



March 5, 2019

Ms. Jammie Robbins  
NC Department of Transportation - Environmental Analysis Unit  
20301 Mail Service Center  
Raleigh, NC 27699  
Sent via email: [jrobbins@ncdot.gov](mailto:jrobbins@ncdot.gov)

**North Carolina  
Chapter**

**Re: Modernization of outdoor advertising rules 19A NCAC 02E .0225**

**Regional Groups**

Dear Ms. Robbins:

**Blue Ridge**  
Boone

The North Carolina Chapter of the Sierra Club represents over 100,000 members and supporters in the state who care about the environment. We write to oppose the proposed changes to the modernization of outdoor advertising rules (19A NCAC 02E .0225) that would limit local ordinances and allow billboards with a state permit to be converted to digital and raised to 50 feet in height, even if such changes are not allowed by the applicable city or county ordinance.

**Cape Fear**  
Wilmington

Billboards are ads that all drivers are forced to see, whether they want to read or not. Digital billboards are like giant television screens, distracting to drivers, a nuisance to residents, and an eyesore damaging to the scenic beauty of North Carolina.

**Capital**  
Raleigh

We further oppose the proposed rule changes because the changes do not meet legislative intent. Based on the House debate, the bill sponsors did not intend for the 2013 bill (N.C.G.S. 136-131.2, Session Law 2013-413) to allow a billboard to be made larger or allow a billboard to be digitized.

**Central Piedmont**  
Charlotte

Instead, we support the considered "Alternative 2" described on page 6 of the agency's March 1, 2019, fiscal note. Alternative 2 would recognize local government ordinances and limit the changes that could be made to an existing billboard as part of modernization.

**Croatan**  
Morehead City

Alternative 2 as described in the fiscal note:

**Cypress**  
Greenville

"The second alternate is to further limit activities that industry could do as part of modernization. An example includes restricting companies to modernize from static to digital faces. Some local governments have more stringent rules associated with outdoor advertising regulations including moratoriums on allowing digital billboards. NCDOT considered excluding digital faces as part of modernization. NCDOT chose not to make this

**Foothills**  
Winston-Salem

**Headwaters**  
Durham

**Medoc**  
Rocky Mount

**Orange-Chatham**  
Chapel Hill

**Piedmont Plateau**  
Greensboro

**Pisgah**  
Brevard

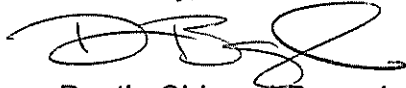
**Wenoca**  
Asheville



exclusion since the state already allows digital billboards and that industry should be allowed to accommodate for technology enhancements.”

We wish to protect the ability of local communities to control billboards, especially taller, digitized billboards that impact the scenic beauty of North Carolina and can be a distraction to drivers.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dustin Chicurel-Bayard', with a stylized flourish at the end.

Dustin Chicurel-Bayard

Interim Director, North Carolina Chapter of the Sierra Club