

## Overview and Response to June 21, 2017 Joint Planning Commission – Citizen Sign Code Committee Public Hearing and June 15, 2017 MPA-Chamber-SAHBA Letter

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The following is an overview and response to issues heard at the June 21, 2017 Joint Planning Commission and Citizens' Sign Code Committee (CSCC) public hearing on the June 2, 2017 draft of the Article 7A Sign Standards. At that meeting, after the Commissions closed the public hearing, there was discussion about the June 15, 2017 SAHBA/MPA/TMC letter. Some members of both groups said they thought the draft and the public review process were done well and were ready to vote on the June 2 draft and send it forward. At the same time, other members of both groups wanted to continue the meeting so that the letter could be reviewed more closely. In the end, it was agreed that the CSCC would meet on July 11 and review the June 15, 2017 letter more carefully, then they would join the Planning Commission on July 12 and discuss the letter and the entire draft as a joint group.

### PDSD Response to June 15, 2017 MPA/Chamber/SAHBA Letter and Items from June 21, 2017 Joint Public Hearing

At the June 21, 2017 joint public hearing of the Planning Commission and the Citizen Sign Code Committee, it was agreed upon for the joint bodies to postpone their votes to recommend the draft Sign Standards until July 12, 2017. To aid in the review of these issues, staff has prepared a summary of each of those issues with a response. These have been categorized into the following three categories: (1) items from the members of the joint Planning Commission / Citizen Sign Code Committee, (2) items from the speakers at the public hearing, and (3) items from the MPA-Chamber-SAHBA letter.

#### Items from the members of the joint Planning Commission / Citizen Sign Code Committee (response in bullets)

1. **Re-organize Master Sign Program** – Concerns from Commissioners Ench and McLaughlin related to the organization of the master sign program. Commissioner McLaughlin stated she would like to combine all of the sections of the Master Sign Program. Commissioner Ench stated that he did not see why the Singular Design Option was necessary and would like to have it removed.

- The organization of the Master Sign Program into three parts mirrors the permitting process to establish a consistency between the code and the regulatory processes.
- The Singular Sign Program was created as a more robust replacement for the integrated architecture option.
- The Singular Sign Program is a program designed to provide flexibility for one sign on a site.
- The Singular Sign Program is one for unique situations and is not intended for everyone to do; it is a longer process and the general standards already meet the majority of signage needs in the City.

#### Items from the speakers at the public hearing (response in bullets)

1. **5000% Reduction in Portable Signs for Real Estate Industry** – At the public hearing it was suggested that the amount of portable signage allowed for the Real Estate Industry was being reduced by 5000% in the new draft.

- This is a calculation based on the most extreme situation which assumes the need for the most amount of currently permitted signage (900 sf) to the smallest proposed category, which is residential zone on a

local street (16 sf). Under the current regulation, 900 sf could be used throughout the city, on one single-family lot, on a local street, with less than 300 linear feet of a single street frontage.

- This number also overlooks that the proposed Portable Master Sign Program will allow for up to what was allowed historically (900 sf), if proved to need that much. This process will allow both individuals and/or organizations to apply for the program.

Staff suggested changes to address issue:

- Create a minor review by the design professional for the Portable Sign Design Option.
- Create staff templates for applicants to use that could be used by organizations or individuals.

**2. Regulating Signs by Variance** – Several members of the public spoke about problems with the current code and how it forces them into requiring variances and that it hurts small business owners.

- Staff has developed the proposed Master Sign Program and Singular Sign Program to address this issue by allowing flexibility from the more restrictive general standards and essentially removing the need for variances.
- Additionally, the following clarifications and modifications in the proposed standards are designed to help to reduce the need for variances:
  - Parapet – Wall Sign clarification
  - More sign allowance for non-residential on arterials and collectors (20sf to 100sf)
  - Premise definition
  - Measurement for grade
  - Clearance, street frontage, and building frontage are clarified for projecting signs in pedestrian districts
  - Simplification of the Canopy Sign regulation
  - Historic Signs - allowing Wall Signs as a type of Historic Landmark Sign - allowing more sign allowance when in a commercial zone in an HPZ

**3. Non-conforming Signs** – The need to address non-conforming signs (grandfathering) and the current difficulties created by the existing sign code.

- The proposed June 2 draft has added a provision that allows for like for like electrical component swap outs addressing a well-documented problem with the current sign code.
- The proposed draft also has the Singular Sign Option, which can be used to bring non-conforming signs into conformance. It can function as a replacement for the old 20 and 20 regulation, which was allowed to sunset several years ago.

**4. Religious Institutions** – It was suggested at the public hearing that the existing code has placed an undue burden on religious institutions and forces them to require variances for their signage.

- Staff agrees this is a significant problem with the existing code and has addressed the issue in the following ways:
  - The proposed draft has added a provision to increase to 100sf from 20sf for non-residential (churches and schools) in residential zones on arterials and collectors.
  - The proposed draft has changed how we measure a cross.
  - Interior signs no longer count toward the site’s sign allowance.

**5. Signs and Technology** – A couple members of the public expressed concerns about how old the current sign code is and the need to have a modern code that addresses signs and technology.

- The proposed draft has a Master Sign Program.
- The proposed draft has increased the rate-of-change for signs from one-hour to five-minutes.
- The proposed draft allows for like to like electrical component swap out without bringing up to code.

6. **Scenic Corridor Issues** – It was suggested at the public hearing that the existing Scenic Corridor regulations are too restrictive and hinder economic development of those areas.

- Staff has developed the proposed Master Sign Program and Singular Sign Program to address this issue by allowing flexibility from the more restrictive Scenic Corridor standards.

7. **Master Sign Program Findings** – It was suggested at the public hearing that the findings are too subjective and may lead to uncertainty in the process

- Staff has reviewed the findings and believes they are an accurate reflection of the regulations in Section 7A.7.1. They provide a framework for an applicant to demonstrate compliance to the Sign Design Review Committee.
- Staff also acknowledges the term clutter may be seen as unclear and suggests a rewording of that finding to allow for a more certain and measurable finding.

8. **Overall Clarity and Simplification of the Sign Code** – It was suggested that the existing sign code is confusing and the proposed draft needs to address its overall clarity and simplify regulations when possible.

- Staff believes the proposed June 2, 2017 draft takes significant measures to improve the overall clarity and simplification of the Sign Code. The following are areas that have been addressed related to this:
  - Parapet – Wall Sign clarification
  - Premise definition
  - Measurement for grade
  - Clearance, street frontage, and building frontage are clarified
  - Clarified status of feather banners and commercial signs
  - Organized Maximum Sign Area by zones and Permanent Signs by zone into tables
  - Historic items
  - Use of Master Sign Program instead of variance(s) through the Board of Adjustment
  - Master Sign Program may be used for a PAD

Items from the MPA-Chamber-SAHBA letter (response in bullets)

#### 1. Section 7.A.1.1. PURPOSE

MPA-Chamber-SAHBA Recommendation - add bolded language below

**G. Ensure that signage functions and contributes to the retention of Tucson’s locally owned, small businesses.**

**H. Support signage that furthers Plan Tucson’s Focus Areas, Goals and Policies and the City of Tucson’s Economic Initiatives.**

**I. Recognize the importance of expedited review of signage as an element considered in business expansion and relocation, when consistent with Primary Jobs Initiative and other established City of Tucson economic initiatives.**

Staff Response

- The current purpose statement was discussed at length, and the current draft was voted on by the Joint Subcommittee.
- The key issues related to the *Reed vs. Town of Gilbert* case involved first amendment rights, property rights, visual environment and public safety.
- Staff has no objection to adding language related to Economic Development, but in general referencing a specific document that is required to be updated every 10 years is generally not a good idea. Staff supports consolidating the three statements into one that states the importance of Economic Development.

2. **Section 7.A.6.4.C. SIGN COPY CHANGE**MPA-Chamber-SAHBA Recommendation - change bolded language below

A digital sign is permitted to have a rate of change of sign copy, graphic, or information not more than once **every minute**. The digital sign copy shall not have any transitions or animations.

Staff Response

- The Joint Subcommittee and the CSCC have debated this issue.
- The final recommendation was for a change from a one-hour change rate to a five-minute change rate, which is reflected in the June 2 draft.
- Staff has no objection to either five-minute or one-minute rate-of-change.

3. **Section 7.A.6.5.A. SIGN HEIGHT MEASUREMENT ADD**MPA-Chamber-SAHBA Recommendation - add bolded language below

The sign height is measured as the vertical distance from the average finished grade, **(5' radius from the center of the sign)** beneath the sign to the topmost sign copy of the sign.

Staff Response

- The June 2 draft language is consistent with how PDSD measures average finished grades elsewhere in the Unified Development Code.
- The recommended language from the letter would create two different processes for measuring average finished grade.
- Staff recommends keeping the current proposed language.

4. **Section 7.A.6.9.C.1 & E.1 STREET AND BUILDING FRONTAGES**MPA-Chamber-SAHBA Recommendation - add bolded language below

**C.1. “, provided however that the zoning administrator may approve a transfer in whole or in part from one street to another when, in his or her judgment, that transfer will not be detrimental, given the profile of buildings, freestanding signs, and structures on the property and surrounding area.”**

**E.1. “, provided however that the zoning administrator may approve a less restrictive standard of the zone category when, in his or her judgment, a less restrictive zone category will not be detrimental, given the profile of buildings, freestanding signs and structures on the property and surrounding area.”**

Staff Response

- While there may be merit in the proposal, this was not discussed during public review.

- Creating a whole new process such as this requires significant time for input and review.
- This issue could be reviewed by the Sign Design Review Committee (SDRC) as part of its authority to review sign text amendments for the Planning Commission during the 18-month sunset period.

5. **Section 7.A.6.10. SIGNS IN OR OVER PUBLIC RIGHTS-OF-WAY**

MPA-Chamber-SAHBA Recommendation - add bolded language below

**“SPECIAL LICENSES”**

**J. When consistent with the purpose and intent of Tucson Sign Code, the Mayor and Council and/or City Manager may grant special licenses for signage based upon new information, changed circumstance, Tucson voter and City Council approved initiatives.**

Staff Response

- This is the current regulation from the existing Chapter 3 Sign Code.
- In reviewing this matter with our legal advisors, staff believes this clarification may not be needed.
- It could be an issue that can be reviewed by the SDRC during the 18-month sunset period.

6. **Section 7.A.6.11. PREMISE**

MPA-Chamber-SAHBA Recommendation - add bolded language below

“Commercial shopping centers, office complexes, commercial or industrial subdivisions, or similar development are a premise to the extent such lands are identified as a single site and/or one or more development plans or **packages, parcels or ownerships.**”

Staff Response

- Premise definition was discussed and voted upon by the Joint Subcommittee and the Citizens Sign Code Committee to keep the current wording.
- There may be some merit to the proposed idea, but we believe more discussion and review are needed.
- This can be monitored during the 18-month sunset period to see if the Premise or the spacing provision needs to be modified.

7. **Section 7.A.6.12. ILLUMINATION**

MPA-Chamber-SAHBA Recommendation – replace with bolded language below

**All signs may be illuminated subject to the provisions of Tucson code.**

Staff Response

- This is the current regulation from the existing Chapter 3 Sign Code.
- The removal of the text, “unless otherwise prohibited in the sign standards,” could lead to less ability to regulate illumination and light pollution.
- This idea was presented to and discussed by the Joint Subcommittee and was not supported.

8. **Section 7.A.7.1. MASTER SIGN PROGRAM – PERMANENT SIGNS**

MPA-Chamber-SAHBA Recommendation – change and add bolded language below

A. Purpose. The purpose of this section is to respond to special permanent sign needs of a premise as well as provide **flexibility, encourage development in designated growth areas** and promote superior sign design to implement the purpose of this article.

Staff Response

- The term ‘designated growth area’ is not in the Unified Development Code as a regulated area with specific boundaries.
- This has not been discussed up to now, or during the Joint Subcommittee public review process.
- This item needs for time to be reviewed and discussed; it could be something reviewed during the 18-month sunset period.

9. **Section 7.A.7.1.E.3. Wall-mounted Signs**

MPA-Chamber-SAHBA Recommendation - add bolded language below

d. For all wall-mounted signs, an organized, proportional appearance is required among the signs of a building or tenant space. Disorganized sizes and color arrangements in the signs’ appearance on a specific building or tenant space is to be avoided. **However, publicly recognized business logos which may include in their graphic standard, a logo or graphic element, typeface or font, and branded color may be used.**

Staff Response

- Staff has no objection to this language, but does not believe it is necessary.
- The current June 2 draft mentions registered trademarks but is not intended to prohibit logos.
- Staff is willing to add language to recognize business logos either in the draft or as part of the preparation of the PDSD application checklist.

10. **Section 7.A.7.1.F. Best Practice Option**

MPA-Chamber-SAHBA Recommendation - add bolded language below

1.a. An already approved permanent sign, master sign program with the **City of Tucson Metropolitan Statistical Area or an analogous project from which directly relevant comparisons may be made.**

Staff Response

- Staff believes this would likely be unnecessary.
- There is already a process that that allows an applicant to present to the Design Professional a Master Sign Program.
- The Design Professional can verify that the example Master Sign Program is consistent with the purpose statement and design standards of the City’s sign standards.

11. **Section 7.A.7.1.G. Findings**

MPA-Chamber-SAHBA Recommendation – change and add bolded language below

**l. The decision should show how the sign program addressed the following applicable findings:**

- g. Acknowledges significant scenic views.**
- h. Improves the affected street.**

Staff Response

- Staff does not recommend using the word ‘should’ in a finding.

- In consulting with our legal advisors, our position is a finding needs to be definitive and factual in the case that a finding may be substantive information if an application was appealed or if the case were to go to court.

12. **Section 7.A.7.1.E. MASTER SIGN PROGRAM – PERMANENT SIGNS – Design Standards**

MPA-Chamber-SAHBA Recommendation - remove highlighted sections below and add height cap

E. Design Standards

1. All signs

a. **DELETE**

b. **DELETE**

c. **DELETE**

2. Ground-mounted Signs

b. Sign Height

**(4) The Master Sign Program may allow an increase of up to 100% based upon providing adequate visibility, legibility and improved vehicle reaction time when an increase is deemed compatible with the surrounding area.**

Staff Response

- The Joint Subcommittee and Citizens Sign Code Committee reviewed and voted on the issue and decided to recommend keeping this language and removing the height cap.
- This provision does not limit a business from using federally registered trademark sign copy or sign copy colors, but provides simple design standards for utilization of the Master Sign Program.
- Staff leaves it up to the discretion of commission if they would like to add the cap back in.

13. **Section 7.A.7.2.B. APPLICABILITY**

MPA-Chamber-SAHBA Recommendation - add bolded language below

**Applications under the Master Sign – Portable Sign program that comply with standards in place at the time of new code adoption shall receive automatic approval.**

Staff Response

- Staff has discussed this matter with our legal advisors and we have concerns about this provision.
- It appears to create an arbitrary standard without any sign clutter controls and may potentially override both the June 2 draft’s portable sign general standards and the Master Sign – Portable Sign Program, making them irrelevant.
- The June 2 draft has a sound legal strategy and allows flexibility to property owners understanding the need to operate in a content-neutral environment.

14. **Section 7.A.9.2. CHANGE OF USE**

MPA-Chamber-SAHBA Recommendation - add bolded language below

**14. Medical / Health-related**

Staff Response

- Staff has no objection to this language, but does not believe it is necessary.

- This regulation comes from existing language in the Chapter 3 Sign Code and is based on occupancy categories used in building codes.
- Any change in this section would have to be consistent with the occupancy categories used in those building codes, as it impacts non-conforming signs.

15. **Section 7.A.10. SIGN TYPES AND GENERAL STANDARDS**

MPA-Chamber-SAHBA Recommendation - add bolded language below

Standards in special districts, **when not in conflict with Plan Tucson, may supersede the regulations for the underlying zone or general requirements for the sign type. Master Sign Program applications will be considered within the context of the Special District, Plan Tucson, and other applicable City approved policies.**

Staff Response

- Staff agrees that a clarification would be helpful in clarifying the relationship between a Master Sign Program and a sign special district.
- Adding the language, “unless stated herein” or similar language at the end of the first paragraph would clarify.
- Any additional changes may require more time to review and discuss during the 18-month sunset period.

16. **Section 7A.10.1. GENERALLY PERMITTED SIGNS**

MPA-Chamber-SAHBA Recommendation – remove text where bolded language is below

C. Interior Sign Exception “**DELETE...** A wall-mounted permanent or portable sign, that is within a premise’s boundaries, outside a building or enclosed area, viewable from the right of way, and has a sign area greater than twelve square feet, is counted as part of the applicable sign types’ maximum sign area. **DELETE...**”

Staff Response

- The existing language was recommended and voted upon by the Joint Subcommittee and the CSCC.
- Staff believes this provision is reasonable way to mitigate noise when adjacent to residential property.
- If it is not needed, it can be reviewed during the 18-month sunset period.

17. **Section 7A.10.2. PERMANENT SIGNS – ZONE CATEGORY STANDARDS**

MPA-Chamber-SAHBA Recommendation - add bolded language below to table

**7. Businesses allowed within residential zones, such as churches and schools, should be considered as part of the General Business category.**

Staff Response

- This issue was reviewed by the joint subcommittee and has been presented to the Planning Commission and Citizen Sign Code Committee at study sessions.
- The recommendation reflects a compromise of allowing 100 sf of signage for non-residential uses on arterial or collector streets but to require the current 20 sf provision for non-residential uses on local streets.
- If the June 2 language is shown to be still inadequate, that information can be reviewed during the 18-month sunset period.

## 18. Section 7A.10.2. PERMANENT SIGNS – ZONE CATEGORY STANDARDS

MPA-Chamber-SAHBA Recommendation - add bolded language below

All Permanent Signs

1. On building having more than one street frontage, the maximum allowable number and square footage of on-site signs area permitted for each street frontage. The maximum allowance however is not transferable either in whole or in part from one street frontage to another. **Provided however, that the zoning administrator may approve a transfer in whole or in part from one street to another when, in his or her judgment, that transfer will not be detrimental, given the profile of buildings, freestanding signs, and structures on the property and surrounding area.**

Staff Response

- While there may be merit in the proposal, this was not discussed during public review.
- Creating a whole new process such as this requires significant time for input and review.
- This issue could be reviewed by the Sign Design Review Committee (SDRC) as part of its authority to review sign text amendments for the Planning Commission during the 18-month sunset period.

## 19. Section 7A.10.2. PERMANENT SIGNS – ZONE CATEGORY STANDARDS

MPA-Chamber-SAHBA Recommendation – remove text and change where bolded language below

All Permanent Signs

1. Illumination and color: Signs on arterial and collector streets **DELETE should** not be illuminated between the hours of 10:00 p.m. and 7:00 a.m. Signs located on a local street frontage **should** not be illuminated. Color schemes for all sign components, including copy, **DELETE should consider** compatibility with surrounding residential areas.

Staff Response

- This is the current regulation from the existing Chapter 3 Sign Code.
- This item was not presented or discussed during the public review process up to now.
- The removal of the text could lead to less ability to regulate illumination and light pollution.

## 20. Section 7.A.10.2.C. PERMANENT SIGNS

MPA-Chamber-SAHBA Recommendation – remove where bolded language below

1. Sign Types A through E

a. Access point sign. An on-site sign located at or near the access point or other wayfinding location providing information or directing the reader to the location or direction of any place or area. This sign type is not permitted **DELETE** in the historic district.

Staff Response

- This provision is from the existing Chapter Three Sign Code.
- Staff believes there may be merit in allowing access signs in certain situations.
- Staff defers to the joint commissions as to whether they would like to modify this section.

## 21. Section 7.A.10.2.C. PERMANENT SIGNS

MPA-Chamber-SAHBA Recommendation – remove where bolded language below

## 2. Sign Types F through O

One freestanding sign for each street frontage.

One additional freestanding sign on that street frontage for each additional one hundred fifty ((150) feet of street frontage in excess of the first three hundred (300) feet.

**DELETE**

Staff Response

- This is the current regulation from the existing Chapter 3 Sign Code.
- This item was not presented or discussed during the public review process up to now.
- This item can be monitored during the 18-month sunset period.

22. **Section 7.A.10.3. PORTABLE SIGNS**MPA-Chamber-SAHBA Recommendation – add bolded language below

**Premises with street frontage of 150 feet or greater, regardless of zone or street type are allowed an additional 32 square feet of signage per 150 feet - not to exceed 900 square feet of total signage. The combined signage may be used either on the premise or off premise as part of the permit application.**

**Premises with more than one building permit are allowed an additional 16 square feet of signage per building permit in addition to the base amount of signage as determined by zoning & street type – not to exceed 900 square feet of total signage. The combined signage may be used either on the premise or off premise as part of the permit application.**

Staff Response

- This item was not presented or discussed during the public review process up to now.
- The Joint Subcommittee and CSCC ultimately voted to support the provisions in the June 2 draft.
- Staff believes the Sign Design Option is a reasonable option to allow for the signage needs of the Real Estate industry and would be willing to work with them to develop templates to be used.

23. **Section 7A.11.1 SPECIAL DISTRICTS**MPA-Chamber-SAHBA Recommendation – add bolded language below

The sign standards in historic, pedestrian and scenic corridor districts take precedence over the sign standards listed above in Sec. 7A.10 (Sign Types and General Standards). **Master Sign Program applications take precedence over special districts when consistent with voter-approved Plan Tucson.**

Staff Response

- Staff agrees that a clarification would be helpful in clarifying the relationship between a Master Sign Program and a sign special district.
- Adding the language, “unless stated herein” or similar language at the end of the first paragraph would clarify.
- Any additional changes may require more time to review and discuss during the 18-month sunset period.

24. **Section 7.A.11.3. SCENIC CORRIDOR ZONE (SCZ) DISTRICT**MPA-Chamber-SAHBA Recommendation – remove and change language where bolded below

A. Location: The scenic corridor zone (SCZ) district includes any portion of property or parcels within (200) feet, measured in any direction, **from the center line of DELETE existing** right-of-way **DELETE** of a scenic route, as designated on the Major Streets and Routes (MS&R) Plan map. **DELETE Only the portion of DELETE the development that** is within the SCZ district, **DELETE** will be treated for sign purposes, as **DELETE** within the SCZ district.

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E. Permitted signs: CHANGE

3. Freestanding signs, monument and low profile only.

a. Maximum number per premises, **consistent with the General Business District:**

(1) Scenic Route: One (1) for the first **three hundred (300)** feet of scenic route street frontage with one (1) additional sign for every **one hundred fifty feet (150)** of additional scenic route street frontage.

(2) Arterial street: One (1) for the first **three hundred (300)** feet of arterial street frontage with one (1) additional sign for every **one hundred fifty feet (150)** of additional arterial street frontage.

(3) Collector street: One (1) for the first **three hundred (300)** feet of collector street frontage with one (1) additional sign for every **one hundred fifty feet (150)** of additional collector street frontage.

Staff Response

- This is the current regulation from the existing Chapter 3 Sign Code.
- The Joint Subcommittee and the CSCC voted and recommended not to change the Scenic Corridor regulations.
- The proposed Master Sign Program allows for relief from the current regulations of the Scenic Corridor.

25. **Section 2.2.12 SIGN DESIGN REVIEW COMMITTEE**

MPA-Chamber-SAHBA Recommendation – add bolded language below

C. Composition. The committee shall be composed of the following nine (9) members who shall serve without compensation. Members shall include:

Architect **or Planner**

Outdoor Lighting Committee Representative **or Astronomy or Aerospace Representative**

**Sign Industry Representative**

Local Business Representative **or Site Selector or Economic Development Representative**

A Planner **or a Commercial or Residential Land Owner in a Designated Infill Incentive District or City Designated Growth Area**

A Portable Sign Expert (i.e. Commercial Real Estate Broker) **or a Residential or Commercial Real Estate Agent or Broker**

City Manager At-Large Appointment General Neighborhood Association

An Ad Hoc Neighborhood Representative appointed by a neighborhood association within 300 feet of the location of the subject property submitting the application

Staff Response

- Staff has no objection to having similar professionals being part of the SDRC.
- We believe the following additional sentence may address this: “The City Manager may appoint a professional or stakeholder with a similar background to the above listed committee members.”

- Staff defers to the joint commissions as to whether they would like to modify this section.

26. **Section 11.4.7. DEFINITIONS – FREEWAY**

MPA-Chamber-SAHBA Recommendation – add bolded language below

**Freeway – Designated interstate roadways, including frontage roads adjacent to interstate freeways, ADOT designated State Routes and PAG Regionally Significant Corridors.**

Staff Response

- This item was not presented or discussed during the public review process up to now.
- It is our understanding this proposal includes more than interstates and would include roads such as Oracle Road and Houghton Road.
- This issue could be reviewed by the Sign Design Review Committee (SDRC) as part of its authority to review sign text amendments for the Planning Commission during the 18-month sunset period.

27. **Section 11.4.17. DEFINITIONS – PARAPET**

MPA-Chamber-SAHBA Recommendation – change bolded language below

**Parapet – An integrated wall component of an exterior building surface thirty (30) degrees or less from vertical.**

Staff Response

- This item was the topic of a considerable amount of discussion from the Joint Subcommittee and the Citizen Sign Code Committee.
- The Joint Subcommittee asked Commissioner Cook to review the issue with staff, which is reflected in the June 2 draft.
- Staff believes the status of parapets has been addressed by the re-defining of roof and wall signs.

28. **Section 11.4.24 DEFINITIONS – WALL**

MPA-Chamber-SAHBA Recommendation – add bolded language below

**Wall – An exterior building surface thirty (30) degrees or less from vertical, including affixed to interior and the exterior of window and door surfaces, including a parapet.**

Staff Response

- This item was the topic of a considerable amount of discussion from the Joint Subcommittee and the Citizen Sign Code Committee.
- The Joint Subcommittee asked Commissioner Cook to review the issue with staff, which is reflected in the June 2 draft.
- Staff believes the status of parapets has been addressed by the re-defining of roof and wall signs.

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