There is strong research demonstrating the potential impacts of alcohol advertising on underage drinking and associated negative consequences. Permitting alcohol advertising on digital message boards that the City controls is in direct conflict with the stated purpose of the project:

"The purpose of the proposed project is to communicate city messages for benefit of the community. Messages will include public safety announcements, community events and amenities. The message boards will also generate additional revenue for the City of Vista. (p. 5) "

The short-term gains in revenue from alcohol advertising are over-shadowed by the significant social costs of advertising a product associated with the leading causes of death for teens and young adults (motor-vehicle crashes, homicides, suicides and unintentional injuries).

Sincerely,



Aaron J. Byzak, MBA, FACHE
President

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July 1, 2013

**NORTH COASTAL PREVENTION COALITION COMMENTS TO:
City of Vista Digital Message Boards – Draft Initial Study/Mitigated Negative
Declaration, June 3, 2013**

[NOTE: All highlighted sections are taken directly from the Report. NCPC comments are in response to those sections or statements highlighted in blue.]

[Page 1] Determination: The proposed project would result in potentially significant impacts associated with Biological Resources, Cultural Resources, Hazards and Hazardous Materials, and Transportation. Mitigation measures would be implemented to reduce these impacts to a less than significant level.

The Report lacks analysis of long-term impacts of the 'Revenue Generating Messages' proposed for this project.

[Page 5] Purpose and Need

The purpose of the proposed project is to communicate city messages for benefit of the community. Messages will include public safety announcements, community events and amenities. The message boards will also generate additional revenue for the City of Vista. The City has a population of close to 100,000 and is bisected by SR-78 which carries approximately 131,000 average daily vehicle trips on a typical weekday. The project would increase and diversify the City's available revenue sources. It is anticipated that the two digital message boards would generate between \$300,000 and \$400,000 in the first several years of operation.

The proposed project would involve the construction and operation of two new digital outdoor advertising LED message boards located along the north side of SR-78 on property owned by the City of Vista.

Both message boards would display paid commercial messaging, hereinafter referred to as "Revenue Generating Messages," as well as, city/public safety/community/civic content messages sponsored by the City, hereinafter referred to as "Public Service Messages." The City may utilize up to 15 percent of the message board display time for Public Service Messages. In times of emergency or public need, the City may determine that it is necessary to preempt some or all of the Revenue Generating Messages occurring on a particular day or days with Public Service Messages concerning the emergency or public need

The first purpose stated is "to communicate city messages for benefit of the community," yet there is no discussion or analysis of the variety of messages that would be contained on the digital message boards or what benefit they are likely to bring to the community. By stating the City 'may utilize up to 15 percent of the message board display time for Public Service Messages,' there does not appear to be a minimum guarantee for messages of community benefit.

4.18 Mandatory Findings of Significance

- a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?
- b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?
- c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

As currently being proposed, there are no prohibitions on alcohol advertising on the digital message boards. Below is an excerpt from a report prepared by Alcohol Justice to the City of Los Angeles, which is currently considering banning alcohol advertising on publicly owned land.

Alcohol is the number one drug of choice among youth of all ages, at federal, state, and local levels. Underage drinking is associated with academic failure, illicit drug use, tobacco use, and a range of harmful physical effects from hangovers to alcohol poisoning.ⁱ Alcohol is an estimated \$116 billion-per-year industry in the U.S., and underage drinkers are responsible for 20% of all alcohol consumed and for 19% (or \$22.5 billion) of alcohol industry revenues.ⁱⁱ

The connection between exposure to alcohol advertising and drinking in youth is well documented, from both the federal courts and extensive research findings:

- Alcohol beverage advertising influences underage consumption of advertised products.ⁱⁱⁱ
- The more alcohol ads kids see, the more likely they are to drink, to start drinking at an earlier age, and to drink more.^{iv}
- Exposure to alcohol advertising increases positive expectancies and attitudes about alcoholic beverages and drinking behaviors in youth populations, creating an environment that promotes drinking to youth.^v
- Advertisements promoting alcoholic beverages are pervasive, and oversight is left to ineffective self-regulation by the alcohol industry.^{vi}

In 2005, the alcohol industry spent more than \$2 billion on television, radio, print, outdoor, and newspaper advertisements. Outdoor advertising is a particularly attractive media buy for alcohol companies, because everyone, regardless of age, can see it. Billboards and other publicly

visible ads are a unique and distinguishable type of brand marketing that exposes the public to solicitation that is both involuntary and unavoidable.^{vii}

Even the most vigilant of parents cannot protect their children from exposure to out-of-home alcohol ads--they would have to keep their kids from doing things like walking or riding to school, riding the bus, riding in cars, and going to outdoor events.

Youth in markets with greater alcohol advertising expenditures drink more; each additional dollar spent on alcohol advertising raises the number of drinks consumed by 3%.^{viii} Other studies have reported similar relationships, including a 2006 study that found reductions in alcohol advertising could produce declines in adolescent alcohol consumption (e.g., a 28% reduction in alcohol advertising would reduce adolescent monthly alcohol participation from 25% to between 24 and 21%, and binge drinking from 12% to between 11 and 8%).^{ix}

5.10 Land Use and Planning

Would the project:

a) Physically divide an established community?

No Impact. Both proposed project sites are at the boundaries of currently developed parcels and highways. The digital message boards would not involve any physical changes that would have the potential to divide the established community. Therefore, the proposed project would not physically divide an established community. No impact would occur.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. All of the proposed project sites are zoned for commercial development, which is consistent with the proposed digital message boards project. The proposed project is allowed with a building permit and would comply with Outdoor Advertising Association of America guidelines to minimize light (see Section 5.1 Aesthetics for additional detail) and applicable highway safety regulations (see Section 5.16 Transportation and Traffic for additional detail) to minimize hazards. Additionally, the proposed project would comply with the City's Design Guidelines and any conditions of approval related to the building permit. Therefore, the proposed project would not conflict with any applicable land use plan, policy, or regulation. No impact would occur.

NCPC strongly disagrees with the conclusion in the Report that there would be no impact or conflict with any applicable land use plan.

Vista's General Plan, adopted in 2011, includes an introduction and several opportunities, including ***"Opportunity #6 –Address Health Concerns - Vista has the opportunity to become a leader in establishing community health as a city-wide priority."***

Vista's General Plan also includes a Healthy Vista Element, which states its purpose is ***"to incorporate health considerations into the City's policies, programs, decisions, and development activities, and to acknowledge and strengthen the relationship between planning decisions and public health outcomes"*** (p. 5-3). More specifically, it includes Healthy Vista Policy 1.11 – ***"Strive to reduce problems associated with alcohol and drug abuse when developing or altering programs, policies, and practices"*** (p. 5-5).

While NCPC acknowledges these sections of the General Plan may be considered 'optional' and non-regulatory, they were nonetheless developed based on research, public input, and future goals, and should not be ignored in the City's planning and policy development.

ⁱ U.S. Department of Health and Human Services. The Surgeon General's Call to Action To Prevent and Reduce Underage Drinking. U.S. Department of Health and Human Services, Office of the Surgeon General, 2007.

ⁱⁱ Foster et al (2003). Alcohol consumption and expenditures for underage drinking and adult excessive drinking. JAMA.

ⁱⁱⁱ Center on Alcohol Marketing and Youth (2004). Model statutory language restricting alcohol advertising and alcohol sponsorship. http://www.camy.org/action/Legal_Resources/Billboard_Model_Statute.pdf

^{iv} Anderson et al (2009). Impact of alcohol advertising and media exposure on adolescent alcohol use: A systematic review of longitudinal studies. Special issue: The message and the media. Alcohol and Alcoholism, 44, 229–243.

^v Austin EW & Knaus C. (2000). Predicting the potential for risky behavior among those "too young" to drink as the result of appealing advertising. Journal of Health Communication, 5, 13–27.

^{vi} Gomes L and Simon M. (2008). Why Big Alcohol can't police itself: A review of advertising self-regulation in the distilled spirits industry.

^{vii} Center on Alcohol Marketing and Youth (2004). Model statutory language restricting alcohol advertising and alcohol sponsorship. http://www.camy.org/action/Legal_Resources/Billboard_Model_Statute.pdf

^{viii} Snyder et al (2006). Effects of alcohol advertising exposure on drinking among youth. Archives of Pediatrics and Adolescent Medicine, 160, 18–24.

^{ix} Saffer H and Dave D. (2006). Alcohol advertising and alcohol consumption by adolescents. Health Econ., 15: 617–637.