



January 18, 2023

Gilroy Planning Commission
7351 Rosanna St.
Gilroy, CA 95020

Via email to: Manny.bhandal@cityofgilroy.org
planningdivision@cityofgilroy.org

Re: Electronic Billboards

Dear Chair Bhandal and Gilroy Planning Commissioners,

Santa Clara Valley Audubon Society and Sierra Club Loma Prieta Chapter expressed serious concerns about the electronic billboard project and provided comments on the environmental report. Please see the attached letter and documents referencing the relevant studies. The following is only a brief summary of the substantiated concerns.

- Electronic signs are, by design, intended to be viewed from a distance. By design, electronic billboards disrupt aesthetics and visual character, and produce day and nighttime illumination, light and glare.
- The Biological Report underestimates the potential impact to ecosystems. Recent scientific studies highlight the pervasive, cumulative, and harmful impacts of Artificial Light At Night (ALAN) to terrestrial and aquatic organisms, species, and ecosystems. The impacts, including effects on circadian rhythms, metabolism and behavior in fish, birds, insects, and other taxa, have been summarized in several recent publications in major scientific journals.
- Recent studies also implicate ALAN as one of the primary drivers of the global decline in insect numbers and diversity (the insect apocalypse).
- The IS/DNMD acknowledges that “migrating birds can be affected by human-built structures because of their propensity to migrate at night, their low flight altitudes, and their tendency to be disoriented by artificial light, which makes them vulnerable to collision with obstructions that could potentially lead to injury or mortality. In addition, birds migrating at night can be strongly attracted to sources of artificial light, particularly during periods of inclement weather”. The IS/DNMD provides two reasons why the “proposed electronic billboard would not have a significant impact on the movement of migrating birds” (IS/DNMD p. 41). These reasons and the findings are not supported by evidence.
- Open storm drains, irrigation channels and other flood management infrastructure features often connect habitat patches and provide pathways for animals to traverse an urban landscape.

This connectivity for wildlife is important to preserve biodiversity, and is easily disrupted by lighting. The Project is adjacent to the Princevalle Channel, which is currently a wildlife connectivity corridor and allows permeability between Uvas and Llagas creeks. The DMND provides no analysis of wildlife movement in the channel, dismissing impact to wildlife movement.

- “Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan” (IS/DNMD) cannot be mitigated because CEQA does not allow mitigation measures to depend on future disclosure of impacts and actual mitigation measures for NMD.
- The IS/DMND acknowledges that the project undermines driver safety but the impact and of this hazard is understated by the IS/DMND.
- While the IS/DMND lists the estimated 52,400 kilowatts/year of electricity and 6.6 megatons of CO2/year expected to be released into the atmosphere with the energy required for the billboards, the IS/DMND only states that it meets standards and does not prescribe mitigation for the greenhouse gas emissions in our current climate emergency.

We ask the City of Gilroy not to approve highway or road-facing electronic billboards. Instead, the city should develop an ordinance prohibiting such billboards city-wide. If the city persists in moving forward with this project, an EIR must be prepared.

Respectfully,



Gladwyn d'Souza
Conservation Committee Chair
Sierra Club Loma Prieta Chapter



Shani Kleinhaus
Environmental Advocate
Santa Clara Valley Audubon Society