

City of Tucson Planning Commission –
Citizen Sign Code Committee
Joint Subcommittee on Sign Code Revision
201 North Stone Ave.
Tucson, AZ 85701



November 4, 2016

info@apss-az.org

Dear Members of the Joint Subcommittee:

The consortium of professional research organizations that rely on Arizona dark skies, APSS, wants to make a few points with respect to your considerations about revising the City of Tucson Sign Code:

- We represent a significant economic sector in Southern Arizona.
- We strongly urge separating the pace of the revisions necessitated by *Reed v. Town of Gilbert* from those of process and other major changes, out of concern for the unintended consequences of substantially increasing glare from lighted signs.
- We encourage you to include the protection of the dark night sky in the statement of purpose, so that it is a clear aspect of maintaining the character of Tucson.
- We also encourage the inclusion of the already mature language about electronic message centers, and any revisions that will have the effect of reducing the amount of artificial sky glow.

Attached is a previous economic impact study for our professional research enterprise. We note that the \$250M per year impact is statewide, but with a substantial concentration in Southern Arizona. It is ongoing: NASA and the Department of Energy have each recently committed tens of millions of dollars for reinvestment in Kitt Peak instrumentation, based on its being a dark sky site. The astronomy, planetary, and space science enterprise has been a strong driver for other key industry sectors, such as the Optics Industry. It also impacts the tourist industry. The annual figures for the Kitt Peak Visitor Center show 8647 public visitors and 7674 visitors participating in the nightly programs. (These do not count local school groups and other more local impact.) The Mt. Lemmon Sky Center attracts some 2000 out-of-town visitors annually. Astro-tourism is called out as an attraction on the Visitor Bureau website. All these economic drivers are obviously dependent on the public commitment to protect the regional asset of dark skies.

We are concerned that unintended consequences of rapidly adopted changes will lead to considerably more unshielded light. The Outdoor Lighting Code currently places no limits or zone restrictions on the lighting of internally illuminated signs. Several provisions under consideration in the new draft relax restrictions on the size and placement of such signs or even

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change the definition of whether an object is considered a sign, depending on its location. More and larger lighted signs, with some potentially unregulated, will produce more sky glow. We urge careful deliberation about the substantive proposed changes, not coupled to the pressure of the fast track revisions required for compliance with *Reed v. Town of Gilbert*.

Since cities clearly retain the right to regulate signs for stated governmental purposes, we encourage the inclusion of dark sky protection explicitly as part of the statement of purpose. Commissioner McLaughlin's suggested phrasing of that point captures the intent:

* protect the natural resource of dark night sky from the glare of improperly controlled sign illumination for the benefit of the world renowned and economically vital astronomy and space science research enterprise, amateur astronomers, and the public at large;

We understand that it is the intent to include previously considered provisions for electronic message centers, and encourage that intent to be realized. With adequate time for consideration, other provisions for reducing sky glow can be included in the Sign Code or the Outdoor Lighting Code to accompany and offset any major lighting increases allowed in the revised Sign Code itself.

Thank you for considering our requests.

With best regards,

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