

square feet; 3) the maximum number is increased from one (1) to two (2) with a further additional sign for each additional drive-through lane; 4) the limitation in the existing code that the signs not be legible from the right-of-way has been eliminated; and 5) the disallowance in residential and rural zones has been deleted. Lastly, it should be noted that neither the existing code nor the proposed Draft 2 have any performance criteria as to the signs being located within a certain distance of and exclusively oriented to drive-through lanes or a limitation on the number of freestanding drive-through signs if wall-mounted drive-through signs are used as well.

Directory Signs (Entirely Deregulated in Draft 2)

As with menu board signs, directory signs are not intended to be viewed from the right-of-way under the existing code. Such viewing from the street is precluded by the minimum setbacks of 43 feet from a right-of-way and 30 feet from other property lines, combined with a maximum area of 40 square feet and a maximum height of 8 feet. Draft 2 proposes to entirely deregulate this sign type through the revised definition of a concealed sign (exempting signs not legible from the right-of-way) and, in turn, simply deletes any reference to them from the code.

Residential Entryway Signs

This residential use sign type was eliminated in Draft 2 for some reason. It should probably be reinstated, except with a height limit of 8 feet, rather than 6 feet.

Wall Signs for Non-Residential Uses

The allowances for wall signage in the existing code are dramatically increased in Draft 2, particularly for occupancies with less frontage. Where the existing code sets a minimum and then pro-rates the allowance as the frontage increases, Draft 2 provides for only the maximum, no matter how narrow the occupancy's frontage. As if this were not enough, the maximum areas themselves are increased in Draft 2 over what is currently allowed in the existing code.

The following will detail these increases by zone:

Increases in Wall Sign Area Allotment for Single Tenant Buildings

Zones	Minimum Area	Square Feet Per Foot Frontage	Maximum Area	Draft 2 Maximum Area Frontage ≤ 500 Feet	Increase %	Draft 2 Maximum Area Frontage > 500 Feet	Increase %
ML,SR,SR-2,SH,CR-1,CR-2,CR-3,CR-4,CR-5,CMH-1, MU (other than conditional uses) (non-residential uses only)	30	NA	30	200	567%	300	900%
TR,TH,RVC,Resort	30	1.0	80	200	150%-567%	300	275%
CB-1,CB-2,CPI, MU (conditional uses)	30	1.5	150	200	33%-567%	300	100%
CI-1,CI-2,CI-3	30	2.0	200	200	0%-567%	300	50%

Increases in Wall Sign Area Allotment for Multi-Tenant Buildings

Zones	Mini-Mum Area	Square Feet Per Foot Frontage	Maxi-mum Area	Draft 2 Sq Feet Per Foot Frontage	Increase %	Draft 2 Maxi-mum Area	Increase %
ML,SR,SR-2,SH,CR-1,CR-2,CR-3,CR-4,CR-5,CMH-1, MU (other than conditional uses) (non-residential uses only)	30	NA	30	1.5	NA	200	567%
TR,TH,RVC,Resort	30	1.0	80	1.5	50%	200	150%
CB-1,CB-2,CPI, MU (conditional uses)	30	1.5	150	1.5	0%	200	33%
CI-1,CI-2,CI-3	30	2.0	200	1.5	-25%	200	0%

As if the forgoing increases in sign area per wall were not enough, Draft 2 would also increase the number of walls on which the wall signage calculation is based. Such an increase in the number would result in a prorated increase in the total overall wall signage. For example, the wall signage allowances for single occupancy buildings would increase in a range from double to all the way up to 40 times as much (see table below). It should be noted in this regard that virtually no Arizona local jurisdiction of any size allows a full signage allowance on all four building walls, with the number of walls counted instead ranging from one to three (usually based on various site configuration characteristics, such as the number of street frontages).

Increases in Wall Sign Area Allotment for Single Tenant Buildings (From Two Walls to All Four Walls)

Zones	Minimum Total Area	Maximum Total Area	Draft 2 Total Area Frontage ≤ 500 Feet	Increase %	Draft 2 Total Area Frontage > 500 Feet	Increase %
ML,SR,SR-2,SH,CR-1,CR-2,CR-3,CR-4,CR-5,CMH-1, MU (other than conditional uses) (non-residential uses only)	30	30	800	2567%	1200	3900%
TR,TH,RVC,Resort	30	30	800	2567%	1200	3900%
CB-1,CB-2,CPI, MU (conditional uses)	60	300	800	167%-1233%	1200	100%-1900%
CI-1,CI-2,CI-3	60	400	800	100%-1233%	1200	200%-1900%

The existing Pima County wall sign allowances generally fall within the norm of other local jurisdictions in Arizona and the core allotment per wall should be retained for general commercial and industrial applications. For non-residential uses in residential zones and commercial/industrial, however, the existing Pima County code (like many others) does not provide adequate allowances for larger scale uses. This inadequacy needs to be addressed in a scaled, but restrained fashion, consistent with the location of such uses being in residential zones. The same inadequacy exists for commercial and industrial uses where larger buildings have unusually long building frontages.

Draft 2 further provides for the full wall sign area allotment to apply to all four walls of a building, where the existing code only allows an allotment for two walls (with some degree of transferability and an exception where the occupancy is not identified on a freestanding sign). This change alone doubles the overall allowance for wall signage and it would

be hard to find a jurisdiction anywhere that allows a full signage allotment on all four walls. Draft 2 needs to be revised to be more consistent with the existing code, with some more narrowly-tailored additional allowances.

Draft 2 also eliminates any maximum for the number of wall signs on a building, in contrast to the specific limits in the existing code. Generally, the existing code allows a maximum of only three wall signs on each of two building sides (main wall identification sign, plus two accessory wall signs). If incidental signs are used, the number of signs on one of those two elevations could potentially be increased from 3 to 7, resulting in a maximum total of 10 signs for the two elevations and no signs on the third and fourth elevations (noting that there is some wall transferability allowed, but that would not increase the number of signs).

As such, Draft 2 would not only greatly increase the overall wall signage area allowed, but would even further increase the impact on streetscape appearance. For example, if an otherwise blank wall on a commercial building had 15 signs that were 10 square feet in area and spread out over the space of that wall, the installation would be overbearing from a visual perspective compared to a single 150 square foot sign. A formula on the maximum number of wall signs should be retained that is within reasonable range of the existing formula (but more simplified).

There are other issues related to what are referred to as accessory wall signs in the existing code whose areas are counted in the applicable wall sign area allowances. Awning signs, a standard in almost every code, simply vanish from Draft 2. This sign type should be reinstated with its existing provisions.

In Draft 2, projecting signs and suspended signs are merged into one definition. Although there are a few other codes that have taken this approach, it is less common, and in those cases the projecting sign is also required to be under a canopy or similar walkway covering. Further, issues rarely arise with suspended signs, whereas in contrast, projecting signs for general use are typically disfavored and limited to pedestrian areas only.

As to both projecting and suspended signs, Draft 2 eliminates any maximum area short of the overall applicable wall sign area allotment. The existing maximum areas of six square feet for each needs to be reinstated, consistent with the intent of being viewed by passing pedestrians. Draft 2 also increases the projection distance from the building wall and eliminates the 15-foot height limit for projecting signs. The projection and height limits in the existing code should be reinstated or otherwise revised to similar provisions consistent with a pedestrian setting.

Draft 2 also eliminates the definition of and allowance for freestanding canopies (e.g., at gas stations over fuel pumps). The definition and allowance should be reinstated without counting toward wall signage allotment (as in the existing code).

Draft 2 further eliminates permanent window signs from being counted in the wall area allotment, providing for an even greater cumulative wall sign allowance increase than cited in the tables above. The inclusion of permanent window signs needs to be reinstated, perhaps with an exception for one unilluminated window sign per window that does not exceed two square feet in area. Draft 2 also increases the percentage of window area for a permanent window sign from 30% to 40% and eliminates any limit on the number of permanent window signs (where the existing maximum is one per building frontage and two in total for the occupancy).

Lastly, there are no area limits of any kind on “changeable copy components” of a wall sign (undefined, but apparently meaning non-electronic copy per existing code). This contrasts with the existing code limit of either 20 or 40 square feet, depending on the usage of other accessory wall sign types (and where electronic message displays are prohibited). A limit within the existing range needs to be re-established.

The following changes need to be made to Draft 2 to reflect the foregoing comments:

17. Revise Draft 2 to reinstate the core wall signage allowances, with scaled additional allowances for non-residential uses in the less intensive non-commercial/industrial zones and for particularly long commercial/industrial building frontage. The table below implements this approach:

Proposed Wall Signage Allotment for Non-Residential Uses (Includes Building Wall Signs, Awning Signs, Changeable Copy Signs (Manual/Electro-Mechanical), Projecting Signs, Suspended Signs, and (Permanent) Window Signs)

Zones	Minimum Area	Square Feet Per Foot for up to 100 Feet of Building Frontage	Additional Square Feet Per Foot for over 100 Feet of Building Frontage	Maximum Area
ML,SR,SR-2,SH,CR-1,CR-2, CR-3,CR-4,CR-5,CMH-1, MU (other than conditional uses) (non-residential uses only)	10	0.5	0.10	80
TR,TH,RVC,Resort	20	1.0	0.20	160
CB-1,CB-2,CPI, MU (conditional uses), CI-1,CI-2,CI-3	30	1.5	0.30	240

18. Revise Draft 2 as to the number of building frontages for which the full wall sign allotment is allowed to one more consistent than in the existing code. A similar, but more specially tailored scheme is as follows: the full allotment applies to the building frontage where the main entrance to the occupancy is located and to any second building frontage that faces a street or parking lot for the premises without any intervening loading zone or service area; a one-half allotment applies to a third building frontage that faces a street or a parking lot for the premises without any intervening loading zone or service area; and a 10 square foot allotment applies to any building frontage that otherwise has no allotment. No transfers of allotments from one wall to another are permissible.

19. Revise Draft 2 to limit the overall number of wall signs as in the existing code, but with a simpler scheme that recognizes that some of the specified incidental signs may have content-neutrality issues. One such scheme is that for any one building frontage, the number of wall signs exceeding two square feet in area is limited to five, and for all of the remaining walls the number is limited to two.

20. Reinstate the existing definition and allowances for awning signs.

21. Reinstate separate definitions for projecting and suspended signs; revise the title of the subsection on suspended signs to read suspended and projecting signs; reinstate the six square foot area limit for each and the 15 square foot height limit for projecting signs, clarify that only one of either may be used on any given building frontage.

22. Reinstate inclusion of permanent window signs in the wall sign allotment and the 30% coverage limit for any given window; limit illuminated window signs to one per frontage and two total (as per the existing code for all permanent window signs) and to no more than 15% of window area; and provide limits on the number of non-illuminated permanent signs more in line with the existing code.

23. Reinstate an area limit for a changeable copy sign (non-electronic sign copy) of one 40 square foot sign per building frontage and a limit of no more than two such signs per occupancy (whether as a component of a freestanding sign or as a building wall sign). Also. Reinstate a definition for such signs.

24. Reinstate the definition of and allowances for detached canopy signs (not to be included in any wall sign allotment).

Dark Sky Protection Option

It is difficult to find a provision in Draft 2 that is more offensive to environmentalism, scenic conservation and neighborhood protection than the so-called “dark sky protection option” (which would more accurately be entitled the

“let’s increase visual pollution option)”. Even after the other proposed massive increases in sign area in Draft 2 (and the associated increases in light pollution), this option proposes to pile on yet even more, with further increases in sign area and height. The idea that the same jurisdiction that has enacted and implemented the Sonoran Desert Conservation Plan would sacrifice the visual quality of the community in such a banal fashion is beyond comprehension. The option shows a wholesale disregard for the value of protecting the visual quality of the community in its own right and for those community protectors that advocate for it.

The option also reflects a total unwillingness to control light pollution for its own sake. It suggests that dark skies and the economic worth of the many observatories in the area will only be protected if the on-premises sign industry first gives its permission. This is particularly obvious given that internally illuminated signs are the only significant light source that have escaped regulation in the Outdoor Lighting Code to date, and that the allowed light output of electronic signs in the Outdoor Lighting Code is some 2 ½ times greater than that specified for roadway signs in manuals adopted by transportation officials.

The so-called Dark Sky Protection Option needs to be deleted from Draft 2 as follows:

25. Delete the section establishing the “Dark Sky Protection Option” (Sec 18.79.100.A) and renumber to conform, if applicable.
26. Delete the dark sky protection option from the sections on freestanding signs and wall signs (Sec. 18.79.080.A and Sec. 18.79.080.D) and renumber to conform.
27. Delete all other references to electronic message display signs as necessary.
28. Support the work of the Outdoor Lighting Code Committee to revise the Outdoor Lighting Code so as to more effectively control sign illumination.

Concealed Signs

The definition of concealed signs is dramatically altered in two ways that would entirely exempt outdoor signs from regulation in many applications. First, Draft 2 changes the existing exemption that applies to signs that are not “visible” from property lines to signs that are not “legible”. This would result in even very large freestanding signs, including those near property lines, from being exempt if their display is only oriented to the interior of the property (i.e., a one-sided sign). It would also exempt large signs, if they had small text and were located a sufficient distance from property lines so as to not be “legible”.

Second, where the existing exemption does not apply if visible from an adjacent property, under Draft 2 the exemption would apply, even if the sign were plainly visible or legible from an adjacent property.

It would be difficult to find any other zoning regulations that do not apply once a building, structure or use are a sufficient distance from the street property line as to not be visible or legible. Such as a standard complicates sign regulation because it suggests wall signage for one row of tenant spaces is subject to the code but the wall signage just around the corner of the building for a similar row of tenant spaces is not. Even for the first row of tenant spaces, it suggests that elevated wall signage above the doors/windows is subject to regulation where lower placed signage adjacent to doors/windows may not be (due to asserted legibility obstructions). In addition, any lack of legibility that is asserted due to trees, for example in a landscape buffer, may not be permanent, as trees grow and change configuration or could later be removed entirely and any asserted obstruction.

Adding to the confusion, Draft 2 retains the examples that were clearly intended to illustrate which signage applications the exemption was intended for in the first place: signs inside of buildings and signs in courtyards. Draft 2 needs to be revised to clarify the definition of concealed sign as follows:

29. Revise the definition of concealed sign so that it only includes: a) signs located within a building, except those that are attached to the inside surface of a window or otherwise placed so as to principally be viewed from outside of a window; and b) signs located within a courtyard or other outdoor area that is surrounded by a building or other permanent opaque structure.

Master Sign Program

Draft 2 would add a “master sign program” that is not in the existing code, in order to provide “flexibility” in sign regulations. The provisions for this program would have no set limitations of any kind as to increases in sign area and height or other criteria by which the underlying requirements may be weakened. Only vague and unmeasurable guidelines are proposed so as to meet the design criteria that would supposedly warrant weaker requirements. Furthermore, the review and approval would be at the sole discretion of the Planning Director without any public notice or public hearing and aggrieved parties other than the applicant would have no right of appeal.

The legality of this scheme is questionable. It is long-established law in Arizona that sign regulations are zoning regulations (as opposed to building, electrical, and other technical codes that may apply) and that the authority for a local jurisdiction to zone is subject to legislative grant. As such, zoning procedures must be consistent with the applicable state statutes. In this case, Draft 2 would convey the legal authority to grant variances, which is strictly reserved for Boards of Adjustment, to a planning administrator. Furthermore, the decisions would be made without meeting the notice and public hearing requirements provided by state law.

Alternatively, the master sign program could be considered a planned area development for signs. In that case, required notice would be provided and a public hearing held before the Planning & Zoning Commission for either a decision or for a recommendation to the governing body for the latter to make a decision. In either case, aggrieved parties other than the applicant would have the right to appeal the decision.

Given the serious legal issues with the master sign program, its lack of clear limitations and guidelines, and its opacity to the public, the following needs to occur:

30. Delete the master sign program from Draft 2 and only consider it at a future date when a proposed program includes a proper legal procedure with public notice and hearing; clear limitations and guidelines; a provision that overall sign allowances are not to be substantially increased; and an analysis that sets forth the actual public benefit to be derived in terms of community appearance.

Temporary Signs for Non-Residential Uses

The changes proposed by Draft 2 that would weaken the regulation of permanent signs do not stop there, but also extend to temporary signs. The analysis in this section is not comprehensive, but will only cover the four types of temporary signs that have historically contributed to a degraded visual appearance of community streetscapes.

The first type is air dancers, which are referred to as “air-activated signs” in Draft 2. These signs are one of the most offensive of any sign type as to their impact on community aesthetics. They serve virtually no communicative purpose and are one of the most banal forms of attention-getting. They need to remain a prohibited use as in the existing code (as are all moving signs).

The second type is portable signs, which are prohibited in the existing code. They have also been prohibited in most other local Arizona codes, but have crept into acceptance in recent years, particularly in a pedestrian context. The proposed changes in Draft 2 would allow them for the first time in that context, but with the weakest of secondary regulations that, among other things, would hinder any enforcement. Once again, Draft 2 borrows from the least restrictive local jurisdiction in Pima County (Marana) and weakens their regulations further, while at the same time ignoring the sounder regulations in other jurisdictions (e.g., Sahuarita & Oro Valley). The proposed area and height

limits for these signs need to be reduced; the signs need to be required to be removed after the occupancy closes; sidewalk clearance needs to be specified at a minimum of four feet; the draft needs to clarify that the signs are not to be allowed in any parking area, including landscaped islands and spurs; the sign construction materials need to be specified as being of rigid and durable materials (wood, metal, or hard plastic); and the signs need to be anchored to a stake in the ground/hardscape or other embedded object (typically with a small chain).

The third type is banners. The existing code only allows a one-time display of grand opening banners that do not exceed 50 square feet in area. Draft 2 instead would provide for their widespread usage, including a display allowance for up to 180 days a year, which grossly stretches the concept of being temporary. Draft 2 would also permit their freestanding display near street property lines, where both safety and visual blight issues come to the fore. Draft 2 needs to be revised to only allow their usage when securely attached at all four corners to a building, to reduce the allowable area from that designed to give a particular profile to a new occupancy on a one-time basis, and to reduce the allowed time period per year to more rationally comport with the concept of being temporary.

The fourth type of temporary sign addressed in this analysis is window signs. The existing code limits temporary window signs to 15% of a window's area, while Draft 2 would increase that allowance all the way up to 40%. Draft 2 would also allow temporary window signs on the exterior side of windows, whereas the existing code prohibits such signs if they are paper or cloth. Temporary (and permanent) signs need to be excluded from the exterior side of windows and the percentage of an interior side of a window allowed for a temporary sign needs to be limited to something much more akin to the existing 15%. Consideration should be given to banning window signs in their entirety, save for a limited size formula to account for open/closed/hours, restaurant menu, and other similar pedestrian-oriented information to be provided at eye level.

31. Reinstate the existing prohibition on air-activated signs (as a type of moving sign).
32. Reduce the area limit for portable signs in Draft 2 from 12 square feet to 6 square feet
33. Add a height limit for portable signs in Draft 2 of 3.5 feet.
34. Revise Draft 2 so as to clearly require that portable signs are to be removed during the time between the close of business to the next opening of business.
35. Revise the temporary sign section in Draft 2 to specify a minimum 4-foot horizontal clearance on sidewalks for portable signs and for any other temporary signs where such a clearance may be applicable.
36. Revise Draft 2 so as to clarify that portable signs are not to be permitted in parking areas, including islands and spurs, and to provide at least a minimal clearance from the perimeter of parking areas.
37. Revise Draft 2 so as to only allow banners that are rigidly affixed to building walls at all four corners.
38. Revise Draft 2 to reduce the maximum area for banners from 60 feet to 40 feet (equivalent to the area allowance for changeable copy signs/panels in the existing code).
39. Reduce the time period allowed for wall banners from 180 to 90 days per calendar year with the 90 days to be divided into no more than two time periods.
40. Revise Draft 2 so that window signs are not permitted on the exterior side of windows.
41. Revise Draft 2 to reduce the area of a window within which a temporary window sign may be displayed from 40% to no more than 25%.

FIN.

9/21/20

Ms. Weesner,

We received your public comment on our proposed sign code. We have worked with stakeholders from the beginning of the process. Since the draft you reviewed was released we have made additional changes based on the feedback received from stakeholders. Would like to offer to setup an Microsoft Teams meeting to discuss the comments provided. If this is something that you would like to do, please let me know and we can set up a time that works for my team and with yours.

Tom Drzazgowski
Pima County - Chief Zoning Inspector
201 N Stone Av – 1st Floor
520.724.6675

Original Message-----

From: Thomas <tburdon@cox.net>

Sent: Monday, September 14, 2020 9:55 PM

To: District1 <District1@pima.gov>; DIST2 <DIST.2@pima.gov>; District3 <District.3@pima.gov>;

District4 <District4@pima.gov>; District5 <District5@pima.gov>

Subject: Billboard Proposed Changes

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

Dear Pima County Board of Supervisors,

I am against any proposed lighting changes, including the proposed billboard changes.

I have lived in Tucson for over 45 years. I grew up on Swan road when it was just two lanes and dirt. I remember looking up at the night sky and my dad getting me my first pair of binoculars. My dad was a navigator for the Navy on seaplanes and knew a lot about the night sky. Back then you could see the Milky Way stretch across the sky, not today though.

I have belonged to the astronomy club here in Tucson on and off for a long time. I regularly visit Kitt Peak (when it is open) and try to get to all of the local observatories. I support our young astronomers and changing lighting codes makes it tougher.

Tucson was known for being the Astronomy capital of the World. Do you know how many observatories in the Tucson area there are? How many businesses depend on Astronomy?

Put off the vote for now. Go to Starizona on a Friday or Saturday night.
I have attached a picture where you can still see some sky glow around Tucson.

Professional and amateur astronomers are already fighting to keep our dark skies. We are also fighting the star-link satellite system orbiting the earth now too. Please fight against light pollution and save our skies. Please go outside and look up and think about what it was like even years ago.

I appreciate you taking your time to read this and consideration.

Thank you,

Tom Burdon

Written Comments Received After October 13, 2020

----- Forwarded Message -----

From: Meg Weesner <mweesner@att.net>

To: Chris Poirier <chris.poirier@pima.gov>; Carla Blackwell <carla.blackwell@pima.gov>; Thomas Drzazgowski <thomas.drzazgowski@pima.gov>

Cc: Margaret Weesner <mweesner@att.net>

Sent: Tuesday, October 20, 2020, 06:36:53 AM MST

Subject: Follow up on sign code

Mr. Poirier and others:

Rincon Group of Sierra Club registers its firm opposition to the draft sign ordinance before you. In contrast to Staff representation that the ordinance is only an "update" or "simplification" and is necessary to address a 2015 US Supreme Court decision, it is instead a mass deregulation of signage requirements.

Attached is Rincon Group's October 1 letter to County planning staff that opposes the Draft 2 version of the ordinance and includes a detailed 14-page analysis showing the large to enormous proposed increases in signage allowances. In terms of the just issued Draft 3, Rincon Group's position of opposition remains the same. Draft 3 makes no changes in 7 of the 10 issue areas addressed by the Rincon Group analysis, so there is no basis to change the Rincon Group position. As to the other three issue areas (electronic message displays, wall signs, and master sign programs), Draft 3 walks back the degree of additional signage allowances somewhat, but not anywhere near enough to address Rincon Group's concerns.

The process that resulted in this proposal allowed undue influence of the on-premises sign industry, aggressive sign users, and their commercial association backers. We urge that you send a recommendation against approval of this draft ordinance and to instead start a process that is centered on community participants who do not have a self-interest in such mass deregulation.

Please distribute this message and attachments to members of the Planning and Zoning Commission and make them part of the official record.

Meg Weesner
Rincon Group Chair
Sierra Club Grand Canyon Chapter



**SIERRA
CLUB**

Grand Canyon Chapter • Rincon Group
300 E. University Blvd. #260 • Tucson, Arizona 85705
(520) 620-6401

October 20, 2020

Mr. Chris Poirier
Pima County Development Services
201 N Stone Ave
Tucson AZ

Re: Sign Code Revisions
Sent by email to Chris.Poirier@pima.gov

Dear Mr. Poirier,

Rincon Group of Sierra Club registers its firm opposition to the draft sign ordinance before you. In contrast to Staff representation that the ordinance is only an "update" or "simplification" and is necessary to address a 2015 US Supreme Court decision, it is instead a mass deregulation of signage requirements.

Attached is Rincon Group's October 1 letter to County planning staff that opposes the Draft 2 version of the ordinance and includes a detailed 14-page analysis showing the large to enormous proposed increases in signage allowances. In terms of the just issued Draft 3, Rincon Group's position of opposition remains the same. Draft 3 makes no changes in 7 of the 10 issue areas addressed by the Rincon Group analysis, so there is no basis to change the Rincon Group position. As to the other three issue areas (electronic message displays, wall signs, and master sign programs), Draft 3 walks back the degree of additional signage allowances somewhat, but not nearly enough to address Rincon Group's concerns.

The process that resulted in this proposal allowed undue influence by the on-premises sign industry, aggressive sign users, and their commercial association backers. We urge that you send a recommendation against approval of this draft ordinance and to instead start a process that is centered on community participants who do not have a self-interest in such mass deregulation.

Please distribute this message and attachments to members of the Planning and Zoning Commission and make them part of the official record.

Sincerely,

Meg Weesner
Rincon Group Chair
Sierra Club Grand Canyon Chapter

Cc: Carla Blackwell, Tom Drzazgowski

Attachments: Sierra Club letter from October 1; Sierra Club 14-page comments on Draft 2



Printed on recycled paper



October 20, 2020

Pima County Planning & Zoning Commission
c/o Pima County Development Services Department
201 North Stone Avenue, First Floor
Tucson, Arizona 85701

Via electronic mail to dsdplanning@pima.gov

**RE: Pima County Planning & Zoning Commission Meeting, October 28, 2020,
Agenda Item # 6, P19TA00001 New Sign Standards**

Honorable Chair Johns & Members of the Commission:

Scenic Arizona opposes the draft ordinance before you that would revise signage requirements in the Pima County Code (principally in Chapter 18.79, Sign Standards). The revisions represent deregulation on a truly epic scale, including first time allowances for many types of now prohibited signs. Our sister organization, the Sierra Club Rincon Group, has produced and provided you with a detailed analysis that quantifies the degree of such deregulation, and Scenic Arizona concurs with its findings and supports most of their proposed resolutions.

It should be further noted this process itself has been extremely flawed, as the proposed revisions have repeatedly been characterized as simply being an "update", a "simplification" or only those such changes as necessary to comply with a 2015 US Supreme Court decision (*Reed v Gilbert*). It is apparent that the regulated industry has had undue influence in this process, as evidenced by inclusion of much of their longstanding wish list in the draft and by a recently obtained memo to the Board of Supervisors (attached) that highlights how staff would "work with" the two largest on-premises sign companies in the County. The memo also highlighted numerous other commercial organizations, but entirely absent were any environmental, scenic, or other organizations whose specific mission and expertise includes protection of the visual environment.

It is difficult to understand how the same jurisdiction that produced the Sonoran Desert Conservation Plan could now produce such a lop-sided deregulatory document. As such, Scenic Arizona urges that your recommendation to the Board of Supervisors is to vote "no" on the draft ordinance and instead establish a community-based committee representing scenic conservation and environmental values to vet the document and make its own proposals as to what is truly necessary to comply with *Reed* and as to what adjustments to the existing code may be justifiable.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Mayer".

Mark Mayer
Government Affairs & Outreach Coordinator
520.326.4522 Email: scenicaz@mindspring.com



MEMORANDUM

Date: August 7, 2018

To: The Honorable Chairman and Members
Pima County Board of Supervisors

From: C.H. Huckelberry
County Administrator

A handwritten signature in black ink, appearing to read "CHH", is written over the printed name "C.H. Huckelberry".

Re: **Initiation of Major Revision to the Pima County Code of Ordinances, Title 18 – Zoning, Chapter 18.79 - Sign Standards**

Attached please find a July 31, 2018 memorandum from Development Services Staff regarding their initiation of a process to implement changes in the Pima County sign code standards to conform to existing law based on a 2015 Supreme Court Ruling.

The last major change to Pima County sign code standards occurred in 1985. It is likely the sign code will be completely revised, the number of signs listed in the code will be reduced and the standards simplified. Other jurisdictions have already amended their sign code standards. Pima County will begin the process to amend our sign code standards and conform to the Supreme Court Ruling. Staff will initiate this action at a Planning and Zoning Commission meeting this fall.

If you have any questions regarding this matter, please feel free to contact Deputy County Administrator for Public Works Carmine DeBonis, Development Services Director Carla Blackwell, Development Services Deputy Director Chris Poirier, or Chief Zoning Inspector Tom Drzazgowski.

CHH/lab

Attachment

c: Carmine DeBonis, Jr., Deputy County Administrator for Public Works
Carla Blackwell, Director, Development Services
Chris Poirier, Deputy Director and Planning Director, Development Services
Tom Drzazgowski, Chief Zoning Inspector, Development Services



MEMORANDUM

DATE: July 31, 2018

TO: Chuck Huckelberry, County Administrator

FROM: Carla Blackwell, Director *CB*
Tom Drzazgowski, Chief Zoning Inspector *TD*

SUBJECT: Sign Code Revision

The Town of Marana recently released their draft changes to their sign code. The town expects this to be approved by the Town Council in October. If approved this will be the third municipality in the metropolitan area that will have adopted a revised sign code in the last couple of years. Counties, cities and towns throughout Arizona and the country are in the process of amending their codes based on a 2015 United States Supreme Court ruling from the Town of Gilbert (Reed v Gilbert). One of the points of the ruling involved signage and the content of signs. The Supreme Court ruled that governments can't regulate signs based on content.

Since this ruling the City of Tucson and the Town of Sahuarita have both amended their zoning codes to align with the court ruling. With regional examples to pull from, we believe that now is an appropriate time to begin the amendment process.

Sign code changes have traditionally surfaced concerns from numerous stakeholders in the region that have an interest in changes to the zoning code. For the sign code amendment, we would expect to work with major sign companies such as Addisigns and Fluoresco. Neighborhood groups, dark sky advocates, and organizations would also be involved. Customers of Development Services such as SAHBA, home builders, commercial real estate firms and shopping center owners would be consulted. Organizations such as the Chamber of Commerce, MPA and Sun Corridor could also be involved. Lastly, we would work closely with area astronomy observatories and Davis Monthan Air Force Base.

The objectives of the sign code amendments will be as follows:

- The sign standards will be content neutral rather than the current code that regulates commercial signs, real estate signs and political signs by content.
- Sign standards will still contain limits for size, height, color and number on a

property.

- Where possible, try to adopt similar standards as neighboring jurisdictions
- Signs will still be regulated for lighting, moveable copy and type of lighting
- Change and modernize how sign area is calculated and align Pima County's code with current national standards.
- Possibly adopt an "exceptional design" standard. This could allow for increases in size or square footage based on aesthetic criteria such as uniform copy, backlighting, and using items such as brick, simulated stone, unfinished metal or other similar materials in the sign.

This overview is to assist you in providing information to the Board of Supervisors. The current sign standards can be found in Section 18.79 of the Pima County Zoning Code. Since the last major changes to the sign standards were in 1985, we believe this section of the code will be almost completely revised. It can be expected that the number of signs listed in the code will be greatly reduced and standards simplified. We would plan to initiate this action at a Planning and Zoning Commission this fall.

C: Carmine DeBonis, Deputy County Administrator for Public Works
Chris Poirier, Deputy Director of Development Services

October 23, 2020

Pima County Planning & Zoning Commission
c/o Pima County Development Services Department
201 North Stone Avenue, First Floor
Tucson, Arizona
electronic mail to dsdplanning@pima.gov

Via

**RE: Pima County Planning & Zoning Commission Meeting, October 28, 2020,
Agenda Item #6, P19TA00001 New Sign Standards**

Honorable Chair Johns & Members of the Commission:

As a member of the Billboard Review Committee for over two decades, I oppose the draft ordinance before you that would revise the signage requirements in the Pima County Code as primarily found in Chapter 18.79, Sign Standards. The proposed revisions amount to deregulation on a large scale, allowing the considerations for numerous types of currently prohibited signs. The Sierra Club Rincon Group and Scenic Arizona agree about the negative effects and impacts of these proposed revisions.

As many of the members of the Billboard Review Committee see it, this has been a distorted process with undue influence by the billboard industry selling the changes as merely being an "update" or a "simplification" to the current standards in place. The organization presented as backing these new changes may be influential in the County but what is lacking is the support from environmental and scenic organizations or those involved with one of Tucson's most important industries, astronomy, all working for the protection of the visual environment.

I bring up astronomy as I spent time listening to my neighbor of almost three decades, the late Michael J. Belton, as he would tell me about his adventures as an astronomer. He joined Kitt Peak National Observatory in 1964 and carried out numerous studies under planetary science. He was part of the Mariner 10 team that flew a space probe by Mercury and Venus and later the Voyager missions and on and on. It was the dark skies of Tucson that brought Michael to our city and allowed these historic events in astronomy to happen. Our you really willing to just throw away Tucson's standing in this field of science to have one more billboard signs light up the sky advertising hamburgers 2 for \$5.00. With the important of science being challenged today by our leaders in Washington, D.C., I can only hope you consider the importance of astronomy in Tucson and to the University of Arizona before you make your decision.

Thank you for your time and consideration,
Bill Du Pont, Member
Billboard Review Committee
520-404-7237

EMAIL dated 10/20/20

Tom and Janet,

Here are some suggestions for language which we think will clarify the County's prohibition of moving signs.

Special Use Permit Requirements for Billboards

Draft 3 deletes two requirements for a billboard special use permit, which are found in both the existing code and Draft 2, but somehow omitted from Draft 3. The fix is as below and would technically restore the existing language. Note, however, that it appears there was an inadvertent error in the 1986 code that somehow omitted what in Draft 3 is (A)(1)(a)-(f). These provisions are development standards that due to being located in a separate table rather than in the billboard section text in the existing code were somehow not included, even though there is of no qualitative difference from the types of standards found in the table as opposed to the text (which is true across all sign types). If this is to be addressed, the insertion below would simply be '(A)(1)' instead of '(A)(1)(f)-(h)'. Note that this change would not result in any additional restrictions, but would rather be a clarification that the special use permit process may apply additional requirements, but cannot waive or vary existing requirements (which is under the sole purview of a board of adjustment).

In Dec. 18.79.080.A.4.d, strike "(A)(1)(h)" and insert "(A)(1)(f)-(h)"

Moving Signs

The staff provided language indicates that it would revert to the old definition of moving signs (deleted in Drafts 2 & 3 from the existing code). The following reinstates the existing code definition of a moving sign, with some added text found in the Draft 3 prohibitions section to cover reflectivity, animation, and intermittence and variation of illumination. The prohibitions are altered to cover all forms of moving signs except the expressly allowed EMD signs. Inflatable signs are separated out as a prohibition because not all other inflatable signs not intended to be allowed would necessarily exhibit motion. Given staff commitment to not allow any sign motion other than the EMD exception, that requires deleting the air-activated signs (aka air dancers or air puppets) provided for in Sec. 18.79.09.D and revised language is provided in this regard as well. The proposed revisions are as follow:

After Sec. 18.79.030,M.1, insert:

2. Moving sign. A sign that flashes, blinks or reflects light, changes physical position, or conveys the illusion of movement by mechanical means, illumination, or air movement. Includes signs with animation or intermittent or varying color

or intensity of artificial illumination, whether deliberate or as a consequence of a defect in the sign or illumination source.

Strike text in Sec 18.79.040.A.4 and insert:

4. Inflatable signs, except on-site inflatable signs expressly allowed under Section 18.79.090(D).

Strike text in Sec. 18.79.040.A.5 and insert:

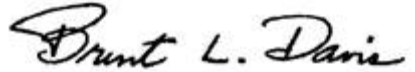
5. Moving signs, except on-site electronic message display sign components expressly allowed under Sections 18.79.080(C)(10) and (E)(8)).

Revise Sec. 18.79.080.D to read as follows:

D. Inflatable signs. A temporary inflatable sign is allowed in conjunction with a special event or activity subject to:

1. Location: On-site; non-residential areas only;
2. Maximum number per site: No more than two inflatable signs may be displayed concurrently;
3. Maximum area: None;
4. Maximum height: 24 feet. Shall not be placed on the roof of any building or structure. Maintain 18 feet of clearance from overhead utility lines;
5. Minimum setback: A distance equal to or greater than the height of the sign from all property lines;
6. Placed and operated in accordance with applicable building and fire codes including proper anchoring to the ground;
7. May be displayed for a period of up to three consecutive days and no more than two display periods per calendar year.

If you have any questions, please feel free to contact me.



Brent L. Davis
President



Group Management, Inc.

660 S. Country Club Rd.

Tucson, AZ 85716

O – 520-323-1115

M – 520-977-6229

F – 520-323-3399

brent.davis@gmi-tucson.com

10/21/20 EMAIL

Ms. Emel

We have reviewed the code and have no comments here at Davis-Monthan

B. Kacey Carter

Installation Community Planner

355 Civil Engineer Squadron/CENPP

520-228-3291 commercial

228-3291 DSN

EMAIL

Janet,

From reviewing this it looks like our sign concerns for most of our members are addressed.

18.79.050 exempts or "Open House" Portable "A" and "T" signs from application, permit and fee regulations.

It appears " For Sale signs on a residential property are also exempt and section 18.79.070 allows for one sign with six square feet of signage with a maximum 6 foot height.

Am I correct in this?

Where do I find the regulations for sign placement. Obviously the signs cannot create a safety hazard but where does this code allow us access to placement of temporary signs in the public rights of way and is there a fee associated with that?

Steve Huffman
Tucson Association of REALTORS®
520-954-2233

Email 2 from Steve Huffman October 22

I am still confused.

Our temporary signs would be put in the right of way and removed in a few hours. Largely open house signs.

What would the application entail? There would be no site per se. These same signs would be used throughout the county for a few hours.

Are you going to ask all 6000 of our members to come in individually? Is this an annual permit? Do just brokers apply?

I would like to talk to someone to clarify what is going on with the right of way.

Can someone call me?

Steve Huffman
Tucson Association of REALTORS
520-954-2233

From: Janet Emel <Janet.Emel@pima.gov>
Sent: Wednesday, October 21, 2020 10:16 AM
To: Steve Huffman <steve@tucsonrealtors.org>
Cc: Thomas Drzazgowski <Thomas.Drzazgowski@pima.gov>
Subject: RE: Pima County Sign Code Text Amendment

Steve,

Thank you for responding.

In answer to your questions:

Yes, portable A & T signs are exempt

Yes, you are correct about the 6 sf 6' height residential signs – including realtor signs - being exempt

Placement of signs in the right-of-way is proposed to be dealt with through the “Master Sign Program” (somewhat similar to the City of Tucson’s program) where you submit a layout according to the criteria in Draft 3 and the Planning Official can approve. I believe the fee would be \$100 per site or project but I will need to confirm that since a new set of fees was approved by the Board of Supervisors yesterday. The Master Sign Program was purposefully created to address signs in the right-of-way.

As far as the location of signs – it is as you said subject to traffic safety. For freestanding signs, there is no front setback requirement if the sign is 10' or less. If over 10' in height then it is a 10' front setback.

I hope this answers your questions – if not, please let me know. I hope you are able to participate in the Planning and Zoning Commission hearing on October 28, 2020.

Thank you, Janet Emel, Development Services Department

From: James Hannley <jhannley2@msn.com>

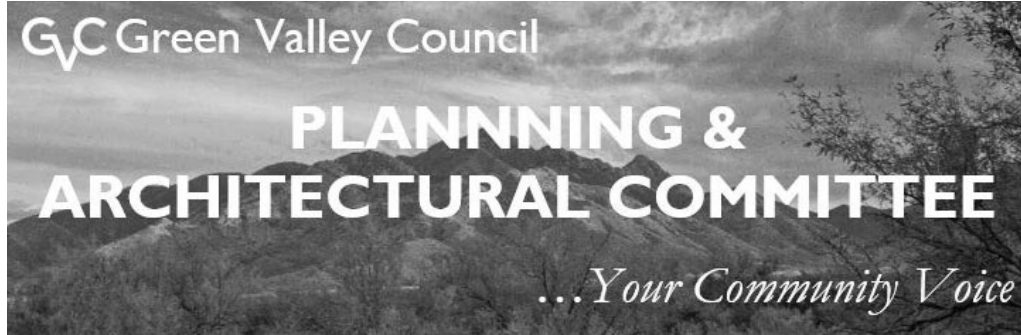
Sent: Thursday, October 22, 2020 10:08 AM

To: DSD Planning <DSDPlanning@pima.gov>

Subject: Sign ordinances

I want to request that you oppose any changes to current on-premises sign codes. I am a businessman and native born Tucsonan who lives and works within the city of Tucson. Thank you.

Jim Hannley
3553 E. Camden St.
Tucson, AZ 85716
JHannley2@msn.com



October 23, 2020

P&A Committee

GVC Planning and Architecture Committee comments on Draft 3 of the proposed changes to the Pima County Sign Code

18.7 9.030.I Illuminated signs.

Internally illuminated signs are not permitted by Dark Skies in the E1A zone, roughly south of Continental. Internally illuminated signs should not be permitted in the entire Green Valley Specific Area. The illumination output of signs should be limited by the outdoor lighting code regardless of solar or any other light source.

18.7 9.070. Measuring the sign height from the crown of adjacent freeways would allow signs taller than buildings. Freestanding signs should be limited to the height of the adjoining building.

18.79.080.A.4.b. Billboards should not be allowed on the I19 Designated Scenic Route in the Green Valley Specific Area.

18.79.080.C.5. A 25% increase in area and height of illuminated, or any other type of signs, should not be allowed regardless of meeting the the Dark Sky requirements.

18.79.080.C.10 Electronic message displays should not be allowed in the Green Valley Specific area.

18.79.080.F Permanent window signs should be limited in area regardless of the letter or symbol heights.

18.79.100.B. Master Sign Program and Design Review Committee. Prior to taking action on requests, the planning official and design review committee will request the recommendation of the GVC planning and architecture committee for applications in the Green Valley Specific Area.

Emailed from the GVC Planning & Architectural Committee 10/23/20

Pima County will notify the GVC planning and architecture committee of all sign permits. Pima County will request a recommendation from the GVC Planning and Architecture Committee for requested variances of the sign code prior to Pima County action.

Thanks,
Bill O'Malley

10/21/20 EMAIL

Thank You Janet and Tom for today's virtual meeting about the Sign Code Update. I reviewed Drafts 2 and 3 that we discussed today. Your explanation of the update and answers to my minor comments or questions helped me to explain at tonight's Tucson Mountains Association (TMA) Board meeting.

TMA Board members agree with the update to protect Dark Skies and Scenic Values. They had a few questions about electronic messaging and billboards I was able to answer due to our virtual meeting today. Thanks!

There is no need for more TMA explanation or collaboration. I will participate in the Oct 28 P&Z Commission meeting to re-learn the process after a dozen+ years away from Pima County! If any P&Z questions or input from TMA, then I can give a positive answer.

Steve Dolan CFM, TMA Board member



October 21, 2020

Pima County Planning & Zoning Commission
c/o Pima County Development Services Department
201 North Stone Avenue, 1st Floor
Tucson, Arizona 85701

RE: Pima County Planning & Zoning Commission Meeting, October 28, 2020
Agenda Item #6, New Sign Standards

Dear Planning & Zoning Commission Members,

The *Mayahuel Prevention Consortium* (MPC), a coalition of Amistades, Inc., is writing to oppose the Sign Standards Ordinance before you, as it would severely undermine our alcohol prevention efforts in the community that we have strived to achieve.

Amistades, Inc. is a Latino-led, Latino serving community development organization with six focus areas, including substance abuse prevention services for high risk youth and families. Many of our projects are specifically oriented to youth making the right decisions about alcohol and tobacco consumption in the face of peer pressures and a multitude of advertising messages. To that end, the *Mayahuel Prevention Consortium* was created to monitor retail alcohol and tobacco outlets to assure that signs being displayed are in compliance with the code regulations. The MPC conducts monthly environmental scans at approximately 200 locations within zip codes 85705 and 85706 that possess active liquor licenses. The project to date has had a very high rate of success in bringing merchants into compliance and thus greatly reducing the negative messages that youth are exposed to.

The proposed ordinance, if approved, would provide merchants little incentive to not go back to their old ways with new lax rules in place that their competitors down the street are taking advantage of. This would particularly apply to allowing banners, which have often been strung between stakes out by the streets or plastered onto walls with beer ads. There are similar concerns with A-frames and other temporary signs. We are also particularly concerned about allowing electronic signs, which could be used to display never-ending rotations of full color alcohol ads (as we have seen in other communities).

Please vote against this ordinance, so that our efforts to protect the youth of our community can continue to have the successes that we have had to date.

Sincerely,

Joseph M. Gill, M.A.
Project Director

cc: Pima County Supervisor Ramon Valadez
Pima County Supervisor Sharon Bronson

www.amistadesinc.org / Ofc: 520.882.8777 / Fax: 520.882.8886 / 5501 N. Oracle Road, Suite 125, Tucson, Arizona 85704

Amistades is a Latino non-profit community development organization committed to providing culturally responsive services, advocacy for social justice, and community empowerment.

Gayle G. Hartmann

2224 E. 4th Street

Tucson, AZ 85719

23 October 2020

TO: Chairman Brad Johns and Members

Pima County Planning and Zoning Commission

FROM: Gayle G. Hartmann

RE: New Sign Standards

Chairman Johns and Members,

I am writing to urge you NOT TO RECOMMEND APPROVAL of the “New Sign Standards” (Agenda Item 6) at your 28 October meeting.

As a member of the Pima County Planning and Zoning Commission in the late 1980s, I was involved with the creation of the county sign code. At that time, there was a sincere effort from all those involved to create an ordinance that limited the visual clutter of signage while still allowing businesses to be easily located.

Unfortunately, the current version of the sign standards that is before you has not adhered to those goals. First, there has been virtually no community involvement, other than by those individuals who would like to see an increase in the size and density of signs. Second, the changes, in the direction of more and larger signage, are simply too great.

Over the past few decades, Pima County and Tucson have moved in the direction of fewer billboards and fewer and smaller signs. For a community that values the scenic beauty of the surrounding Sonoran Desert and mountains, this has been a movement in the right direction – although not far nearly enough, in my opinion. I realize this ordinance does not address billboards, but it seems worthwhile to point out that four states do not permit billboards of any kind – Alaska, Hawaii, Maine and Vermont. All are known for their beautiful environment and all have flourishing economies.

Please allow this ordinance to be reviewed more carefully by a broader segment of the community.

Sincerely,

Gayle G. Hartmann

-----Original Message-----

From: Ted Warmbrand <its@theriver.com>
Sent: Friday, October 23, 2020 12:06 PM
To: DSD Planning <DSDPlanning@pima.gov>
Subject: New Sign Ordinance

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

Dear Pima County Planning and Zoning Commission:

Please vote NO on New Sign Ordinance up for a vote. The sky belongs to everyone.

Ted Warmbrand
(Secretary of Barrio San Antonio Neighborhood Association) Barrio San Antonio
402 S Star
Tucson AZ 85719

From: William K. Hartmann <hartmann@psi.edu>

Sent: Friday, October 23, 2020 12:48 PM

To: DSD Planning <DSDPlanning@pima.gov>

Subject: RE: Planning & Zoning Commission Meeting, October 28, 2020, Agenda Item #6, New Sign Standards

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

Please vote against the proposed New Sign Standards.

One of the main things that Tucson has going for it is the beauty of our city, the views of the mountains and our unique vegetation. Reducing the standards moves us in the direction of more clutter of billboards and the possibility of electric flashing billboards that, by design distract drivers and make our streets more dangerous. It's part of P&Z's responsibility to try to maintain the beauty and ambience of Tucson.

William K. Hartmann, Ph.D.
Senior Scientist Emeritus
Planetary Science Institute
Tucson

JULIA KEEN NEIGHBORHOOD ASSOCIATION

Email: jkna@mindspring.com

Pima County Planning & Zoning Commission
201 N. Stone Ave., 1st Floor
Tucson AZ 85701

RE: Pima County Planning & Zoning Commission Meeting on October 28, 2020;
For #6 on the Agenda, Sign Standards

To Members of the Pima County Planning & Zoning Commission:

The Julia Keen Neighborhood Association (JKNA) wishes to bring to your attention our opposition to the Sign Standards ordinance you are considering. We would urge you to vote “no” on this ordinance and properly inform the Board of Supervisors of your views.

JKNA lies mostly within the City of Tucson with Alvernon, 22nd Street, Country Club, and the Barraza Parkway forming our boundaries. The southernmost area of our neighborhood lies within an industrial area in unincorporated Pima County. Despite being affected by this issue, we were not informed by the County on this proposal (or never much of anything else).

Tremendous progress has been made over the past few decades or so as to the removal of billboards along Alvernon and Palo Verde (which Alvernon turns into), all the way from 22nd Street to south of Ajo Way. Our residents routinely travel this route, which is about half in the City and half in the County, as it is the only pathway to go south over the railroad tracks. Having seen the improvement with some ¾ of the billboards gone, we do not now need to see more and larger business signs popping up in their place and certainly do not want to travel through gauntlets of electronic signs.

Please do your duty, listen to the citizens, and reject this ordinance. The ordinance seems to have been written to only benefit those that have a financial stake in the manufacture and sale of more and larger signs and the small minority of businesses that seem to have an unhealthy need to stand out above the crowd at everybody else's expense.

Sincerely



Co-Chair
3679 E 33rd St
Tucson AZ 85713

cc: Supervisor Ramón Valadez
JKNA Board

From: Hector Campoy <hcampoy@icloud.com>
Sent: Sunday, October 25, 2020 3:24 PM
To: DSD Planning
Subject: Planning & Zoning Commission Meeting, 10/28/20, Agenda Item #6, New Sign Standards- Opposition to Proposed Change

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

Dear Pima Planning and Zoning Commissioners,

Please note my objection to the proposed Sign Standards ordinance . The change will encourage a proliferation of electronic signs with increases in standards for height, size and a reduction in required setbacks. While we sometimes tout the natural beauty of our area, we often overlook this attribute when commercial development is at issue.

Thank you for your consideration.

Very truly,

Héctor E. Campoy
Pima County Resident
1970 N. Calle del Suerte 85745



From: [Janet Emel](#)
To: [Nicholas Coussoulis](#)
Subject: FW: Planning & Zoning Commission Meeting, October 28, 2020, Agenda Item #6, New Sign Standards
Date: Monday, October 26, 2020 3:57:21 PM

From: DSD Planning <DSDPlanning@pima.gov>
Sent: Monday, October 26, 2020 10:48 AM
To: Janet Emel <Janet.Emel@pima.gov>
Subject: FW: Planning & Zoning Commission Meeting, October 28, 2020, Agenda Item #6, New Sign Standards

From: Barbara Jones <bwjones123@hotmail.com>
Sent: Monday, October 26, 2020 10:41 AM
To: DSD Planning <DSDPlanning@pima.gov>
Subject: RE: Planning & Zoning Commission Meeting, October 28, 2020, Agenda Item #6, New Sign Standards

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

RE: Planning & Zoning Commission Meeting, October 28, 2020, Agenda Item #6, New Sign Standards

Dear Members of the Pima County Planning & Zoning Commission:

We urge you to vote No on the above Agenda Item #6 regarding New Sign Standards. We strongly oppose the addition of more signs in our area, especially larger ones or electronic/lighted ones. The beauty of our area here would be very negatively impacted and these proposed changes are entirely unwelcome by residents in the Tucson Mountains.

Thank you,
Barbara and Ken Jones
1951 N. Box Canyon Pl.
Tucson, AZ 85745

From: [Janet Emel](#)
To: [Nicholas Coussoulis](#)
Subject: FW: Planning & Zoning Commission Meeting, October 28, 2020, Agenda Item #6, New Sign Standards
Date: Monday, October 26, 2020 3:57:30 PM

From: DSD Planning <DSDPlanning@pima.gov>
Sent: Monday, October 26, 2020 11:03 AM
To: Janet Emel <Janet.Emel@pima.gov>; Thomas Drzazgowski <Thomas.Drzazgowski@pima.gov>
Subject: FW: Planning & Zoning Commission Meeting, October 28, 2020, Agenda Item #6, New Sign Standards

From: Helene Cann <desertlover02@yahoo.com>
Sent: Monday, October 26, 2020 10:49 AM
To: DSD Planning <DSDPlanning@pima.gov>
Subject: RE: Planning & Zoning Commission Meeting, October 28, 2020, Agenda Item #6, New Sign Standards

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

Dear Members of the Pima County Planning & Zoning Commission:

I have lived in the Tucson Mountains for over 20 years. I am urging you to please VOTE NO on the above issue.

Our Dark Skies make this area one of the most magical and beautiful places to live in the country. These signs would seriously interfere with our night skies as well as our enjoyment of the majesty and beauty of the Sonoran Desert during the day.

Our community does not need the added blight of more signs, larger signs, or electronic signs - especially now that we are all staying home more. I find it very disheartening that this issue is even being raised.

Please continue to protect the beauty and serenity of our wonderful Sonoran Desert.

Thank you.
Helene Cann

From: [Astronomy Events](#)
To: [DSD Planning](#)
Subject: Input to October 28, 2020 Pima County Planning and Zoning Commission Meeting
Date: Friday, October 23, 2020 4:53:42 PM
Attachments: [PC Outdoor Lighting Code \(Tucsonb Amateur Astronomy Association\).pdf](#)

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

Pima County Planning and Zoning Commission,

We appreciate the opportunity to provide input to the Board of Supervisors concerning updating the sign standards for the October 28, 2020 Commission meeting. Attached is our letter of concern. Thank you and please let us know if you have any questions.

Jim Knoll

Jim Knoll
TAAA School/Non-Profit Astronomy Events Manager
[astronomy-events\[at\]tucsonastronomy.org](mailto:astronomy-events[at]tucsonastronomy.org)
<http://tucsonastronomy.org>
(520) 241-3113 (cell)



Tucson Amateur Astronomy Association

PO Box 41254 Tucson, AZ 85717

October 23, 2020

Subject: Pima County Outdoor Lighting Code

October 28, 2020 Pima County Planning and Zoning Commission Meeting

Pima County Board of Supervisors,

The Tucson Amateur Astronomy Association (TAAA) is asking the Pima County Board of Supervisors to support a limitation of the amount of Electronic Message Displays (EMDs) being used throughout the County and to enforce restrictions on the amount of emitted ambient light.

Astronomy is a significant economic and science activity within Pima County and any activities that inhibit our dark skies will hurt this industry. In addition to an economic impact, astronomy is also a significant portion of the Science, Technology, Engineering, and Math (STEM) activities for schools and youth groups. In 2019, TAAA conducted 120 events for schools, non-profits, youth groups, and the public. 57 percent supported schools. We also conducted 72 events for local area resorts and their guests. We are able to accomplish these events at schools and venues in the heart of the city and surrounding Pima County because we do have good lighting codes that enforces downward directed lighting. We do not want to go the way of Phoenix with so much excessive ineffective lighting that sends more light into the sky than onto the ground where it is most effective.

We strongly advocate that any lighting changes need to be vetted with the various stakeholders to include the Astronomy Consortium of Arizona (AZAC) and the Outdoor Lighting Committee. We echo AZAC's concern about the legalization of EMDs and their proliferation throughout the County. Several EMDs (Ambassador Jewelry on Broadway in particular) are exceptionally bright and intrusive. They also have a safety impact by being another distraction for drivers, diverting their attention away from the road with the brighter ones causing a great deal of glare. None have any downward directed lighting similar to traditional signs.

We appreciate your consideration to help balance the need for advertising with the dark astronomy skies Tucson and Pima County is known for. Thank You.

Sincerely,

Dr. Stella "Mae" Smith, PhD
President

From: [Gary Kordosky](#)
To: [DSD Planning](#)
Subject: Letter Sign Code Changes
Date: Monday, October 26, 2020 12:06:33 PM
Attachments: [Pima County sign code changes 2020.pdf](#)

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

To Whom it may concern:

Please find attached a letter from the Gates Pass Area Neighborhood Association to be delivered to members of the Planning and Zoning Commission regarding the Oct. 28 hearing on changes to the Pima County Sign Code.

Thank you for your attention to this matter.

Sincerely,

Gary Kordosky
2020 President of Gates Pass Area Neighborhood Association



Gates Pass Area
NEIGHBORHOOD ASSOCIATION

PO Box 87554 • Tucson, AZ 85754 • gpanasec@gmail.com • www.gpana.info

October 26, 2020

Pima County Planning and Zoning Commission
c/o Pima County Development Services Department
201 North Stone Avenue, First Floor
Tucson, AZ 85701

Via electronic mail to dsdplanning@pima.gov

RE: Pima County P& Z Commission Meeting, October 28, 2020
Agenda Item #6 P19TA00001 New Sign Standards

Commission Members:

The Gates Pass Area Neighborhood Association, a group of over 120 households in the Gates Pass area, has the mission to maintain the residential character and scenic beauty of our neighborhood and the roads leading into and out of our neighborhood to the city. We offer the following comments on Agenda Item #6 P19TA00001 New Sign Standards.

The existing Pima County Sign Standards have served our community well as they balance the needs of the sign industry, businesses and the people of Pima County. We found this to be true several years ago when the International Wildlife Museum sought a setback exemption to the Pima County Sign Code for an electronic sign. The community stood behind our fight against this exemption and the exemption was not granted.

The proposed changes to the Pima County Sign Standards are said by Pima County Development Services to be minor and are said to simplify the code. As a person who has some experience with matters such as this (I served for 11 years on the P&Z Commission 1981 – 1993) I had great difficulty following the changes and trying to make sense of them even though I sensed the changes are not minor and not a simplification of the code. I expect most residents of Pima County reading and trying to follow the changes would have the same experience I had.

For this reason The Gates Pass Area Neighborhood Association will not comment directly on the proposed changes to the Pima County Sign Code. Rather we have carefully read the comments on the proposed changes from knowledgeable community groups with such as The Sierra Club Rincon Group, The International Dark Skies Association and Scenic Arizona and we are in full agreement with their comments.

Sincerely,

Gary A Kordosky
President Gates Pass Area Neighborhood Association

From: [Ronald Spark](#)
To: [DSD Planning](#)
Subject: New Sign Code Standards
Date: Sunday, October 25, 2020 3:22:17 PM

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

Pima County Planning & Zoning Commission
c/o Pima County Development Services Department
201 N. Stone Ave., 1st Floor
Tucson AZ 85701

**RE: Pima County Planning & Zoning Commission Meeting, October 28, 2020,
Agenda Item # 6, New Sign Standards**

Dear Members of the Pima County Planning & Zoning Commission:

I urge you to vote down changes to Pima County's current sign code. The proposed modifications would only add to our already visually sign polluted environment. Changing Electronic signage in particular poses a safety hazard for drivers as do reduced set backs. Increasing the size and number of free standing commercial signs only adds to the cluttered appearance of our public spaces. Maintaining a strict enforcement of the current measures represents a commitment to citizens.

Thank you for voting down these onerous and degrading changes.

Ron Spark, M.D. Director, Southern Arizona Transportation Advocates, 100 Calle Encanto,
Tucson, Arizona 85716 520-664-6062

From: beekerr2@netzero.net
To: [DSD Planning](#)
Subject: New Sign Standard, Item 6, P&Z Commission Meeting
Date: Sunday, October 25, 2020 11:45:31 AM

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

I urge you to restrain from passing new sign code regulations which would contribute to damage to our area's most valuable natural assets: dark skies and glorious mountain views.

Respectfully,
Ruth Beeker
3250 E. Hawthorne St.
Tucson, AZ 85716
beekerr2@netzero.net

From: [Teri Hardy](#)
To: [DSD Planning](#)
Subject: NO on Agenda Item #6
Date: Sunday, October 25, 2020 1:43:10 PM

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

As a member of the Gates Pass Homeowners Organization I am asking you to vote NO on **Agenda Item #6, New Sign Standards.** We do NOT need more light blight in this beautiful desert.

Thank you for reading this.

Teri and David Hardy

From: [Denise Garland](#)
To: [DSD Planning](#)
Subject: Pima County P& Z Commission Meeting, October 28, 2020 Agenda Item #6 P19TA00001 New Sign Standards
Date: Sunday, October 25, 2020 1:15:28 PM

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

Pima County Planning and Zoning Commission
c/o Pima County Development Services Department
201 North Stone Avenue, First Floor
Tucson, AZ 85701

Commission Members:

As a resident of the westside area of Tucson, where maintaining the residential character and scenic beauty of our neighborhood is highly valued, I offer the following comments on Agenda Item #6 P19TA00001 New Sign Standards.

The existing Pima County Sign Standards have served our community well as they balance the needs of the sign industry, businesses, and the people of Pima County. My neighborhood found this to be true several years ago when the International Wildlife Museum sought a setback exemption to the Pima County Sign Code for an electronic sign. The residents in the area and I stood behind fighting this exemption and the exemption was not granted.

The proposed changes to the Pima County Sign Standards are said by Pima County Development Services to be minor and are said to simplify the code, yet I had great difficulty following the changes and trying to make sense of them.

For this reason, I oppose the proposed changes to the Pima County Sign Code and stand in support of those who also oppose the changes like, The Sierra Club Rincon Group, The International Dark Skies Association and Scenic Arizona.

Denise Garland
5201 West Via Mallorca
Tucson, AZ 85745
(916) 425-4837

From: [Green, Richard F - \(rgreen\)](#)
To: [DSD Planning](#)
Cc: [Chuck Huckelberry](#); [Carmine DeBonis](#)
Subject: Planning & Zoning Commission Meeting, October 28, 2020, Agenda Item #6, New Sign Standards
Date: Monday, October 26, 2020 2:50:18 PM
Attachments: [P&Z Oct 20.pdf](#)

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

Please note this letter on the New Sign Standards from the Arizona Astronomy Consortium of professional observatories.

Richard Green
Assistant Director for Government Relations
Steward Observatory
University of Arizona
933 N. Cherry
Tucson, AZ 85721-0065
520-626-7088

October 22, 2020

Pima County Planning and Zoning Commission
201 N. Stone Ave.
Tucson, AZ

Re: Oct. 28 Meeting Agenda Item #6, New Sign Standards



info@azastronomy.org

Dear Chairman Johns and Commissioners,

As representatives of the professional observatories in the State of Arizona, we want to express our concern about the potential for significant negative impact on facilities in Southern Arizona should the radical revisions to the Sign Code be adopted as proposed. First of all, we acknowledge that County Staff were proactive in contacting selected representatives of the “dark skies” community as they were developing the revisions, that there are consequently some provisions that offer nominal protections, and that we are grateful that there is a statement of intention for the County to retain its commitment to protection of dark skies.

In the version now being presented, we have three main items of concern.

- 1) **Legalizing previously prohibited electronic message displays (EMDs).** EMDs are solid-state light boards that directly radiate light outwards, unlike other classes of illuminated signs. All current EMD technology projects a fraction of that light immediately above horizontal, the direction most negatively impactful in increasing the artificial sky glow veiling astronomical observations. Prohibition of such upward light has been the core of lighting regulation in the County for decades, and was the basis for State Statute prohibiting EMDs as billboards in all of Southern Arizona. The proposed revision offers two nominal protections: EMD operation is prohibited during dark hours and EMDs must not be visible from above. These protections are completely inadequate to prevent an explosive growth of stray light. Enforcement by response to complaint is fully proven to be ineffective on large scale, there is no enumerated penalty for non-compliance with curfews, and the proliferation of such signs after legalization is highly likely to lead to pressure for evening and even all-night operation. It is also unlikely that all permits will be denied because the technology is on its face non-compliant.
- 2) **The vast increase in the number and area of permitted lighted signs.** Although there is a welcome incentive to reduce the illumination and blue light content on a per sign basis, the ~30% decrease in light per sign is more than offset by the increases in illuminated sign area proposed, ranging from a factor of two to a factor of 40, depending on usage zone.

Lowell Observatory

*University of Arizona
Steward Observatory*

*University of Arizona
Planetary Sciences Department*

Kitt Peak National Observatory

Fred Lawrence Whipple Observatory

Vatican Observatory

- 3) **The absence of a sunset clause.** The City-County Outdoor Lighting Code Committee is actively engaged in revising the OLC, with particular attention to the Electronic Message Displays now proposed for the Sign Code. The addition of a sunset clause would force a reconciliation of anticipated discrepancies. Without it, Proposition 207 from 2006, as realized in State Statute ARS 12-1134, can form the basis for claims from sign owners and operators that they have vested rights, even in specific modes of operation.

Southern Arizona hosts the world's largest optical telescope and 10% of the world's largest telescopes. The Department of Energy, the National Science Foundation, the Smithsonian Institution and NASA, along with US universities and foreign institutions, invest tens of millions of dollars annually in the operation and upgrade of the Southern Arizona observatories. A basis for their long-term scientific investment strategy is their perception of the commitment of local government to protecting that national and international investment. In our view, approval of the sweeping revisions of the Sign Code as currently proposed would make a strong statement that Pima County has priorities other than protecting their investment, in contradiction to its stated purpose. We suggest that it would be wise to avoid the risk of making such a statement.

Dr. Lori Allen
Director, Mid-Scale Observatories
NSF's National Optical-Infrared Astronomy Research Laboratory

Dr. Richard F. Green
Assistant Director for Government Relations
Steward Observatory
University of Arizona

Ms. Amy C. Oliver, MLS
Public Affairs Officer
Fred Lawrence Whipple Observatory
Smithsonian Astrophysical Observatory

Dr. G. Grant Williams
Director, MMT Observatory

Dr. Donald R. Davis
Director Emeritus
Planetary Sciences Institute

Fr. Paul Gabor, S.J., Ph.D.
Vice-Director, Vatican Observatory

Dr. Constance Walker
Scientist
NSF's National Optical-Infrared Astronomy Research Laboratory

CC: Chuck Huckelberry, County Administrator
Carmine DeBonis, Deputy County Administrator

Lowell Observatory

*University of Arizona
Steward Observatory*

*University of Arizona
Planetary Sciences Department*

Kitt Peak National Observatory

Fred Lawrence Whipple Observatory

Vatican Observatory

From: [Anthony Knight](#)
To: [DSD Planning](#)
Subject: Planning & Zoning Commission Meeting, October 28, 2020, Agenda Item #6, New Sign Standards
Date: Monday, October 26, 2020 2:20:42 PM

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

Dear Planning and Zoning Committee

As a member of the Gates Pass Neighborhood Area Association I respectfully request that the committee vote NO on the proposed changes to the Sign Standards. This community does not need the added

blight of more signs, larger signs, or electronic signs.

Thank you.

Anthony and Cassandra Knight

1876 North Camino De Oeste, Tucson 85745

From: [Susan Thorpe](#)
To: [DSD Planning](#)
Subject: Planning and Zoning Commission Meeting, October 28, 2020, Agenda Item #6 New Sign Standards
Date: Sunday, October 25, 2020 7:44:10 PM

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

Please do NOT relax sign standards in Pima County.
We hate billboards, need MORE fines and enforcement against the Realtors and Developers who put up "We Buy Houses" signs, and we enjoy our sign-free beautiful landscapes and neighborhoods in Pima County. Keep our neighborhoods and highways sign free!!!!
THANK YOU
Susan Thorpe,
Realtor, Tierra Antigua Realty

From: [Matthew Somers](#)
To: [DSD Planning](#)
Subject: Please vote No on agenda item 6, PC P&Z Oct 28, 2020, New Sign Standards
Date: Saturday, October 24, 2020 5:04:07 PM
Attachments: [20201019_125224.jpg](#)

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

October 24, 2020

Matthew Somers
125 N Vine Ave
Tucson AZ 85719
(520) 882-620924, 2020

Pima County Planning & Zoning Commission
c/o Pima County Development Services Department
201 N. Stone Ave., 1st Floor
Tucson AZ 85701

Subject: Pima County Planning & Zoning Commission Meeting, October 28, 2020,
Agenda Item # 6, New Sign Standards

RE: Please vote no on agenda item 6.

Dear Pima County Planning & Zoning Commission Members,

While I understand the need for a business to advertise or for a point of view to be known, I am getting overwhelmed by the large amount of advertising that I am finding in town. As a 60-year resident of Tucson, I am finding it starting to be dangerous. Take electronic signs.

The proliferation of electronic signs is becoming ubiquitous--and not always in a good way. Electronic signs on government vehicles needed by government transportation departments and their subcontractors for construction, traffic control or emergencies is a use of electronic signage that is good for the community and promotes safety for pedestrians and drivers alike. But not all electronic signage is good.

As you can see in the attachment taken just last weekend on the frontage road for eastbound I-10 at Saint Marys Rd, the electronic revolution in advertising signage continues unabated. Now mobile signs on three sides of large trucks are being used. And the back of the truck now captures, even kidnaps, the attention of the driver. This enforced advertising, especially on a truck, will cause difficulty seeing around at left turns and near crosswalks. It is dangerous, and even more dangerous near dusk or dawn when visibility is bad. I understand moving sign content would

be allowed by the proposed changes. With pedestrian injuries and deaths increasing and worse driving habits quantified, how many pedestrians must die or be injured before someone at Pima County believes the cost/benefit analysis shows such use of electronic signs are dangerous?

In a nutshell, not all technological advances should be used and government should not carve out legislation for that technology's usage. The fastest car in the world is able to speed to over 300 miles per hour. Shall the state and federal government now build roads so someone may drive that fast? No, because the hand-eye co-ordination of driving at permitted speeds that is needed for driving safely already seems too high. The same is with electronic signs: just because you can make it doesn't mean it is needed by the community or is safe in its usage. I would, in fact, say the usage of electronic signs should be eliminated.

Freestanding signs are a pain.

Do I really need to know who is the property manager for a shopping, business or medical center? Or that a construction company built some improvement years ago? Or that a part or whole of an obviously vacant shopping center is for lease? No. These freestanding signs are a distraction from driving and do not give information which is ignored to nearly 99% of those driving by. The Internet has developed to a point where you can receive total information at your fingertips within seconds. To make these sign larger will not increase the amount of leasing or sales simply because, once again, 99% of those driving by do not care and will still ignore the message. Where is the cost/benefit for the community?

And it used to be a-frame signs were supposed to be brought in at night. I now see these signs locked to transportation department signs and not brought in. How safe or aesthetic is that for the community, especially pedestrians?

Wall signs look like a designation of desperation and not of a well-run business.

Why is it that every businessperson will say word-of-mouth advertising is the best, then support more and larger signs for those who don't care to shop at their place or even don't like the business?

Temporary signs that don't last are ridiculous.

Around town you see all these feather signs that try to advertise something that you can't read because of sun fading, or if you see the ad from one side the wording is backwards. Banners are on buildings, but because the signs aren't painted, the banners rip and fade and look ugly.

Window signs are stupid simply because police officers can not easily see a robbery in progress or an assault taking place inside the business.

Window signs used to be banned for that reason. And guess what. I have never been by a business and thought to myself, "Gee, that phone company had an air dancer sign. I think I'll buy a thousand dollar phone". I don't think you bought your phone that way either.

Dark sky:

It's bad enough Elon Musk has been launching Star Link to send out

hundreds of satellites to hinder astronomy while making money at everyone else's expense. Do we want to have hundreds of new electronic signs hinder the astronomy in Pima County? Do we want to possibly destroy astronomy, an industry that does not pollute but brings in millions of dollars to the community every year, for signs that will not bring any more money into the community?

This whole situation is not really to modify the sign code to match some court case. This attempt at new standards is an attempt to make money at the community's expense. While any business has to quantify its value daily, the community environment can not so easily be quantified. For example, decades ago mileage standards were raised for automobiles and the auto industry said their companies would be destroyed by this. You would think from what they said that capitalism was at its end. The auto companies adapted and are still around. In return, communities around the world breathe better air.

When it comes to signs you can go to Oro Valley and not see billboards and all the trashy suggestions in the proposed amendments and actually enjoy the mountains and scenery. Why should less affluent neighborhoods be visually ugly while the more affluent communities like Oro Valley be spared? Shouldn't you on the planning commission be reaching for the standards of an Oro Valley and not Las Vegas?

You of the Planning and Zoning Commission know that the vote you make will influence signage years or decades into the future. As the pandemic leaves us in the next few years, let's keep the visual impact down. Tourists come to Pima County to see mountains, deserts and skies. They don't arrive wanting to see a wall sign for a furniture sale, or a phone company air dancer sign, or some oversized sign. They come for the beauty of Pima County.

Please vote no on agenda item 6. Thank you.

Matthew Somers



From: [Janel Boston](#)
To: [DSD Planning](#)
Subject: Pls vote NO, New Sign Standards
Date: Sunday, October 25, 2020 2:13:51 PM

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

Pls vote "NO" to Agenda item # 6, New Sign Standards.

Our area is beautiful, and we don't want more signs, bigger signs, electronic signs, etc. It's important for us to keep it beautiful and it requires constant vigilance. Please vote NO.
Thank you,
Janel

From: [John Pestle](#)
To: [DSD Planning](#)
Subject: Propose Sign Code Changes, October 28 Hearing
Date: Saturday, October 24, 2020 5:27:23 PM

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

To the Pima County Planning and Zoning Commission:

Madera Reserve is a subdivision of nearly 300 homes on the east side of Green Valley. We value our dark skies and support the Fred Lawrence Whipple Observatory, which we see from our houses, porches and back yards.

The Board of Directors of Madera Reserve Homeowners Association met on Wednesday, October 21, 2020 and discussed the sign code changes you are considering. Internally illuminated signs, such as those with light emitting diodes and other "electronic message display" signs were a particular concern as a threat to our dark skies. The Board adopted the following statement and directed me as President to submit it to you as the Association's comments for your October 28 hearing on the proposed changes.

Dark skies are a highly valued amenity that the residents in our development of nearly 300 homes currently enjoy in our own backyards, unlike the majority of the nation's homeowners living in populated areas. Dark skies contribute to healthy living conditions for humans, plants and animals that share the land we inhabit.

Dark skies along with the nearby Visitor and Science Center at the Fred Lawrence Whipple Observatory are an easily accessible source of education and inspiration for our residents, and especially for young people learning more about the universe we live in. We support the ongoing research of all local observatories and consider them an exceptionally clean and valuable industry for Pima County.

Any light that escapes upward, beyond the horizontal plane of the light source, is a detriment to dark skies, and every incremental increase in upward lighting is a concern to us. We urge further study on the proposed Sign Standards changes to ensure the best possible mitigation measures are in place to preserve our dark skies.

I understand that the Green Valley Council via its Planning and Architecture Committee will be submitting comments about the proposed changes. Please take the Council's comments seriously,

as it represents the interests of homeowners/homeowner associations in the Green Valley area.
Respectfully submitted,

John W. Pestle, President
Madera Reserve Homeowners Association

From: [Tim Hunter](#)
To: [DSD Planning](#)
Subject: Proposed changes to the Pima County Sign Code.
Date: Friday, October 23, 2020 6:34:46 PM
Attachments: [image001.gif](#)

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

Tim B. Hunter, MD, MSc
4571 East Avenida Shelly
Tucson, AZ 85718
tbh@3towers.com
<http://www.3towers.com>
520-299-2972

23 October 2020

Pima County Board of Supervisors:

I feel many of the upcoming proposed changes to the Sign Code will negatively impact the quality of life in Pima County. There will be more obtrusive signs and an increase in electronic messaging displays (EMDs). “Electronic billboards” often significantly decrease traffic safety by distracting drivers, particularly those with bright and rapidly changing displays. As an active amateur astronomer, I am especially concerned about the impact of electronic displays on dark skies.

I believe the proposed changes would allow many more large and intrusive signs than allowed by the current code language. This would be a significant backslide on improvements to signs in the last decade. I would hope the proposed Sign Code would not promote commercial interests over traffic safety. Certainly, for electronic displays of any kind there should be no change in sign messaging allowed less than every 60-seconds. More rapid messaging is very distracting and dangerous for signs located on busy streets and

highway.

I do not think the County should allow greater sign size and height than currently permitted, even though such signs may be ameliorated by a reduction in allowable illumination. Electronic message centers of any type should not exceed 200 nits brightness, though a 100 nits level would be considerably better. One hundred nits is bright enough to provide good visibility for an electronic message, yet this lower level would provide much greater dark sky protection.

I am opposed to your permitting on-site Electronic Message Displays. If they are permitted, they should only be allowed during daylight with defined times of allowed operation, such as 6:00 Mountain Standard Time (MST) to 6:00 pm MST.

My wife and I owned and operated the China Rose Restaurant for over 20 years until she retired in 2011. We are quite familiar with the struggles of maintaining a small business and complying with sign regulation. We are also indirectly invested in a local business and want all Tucson businesses to succeed and have a friendly regulatory environment. The Sign Code may need revision as recommended by Staff to update it to modern terminology and to meet court rulings. However, such a revision should not allow any deterioration of the visual and dark sky environment by large, bright obtrusive signs. I hope you will take my concerns into consideration when the proposed changes to the Sign Code are addressed by the Board of Supervisors.

Thank You,

Tim Hunter

From: [Carolyn Leigh/Ron Perry](#)
To: [DSD Planning](#)
Subject: Proposed sign standard ordinances amendment(s)
Date: Sunday, October 25, 2020 1:48:17 PM

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

Dear Planning and Zoning Commission,
We strongly urge you to vote no on any changes to the existing standards. Our area of the Tucson Mountains turned out a huge crowd of voters against the proposed electronic signage at The International Wildlife Museum.

Our neighborhood and both the Gates Pass Area Neighborhood Association and the Tucson Mountains Association have been vigilant in keeping the approaches and surrounding areas of our parks, museums and other attractions beautiful. Please vote against any options that would bring more signs!

Thanks for your consideration, Carolyn Leigh and Ron Perry
4530 and 4550 West Speedway Blvd, Tucson, AZ 85745

--

Carolyn Leigh and Ron Perry
Art and Artifacts

[Art-Pacific.com](#) - New Guinea and Indonesian artifacts
[CarolynLeigh.com](#) - painting, prints and painter's books
[RimJournal.com](#) - Alamos, Mexico, recipes, adobe ...

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From: [fran stach](#)
To: [DSD Planning](#)
Subject: RE: Planning & Zoning Commission Meeting, Oct. 28, 2020, Agenda Item #6, New Sign Standards
Date: Monday, October 26, 2020 11:12:33 AM

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

Dear Planning & Zoning Committee,
I live in the area affected by this proposed change in sign standards. After reading what this entails, I strongly urge you to vote NO on this "New Sign Standards" agenda item.

Respectfully,
Frances E. Stach
849 N. Circulo Zagala, Tucson 85745

From: [Alan Goldstein](#)
To: [DSD Planning](#)
Subject: RE: Planning & Zoning Commission Meeting, October 28, 2020, Agenda Item #6, New Sign Standards
Date: Sunday, October 25, 2020 3:08:59 PM

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

To: Planning & Zoning Commission Members

RE: Planning & Zoning Commission Meeting, October 28, 2020, Agenda Item #6, New Sign Standards

No more commercial light pollution in the Tucson Mountains PLEASE!!

I urge you to vote NO on Agenda item #6!!

> Our community does not need the added blight of more signs, larger signs, or electronic signs.

> It would allow now-prohibited electronic messaging signs that could be full color and change messages once per minute

> It would significantly increase the size and number of freestanding signs allowed in commercial areas (including for non-residential uses in residential zones)

> It would significantly increase the overall size and number of wall signs allowed

> It would significantly increase the height of free-standing signs allowed in residential and other less intensive zones

> It would reduce the required setbacks for freestanding signs from the street and side property lines

> It would allow department personnel to grant even more exceptions from these rules than would already be allowed under these greatly relaxed rules.

> It would allow a variety of obtrusive temporary signs that are now expressly prohibited.

Thanks for your consideration,
Alan H Goldstein, Ph.D., GPANA Member



Industrial NanoBiotechnology
Evolution beyond the speed of life

<biomimetics@hotmail.com> <www.alanhgoldstein.com>

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From: [Warren Siringer](#)
To: [DSD Planning](#)
Subject: RE: Planning & Zoning Commission Meeting, October 28, 2020, Agenda Item #6, New Sign Standards
Date: Sunday, October 25, 2020 2:59:57 PM

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

As a member of the Gates Pass Neighborhood Association, I am against adopting the new sign standards. It appears the new standard is in violation of the Pima County Outdoor Lighting Code. The electronic billboard signs are very distracting and should be considered a nuisance. They do not belong in our rural area.

Sincerely,

Warren Siringer
Retired Senior Plans Examiner

From: [Olivia CB](#)
To: [DSD Planning](#)
Subject: RE: Planning & Zoning Commission Meeting, October 28, 2020, Agenda Item #6, New Sign Standards
Date: Sunday, October 25, 2020 2:50:28 PM

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

Hi,

Please vote no on the proposed new sign standards. We do not need electronic signs, more light pollution or changes to current sign standards.

What we do need are more bike lanes and litter removal.

Thanks,
State Senator Olivia Cajero Bedford, Retired

From: [chandika tazouz](#)
To: [DSD Planning](#)
Subject: RE: Planning & Zoning Commission Meeting, October 28, 2020, Agenda Item #6, New Sign Standards
Date: Sunday, October 25, 2020 2:47:49 PM

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

Hi

Please vote no on agenda #6 New sign Standards
We don't need them here in our lovely Desert so please vote no.

Thanks
Chandika Tazouz
El Rancho de Las Lomas. 4500 W Speedway blvd Tucson Az 85745

From: [Kay Lehman](#)
To: [DSD Planning](#)
Subject: RE: Planning & Zoning Commission Meeting, October 28, 2020, Agenda Item #6, New Sign Standards
Date: Saturday, October 24, 2020 7:35:32 AM

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

Dear Members of the Pima County Planning & Zoning Commission:

I am writing this to urge that you vote “no” on the above item regarding sign standards. I don’t believe that community needs more or larger signs. We especially don’t need signs that add additional light. As an amateur astronomer, I realize the value of darkness at night, but not just to be able to look at stars. Additional light is harmful to wildlife and even to us, disrupting circadian rhythms. Tucson is known as a center for astronomy and for the effort to keep our skies dark. Don’t mess this up just to allow more advertising!

Sincerely,
Kay Lehman

From: [Colin Dunnigan](#)
To: [DSD Planning](#)
Subject: RE: Planning & Zoning Commission Meeting, October 28, 2020, Agenda Item #6, New Sign Standards
Date: Saturday, October 24, 2020 2:46:16 AM

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

To the Members of the Pima County Planning & Zoning Commission,

I am writing this in order to ask you to please vote 'NO' on Agenda Item # 6, New Sign Standards, when it is brought up for consideration at your October 28th meeting.

Agenda Item # 6 would:

- It would allow now-prohibited electronic messaging signs that could be full color and change messages once per minute
- It would significantly increase the size and number of freestanding signs allowed in commercial areas (including for non-residential uses in residential zones)
- It would significantly increase the overall size and number of wall signs allowed
- It would significantly increase the height of free-standing signs allowed in residential and other less intensive zones
- It would reduce the required setbacks for freestanding signs from the street and side property lines
- It would allow department personnel to grant even more exceptions from these rules than would already be allowed under these greatly relaxed rules.
- It would allow a variety of obtrusive temporary signs that are now expressly prohibited.

The county does not need a return to the 'bad old days' when rampant advertising signage was a major factor in urban blight.

Thank you,

Colin Dunnigan

From: [Colin Waite](#)
To: [DSD Planning](#)
Subject: RE: Planning & Zoning Commission Meeting, October 28, 2020, Agenda Item #6, New Sign Standards
Date: Sunday, October 25, 2020 7:55:59 PM

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

Dear Members of the Pima County Planning & Zoning Commission:

Please vote NO on Agenda Item #6, New Sign Standards, at Wednesday's meeting. Our community does not need the added blight of more signs, larger signs, or electronic signs. As an environmental educator here in Southern Arizona, I can attest to the value of our wondrous Sonoran Desert, and I cannot imagine making a change that would further impact this beauty with manmade advertising. I stand with Scenic Arizona and the Sierra Club Rincon Group in opposition to the proposed changes.

Sincerely,
Colin Waite
9032 E. Pomegranate Street
Tucson, AZ 85730

From: [Travis](#)
To: [DSD Planning](#)
Subject: RE: Planning & Zoning Commission Meeting, October 28, 2020, Agenda Item #6, New Sign Standards
Date: Monday, October 26, 2020 11:13:05 AM

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

Hi,

Please vote against the new sign standards. We already have too much light in the desert and the addition of electronic signs is not a good idea. We have other needs such as stopping litter and illegal shooting to address instead. Bike lanes on Camino De Oeste, Sweetwater and Camino Del Cerro would be much better addition to the county.

Thanks,
Travis Bedford

From: [Roger Carpenter](#)
To: [DSD Planning](#)
Subject: RE: Planning & Zoning Commission Meeting, October 28, 2020, Agenda Item #6, New Sign Standards
Date: Sunday, October 25, 2020 3:45:14 PM

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

Dear Members,
Pima County Planning and Zoning Commission

I am writing to express an opinion about some of the proposed changes to County Code with regard to public signs. I have looked at the proposal. I have looked at the comments and the Staff's response to them. It is a difficult challenge to understand arguments in both directions, unless one is familiar with present regulations and can imagine the effects of the new proposals. Rather than complaining or applauding about one change or another, I offer the following two perspectives

For many years my father, Edwin F. Carpenter, was Director of the Steward Observatory on the University of Arizona Campus. For all of those years the damaging effects of night time light pollution was a constant concern, as the city expanded and street lights and advertising reduced the effectiveness of telescopes for astronomical research. In fact, it was brought up often at the dinner table. It was the motivating force to find a new location for the 36" telescope; after several sites were considered over the years, the instrument was moved to Kitt Peak.

Also, for over twenty years, I have been a member of the Gates Pass Neighborhood Association. We have worked hard to fight inappropriate development, encroachment on protected ridges, and the proliferation of unwanted, and sometimes illegal signage. We were successful in our last battle against exterior electronic signage at the International Wildlife Museum.

While I cannot comment on any specific change of the large number being proposed, I do urge that the Planning and Zoning Commission follow all of the recommendations of the several observatories and conservation organizations who have stated their positions with regard to the proposed changes in the codes regulating signage.

I thank you for your attention.

Roger Carpenter

Roger E. Carpenter
rogercarpenter6@icloud.com
1124 N. Camino de Oeste
Tucson AZ 85745
(520) 622-4070

From: [Janice](#)
To: [DSD Planning](#)
Subject: RE: Planning & Zoning Commission Meeting, October 28th, 2020, Agenda Item #6, New Sign Standards
Date: Monday, October 26, 2020 11:47:24 AM

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

I am requesting a NO vote on AGENDA ITEM #6 because the community does not need the added blight of more signs, larger signs, or electronic signs.

In addition:

- 1) It would allow now-prohibited electronic messaging signs that could be full color and change messages once per minute*
- 2) It would significantly increase the size and number of freestanding signs allowed in commercial areas (including for non-residential uses in residential zones)*
- 3) It would significantly increase the overall size and number of wall signs allowed*
- 4) It would significantly increase the height of free-standing signs allowed in residential and other less intensive zones*
- 5) It would reduce the required setbacks for freestanding signs from the street and side property lines*
- 6) It would allow department personnel to grant even more exceptions from these rules than would already be allowed under these greatly relaxed rules.*
- 7) It would allow a variety of obtrusive temporary signs that are now expressly prohibited.*

OF SERIOUS CONCERN is SAFETY:

GATES PASS Rd has in the last 3 years seen an INCREASE in serious TRAFFIC ACCIDENTS. Having an "electronic road sign" on a curving mountain road would present a MAJOR DISTRACTION to drivers. Many of the serious accidents have occurred in the vicinity of the International

Wildlife Museum.

In addition many residents moved to Gates Pass, Tucson Mountains and surrounding areas to get away from commercial signage and light pollution. Protection of wildlife (animals & plants) with dark skies have helped this area maintain an ecosystem in need of preservation in our rapidly changing communities.

Thank you,

Janice Crowder-Torrez
Cell (520) 789-6374

From: [Chris Shea](#)
To: [DSD Planning](#)
Subject: Re: Planning and Zoning Commission Meeting 10/28/2020 Agenda item #6, new sign standards
Date: Sunday, October 25, 2020 2:47:07 PM

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

As a resident of the West Side of Tucson I strongly urge you to vote NO on the agenda item #6 on new sign standards. We object to selling this real estate and subjecting us to more signs, larger signs and even electronic signs. Do not ruin our city and beautiful desert, not to mention creating more driving distractions by approving this proposal.

Christina Shea, 1871 N Moon Valley Pl, Tucson, AZ 85745

From: [Nancy Zeller](#)
To: [DSD Planning](#)
Subject: Sign amendment
Date: Sunday, October 25, 2020 1:36:43 PM

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

Please vote NO on amending the signs standard ordinance.
Nancy Zeller
Gates Pass Area.

Sent from my iPhone

From: [Fredrick Bertz](#)
To: [DSD Planning](#)
Subject: Signs
Date: Friday, October 23, 2020 9:55:12 PM

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

I just heard about the changes being proposed for signs and billboards. These changes would make Tucson more like Los Angeles with signs everywhere. Additionally, many of these proposals would increase distractions for drivers, potentially leading to more accidents. We don't want Tucson to become just another big city. Please don't allow these changes which enrich billboard companies at the expense of everyone else.

Fredrick Bertz
Former resident of Los Angeles

Sent from my iPhone

From: [Diahn Swartz](#)
To: [DSD Planning](#)
Subject: Vote No on the New Sign Standards
Date: Monday, October 26, 2020 1:06:54 PM
Attachments: [scan0004.pdf](#)

This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

Please see my letter to the Planning and Zoning Commission

October 26, 2020

Pima County Planning & Zoning Commission
c/o Pima County Development Services Department
201 N. Stone Ave., 1st Floor
Tucson AZ 85701

RE: Pima County Planning & Zoning Commission Meeting, October 28, 2020,
Agenda Item # 6, New Sign Standards

Dear Commissioners,

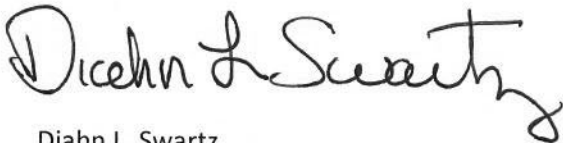
I am aghast that the Pima County would consider going backwards and dismantle the County's Sign Code. Please vote **NO** on the proposed sign standards.

The region has one of the highest red-light running rates. Tucson has such an alarming pedestrian crash rate that even the federal government is concerned. Drivers do not need more distractions! Allowing full-color messages that change frequently on our roads will increase traffic accidents.

Signs do not need to be higher and larger! The County does not need the blight of ugly signs. Property values will diminish because of ugly signs. I want to be proud of where I live when I drive around the County, not be disgusted.

With so much advertising now being done on-line, there is no need for more, larger, closer signs or electronic signs. There is no need to change the sign code. Please vote NO.

Sincerely,

A handwritten signature in black ink, reading "Diahn L. Swartz". The signature is written in a cursive, flowing style with a large initial 'D' and a long, sweeping tail on the 'z'.

Diahn L. Swartz
519 E. Roger Road
Tucson AZ 85705

Opposition to Use of Electronic Messaging Displays

Based on the 2019 Arizona Office of Tourism's annual report, developed by Runyon, tourism was the number one export industry in Arizona in 2019.

Arizona's warm weather and magnificent natural beauty made tourism the number one export industry in Arizona in 2019: 46.8 million people visited Arizona in 2019 who collectively spent \$25.6 billion in the state. The money spent by visitors supported jobs and generated tax revenue. The \$3.78 billion in 2019 tax revenue equaled an annual tax savings of \$1,400 for every Arizona household and supported 194,300 industry jobs.

My name is Dr. Kathleen Wishnick, and I am the President of Az19 Regional Tourism Alliance

Az19 Regional Tourism Alliance is a group of Chambers, Tourism Groups, Associations, and other like businesses who have joined together to promote the educational, historical, cultural heritage and economic attributes of southern Arizona. In June of 2018, Az19 Regional Tourism Alliance submitted paperwork to be recognized as, a nonprofit in Arizona. We received our official Federal 501(c) [3] status on March 20th, 2019.

Our goal is to transform Az19 Sahuarita, Green Valley, Tubac, and Nogales from a seasonal economy to a year-round economy through increased targeted tourism.

Our focus is on sharing the unique beauty and inspirational sites along this 101 kilometer drive from South Tucson to Nogales, AZ.

Based upon strong evidence, Tourism is a major economic driver that yields high benefits for people living and working in economically challenged areas!!!

History shows Green Valley and southern Az are impact more by a seasonal economy than Sahuarita.

As you proceed south on Az19, the income and quality of life is reduced for residents during the summer and it is difficult to recover the losses during the high season.

Increased revenues from recreational tourism (birding, camping, cycling, star gazing, hiking, culinary and historical) along the Az19 Region would improve both the quality of life for most residents, as well as businesses.

Besides the warm weather and magnificent natural beauty, tourist travel here to enjoy Madera Canyon's year round recreational opportunities; they enjoy the beautiful sunsets, while enjoying a glass of wine; they look forward to the meteor showers during August and viewing the beautiful clear dark skies during the evenings.

Southern Arizona Tourist enjoy the quiet, serene views of the Mountain Ranges and Sky Islands Southern Arizona has to offer.

Therefore, as an Alliance which promotes the beauty, quiet and relaxing time one can have in Southern Arizona, we are opposed to the Planning and Zoning Commission plan to allow Electronic, Message Displays (EMDs) along Az19.

This increased light in the Valley will diminish the quality of viewing the stars, as well as enjoying the full experience of true dark skies. Instead of looking forward to increasing tourism and revenues for Southern Arizona, visitors might decide to visit South Dakota, Montana, Idaho, or other states that protect the experience of dark skies.

Allowing this type of marketing will not only hurt tourism, it will impact the entire State budget and AZ residents will be the big losers. Lost state revenue will need to be generated through other means, like higher taxes to locals.

Once again, Az19 Regional Tourism Alliance goes on record against allowing EMD's within Pima County. Especially in the area of Southern Pima County where the increased light pollution will impact the overall experience of enjoying the quiet, dark, peaceful evenings in the desert.

Sincerely,

Kathleen Wishnick, Ed.D.

President, AZ19 Regional Tourism Alliance

Tkwishnick@gmail.com

916 214-9297



INTERNATIONAL DARK-SKY ASSOCIATION

International Dark-Sky Association
3223 North First Avenue, Tucson, AZ 85719, USA
tel +1.520.293.3198
www.darksky.org

26 October 2020

Pima County Planning and Zoning Commission
201 N Stone Ave
Tucson, AZ 85701

Re: October 28 Meeting Agenda Item #6 (P19TA00001 NEW SIGN STANDARDS, UPDATED ADDRESSING STANDARDS, AND A NEW DESIGN REVIEW COMMITTEE ROLE CONCERNING SIGNS)

Dear Chairman Johns and Commissioners,

On behalf of the International Dark Sky Association and our 451 members and supporters in Pima County, I want to express our concern about the potential for a significant negative impact on the integrity of the nighttime environment of our region should the revisions to the Sign Code be adopted as proposed. We are certainly grateful to Pima County Development Services staff for reaching out to us as key stakeholders in this initiative, and for accepting many of the suggestions we provided in early drafts of the current proposal. However, there are a few remaining items in the final version that cause us some concern.

In particular, we are worried about the potential for the significant proliferation of new electronic signs, which are prohibited by the existing Pima County Sign Code in §18.79.040. We take no position as to whether these signs are intrinsically good or bad for the community. However, there are recognized best practices for how to regulate electronic signs for the benefit of protecting the night and the night sky. We published this guidance for policymakers in 2019.¹ Our comments here flow from the recommendations of this document.

In the proposed code revision, §18.79.080(C)(10) allows freestanding signs to have what the language calls "Electronic Message Displays", or EMDs. §18.79.080(E)(8) allows wall signs to have EMD components. These are sources of light at night that are directed horizontally and whose emissions cannot be effectively shielded. We identify the following as some consequences of this policy if enacted.

Sign size increases: Increases in sign area allowances for freestanding signs throughout the code update yield more light per sign if they make use of EMD components as compared to conventional internally or externally illuminated signs because EMDs generally emit more light per unit surface area.² While IDA's guidance on electronic signs

Executive Director: Ruskin Hartley

Emeritus Director: David L. Crawford, Ph.D.

Board of Directors: Ken Kattner, President, USA • Kellie Pendoley, Vice President, Australia • Kim Patten, Treasurer, USA • Jessica Dwyer, Secretary, USA • Laurel Alyn-Forest, USA • Krissa Glasgow, USA • Diane Knutson, USA • Alejandro Sanchez Miguel, Spain • Diana Umpierre, USA

does not recommend a maximum sign size due to the diversity of uses, we believe that planners should carefully assess the maximum area of illuminated area in order to appropriately limit nighttime light emissions while ensuring that the messages communicated by EMDs remain legible.

§18.79.080(C)(10)(b) allows the EMD component of a freestanding sign to comprise up to 50% of its surface area. Without zone-based restrictions on where signs may use EMD components, more signs + larger surface area per sign = higher light emissions, even if the brightness per sign is held constant. There are also allowances for larger wall signs, which by §18.79.080(E)(8) may have an EMD component.

§18.79.070(D)(3) says that “A light source of a sign shall not be visible from above, except as allowed in the OLC.” This seems to preclude current-technology EMDs, which can emit up to relatively high angles above the horizontal, but the language is vague.

Permitted zones: The proposed code update allows EMD components of freestanding and wall signs in all zones where those types of signs are generally permitted now. There is no provision to keep this new light emission out of either ecologically sensitive areas or the zones around astronomical observatories. Our Best Management Practice 2 holds that EMDs “should not be placed within or adjacent to sensitive areas.”³

Sign brightness: Our guidance calls for significantly lower sign brightness values than the limits set in the Tucson/Pima County Outdoor Lighting Code (OLC),⁴ to which the Pima County Sign Code refers in §18.79.070(D)(2). After the first draft of the proposed code changes was released by Pima County Development Services, we urged the county to adhere to our zoned-based brightness limits, which match exactly those recommended by the Illuminating Engineering Society.⁵ No new limits were adopted in the proposed code changes, so for now regulation hinges on future changes to the OLC.

Full-color displays: Full-color images are permitted on EMDs for freestanding signs in §18.79.080(C)(10)(c) and wall signs in §18.79.080(E)(8)(c). We have some concerns about the short-wavelength (blue) components of these light emissions in particular. These colors of light scatter more strongly in the Earth’s atmosphere than others and lead to proportionately more light in the night sky over and near the source.

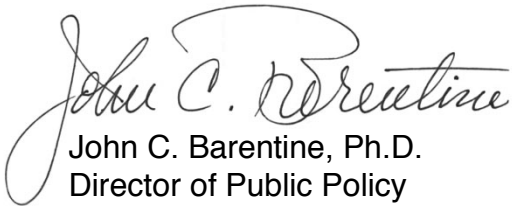
Sunset clause: We believe that this Sign Code revision should have a sunset clause, given the parallel developments in the OLC. That will ensure that the county code “comes along for the ride” when the OLC is updated in the future, particularly if a future revision of the OLC declares EMDs to be prohibited “unshielded lighting”. The OLC has generally prohibited unshielded lighting since its earliest incarnations in the 1970s.

There are a few items in the proposed code changes that we generally do support. These include the “dark sky protection option” (§18.79.100) around sign size and height

in exchange for lower brightness and color limits, and the curfews for EMD operation in §18.79.080(C)(10)(a) and §18.79.080(E)(8)(a).

On the whole, in consideration of all of these elements, IDA cannot support the Pima County Sign Code revision as the proposed text currently stands.

Yours sincerely,



John C. Barentine, Ph.D.
Director of Public Policy

¹ <https://www.darksky.org/wp-content/uploads/2019/10/EMC-Guidelines-IDA2019-1.1.pdf>.

² Luginbuhl, C.B., et al. (2010). "Digital LED Billboard Luminance Recommendations How Bright Is Bright Enough?" http://www.illinoislighting.org/resources/DigitalBillboardLuminanceRecommendation_ver7.pdf.

³ IDA Guidance, page 9.

⁴ Pima County Code of Ordinances, Chapter 15.12.

⁵ IES Recommended Practice 39-19, "Off-Roadway Sign Luminance" (2019; <https://www.ies.org/product/recommended-practice-off-roadway-sign-luminance/>).

Public Comment 4

Hi,

We are writing to oppose changes in the sign code that allow for electronic messaging signs or enlarge the height, size, or number of signs than now permitted. The current sign code is already fully sufficient for customers to be able to identify businesses. For quite a few decades now, Tucson has attempted to improve the look of the community. This has involved regulating signs, building a set of scenic parkways, and requiring or encouraging landscaping along most of our major streets. All these efforts have made a huge difference. Their purpose was not just to improve the experience of Tucsonans and their pride in the community but also for tourists, a major industry, and to enhance the city's ability to recruit valuable new businesses. The proposed amendments to the sign code will take the community many steps backward to the detriment of all these crucial interests. Please vote no on the proposed amendments.

Best,

John E. Schwarz and Maria A. Proytcheva
3720 N. Camino Leamaria
Tucson, AZ 85716

Hello Janet

SEE LETTER

My name is Kathleen Wishnick and I am the President of Az19 REgional Tourism Alliance. Attached please find our input to the Planning and Zoning Commission regarding the impact of EMDs on Dark Sikes in Southern Arizona. If you have any questions, please feel free to contact me.

Thank you for the opportunity to provide input to this important decision.

Kathleen Wishnick, Ed,D,
President, Az19 Regional Tourism Alliance
tkwishnick@gmail.com
916 214-9297 (cell/text)

Pima County Planning & Zoning Commission
c/o Pima County Development Services Department
201 N. Stone Ave., 1st Floor
Tucson AZ 85701

**RE: Pima County Planning & Zoning Commission Meeting, October 28, 2020,
Agenda Item # 6, New Sign Standards**

Dear Members of the Pima County Planning & Zoning Commission:

As a concerned long time Tucson resident I'd like to voice my opposition to the proposed changes to the current sign code. Allowing more electronic signs and altering the setbacks would be an unnecessary and possibly hazardous distraction for drivers. Moreover, the increased volume of signage would create a blight and detract from the visual aesthetic of our city. As it is now, the competing banners and signs are confusing enough without adding larger electronic ones and others to the mix.

Thank you in advance for your consideration in voting down the proposed amendments to the sign code.

Sincerely,

Marcia Spark, 100 E Calle Encanto, Tucson Az 85716 ,(520)404-3485

Please vote NO on agenda item #6 regarding Deregulation of Sign Requirements.

Thank you,
Melanie

My vote is no for this action.
Thank You

C. Jerry Charlow
Sent from my iPhone

Please vote "no" on the proposed new sign standards They would detract from the beauty of the desert , and be dangerous as distractions to drivers.
James and Wanda Torrey

Hello Mr. Drzazgowski,

As a very long-term advocate for reasonable signage (since 1985), I am opposed to the proposed changes to the Pima County Sign regulations. For four decades, citizens of this community worked carefully and diligently to compose regulations that evened the playing field for all sign users. The proposed changes increase very dramatically the amount of signage allowed for a sign user. I am suggesting that these changes be thoroughly reviewed, and only those changes necessary for alignment with the Reed decision be approved.

I will make every effort to virtually attend the Wednesday Planning Commission meeting.

Thank you for your consideration.

Kathi McLaughlin, Architect

520.721.7897 x21

kathi@mcsaia.com

I am sending this email to request that you vote NO on this agenda item. As our city and surrounding communities continue to expand, it would be a shame to allow more visual blight to our beautiful desert community.

Please vote NO.

Regards,

Linda & JP Leon

1431 N. Acacia Cliffs Ct. (Saguaro Cliffs community)

Dear Commissioners,

I am very concerned about the proposed New Sign Standards and urge you to vote NO at Wednesday's meeting 10/28.

Tucson has a reputation for being a Dark Sky city. Please do not change that with additional electronic signage.

I live near the Wildlife Museum on Speedway and strenuously object to any new electronic sign there or in our beautiful Sonoran Desert outlying areas. Please keep our rural areas beautiful and natural and vote NOT to add light pollution and visual blight. I urge you to vote to maintain restrictions on electronic signs and temporary sign that were approved in 1986. They have served our community well and have preserved Tucson's natural beauty. Please support the citizens who love to live here and vote NO on new sign standards.

Carolyn Thurman

Tucson

Dear Pima County Planning and Zoning,

I'm writing to add my opposition to the proposed changes to the current sign ordinances.

First, the current rules respect our designation as a Dark Sky zone. I can't understand why the Commission would want to risk losing that designation, and give up something that draws visitors to southern Arizona.

The current rules also seem to balance the needs of businesses, consumers, and visitors. I personally dislike the bright, changing signs in Phoenix - I don't think they add much to commerce, but they are potentially distracting to drivers. In a larger city such as Phoenix, there may be more competition for sign space and consumer attention, but here signs are not a major determiner for which businesses consumers choose.

One of the things we all love about Tucson is that it is a big, small city with a unique sense of place. We value the environment and cherish our natural resources. Unless the new sign ordinances are in line with those principles, I don't see any reason to adopt them.

Thank you for listening,

Lauren Rabb
1654 N Placita Tuberia
Tucson, AZ 85745

**RE: Pima County P& Z Commission Meeting, October 28, 2020
Agenda Item #6 P19TA00001 New Sign Standards**

Dear Commission Members,

I urge you to vote no on new sign standards in Pima County.

The existing Pima County Sign Standards have served our community well as they balance the needs of the sign industry, businesses and the people of Pima County. I found this to be true several years ago when the International Wildlife Museum sought a setback exemption to the Pima County Sign Code for an electronic sign. The community stood behind a fight against this exemption and the exemption was not granted.

The proposed changes to the Pima County Sign Standards are said by Pima County Development Services to be minor and are said to simplify the code. Frankly, I had trouble figuring out exactly what the changes might entail, but I do know any increase in lighting, especially in the Tucson Mountains, would be detrimental to the wonderful darks sky of the Sonoran Desert.

I have carefully read the comments on the proposed changes from knowledgeable community groups such as The Sierra Club Rincon Group. The International Dark Skies Association and Scenic Arizona and we are in full agreement with their comments.

Sincerely,

Leonard Thurman

5089 W Saguaro Cliffs Dr

Tucson, AZ 85745

To: Pima County Planning and Zoning Commission c/o Pima Co Development Services Dept
201 N Stone Ave, Tucson, AZ 85701

RE: Pima Co P&Z Commission Meeting Oct 28, 2020 Agenda Item #6 New Sign Standards P19TA00001

Commission members:

As a resident of the Gates Pass area and past president of the Gates Pass Area Neighborhood Assoc, I oppose the proposed changes to the existing sign standards and urge you to vote "No" on the issue before you.

I concur with the view of GPANA President Gary Kordosky who points out that the existing sign standards have served the residents of Pima Co well, and we see no substantive reasons for their change.

And I agree with Mark Mayer of Scenic Arizona when he points out that the new proposal favors commercial interests over those of the residents, even in residential zones.

The Sierra Club Rincon Chapter and International Dark Skies Assoc have also voiced their studied objections to this proposal, most importantly of which are the detrimental effects on traffic safety even in areas of dangerous congestion and problem speeding, the increased distraction to already distracted drivers, and the major negative impact on our optics and astronomy industries.

Given the weight of these objections, we hope you will realize that this proposal does not have the best interests of its citizens at heart.

Just because the commercial sign industry continues to invent new ways to blight our visual landscape, distract our driving, and disrupt major industry is not reason enough to alter the regulations against their proliferation, especially in residential neighborhoods. Sign companies may want more signs, bigger signs, brighter signs, and flashier signs, but the voters do not!

Sincerely,

Barbara Fleming

846 N Camino de Oeste, Tucson 85745

Dear P&Z Commission Members:

Please vote no on item #6. Pima County doesn't need to relax its sign regulations. Remember how things once were back in the 1970s. We don't want to go back to then, sign-wise.

Dave Devine
1705 E. Water Street
Tucson, AZ 85719

Dear Members of the Pima County Planning & Zoning Commission:

The added blight from more signs, larger signs, or electronic signs will destroy the beauty of our Southern Arizona.

Please vote NO on the above item.

Thank you,

Robert Lipson
1495 N. Sky Canyon Place
Tucson, AZ 85745
boblipson@gmail.com

I am writing in opposition to the proposed changes to the Pima County Sign Standards. There is no need for these changes and the proposed changes would have a significant detrimental impact on our communities.

Please vote against these changes at the October 28th hearing.

Thanks
David Rabb
1654 N Placita Tuberia

From: Donna Snyder <dsnyder1661@gmail.com>

Sent: Tuesday, October 27, 2020 3:05 PM

To: DSD Planning <DSDPlanning@pima.gov>

Subject: Planning & Zoning Commission Meeting, October 28, 2020, Agenda Item #6, New Sign Standards

RE: Planning & Zoning Commission Meeting, October 28, 2020, Agenda Item #6, New Sign Standards

Dear Members of the Pima County Planning & Zoning Commission

We urge you to vote NO on the proposed ordinance changes to Pima County signage. Our desert community in the Gates Pass area is quite rural and scenic. Allowing the possibility of electronic signage, as was proposed and defeated three years ago for the International Wildlife Museum on Gates Pass Road, would be a visual blight on the area. Please work to keep Pima County's skies dark and its natural desert surroundings beautiful. Thank you for your consideration.

Sincerely,
Donna and Bob Snyder
1661 N Placita Tuberia, Tucson, AZ 85745



**Southern Arizona
Home Builders
Association**

2840 N. Country Club Rd.
Tucson, AZ 85716
P: 520.795.5114
F: 520.326.8665
www.sahba.org

President

David M. Godlewski

2020 Executive Officers

Chairman

John Ward
Urban Moment

1st Vice Chairman

Tom Gansheimer
Lennar Homes

2nd Vice Chairman

Michael Del Castillo
Richmond American
Homes

Secretary/Treasurer

John Davison
Pulte Group

Immediate Past Chair

Tim Staring
TRS Custom Builders

Affiliated With



VIA ELECTRONIC MAIL

October 27, 2020

Mr. Brad Johns, Chair
Pima County Planning & Zoning Commission
130 W. Congress St.
Tucson, AZ 85701

Dear Chairman Johns:

Signage is the most cost-effective advertising a business can use and a critical element for Pima County's home builders. To highlight the economic development importance of this fact, some builders include a sign code review in their process to determining feasibility of a project in a particular jurisdiction. As our economic recovery from the global pandemic moves forward, Pima County's Sign Code must assist home builders meet their marketing needs and help drive future home buyers to their development.

For that reason, SAHBA has been an active participant in the stakeholder process to develop a Sign Code which brings Pima County into compliance with the Reed decision. The proposed Master Sign Program which home builders will utilize is consistent with other jurisdictions in Southern Arizona. Additionally, our members have participated in various opportunities made available for feedback during the process so far. County staff has been readily available to answer questions and receive industry specific feedback.

We are confident the sign code now before you for consideration achieves a reasonable balance between a variety of stakeholder interests and request your support.

Thank you for your consideration.

Shawn Cote

cc: Pima County Planning & Zoning Commission, Mr. Chris Poirier, Mr. Thomas Drzazgowski



Chairman Brad Johns
Pima County Planning and Zoning Commission
130 W. Congress Street
Tucson, Az 85701

Dear Chairman Johns,

The Tucson Association of REALTORS® has a membership of nearly 6,000 members.

In addition to the massive impact our industry has on the Pima County economy, we are the sales force for all the special attributes that make Pima County a special place to work and to live. Every day we help people find homes and locations for creation or expansion of their businesses. We help them discover why Pima County is the place to call home.

Signs are very important to our business. Most of our signs are temporary, such as open house signs or for sale signs placed on private property.

The current draft allows us to use our temporary signs to continue to market Pima County and to assist with the expansion of our economy. As written the proposed code allows us to use temporary signs without fees, permits or applications so long as they are safely placed. I believe this is appropriate due to the temporary nature of these signs.

We look forward to assisting with the creation of additional guidance which would allow access for our temporary signs to the public right of way. This access is essential, particularly for our temporary open house signs. We also need clarity on the permitting and fees associated with this access.

Thank you for your assistance,

A handwritten signature in black ink, appearing to be "Steve Huffman", with a long, sweeping horizontal line extending to the right.

Steve Huffman
Government Affairs Director
Tucson Association of REALTORS®

COMMENTS RECEIVED 10/28/20 AM

From: Marian Hoblitt <rhoblitt@comcast.net>

Sent: Tuesday, October 27, 2020 7:27 PM

To: DSD Planning <DSDPlanning@pima.gov>

Subject: Planning & Zoning Commission Meeting, October 28, 2020, Agenda Item #6, New Sign Standards

Please vote no on the proposed new standards for signs.

Marian Hoblitt
PO Box 85925
Tucson, Az. 85754

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From: Rick Hoblitt <rick@hoblitt.com>

Sent: Tuesday, October 27, 2020 8:07 PM

To: DSD Planning <DSDPlanning@pima.gov>

Subject: RE: Planning & Zoning Commission Meeting, October 28, 2020, Agenda Item #6, New Sign Standards

I just learned that the Planning & Zoning Commission is considering a revised sign ordinance that would abandon Dark Sky. Please vote NO--don't let commercial interests take precedence over preservation of our precious Sonoran desert environment.

Thank you,

Richard Hoblitt
3433 N. Scott Mine Lane
Tucson, AZ 85745