

Staff Analysis:

The current proposed 7A Sign Standards Singular Sign Design Option, provides a process in which signage can be transferred from one street frontage to another after review by the Sign Design Review Committee.

This process will allow for reasonable review and transfer of signage that should prevent unwanted light trespass issues or an abrupt commercial intrusion into a residential area. There may be other unintended consequences that could occur with other transfer requests. If a general standards' signage transfer is allowed, a modification of the MPA et al recommended language is suggested, whereby the Zoning Administrator has the option to send the request to the Sign Design Review Committee for a review and recommendation.

Regarding the corner sign, the referenced section in the letter is intended to ensure proper spacing of signs along frontages. However, language may be changed to 7A.6.9.D.3 so that sign area is only deducted from one of the street frontages and is not counted twice.

The following changes to the proposed sign standards reflect that suggestion:

7A.6.9. STREET AND BUILDING FRONTAGES

C. Multiple Frontage Lots

On corner lots and other lots with more than one street frontage, the maximum allowable number and square footage of on-site signs are permitted for each street frontage. The maximum allowances, ~~however, are not~~ are only transferable either in whole or in part from one street frontage to another if the Zoning Administrator determines the request will not negatively impact surrounding properties. The Zoning Administrator may send the request to the Sign Design Review Committee for review and recommendation.

D. Intersection Corner Sign

1. When a sign is erected at the street intersection corner of the lot and is placed in such a manner so as to be readable from both streets or both frontages, the sign shall not exceed the maximum area allowed for the longest street frontage;
2. The sign shall count as one sign for each street frontage; and,
3. The area of the sign shall be deducted from the allowable sign area for ~~each the~~ longest street frontage.

E. Signs per Street Frontage

General rule: For a premise having more than one street frontage, the maximum **sign area and** number of **permitted** on-site **permanent** signs are permitted for each street frontage and are ~~not only~~ transferable from one street frontage to another if the Zoning Administrator determines the request will not negatively impact surrounding properties. The Zoning Administrator may send the request to the Sign Design Review

Committee for review and recommendation. In the case of a freestanding sign, the more restrictive standard of the zone category shall apply.

2. MPA/TMC/SAHBA Proposal – Master Sign Program - Best Practice Option:

7A.7.1. F. MASTER SIGN PROGRAM Best Practice Option

In the current draft, an applicant can request a variation from the design standards by showing a best practice alternative. In the current draft, there is a geographic option, which is limited to other signage examples within the incorporated City of Tucson. **REQUEST: Expand the geographic range to be the Tucson MSA, Pima County/PAG Region, or Arizona.**

Staff Analysis:

It is important to consider new ideas from other regions and municipalities. This promotes innovation and increases efficiency and was the impetus for including the Best Practice Option in the proposed sign standards. The proposed process in the Permanent Sign Master Sign Program (MSP) allows the applicant to use a MSP concept from another jurisdiction as a best practice option. The proposed concept will be reviewed by an appointed Design Professional. The reasoning is the Design Professional can evaluate the other jurisdiction's MSP in relation to the 7A Sign Standards Purpose Statement and applicable design standards for compatibility and give feedback to staff, applicant, and if needed the SDRC.

3. MPA/TMC/SAHBA Proposal – Master Sign Program - Findings:

7A.7.1. G. MASTER SIGN PROGRAM Findings

In the current draft it can easily be interpreted that all nine Findings criteria must be met. Additionally, the current draft includes Finding i. regarding best practices in dark sky preservation which is potentially inconsistent with the current City Outdoor Lighting Code and it is unclear how compliance with this Finding will be determined. **REQUEST: Clarify that only the applicable Findings must be met and not all Findings listed and delete or revise Finding i.**

Staff Analysis:

The current proposed language in 7A.7.1.G. states the following:

“1. The decision shall show the sign program’s compliance with the following **applicable findings:**”

The following changes in the proposed language help to clarify that only the applicable findings must be met and not all findings:

“1. The decision shall show the sign program’s compliance with the following **applicable findings to the site:**”

As shown above, this states that the decision shall show compliance with only the following *site specific applicable* findings. However, it is not a good practice to use the word ‘should’ when drafting regulatory code, as it is inexact language and creates too much ambiguity when plans are reviewed. Further, the use

of ‘should’ suggests the applicant does not need to meet the findings at all and that the findings are just a suggested list. Requiring the findings shows a direct connection to the design standards and purpose statement. The findings are meant to show that instead of meeting the prescriptive dimensional standards of the 7A Sign Standards general standards for sign types, the applicant will show an equivalent compliance with the design standards through meeting certain applicable findings.

The request to remove or revise finding “i” may have a significant impact on dark skies and light pollution in the region. During the public review process the astronomy stakeholders were very concerned that large freestanding signs are not accounted for by the Outdoor Lighting Code’s (OLC) calculation of ambient light of a commercial development.

The current language is based on consultation and continued discussion with a lighting engineer and the dark skies community. Currently the Outdoor Lighting Code (OLC) does not regulate freestanding signs, and has an assumption built into their model that is based on present sign height and area allowances. To mitigate the potential increase in sign height and area allowed through the Master Sign Program, interim illumination guidelines were developed with feedback from members from the Outdoor Lighting Committee to ensure there will be no increase in light pollution.

These guidelines were discussed in Planning Commission/Citizens Sign Code Committee study sessions and at their public hearing. They represent illuminated signs that are commonly used today by commercial development in the City. If someone has an equivalent alternative, that may be acceptable also with approval by the Sign Design Review Committee. As more experience is gained, the OLC may be revised to have the interim guidelines evolve into general OLC standards for MSP signs. The dark skies community supported the 7A Sign Standards mainly because dark sky protection is mentioned in the Purpose Statement and is followed through in the design standards and findings.

4. MPA/TMC/SAHBA Proposal from November 29th letter:

11.4.7 DEFINITIONS-F

In the current proposed ordinance, the definition of freeway is defined as Freeways designated on the Major Streets and Routes Plan. **REQUEST: For consistency, modify this definition to correspond with the Major Streets and Routes Map and clarify that it includes extensions and proposed new state Highways such as Aerospace Parkway and Sonoran Corridor.**

11.4.20 DEFINITIONS-S

In the current proposed ordinance, there is an underlying 2-tier system of roadways; freeways and all other local neighborhood streets and arterial roadways. **REQUEST: Create a 3-tier system. Add a definition for State Routes: to include State Routes and selected Regional Arterials to correspond to the City of Tucson approved PAG Regionally Significant Corridors Study**

Staff Analysis:

The proposed changes to the definition of Freeway, and the addition of the definition of State Routes, would allow for a significant increase in signage throughout the City. The standards related to freeways are intended for signs along an Interstate, not PAG regional routes or State Routes.

This proposal would allow in the 7A Sign Standards General Standards for freestanding signs, regardless of lot size, that are 48 feet tall and 360 square feet in areas along Miracle Mile, Oracle Road, Ajo Way

and Barraza Aviation Parkway, and would remove the requirement to adhere to scenic corridor regulations.

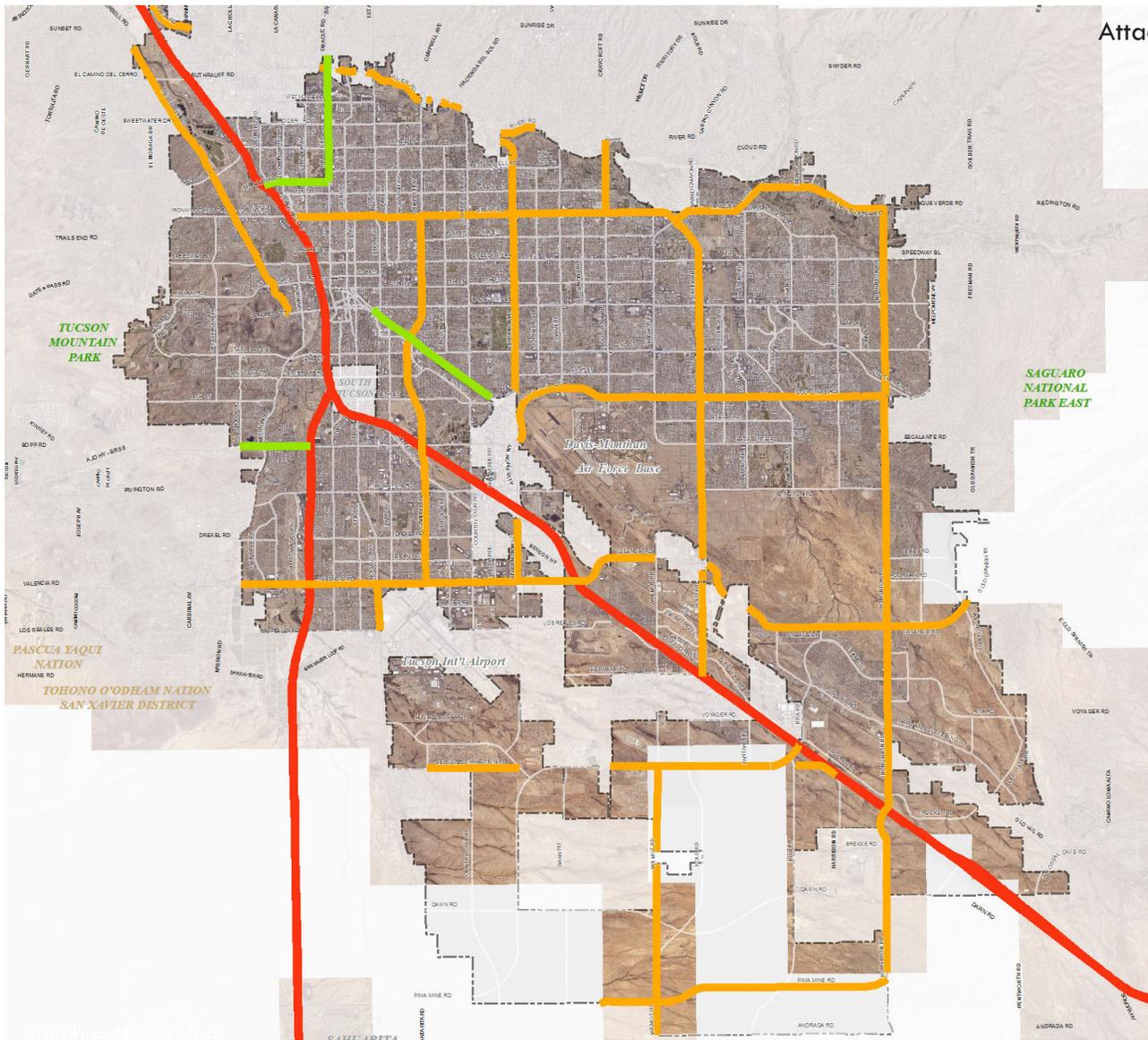
Additionally, it would create a new category named State Routes that would allow in the 7A General Standards for freestanding signs, regardless of lot size, that are 24 feet tall and 180 square feet in area along River Road, Grant Road, Kino Parkway/Campbell Road, Alvernon Way, Old Nogales Highway, Wilmot Road, Kolb Road, Silverbell Road, Houghton Road, Valencia Road, and Golf Links Road, and would also remove the requirement to adhere to scenic corridor regulations. These are all areas where the current sign standard allows for a sign that is 12 feet tall and 72 square feet in area. **[For a graphical representation of the areas impacted by this proposal, please see Attachment A]**

These proposed changes provide for significant concerns for the following reasons:

- This proposal was considered and rejected by both the Citizens' Sign Code Committee and the Planning Commission. The Mayor and Council's original direction was to comply with the *Reed* decision and make practical improvements. This change would have a major impact on the visual environment of Tucson's streets with very little public input.
- This is in conflict with the direction provided by a previous lawsuit regarding billboards.
- This change would likely have a significant impact on dark skies. As stated previously, currently the Outdoor Lighting Code (OLC) does not regulate freestanding signs, and has an assumption built into its model that is based on present sign height and area allowances. Should there be an increase allowed to freestanding sign height and area, this may cause significant light pollution.

The method to achieve a sign that is larger in size due to site considerations is through the Master Sign Program. In the current proposed sign standards, the Master Sign Program provides a process that allows for additional sign height, area, and flexibility. This process will provide a method for businesses to receive the necessary signage in order to properly advertise and direct customers to their establishments. This can be done without creating a general standard that would be open to anyone along one of these corridors. Proposals from the Master Sign Program may also provide data to inform future changes to the General Standards. For instance, if there are several successful projects along Oracle Road, the standards used for those could potentially be utilized to create a new general standard that could be applied to State Routes.

During the 18-months prior to the 7A Sign Standards sunset date, there could be a review of approved Master Sign Program applications to gather information on whether sign height and sign area standards should be increased or kept as is.



Option B:

Freeway (7A)

A roadway designated as a Federal or Interstate Route as shown on the City of Tucson Major Streets and Routes Plan including any proposed extension. Freeways are not subject to 7A.11.

State Route (7A)

ADOT designated State Routes within the City of Tucson which are also designated as Regionally Significant Corridors by Pima Association of Governments, including any proposed extensions. State Routes are not subject to 7A.11 and receive 50% of Freeway signage.

Implications:

This proposal would allow for signs that are 48 feet tall and 360 square feet in area along Miracle Mile, Oracle Road, Houghton Road and Barraza Aviation Parkway (in green above), and would remove the requirement of the Scenic Corridor Regulations. Additionally it would create a new category named 'State Routes' that would allow for signs that are 24 feet tall and 180 square feet in area along River Road, Grant Road, Kino Parkway/Campbell Road, Alvernon Way, Old Nogales Highway, Wilmot Road, Kolb Road, Silverbell Road, Houghton Road, Valencia Road, and Golf Links Road and would also remove the requirement of the Scenic Corridor Regulations.. These are all areas where the current sign standard allows for a sign that is 12 feet tall and 72 square feet in area.

	Existing sign allotment		Proposed sign allotment	
	sign height	sign area	sign height	sign area
Existing Freeways (red above)	48 feet	360 square ft	48 feet	360 square ft
New Freeways (green above)	12 feet	72 square ft	48 feet	360 square ft
State Routes (orange above)	12 feet	72 square ft	24 feet	180 square ft