

ATTACHMENT 1

SIGN CODE UPDATE – COMMENTS

Commenter	¹ Page #	Section	Comments & responses [Stakeholder comments in black; DSD responses in red] ¹ - per Draft 2
SAHBA	6	18.79.030(N) (2)	Interesting that approved subdivision plat in its entirety as a site may be considered non-residential. An entire subdivision plat is differentiated from individual residential lots to allow what used to be called a subdivision directory sign.
“	9	18.79.050(H)	“A” & “T” frame signs exempt? Signs on residential property w/ cumulative area of less than 6’, less than 6’ high and non-illuminated exempt? Signs listed in 18.79.050 are exempt from having to submit application, get permits, and fees but still subject to development standards if applicable and an electrical or building permit may be required.
“	9, 10	18.79.060	Legal non-conforming signs. Grandfathering of existing signage unless deemed safety hazard good. Comment noted. This section underwent some revisions due to received comments; it is the same as Town of Marana’s text.
“	11	18.79.070	General Regulations. Code is specific to single residential lot but silent on subdivision cumulative sign area? See freestanding and wall signage allowed. Could also be addressed through the Master Sign Program and if internal to the subdivision, reference the definition of “concealed” signs and Section 18.79.050.
“	13	18.79.080(A) (1)(a)	Regulations by permanent sign type. A1 – Clarify “Minimum clearance 10 feet”. This is an existing billboard regulation. *Billboard regulations are not being changed at this time due to court settlement with the exceptions of formatting change and two clarifications. Clearance is the distance from the ground to the bottom of the sign; presumably to minimize bulk of the sign.
“	13	18.79.080(A) (1)(d)	Regulations by permanent sign type. D – Why is max. number of signs “none”? Does this mean there is no maximum allowable number of signs? Yes, no maximum. *No changes to billboard regulations with this text amendment with the exceptions of formatting change and two clarifications.
“	13	18.79.080(A) (1)(h)	Regulations by permanent sign type. H – Why is this a requirement? Presumably to reduce the negative effects of billboards by disallowing, for example, neon orange supporting structures. *No changes to billboard regulations with this text amendment with the exceptions of formatting change and two clarifications.
“	14	18.79.080(A) (2)	Regulations by permanent sign type. I – Not acceptable. Eliminate public hearing requirement. *No changes to billboard regulations for this text amendment with the exceptions of formatting change and two clarifications. Surrounding property owners should have the right to comment on new billboard signs.
“	13	18.79.080	Regulations by permanent sign type. Billboard sizes/allowances for CR1-CR5 zoning? Per current regulations *which are not proposed to be changed with this text amendment, billboards are not allowed in the zones not specified.
“	9, 12	18.79.050, 070(E)	Clarification on when permits are required? Says “all signs” unless otherwise stated. Permits are not required for “exempt” signs. Section 18.79.050 states “Exempt signs. The following signs are exempt from the application, permit and fee regulations of this chapter, although the applicable development standards apply and an electrical or building permit may be required”.
“	22	18.79.090(C)	Banner signage – does this include trap fences on developer property? Yes.
“	6	18.79.030(N) (2)	Why consider approved subdivision plat as non-residential? This is where we typically place our signage. It differentiates the entire plat vs the individual residential lots to allow what used to be called a subdivision directory sign. By making it non-residential, can avail standards for freestanding and wall signs. These signs could also be addressed through the Master Sign Program. Also if internal to the subdivision, reference definition of “concealed” signs and Section 18.79.050.
“	22	18.79.090(D)	Balloon signage used for location purposes. If not allowed decreases ability of customers to find sales office. Draft 2 revised to allow balloon signs under “inflatable and air activated signs”.
“	24	18.79.100(B)	Offsite signage. How will weekend directional signage be addressed? These signs are placed late Friday/early Saturday and removed Sunday evening. Through the Master Sign Program – can use a template, similar to COT’s process.
“			Portable A & T frame signs. We use Burma shave signs for marketing path to sales office/model on our property. How will this be affected? They’ll need to comply with the freestanding or wall sign requirements depending on how they are attached.
“			Cumulative sign area of 6 sq ft per each residential property is insufficient for sales office. Prevents communication of high level benefits with key marketing messages and also directional signage. Still not enough in addition to freestanding and wall sign allotments? Please provide an example of set up. Could also be addressed through the Master Sign Program.

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“			Estimated processing time for permits? Fees? Copy of application and checklist? Fees will be based on the fee schedule, application and checklist are not proposed for the code but are administrative documents subject to occasional revisions. Estimated processing time for permits not proposed to change. No changes to sign fees with this text amendment.	
“	13	18.79.080(A)(1)(h)	Are there color guidelines for the earthtone shade of brown or green? Comparable to HDZ review and requirements for “earthtone”.	
“			Water Tanks? 6 sq ft limit prevents from using tanks as signage? Yes, but there would be other means to allow.	
“	23	18.79.090	A-frame signs displayed daily but not exceed 72 hrs? How is this monitored? If signs collected each night does this reset 72 hr clock? 72 hours is to provide flexibility if such signs are accidentally left out. The signs are intended to be put out daily. Yes, it would reset the clock.	
“	24	18.79.100(B)	Need more details on Master Sign Program. Trying to keep it broad and flexible. We have enclosed draft documents with this draft.	
“	9	18.79.050(C)	Exempt Signs. Typically have up to 12 attention flags and one US Flag at our communities Would you please email us some photos of the type(s) of flags you mean? We need a better idea of the type of flags at issue. Received photos. Increased from 6 to 10.	
“	22	18.79.090(B)	B. Clarify size of name/number requirement? One legible label per sign.	
“	23	18.79.090(F)(1)	F. 1 sign insufficient. 30 ft limitation; sometimes sales office is more than 30’ distant from main road. Then you’d have to apply for the Master Sign Program.	
“			Will there be an expanded kiosk program? Would you please further explain this question?	
“	16	18.79.080(B)(2)	Use 3 tier system, of roads for signage, not 2. Comment noted.	
“	1	18.79.010(A)(2)	Eliminate use of pejorative language that is inherently negative such as “reduce visual clutter”. Comment noted, however, sign clutter is a definite problem. Sometimes the most effective word is best. We balance it with the benefits of signage.	
“	16	18.79.080(B)(2)	Should amount of linear street frontage be a factor? Comment noted. Building frontage is for wall signs. Number of signs is related to approved access points.	
“			Consideration of directional signage distances when separated by state land? Would you please further explain this question?	
“			Consider incentives for increased sign allowance when adding public art. Comment noted but do not want to confuse art with signage. May be an option exercised through the Master Sign Program.	
“	1	18.79.010(A)(2)	2. Replace “reduce visual clutter” with “efficient sign placement” The word ‘clutter’ is appropriate here.	
“	1	18.79.010	4. Not all unregulated signs pose a public safety risk. Comment noted.	
“	1	18.79.010(A)(6)	6. Delete word “clear” Agree (it’s repetitive) – deleted.	
“	4	18.79.030(F)	Insert Flag language. Can add definition. Please see previous comment about emailing us photos of flags.	
“	9	18.79.050	Exempt Signs. What about alteration of iconic signs that keep the same “vibe”? Would you please further explain this question?	
“	13	18.79.080(A)	Billboards. Allowable in CB-1, TR, CPI, MU, MR, RVC – other categories? *Not proposing changes to billboard standards with this text amendment (with a few non-substantive exceptions). See previous comments.	
“	14	18.79.080(A)(1)(i)	Billboards. J. Add or allow consideration for some sections of regional roadways such as Old Nogales Hwy, Wilmot, Hughes Access, Sonoran Aerospace Corridor, Houghton Rd. *Not proposing changes to billboard standards with this text amendment (with a few non-substantive exceptions). See previous comments.	
“	17	18.79.080(B)(3)(c)	Use of Hospital reference does not meet content neutral test. We don’t believe it’s a ‘content’ issue.	
“	23	18.79.100	Mention economy in purpose language See 18.79.010(A)(1) It is in the general purpose statement.	
“	24	18.79.100(A)(4)(c)	C-iii & vi. Are these current standards. Have they changed and if so, what are ramifications? The requirements are 30% less than current lighting code specifies. This is a discretionary option to gain larger sign area and height. Standards were requested by astronomy and dark skies community. The requirement is tied to the Outdoor Lighting Code & the OLC committee leads.	
“			Fee schedule No changes to fees proposed with this text amendment.	

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“	14	18.79.080(A)(2)	Billboards. 1 – clarification; road constructed after 1984 or billboard constructed after 1984? The billboard. Added “a billboard” for clarification.	
“	15	18.79.080(A)(2)(a)	Language beginning with “It is the purpose of this subsection..” should be moved to beginning of section? This subsection was reformatted for Draft 2. It only applies to subsection A2 and relates to no substantive changes to billboard text so carrying forward existing purpose statement.	
“	22	18.79.090(C)(2)	Temporary Signs. One within site per street frontage or one per street frontage within site? Please provide example illustrating difference.	
“	22	18.79.090(B)	Banner Sign – Rationale for limiting to 120 days per year? Better as long as sales office still open? An allowance of 6 months if the banner is attached to an existing building was added. Otherwise may need to be addressed through Master Sign Program. (It is supposed to be a temporary sign for special event.)	
“	22	18.79.090(F)	F – “A” & “T” -frame signs listed on Page 8 as exempt sign. It’s exempt from permits but it is allowed (difference between prohibited vs exempt).	
“	24	18.79.100(B)	Master Sign program; wide open as far as sizes, placement, materials, etc? Would some basic sizes/rules help avoid developer going back for multiple appeals? Right-of-way application form? Comment noted – we will look at more closely however we are trying to keep option simple and flexible. If a sign is proposed for the right-of-way, applicant will have to go through PC-DOT in a separate process. Administrative details of Master Sign Program such as the application form, what is required for submittal, etc. are not intended to be in the code, but separate policy documents. See attached draft documents.	
Jim Battaglia (2/18/20 phone call)	17	18.79.080(B)(4)	#1 - EMC or static signs: there’s a problem with max. 10’ heights like COT has – at least with min. of 15’ leaves 5’ of ground clearance out of 10’. Comment noted, however, current draft (Draft 2) proposes 10’ as standard maximum height for freestanding signs.	
”	17	18.79.080(B)(4)	3’ X 8’ EMC with 6 – 9’ ground clearance / sign not high enough car blocks msg center, needs to have 8’ clearance // at least 6’ Comment noted, however, current draft (Draft 2) proposes 10’ as standard maximum height for freestanding signs.	
”	18	18.79.080(B)(10)(b)	#2 - Hold time: electronic bill – 8 sec nationwide, reduce to 3X6’ = 60 sec too long – needs to transition 8 sec – digital billboards For small signs consider 3 seconds Draft 2 proposes 7.5 seconds – same as Town of Marana’s sign code.	
”			#3 - Pole cover – 5’ tall 10’ wide / entire construction – ground clearance / pole cover 30” wide preferred wind load – not so large of a pole cover. Visibility is blocked – skinny it up. Please further explain this comment.	
Jude Cook Cook & Co.	19	18.79.080(D)(4)	Page 17 #4: I’m not clear on what it is describing “Not extensions added to a building.” It means where the sign attaches, it has to be actually part of the building, not an addition to the roof basically intended to attach a sign higher on the building.	
“	17	18.79.080(B)(10)(a)	Page 18 #8. I generally find that when incorporating a letter board the ratio is about 75% of the sign; 50% will make for an awkward design. I want to make sure I am clear on this comment – you are saying that limiting the electronic message center portion of the sign to 50% of the allowable sign area is too restrictive? Response: It makes for a very poor layout proportions - up to 75-80% for the EMC is better. Draft 2 proposes 50% which is the same as the Town of Marana’s sign code.	
“	22	18.79.090(C)(3)	Page 19 Item B #3, 60 sq ft is too small and hard to enforce anyway. This is the amount that the current sign code allows. Are you are saying that 60 sf is too restrictive for a temporary banner sign? What do you propose? Response: I would allow at least 100 sq ft. The existing code allows a maximum of 60 sq ft which we are not aware has been problematic. Draft 2 proposes 60 sq ft.; Town of Marana sign code allows a maximum of 40 sq ft.	
“	23	18.79.100(A)(4)(a)	Page 21 Item 4a: The 9 pm curfew is too early. (I understand that this is part of a master program and more restrictions are involved.) Comment noted. Response: 9 pm is still too early for most businesses. The 25% option is incentive based specifically to protect dark skies.	
“	24	18.79.100(A)(4)(c)(iii)	Page 21 item 4 c iii & vi: I need an explanation of what these two restrictions mean. “A maximum correlated color temperature (CCT) of 30 percent less than allowed by the Outdoor Lighting Code (Ch. 15.12) for the illumination source”. One definition is: A measure in degrees Kelvin (°K) of light’s warmth or coolness. Lamps with a CCT of less than 3,200 °K are pinkish and considered warm. Lamps with a CCT greater than 4,000 °K are bluish–white and considered cool. Response: 4400 K is warm enough, some colors when lighted this warm or more look wrong. A definition of correlated color temperature was added to the definitions section of Draft 2 to help clarify. The 25% option is incentive based specifically to protect dark skies. Generally it’s a measure of the whiteness of a light which at high amounts is detrimental to maintaining Dark Skies. Currently the Pima County/COT Outdoor Lighting Code allows 4400K. Astronomers and other dark sky are asking for a reduction which	

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			we would be applying only to the newly allowed EMC signs and to the 25% incentive dark skies option. For example, 30% less than 4400K would be approx. 3000K. Response: The outdoor lighting code already limits EMCs to 200 Nits. The problem I see here is that the code is not enforced as it is and adding more restrictions without truly enforcing the current code is the wrong approach. A combination of education and enforcement would serve the dark skies much more than more restrictions. Comments noted.	
“	17	18.79.080(B)(7)	What is the proposed setback on freestanding signs? The 10' from property line is always problematic and is the limit on number of tenant panels on a freestanding sign been changed? The header plus 3 is also been problematic and not enforceable. Drafts 1&2 propose no setback. Drafts 1&2 do not specify number of tenant panels, only overall sign size. Response: That would be a vast improvement in itself.	
“	24	18.79.100(A)(4)(c)(iv)	Page 21 Item 4 c iv: I need an explanation of what this means. “Sign surface contains all of the light.” This means that there isn't a lot of scatter of light – to protect the dark skies for observatories and others. Stray light is emitted light that falls away from the area where it is needed or wanted. Light trespass. Response: I am still not clear what is being proposed.	
“	24	18.79.100(A)(4)(d)(i)	Page 21 Item 4 d i: I need an explanation here also. “Light text on dark backgrounds only, where “dark” does not include white, off-white, light gray, cream or yellow colors.” Minimizing the amount of white light which is detrimental to preserving dark skies for observatories and others. Response: Opaque backgrounds with light only coming out from the logos and lettering? Yes.	
“	16 – 20, 23	18.79.080(B) & (D), 18.79.100	Here's a basic project I might have: If I had a client in a strip center that had a 20' frontage how much square footage is allowed? For a freestanding sign it depends on the number of access points for the site of the strip center. For example, 64 sf per sign for 2 or more signs. For a wall sign on a multi-tenant building, it would be 30 sf plus 1.5 sf for each linear foot of building frontage up to 200 sf per tenant unless the sign is not located on the tenant space, then the maximum is 30 sf each. Plus there is the “concealed” sign (see definitions). Then there are also the Dark Skies and the Master Sign Program options for some more flexibility. Response: I'd like to see it applied to an actual project.	
“	16 – 20, 23	18.79.080(B) & (D), 18.79.100	Here's a basic project I might have: For a freestanding sign on a single tenant property with a 60' frontage what size and height is he allowed? Depends on the number of access points for the property – if there's one access point approved, then 81 sf, if it's two then 64 sf per sign. It's different if it's a limited access, high volume arterial roadway or speeds greater than 50 mph – then 100 sf OR if on an interstate then 150 sf. And then there are wall signs, and the Dark Skies and Master Sign Program options for more. Response: This sounds like it will work.	
“	16 - 19	18.79.080(B) & (D)	If they have a freestanding and a wall sign, what is the total square footage allowed for the 2 signs? Would add the allowed 200 sf of wall signage (for frontage less than or equal to 500') or 300 sf (frontage greater than 500') to what's allowed for the freestanding sign. They are cumulative.	
“	16 - 23	18.79.080(B) & (D)	Can you point me the sections in the draft where I could determine what is allowed? Generally 18.79.080B (freestanding) and 18.79.080D (wall) plus there's also suspended (18.79.080E) and temporary signs (18.79.090).	
“	11, 21	18.79.070(B), 18.79.080	One suggestion, incorporate graphics to help questions. Comment noted. Draft 2 has a graphic for sign measurement and for illuminated signs.	
			I see a lot of improvements. Great.	
James Carpentier ASA ISA			We suggest the use of a summary table that includes the requirements “at a glance” so applicants and staff can readily see the code requirements. We will likely provide something like a summary table as part of the public hearing staff report and could provide a summary table to customers and staff. Good idea – thank you.	
“	11, 21	18.79.070(B), 18.79.080	The use of images can be very beneficial when describing sign types etc. We agree; Draft 2 has a graphic for sign measurement and for illuminated signs but will look into sign types as well.	
“	11	18.79.070(B)	The method of measuring sign area is not indicated. We suggest to measure using multiple standard geometric shapes (or something similar) to allow for encourage creative and irregular signs and shapes. See the attached model code page 29 for additional information and some model language and article on Creative Signs. It's in Section 18.79.070(B) – General regulations. B. Measurement. Draft 2 includes a graphic showing how sign area is measured.	
“	10	18.79.060(D)	The applicability and administration of this section not clear. Comment noted. This is in the existing code so it has weathered some application. To delete it would diminish existing sign code rights.	

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"	3, 13	18.79.030(B) 18.79.080(B) – (E)	Clarify that this section is for billboards & off-site. Because of a significant billboard court case in our county we are making very few changes to the existing billboard section with this text amendment. The definition of billboard specifies "off-site" and all other signs specify "on-site".	
"	"	18.79.080(B) – (E)	Clarify that this section is for on-premise by indicating it is on-premise. We recommend giving the on-premise portion of the code a different section number to assist in that clarification. and administration and ease of understanding for applicants. See the above comments plus freestanding, wall, suspended, and window signs all state "on-site".	
"	16	18.79.080	Recommend the inclusion of a smaller ground sign with same type allowances for numbers such as one per entrance around 4' in height and 6 sq ft. to be able to accommodate directional type signs. These signs could be referred to as minor signs. We think we've addressed this through freestanding and wall signs plus the master sign program but will consider if stakeholders or public believe it necessary.	
"	18	18.79.080(B) (10)(c)	This may be difficult to enforce since "light text" may be subject to varied interpretation and undue discretion. With the type of illumination levels proposed an EMC will not be any brighter than a typical static sign. Comment noted.	
"	18, 20	18.79.080(B) (10)(d) & (D) (8)(d)	Recommend that the nits be stated (140) in addition to reference to that section. Tying this figure to the Outdoor Lighting Code (OLC) so that if the OLC committee updates their standards, the sign code will automatically follow. We want the OLC committee to be the lead here.	
"	18	18.79.080(B) (10)(e)	This should just require a 100' offset when adjacent to a residential use and not separated by a row. Determining visibility may allow for varied interpretation. Comments noted.	
"	17	18.79.080	We are fully supportive of performance type approach that gives a bonus when meeting the dark sky protection option. Good.	
"	19	18.79.080(D) (7)(b)	Maximum height should be stated at 8'. Agree, Draft 2 reflects change.	
"	20	18.79.080(E)	We do not recommend that the allowed window sign area be included as the wall sign allotment. Enforcement may be a challenge due to different marketing campaigns, etc and window signs are exempt. 18.79.050(L) exempts window signs (agree with that) while this section requires the window area be calculated as a part of the wall sign allotment (that section should be eliminated). Okay, Draft 2 reflects change as you suggested.	
"	23	18.79.100(A) (4)	This section may be a challenge to administer as noted previously. Consider requiring that sign copy and logos be routed out then the background will not be illuminated and the colors will not be an issue. Comment noted.	
"	24	18.79.100(B)	We fully support flexibility of this nature since the code cannot be designed to meet every type of scenario and project. Great.	
C. Bard (DSD)	9	18.79.050(C)	Is this per site? Yes	
"	12	18.79.070(E) (3)	Like for like: there are areas that require dark background. Asked whether this comment applies to a different section or was moved? Not sure of question.	
"	13	18.79.070(E) (5)	This application is the same as a building permit. Ok, will fix.	
"	16	18.79.080(B)	So I can put one sign on the road 50 MPH and two on the side street and one interstate style sign. Is this correct? Interstate is different than arterial road – is only I-10 and I-19. A site along I-10 will only be allowed one freestanding sign – period. A site not along an interstate would be allowed one sign per DOT approved access point with the exception if it's an arterial or > 50 MPH road.	
"	19	18.79.080 (D) (3)(b)	This allows a multi-tenant building say 500 ft long with 4 tenants to have 800 sq. ft. of sign space. A single tenant building doesn't have even 1/2 the allowed sign space. I think the sq. ft. for a single tenant building could be a little more. Comment noted. It's 200 sf/tenant – what would be your recommendation?	
"	22	18.79.090(C)	Does this mean any temporary banner is allowed as long as it is permitted; cannot consider content anymore (grand opening)? Correct.	
"	2, 22	18.79.030(B), 18.79.090(D)	These are under prohibited signs, then you are sent here and now they are allowed? You're right, this is confusing. Removed prohibition on balloon signs in Draft 2.	

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"	23	18.79.100(A)(4)(c)	Describe, is this a maximum lumen amount, or the same as iii? If lumen amount is it based on maximum allowed lighting per developed area. It's per the allowed amount according OLC – if OLC is changed so does this maximum. Not sure I totally understand comments – please explain further.	
Pima County Small Business Commission P. Cavanaugh			(Paraphrased) The Commission is in support of Draft 1; significant improvement over previous standards; greater flexibility. Also suggest the application process be simplified, refrain from sign fee increases, and provide for consistent interpretation of sign standards. We will keep the process as efficient as we can; no fee changes proposed with this text amendment process; we agree with consistency.	
Arizona Astronomy Consortium			Prohibit the installation of new illuminated signs in all E1 zones (E1a, E1b, and E1c) throughout the county. These are low-density zones near major astronomical observatories. We feel that this request is fair in light of the other provisions of the proposed code update. We note that the designations a-c were for enumeration when the Outdoor Lighting Committee (OLC) was developed, and were not intended to imply a priority. We discussed this at the meeting held after comments received. Agreed that this is mostly the purview of the OLC committee; we cannot restrict existing signs – it could only apply to the newly allowed EMD signs.	
"			Instead of tying the allowed sign luminance limits to the Tucson/Pima County Outdoor Lighting Code, prescribe sign luminance limits that follow the IDA and IES guidance. These allowances scale with the "lighting zones" (LZs) defined in the IDA/IES Model Lighting Ordinance: LZ0: No ambient lighting, LZ1: Low ambient lighting, LZ2: Moderate ambient lighting, LZ3: Moderately high ambient lighting, LZ4: High ambient lighting This is for the OLC committee to consider.	
"			The IDA and IES recommended luminance limits for these zones are: Nighttime Maximum Luminance (nits) 0, 20, 40, 80, 160 nits. There are no regions in unincorporated Pima County meeting the definitions of either LZ3 or LZ4. We argue that all E1 zones in Pima County are equivalent to LZ0. We further maintain that the county E2 and E3a zones are equivalent to LZ1, and the E3 zones are equivalent to LZ2. We therefore propose sign luminance limits of 20 nits. We discussed this at the meeting held after comments received. Agreed that this is mostly the purview of the OLC committee; we cannot restrict existing signs – it could only apply to the newly allowed EMD signs. We are requiring 140 nits for the incentive-based Dark Skies option.	
"			We would like this code to meet or exceed the standards of the OLC, and to tie language appropriately to the OLC so as to clearly follow it through updates without needing to revisit the sign code frequently. We believe that the OLC need to be spearheading lighting requirements so have tied the sign code to OLC standards so that when they revise, the sign code will follow. See above comments.	
"	4	18.79.030(I)	We would like some clarity around the definition of the term 'electronic message display sign.' This term does not appear to be industry-standard, and its definition ("A sign with an electronically activated changeable message") appears to encompass both digital billboards and electronic message centers. These devices are not the same, nor interchangeable for the purpose of regulation in the code; furthermore, the existing Pima County sign code expressly prohibits digital billboards, which it terms "electronic message signs." There are billboard signs (which specifically prohibit digital billboards) and there are electronic message centers – two separate sign types. The prohibition on digital billboards will remain. Added caveat to EMD sign definition that it does not include digital billboards.	
"	16 - 20	18.79.080(B) & (D)	The definition in Draft 1, §18.79.030(O)(2), should expressly state that 'electronic message display signs' are allowed only on-premise. If the county is unwilling to make this distinction and continue to prohibit outright what are commonly known as 'digital billboards', then such signs should be curfewed (fully extinguished) at 9 PM. All of the freestanding and wall signs are specified as "on-site" only. This text amendment proposes to continue the prohibition on digital billboards.	
"	10	18.79.060	We also note some disturbing language in Draft 1, §18.79.060(C), which allows legal, non-conforming signs to be "rebuilt, repaired or replaced only in conformance with the provisions of this chapter" if structurally changed, significantly damaged, moved or destroyed. This is fundamentally at odds with the existing code, which does not allow legal, non-conforming signs to be rebuilt (or re-lit). ¹¹ The language of this section seems to reverse more than 30 years of rule and practice. We oppose this change. This is standard language for non-conforming uses.	
"	16 - 20	18.79.080(B)(10)(d) & (8)(d)	As a minor stylistic point, the phrase 'luminance intensity' is not strictly correct. The phrase used previously, 'luminous intensity' is a better technical usage. Corrected as you proposed.	

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“			You raised two points in your letter. The first had to do with using architectural elements to “hood” or “cap” sign light sources in order to reduce light scatter. This is impractical for both conventional, internally illuminated (‘cabinet’) signs and externally illuminated signs because their surfaces either emit or reflect light in virtually the same amounts in all directions. Shields that would meaningfully block light emitted at significant upward angles would yield impractical added structural weight and wind loading. It would be far more practical and effective to simply lower the allowed luminances for sign surfaces as described above, and impose reasonable curfew times. Okay, comment noted.
“			The other point had to do with the incentive-based provisions of §18.79.080(B)(10), 18.79.080(D)(8), and §18.79.100(B). We are generally supportive of the incentive basis for further light emissions reductions in exchange for larger sign sizes, subject to the additional recommendations above. However, allowing true digital billboards would create a much bigger problem in terms of light emissions, so we urge the County to simply leave the existing prohibition in place. For on-premise electronic message display signs, we again point to the suggested IDA and IES luminance limits based on the lighting zones as proposed to correspond to specific county environmental zones. This is the most effective way to limit the impact of these signs while ensuring they remain adequately legible. Digital billboards remain prohibited.
International Dark-Sky Association			Astronomy and space science are a significant contributor to the economy of Pima County, and the protection of that enterprise should be a strong influence in establishing and maintaining public policies around outdoor lighting. However, IDA’s mission encompasses more than consideration of professional astronomy interests. We represent the interests of amateur astronomers and casual stargazers, ecologists and conservationists, and all those who appreciate and revere the night. IDA stands for improving nighttime conditions across Pima County for the benefit of its residents in ways that respect commercial interests and private property rights, protect nocturnal wildlife, and ensure public safety. Comment noted.
“			The same issues as the Consortium noted: No illuminated signs in E1 zones, prescribe zone-based sign luminance limits that follow IDA and Illuminating Engineering Society (IES) guidance for lighted, on-premise signs; namely, 20 nits in the E2 and E3a zones and 40 nits in the E3 zone; clarify the definition of ‘electronic message display sign’ and/or add other code language to continue the express prohibition of digital billboards; strike draft language in §18.79.060(C), which allows legal, non-conforming signs ..., the county sign code should meet or exceed the standards of the Tucson/Pima County Outdoor Lighting Code (OLC), same response to idea of “hooding” or “capping” signs. See DSD responses to the Consortium comments.
“			The other issue involves the incentive-based provisions of §18.79.080(B)(10), §18.79.080(D)(8), and §18.79.100(B). This is a reasonable approach for conventional illuminated signs, whether internally or externally illuminated, subject to the additional recommendations discussed here. However, the nighttime impact of electronic message display signs and digital billboards is very different. This is why we urge the County to leave the existing prohibition of digital billboards in place, and to enact the zone-based IDA- and IES-recommended luminance limits for on-premise electronic message display signs. For permitted electronic signs, this approach simultaneously serves the interests of sign owners and stakeholder groups by ensuring sign message legibility while minimizing harm to the nighttime environment. See above response to Consortium’s comment on this subject.
Arizona Multihousing Association	22	18.79.090(C)	The 120 day temporary banner sign display time - is this in total or this is the amount of time the same sign can be displayed? For example, apartment communities regularly display banners stating their phone number and/or the type of product the offer ie: “ Renting 1, 2 & three bedrooms” or specials such as “One month free”. Would like to display these types of banners throughout the year to promote different incentives and availability. These signs are often attached to the building or can be found attached to sign posts at the entrances. An allowance of 6 months if the banner is attached to an existing building was added.