

# SIGN REGULATION ASSESSMENT

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City of Reno, Nevada

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Prepared By

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# 1 Introduction

This memorandum provides the written deliverable for Task 1.5: Sign Regulation Memo. It summarizes the Phase 1 tasks completed to date, including:

- Task 1.1 Document Review
- Task 1.2 Kickoff Call
- Task 1.4 Public Outreach

The memorandum provides our evaluation of the City’s sign regulations and proposes concepts to completely revise the current sign regulations to address the issues raised during the project kickoff and stakeholder meetings and that were identified by our analysis of the current regulations.

Reno is a vibrant City in which signs play a prominent part in the built environment. Signs serve important purposes for Reno’s residents, such as identifying a place of business, directing traffic and wayfinding for navigation, and expressing a visual aesthetic. However, signs also can have a negative impact on the community by creating visual clutter along roadways that can distract and overwhelm drivers, disrupting the quiet enjoyment of a neighborhood, and contributing to the appearance of blight when not maintained. Regulating excessive size, lighting, setbacks and lot placement, and other characteristics of signs can minimize the negative impacts of signs. Development codes must balance the important purposes of signs for communication and aesthetics with the negative impacts.

## 2 Task 1.1: Document Review

### 2.1 Major Documents

We have reviewed the following documents:

- Settlement Agreement in *Scenic Nevada, Inc. v. City of Reno* (Case No. CV17-00361) and *Lamar Central Outdoor, LLC v. City of Reno* (Case No. CV17-00474);
- Annexation and Land Development Code Chapter 18.05: Signs; and related definitions in Chapter 18.09;
- Other sections of the ALDC (Chapter 18) that provide additional regulation of signs;
- Other Reno Municipal Code provisions, including the Charter, General Provisions (Title 1), Building and Construction Regulations (Title 14), and Public Art (Title 22);
- Reimagine Reno Master Plan and Downtown Action Plan;
- The assessment report and ALDC adoption draft of the Zoning Code RENOVation project completed in 2020; and
- Sections of the of the Nevada Revised Statutes:
  - a. Chapter 278 of Title 22 (Planning and Zoning);
  - b. Chapters 405 (Control and Preservation of Public Highways) and 410 (410.220-Beautification of Highways) of Title 35;
  - c. Chapter 268 (Graffiti) of Title 21; and
  - d. Chapter 590 of Title 51 (Food and Other Commodities, §§ 590.160 – 590.330, Advertisement of Motor Vehicle Fuel and Petroleum Products).

### 2.2 Summary of Observations and Plan Guidance

Key planning documents help to guide the sign regulation update process. The two main documents that help shape zoning code revisions are the master plan and the existing zoning ordinance. In addition, Reno recently completed a comprehensive ALDC update, and the

assessments and draft comments help to inform the sign code updates. These documents provide critical information about the current conditions and future goals for the community.

### 2.2.1 Reimagine Reno

The City of Reno adopted the current Master Plan, Reimagine Reno, in 2017 and updated the Plan in 2021. The City also prepared a Downtown Action Plan concurrently with the Reimage Reno plan. Reimagine Reno identifies several topics that relate to sign uses, including aesthetics, character, visual clutter, and blight. The following Citywide Policies relate to these issues:

- GP 2.2C: *Historic And Cultural Resources* encourages historic signs in infill/redevelopment projects “to reinforce the distinctive characteristics and history of the city’s neighborhoods and districts.” (p. 26.)
- GP 3.3D: *Blighted And Underutilized Properties* proposes that the City “[w]ork with property owners to improve blighted and underutilized properties (including surface parking lots and signs) through increased enforcement/regulation, incentives, and use of available redevelopment tools.” (p. 36.)

Several of the Area-Specific Policies proposed by the plan also relate to signs:

- RC-CC.7: *Signage* proposes that the Convention Center district include “a hierarchy of signs that is integrated with the overall character of the development, including informational signs for pedestrians. Consolidate signage for larger development parcels and limit heights to minimize visual clutter.” (p. 112.)
- CNC-G.14: *Signage* proposes that Community/Neighborhood Centers “[b]alance visibility considerations with the need to minimize impacts on surrounding views and neighborhood character in the design of signage plans for community/neighborhood centers. Incorporate historic signs or other unique features into signage plans where feasible.” (p. 118.)
- CNC-G.19: *Building And Site Improvements* proposes that Community/Neighborhood Centers “[u]tilize façade improvements, signage, landscaping, and other physical enhancements as a means to increase the vibrancy and longevity of existing centers” but also notes that “the pedestrian-oriented scale of signage and other improvements in existing neighborhood centers should be retained and/or integrated as part of revitalization efforts.” (p. 118.)
- C-UC.19: *Historic Character* proposes that urban corridors “[i]ncorporate historic structures, signage, and other unique features as part of corridor revitalization efforts wherever possible to reinforce the distinctive identity of different areas along the city’s urban corridors (e.g., Midtown, East 4th Street) and support citywide historic preservation objectives.” (p. 125.)
- C-UC.21: *Streetscape Character* proposes that the City “[p]hase out freestanding pole signs [in urban corridors] and decrease the number of billboards where feasible to reduce visual clutter.” (p. 125.)
- C-SC.15: *Development Identity* proposes that suburban corridors should “establish a unique identity based on its overall mix of uses and the surrounding development context. Landscaping, building design, signage, public spaces, and other features all contribute to a distinct identity.” (p. 128.)

Finally, several of the Implementation Strategies relate to signs:

- IMP-7.6a proposes that the City “[s]upport reducing the number of billboards within city limits and periodically review standards for electronic signs.” (p. 229.)
- IMP-7.6b proposes that the City “[r]eview and update design standards for signs within defined centers and corridors to promote signs oriented to the pedestrian scale rather than automobiles.” (p. 229.)

### 2.2.2 History of the Sign Regulations

Reno's sign regulations have caused significant public discussion and even litigation since the year 2000, when the citizens of Reno approved Ballot Initiative R-1 in 2000. Citizens for a Scenic Reno proposed the initiative, which stated:

The construction of new off-premise advertising displays/billboards is prohibited, and the City of Reno may not issue permits for their construction.

In 2002, Council adopted Ordinance No. 5294 conforming the interpretation of the billboard prohibition in the initiative to a cap on the overall number of billboards. In 2003, Council adopted Ordinance No. 5641 allowing billboard owners to remove existing billboards and "bank" the allowance for relocation elsewhere.

After almost four years of public input and discussion, Council adopted a new sign ordinance (No. 6258) in 2012, including an allowance of "digital" billboards. Over the next five years, the City, Scenic Reno, and outdoor advertising companies engaged in litigation over the sign ordinance. In 2017, the City and the other parties reached an agreement to end the litigation and allow the relocation of billboards using the previously banked billboard credits. Since the settlement of the litigation in 2017, the City has only allowed new billboards using the previously issued credits and seeks to prevent the net increase in billboards. In addition, the City no longer allows digital billboards.

The community also discussed the sign code during Zoning Code RENOvation, a comprehensive rewrite of the ALDC from 2018 to 2020 (See project information at <https://www.reno.gov/Home/Components/News/News/18799/87>). The Targeted Assessment Report for that project recommended the City 1) review the existing sign code to ensure content neutrality as defined in *Reed v. Town of Gilbert*; 2) implement Master Plan policies, such as "reducing visual clutter, improving standards for pedestrian-oriented signage, and encouraging the preservation of historic signs;" and 3) update the sign code as part of a separate process. Clarion, *City of Reno, Nevada: Annexation and Land Development Code Targeted Assessment Report*, March 2018, pgs. 4-5 (available at [https://www.reno.gov/home/showpublisheddocument/75602\\_/637024127164230000](https://www.reno.gov/home/showpublisheddocument/75602_/637024127164230000)).

In the Adoption Draft of the ALDC, the drafters noted that changes to Article 1 of the sign code included new formatting and limited updates to provide content-neutral regulations, but changes to Article 2 attempted to simplify the regulatory system for off-premises advertising displays while maintaining the overall intent of limiting new billboards. Clarion, *Zoning Code RENOvation: Adoption Draft*, July 2020 (available at <https://www.reno.gov/Home/ShowDocument?id=85273>).

### 2.2.3 Reno's Current Sign Regulations

ALDC Chapter 18.05: *Signs* provides Reno's current sign regulations. The ALDC organizes the sign regulations in two articles: Article 1 addresses on-premises signs and Article 2 addresses off-premises advertising displays. The Articles provide different substantive standards but similar procedures.

#### **Article 1. On-Premises Signs**

After a statement of purpose, Article 1 immediately provides the sign allowances. Section 18.05.102 allows sign area based on "business frontage," with a limit of two business frontages for the area calculation.

Section 18.05.103 limits the sign location to the entire lot so that it may not project into the right-of-way. Section 18.05.104 controls the number of signs by reference to Table 5-1 and provides an additional allowance of one suspended sign.

The next sections of Article 1 provide permitting standards and defines regulated signs, exempt signs, and prohibited signs. Section 18.05.107 generally requires a permit and also provides that signs over 150 square feet require site plan review if proposed within 150 feet of the Truckee River.

Section 18.05.108 provides exemptions from the permitting requirement for the following types of signs and activities:

- Address numbers;
- Non-structural changes;
- Exemption for residential parcels;
- Flags – allowed at one per parcel;
- Masonry and bronze signs up to 8 square feet in commercial zones;
- Official traffic control signs;
- Public safety signs;
- Signs in a building;
- Drive-through signs up to two per lane of up to 64 square feet; and
- Signs on residential parcels as shown in Table 2.2-1.

Table 2.2-2. Residential Sign Exemptions

Parcel Size	Sign Area Allowance	Sign Height Limit
1 acre or less	16 square feet	3 feet
1 to 5 acres	32 square feet	6 feet
More than 5 acres	64 square feet	12 feet

Section 18.05.109 prohibits the following types of signs:

- Signs that pose a traffic or pedestrian hazard;
- Signs in a stream or canal;
- Mobile signs;
- Inflatable signs;
- Signs that appear similar to official signs or warning signs;
- Snipe signs;
- Roof signs;
- Wall signs that extend above or outside the wall area;
- Signs that produce sounds, odors, smoke, or other sensory stimuli; and
- Signs within 100 feet of a freeway that are more than 20 square feet.

Section 18.05.110 provides the temporary sign standards and prohibits illumination, placement in right-of-way and vision triangles, and snipe signs. It also provides a maintenance requirement, procedure for removal, notice, storage, and retrieval by owner. The section limits the display period to no more than 95 days per calendar year. Residential lots up to two acres may display temporary signs of six square feet, and lots with more than 2 acres may display signs up to 32 square feet in area. Non-residential and mixed-use lots may display signs of 32 square feet per

street frontage, and that allowance is higher on vacant lots, with sizes up to the general allowance for freestanding sign area.

Section 18.05.111 provides for canopy signs and allows them to project over right-of-way with permission of the public entity that controls the right-of-way. The section provides that canopy signs may not exceed 20 square feet.

Section 18.05.112 provides for the removal of abandoned signs, including a procedure for notice and flexible standard for continuation based on expected future use. A sign owner who does not use the sign for six months must remove it unless the Administrator allows it to remain.

Section 18.05.113 includes Table 5-1, which provides the primary allowances for sign types by district. The table distinguishes between freestanding and wall signs and also addresses whether the sign may include illumination and flashing/animation.

In residential districts, the Table limits the sign type to monument signs, height to six feet, and area to 50 square feet per access up to a 150 square foot maximum. The Table also indicates that the sign requires site plan review, but the Table does not clearly describe when a sign requires this review. Residential lots may also display up to 20 square feet of wall signs.

The general mixed-use district standard allows freestanding signs scaled to the lot size, with height limits ranging from eight feet for smaller lots to 35 feet for larger lots on streets with higher speed limits. Regardless of the height, freestanding sign area is 125 square feet, and the code allows the doubling of area for signs on arterial roadways with higher speed limits. The general mixed-use district standard allows wall signs up to one square foot for each linear foot of business frontage, with several caveats:

- The minimum allowance for all lots is 40 square feet regardless of size;
- The maximum allowance is 400 square feet;
- Sign width cannot exceed 75% of the frontage width; and
- Characters in sign copy cannot exceed five feet in height.

The mixed-use districts also provide different scaled sign allowances for GC, NC, and PO districts.

For nonresidential districts, the Table generally allows freestanding signs up to 25 feet in height and 80 square feet per frontage, with a maximum of 160 square feet for lots with multiple frontages. The table allows one wall sign per business/street frontage size based on building frontage.

The Table also provides for smaller signs for the Public Facilities District and very large signs for the Gaming Overlay District. The code allows signs in the Gaming district up to 100 feet in height with no area, illumination, or animation limitations. The code also allows height increases over 100 feet with a conditional use permit.

The footnotes to the Table describe exceptions for certain locations and common conditions and provide an additional sign for multi-tenant buildings, an additional allowance for larger lots, and an additional sign allowance for gas stations. Some of the footnotes provide substantive standards and not just explanations of the metrics.

While the table provides the districts for animated signs (GC, ME, Gaming), § 18.05.114 provides operation standards, including a restriction on NITS and a requirement for automatic adjustments. The section also requires that animated signs within 750 feet of residentially zoned property to obtain a CUP. It does not appear that the code includes any conditional use standards. The section also prohibits animated signs in specified locations, including a 300-foot buffer for Mount Rose Highway, Interstate 80 west of Robb Drive, US 395 north of North McCarren Boulevard, and Interstate 580 south of South McCarren Boulevard. Finally, the section provides separate

standards for displays required by NRS §§ 590.160 - .330, *Advertisement of Motor Vehicle Fuel and Petroleum Products*.

Sections 18.05.115 to .118 address nonconforming signs. Generally, continuing use of nonconforming signs may continue without alterations and with maintenance. The code provides for termination of a nonconforming sign if it becomes hazardous or requires repairs costing more than 50% of its replacement cost. Alteration or relocation of a nonconforming sign requires the reduction of the nonconformity by 25%.

Sections 18.05.119 to .122 provide the procedures for on-premises signs. Section 18.05.119 limits the review time to five days working days for review generally, three working days for temporary or special event signs, and additional standards for reviews that are part of a larger permitting review. Section 18.05.120 provides for appeals to City Council within five days and a hearing no less than 14 days and no more than 45 days from last day of the appeal period. Section 18.05.121 provides for judicial review pursuant to NRS Ch. 34, which provides for remedial writs. This section also provides that the Applicant can write “first amendment” on the application for consideration, and the City will file suit within 10 days if it denies the permit application. Finally, section 18.05.122 requires decisions to be in writing with supporting reasons.

### **Article 2. Off-Premises Advertising Displays**

Generally, the ALDC prohibits the construction of a new billboard unless the applicant holds a valid banked receipt. Section 18.05.202 prohibits the construction of new billboards except pursuant to the sign code. Section 18.05.203 declares that all existing billboards are nonconforming and requires annual reporting of billboards and banked receipts. However, nonconforming billboards may remain in place unless the termination of the lease requires its removal, or a natural disaster causes damage to it in excess of 50% of the value. The Code prohibits all digital billboards in § 18.05.204(d).

18.05.204 provides permitted and prohibited locations for billboards. Generally, the code allows billboards in industrial districts adjacent to arterial roads or freeways and specifies preferred locations designated in the Off-Premise Advertising Map. Prohibited locations include:

- Rights-of-way
- Property used without the consent of the owner
- Prohibited locations marked on the Off-Premise Advertising Map, including a 300-foot buffer along the Truckee River corridor
- Locations within 300 feet of residential property
- Locations within 300 feet of specified corridors
- Locations within 200 feet of portions of McCarran Boulevard
- Locations within 300 feet of U.S. 395 in excess of seven billboards
- A cap on the number of billboards in annexation areas
- Historic and preservation districts

Section 18.05.205 provides numerous general standards, including face area measurements with a standard for back-to-back signs. The code allows a maximum area of 672 square feet with 10% additional area allowed for cutouts. The area allowance provides for the largest standard billboard size of 14 feet x 48 feet according to the Outdoor Advertising Association of America. (<https://oaaa.org/resources/bulletins/>). However, the allowance does not allow larger “spectacular” size billboards, which are up to 800 square feet. The height limit is 30 feet above road grade. The section provides a 750-foot separation distance for standard signs and 1,000 foot separation distance for mechanically changeable signs. The section also includes maintenance standards. The section provides a tree removal and variance procedure that could use some clarification.



The section mandates a monopole design and direct illumination for all off-premises advertising displays.

Section 18.05.206 prohibits the following types of off-premises advertising displays:

- Roof signs;
- Wall signs;
- Building wraps;
- Stacked signs;
- Signs with more than two faces;
- Computer controlled variable message electronic signs;
- Temporary signs with exception for special events; and
- Signs that produce sounds, odors, smoke, or other sensory stimuli.

Section 18.05.207 provides for the use of banked receipts and a litigation stay. Banked receipts issued before July 19, 2012, are valid for 15 years, those issued after that date are valid for three years, and those provided by a court order or settlement agreement apply under the terms of that authority.

Section 18.05.207 also provides the procedure for applications for new billboards by holders of banked receipts. Subsection (e) provides for a litigation stay for the case of *Scenic Nevada v. City of Reno, et al.*, Case No CV17-00361. It appears the City resolved this case by settlement in November of 2017 and agreed to reissue banked receipts listed in an Off-Premise Advertising Inventory.

Sections 18.05.208 and .209 control temporary off-premises advertising displays. The code generally allows temporary off-premises signs up to six square feet within ½ mile of the location of the event advertised and limits the hours of display to 12 hours per day. Section 18.05.209 also provides for off-premises advertising for approved special events with limitations on the duration of the display and a 100 square foot area allowance.

Section 18.05.210 provides for the removal of abandoned signs. It defines abandonment to include lack of maintenance, lack of a business license, and lack of use for one year. The procedure references the general code enforcement regulations. Removal of an abandoned billboard permanently reduces the cumulative number of allowed off-premises advertising displays.

Sections 18.05.211 to .213 provide procedures for off-premises signs similar to those for on-premises signs.

Section 18.05.214 requires off-premises advertising displays to comply with the building code unless exempted by state or federal law, and § 18.05.215 requires a sign permit for construction, relocation, or expansion of all signs.

#### 2.2.4 Regulations Applicable to Signs in Other Sections of the ALDC

Many other sections of the ALDC provide general or specific preferences and mandatory standards for signs. These regulations generally apply to specific districts, specific uses, or to development standards. The following district regulations include specific sign standards.

- 18.02.602(c) - The Gaming Overlay provides 100 foot height limitation and no limit on area of freestanding or wall signs. No limitation on illumination or digital. This matches the sign code.
- 18.02.603(b)(3) - Greenfield Professional Office Overlay (GFPO) District limits signs to monument sign with indirect lighting and 6 feet in height and prohibits lighting signs at

night. The section prohibits signs on Plumas Street and requires signs to face Moana Lane.

- 18.02.603(c)(12)f.2.[b] - Mortensen-Garson Neighborhood Plan (MGOD) Overlay District limits freestanding signs to monument type.
- 18.02.603(g)(8)l. - Wells Avenue Neighborhood Planning Area (WANP) District Mixed-Use designation requires durable materials and prohibits temporary hand-written signs and digital signs. Signage types suggest aesthetic preferences and encourages window and hanging signs. Users can only display two types of signs.
- 18.02.603(g)(8)j.2. - WANP-Mixed-Use designation requires direction of illuminated signs away from residential zoned property or screened.
- 18.02.603(g)(9) - WANP-Mixed Use Residential (MUR) designation requires durable materials and prohibits temporary hand-written signs, digital signs, and internally lit cabinet signs. Signage types suggest aesthetic preferences and encourages window and hanging signs. The design standards suggest conforming with a residential scale and provide a 6-foot height limit.

The following use regulations provide unique or additional sign standards.

- 18.03.304(f)(1)(b)(7). Exemption criteria for adult businesses include that advertising cannot include depictions of products “described under the definition of “adult bookstore” in Section 18.24.203.”
- 18.03.304(g)(2)g. Cannabis Dispensary, Medical requires “discreet and professional” signage.
- 18.03.304(g)(3)g. Cannabis Retail Store, Adult Use requires “discreet and professional” signage and only logos approved by the department of taxation; no temporary or window signs allowed.
- 18.03.304(h)(6)(a)3.[b]. Truck Stop/Travel Plaza requires downlighting on signs.
- 18.03.306(a)(2)f. Cannabis Cultivation Facility, Adult Use limits to one six square foot sign on window or door for business identification.
- 18.03.306(a)(3)g. Cannabis Cultivation Facility, Medical requires “discreet and professional” signage and only logos approved by the department of taxation; no temporary or window signs allowed.
- 18.03.306(a)(4)f. Cannabis Independent Testing Laboratory, Adult Use limits to one six square foot sign on window or door for business identification.
- 18.03.306(a)(5)f. Cannabis Independent Testing Laboratory, Medical requires “discreet and professional” signage.
- 18.03.306(a)(6)f. Cannabis Production Facility, Adult Use limits to one six square foot sign on window or door for business identification.
- 18.03.306(a)(7)g. Cannabis Production Facility, Medical requires “discreet and professional” signage.
- 18.03.405(h)(2)c. Gaming Operation, Restricted prohibits signage identifying it as a non-restricted gaming establishment.
- 18.03.405(k)(1) & (11). Commercial advertising restrictions for home occupation accessory uses. May be deviated from through a site plan review.
- 18.03.405(r)(4). Utilities, Alternative System prohibits advertising or signage except signage identifying manufacturer.
- 18.03.503(i)(7) Urban farms allowed temporary signs per Chapter 18.05, but the signs may remain for the duration of use.

The following development standards provide additional or different regulations for signs.

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- 18.04.1005(d)5.c. - Mixed-Use Midtown Residential District design standards require signs to reflect residential scale, requires durable materials, and prohibits temporary hand-written signs, digital signs, and internally lit cabinet signs. The standard provides a limit of two sign types per lot. Each parcel/development may only display one monument sign, with a four-foot height limit and six-foot width limit.
- 18.04.1406 – development standard prohibits advertising signs on rear or side of building if abutting residential, sign design to minimize glare, and sign illumination limited to hours of operation.
- 18.04.1407 – development standard requires direction of illuminated signs away from residential zoned property or screened.

#### 2.2.5 Building Code

The Building Code provides standards for signs in Chapter 14.16: Signs. Section 14.16.030 provides a 90-day definition for abandoned signs that appears to differ from the abandonment standards of Chapter 18.05. The Building Code generally requires permits for establishment of signs, permit applications, and procedures for the time for a decision and appeals. The Building Code provides exemptions for:

- Permanent signs less than six square feet;
- Temporary signs less than 32 square feet;
- Any sign less than four square feet;
- Maintenance;
- Changing of copy; and
- Transportation authority signs.

The Building Code includes regulations prohibiting unsafe signs and provides for inspection authority and notice of violations. The Building Code also specifies location standards for temporary signs, ground signs, and wall signs.

## 3 Task 1.2: Kick-Off Meeting and Coordination

### 3.1 Communication Plan

An internal communication plan is integral for a successful ordinance revision. White & Smith seeks to communicate regularly by email with City staff and hold phone calls/online meetings every few weeks on an as-needed basis. Although the COVID pandemic may require continued flexibility in communication between the consultant team and staff, it has also increased the capacity of staff, stakeholders, and decisionmakers to participate in virtual meetings. The consultant team and staff effectively communicated on the project's timeline at initial project call on October 18, 2022, and a project update call on January 24, 2023.

### 3.2 Summary of Staff Comments

On February 21, 2023, the consultant team from White & Smith, LLC (Mark White and Sean Scoopmire) joined staff (Angela Fuss, Grace Mackedon, Carter Williams, Holly Parker, Jonathan Shipman, and Chandeni Sendall) to discuss issues and concerns about the City's sign regulations and current conditions of signs in the City. The major topics discussed were:

- Staff expressed an interest in taking all sides into account for a full sign code rewrite. The current code has many band-aid fixes, and staff prefers a more coherent approach.
- Staff described some of the past and current litigation the City has had over the sign code. This experience should guide the direction of the rewrite. In particular, outdoor advertisers and citizen groups have sued the City several times about billboard regulations.

#### 4. Task 1.4: Summary of Public Outreach

- Staff expressed an interest in allowing digital signs for some on-premises uses but to maintain the exclusion for digital features for off-premises signs.
- Staff pointed out several topics for clarification:
  - a. Nonconformities and repair standards;
  - b. Abandonment of signs and removal; and
  - c. The definition of roof sign.
- Staff wants a new approach to allow murals in a content-neutral manner.
- Staff expressed an interest in defining government signs as a separate category to recognize the distinction between an individual's right to free expression and the necessities of government speech in the public realm, such as road signs and wayfinding.
- Staff thinks the rewrite should eliminate separate standards for the Gaming Overlay district because it was eliminated in the Zoning Code RENOVation project but would like to consider allowances for non-restricted gaming uses or districts where these uses are allowed.
- Staff explained that sign programs the City approved for some previous projects create difficulties in administration and numerous inconsistent standards for these legacy developments. Staff would prefer uniformity and consistency and would like to evaluate changing the standards for these legacy projects.
- Staff discussed issues with sign allowances for multi-user sites like shopping centers. Staff prefers that the sign code provide uniform allowances for all sign users instead of the current approach with a cumulative limit for the development that the landlord divides among the tenants. Staff seeks consistency and ease of application in revising these standards. vest
- Staff expressed an interest in clarifying the types of freestanding signs allowed by the code.
- Staff did not believe that the varied standards for design districts, such as the Greenfield Professional Office Overlay, Mortensen-Garson Neighborhood Plan (MGOD) Overlay District, and the Wells Avenue Neighborhood Planning Area (WANP) Mixed-Use District in 18.02.603 created any issues with administration of the sign code.
- Staff discussed digital signs at length. This is an important area for Reno and its residents. Staff believed that current brightness standards are accepted but would like evaluation of other issues such as hold time and scroll rate.
- In evaluating the measurement standard for wall sign area allowances, staff preferred a limit based on the user's facade frontage.

Based on issues with recent permit reviews, staff inquired about refining standards to distinguish signs from to other architectural features or murals. Staff generally would prefer not to treat architectural features that are integrated into a building as a sign. These are issues that many communities struggle with defining, and staff would like some guidance based on how other communities draw this line.

Staff also provide supplemental comments about the commercial sign allowances creating issues with signs on major arterials. The general commercial district standards allow signs at 1 sq. ft. of sign area for every 4 ft. of street frontage. However, signs over 35 sq. ft. on major arterials are prohibited unless the applicant obtains a conditional use permit. This results in undersized signs on major arterials, where speeds would generally require larger signs.

## 4 Task 1.4: Summary of Public Outreach

The consultant team conducted three stakeholder meetings with select community members to evaluate current conditions and community sentiment relating to signs. The stakeholder groups were 1) on-premises sign stakeholders; 2) off-premises sign stakeholders; and 3) representatives

of Scenic Nevada. Each group provided a unique perspective that helped to identify and evaluate the issues relating to the sign code rewrite.

### 4.1 On-Premises Stakeholders

On March 15, 2023, the consultant team (Mark White and Sean Scoopmire) conducted a stakeholder meeting with people interested in on-site signs, including Julie Wilson and Christine Harkness with Julie's Sign Shop, Robert Kohls with Dynamark, Gil Sanchez, and Karen Munsen with Yesco. City staff (Angela Fuss, Grace Mackedon, and Lauren Knox) facilitated the conversation. The stakeholders' input provided a helpful perspective on issues and concerns about the City's sign regulations and current conditions of signs in the City. Major topics discussed included:

- The stakeholders are frequent users of the sign code and generally like the organization due to their familiarity with it.
- They sometimes struggle with sign standards for larger projects that received a special use permit. They sometimes have difficulty reaching agreement with City staff about the appropriate sign area for multi-user sites and mixed-use buildings based on a measurement of floor area and allocation of area between tenants. They prefer each tenant getting a set allowance based on the frontage width or square footage allocated for that tenant.
- They believe that the mixed-use and professional office sign standards are not sufficient and should be revised.
- They expressed a strongly held belief that the current five-foot limitation on the height of wall signs is insufficient for larger buildings, such as office towers.
- The stakeholders described an interpretation of sign area that only the actual face of individual channel letters counts towards the allowed sign area. They said this works for the current 1-to-1 area to frontage allowance but should be increased to something like 3-to-1 if the measurement standard changes.
- The stakeholders believe that properly installed digital signs can function similarly to standard backlit signs. However, some installers use low-quality digital signs without the appropriate control settings, and these signs do not have a long lifespan and become a nuisance. They would like to see broader allowances for digital signs because their customers are increasingly requesting these signs.
- The stakeholders believe that the City should adopt maintenance standards for signs because dilapidated signs are an eyesore.
- The stakeholders install building and window wraps and stated that the window wraps can be used for shade or to present a message.
- The stakeholders have observed that most drive-thru menu boards are changing to digital, and the current sign code does not adequately address this use, depending on the district.
- The stakeholders reported that the state Weights and Measures Office requires strict compliance with gas station sign dimensional requirements and issues violations for minor deficiencies.
- The stakeholders stated that the standard review procedures and processes work very well, and staff responds promptly to applications. However, any signs that require a variance are costly and time consuming for them and the property owner.

### 4.2 Off-Premises Stakeholders

On March 15, 2023, the consultant team (Mark White and Sean Scoopmire) conducted a stakeholder meeting with people interested in off-site signs, including Ryan Saunders with Saunders Outdoor Advertising, April Russ with the Reno-Tahoe Airport, Sandy Clark with Lamar

#### 4. Task 1.4: Summary of Public Outreach

and the Airport, Jeffrey Herson with Outdoor Media LLC and Desert Outdoor, Shelly Capurro with Kemper Kroll, representing Lamar, Benjamin Cossio, Coletta Bwire with Lamar Northern Nevada, Robert Kennerson with Arena Outdoor, Lissa Butterfield with the Airport Authority, and Lori Wray with Scenic Nevada. City staff (Angela Fuss, Grace Mackedon, and Lauren Knox) facilitated the conversation. Most of the stakeholders were outdoor advertising operators, but representatives of the Airport Authority and Scenic Nevada also attended. The stakeholders' input provided a helpful perspective on issues and concerns about the City's sign regulations and current conditions of signs in the City. Major topics discussed included:

- The outdoor advertising companies generally do not construct new billboards due to the limitations of the banked receipt system. Many of the company representatives wanted to eliminate the banked receipt requirement for construction of new billboards because Lamar owns the majority of the credits. The other companies contend that the banked receipt system puts them at a disadvantage in the Reno market. They believe an overall cap might be more equitable.
- Overall, the company representatives believe the Reno ordinance is very restrictive compared to other jurisdictions. Many other jurisdictions have a cap, but few reduce the cap if a sign is damaged. However, the area standards for signs are on par with other jurisdictions.
- The company representatives explained that the district and separation requirements significantly limit their options in locating a new sign. Very few suitable locations are available that meet the criteria of the current code.
- The company representatives would strongly prefer the option of converting billboards to digital in certain locations. Based on the current market conditions, they would not convert all billboards to digital if given the opportunity but would in high-traffic, commercial areas.
- Lamar expressed an interest in updating the façade of its signs to improve the overall appearance of the signs. Improvements are not currently allowed.
- One of the representatives reported that permitting for a new sign was difficult but it appeared no one personally had experience with new signs.
- In general, the Scenic Nevada representative opposed all new billboards because they are an eyesore. Scenic Nevada believes the voters expressed their will in the 2000 ballot initiative, and the will of the voters should prevail.

#### 4.3 Scenic Nevada

On April 3, 2023, the consultant team (Mark White and Sean Scoopmire) conducted a stakeholder meeting with representatives of Scenic Nevada, including Art Rangel, Stephen Shonts, Lori Wray, Joyce Thompsen, Mark Wray, Peter Chase Newman, John Hara, Brian Holm, Marilyn Naylor, Mercedes de la Garza, Leah Sanders, Pam McNeil, Kay Radzick, Jack Hawkins, Kerry Wermier, and Marshall Cowan. City staff (Angela Fuss, Grace Mackedon, and Lauren Knox) facilitated the conversation. The stakeholders are current and former board members of Scenic Nevada and other community members who are interested in community appearance, and their input provided a helpful perspective on the history of billboard regulation in Reno, their concerns about the City's sign regulations, and the current conditions of signs in the City. Major topics discussed included:

- The stakeholders emphasized that 57% of Reno's voters supported an off-premises sign ban in 2000, and 78% of respondents in a 2017 poll opposed new billboards. Based on this, they believe the City should not allow any new billboards.
- The stakeholders also strongly opposed digital conversion of existing billboards.
- They contend that the settlement agreement in *Scenic Nevada v. Reno* in 2017 is binding, and they are willing to file a lawsuit to enforce their views if the City allows new billboards or the digital conversion of existing billboards.

## 5. Task 1.5: Analysis of Sign Regulations

- The stakeholders requested that the City add a provision for notice before permit approval for the construction of new billboards and suggested a 750' radius is appropriate.
- The stakeholders seemed satisfied with the current restricted areas in the existing ordinance.
- In general, the stakeholders appeared satisfied with the on-premises sign standards, but some stakeholders provided specific comments on the aesthetics of several particular situations.
  - a. One stakeholder preferred sign plans for multi-user developments and requested non-branded signs that were architecturally appropriate for the buildings.
  - b. One stakeholder suggested looking to Scottsdale, Arizona, or Austin, Texas, for examples of sign regulations.
  - c. One stakeholder also complained about numerous temporary signs and window wraps for smoke shops and liquor stores. Another thought the City should ban or strictly enforce limitations on flags, feather signs, and inflatable signs.
  - d. One stakeholder thought there should be better mural standards. Some murals in the City effectively functioned as advertising and were ugly. However, some of the murals are attractive.
  - e. In addition, string lighting on buildings is an unattractive form of advertising.
- In general, the stakeholders seemed to support prohibiting pole signs and favored the aesthetic of monument signs.
- One stakeholder pointed out that prohibiting pole signs would create many nonconforming signs and asked for more stringent standards and a shorter time for removal of abandoned signs.
- Many stakeholders expressed strong opposition to the signs at the Glow Plaza. They contend that the Sands Casino and the event venue are not one premises, so any cross-advertising between the two premises should be prohibited as an off-premises sign and not allowed as an on-premises sign. They are concerned this trend will continue throughout the Neon Line District, which risks the addition of many new signs.
- The stakeholders generally seemed to support dark skies initiatives and supported limitations on lighting of signs.
- The stakeholders also requested that the City adopt new luminance standards for digital signs. They believe the current standard of 1500 nits is too bright and causes a traffic safety concern. One participant threatened to sue the City if an accident occurred because a driver was distracted by a digital sign.
- The stakeholders requested stricter standards for signs on skyways and believed that the City has not enforced skyway standards sufficiently.
- The stakeholders thought that digital on-premises signs were not appropriate in mixed-use districts because of the high concentration of residential uses.

## 5 Task 1.5: Analysis of Sign Regulations

This section evaluates the City's existing sign regulations based on changes in sign uses and discusses internal and external policy and regulatory compliance. The internal compliance review will identify conflicts with other City ordinances and regulations, while the external compliance review will focus on consistency with state and federal standards. The section then outlines a general approach to draft sign regulations that will achieve the City's goals while complying with other state and federal standards.

### 5.1 Emerging Sign Uses

Murals and digital signs are two emerging sign types that are increasingly popular with different sets of users. Numerous murals contribute to Reno's unique sense of place. Murals are popular

with many residents and generally emphasize local character or beautify an area. Cities generally prefer to locate murals in pedestrian-scale walkable districts, arts districts, and historic districts. However, murals challenge the traditional regulatory framework for signs and may require special treatment, including mural overlay districts and location and materials standards. The emerging principles of content neutrality discussed below make it difficult to address murals differently than other wall signs.

Digital signs are also increasingly popular with outdoor advertisers and businesses but are not always popular with residents, as Reno's experience has shown. Many communities limit the allowed districts and size of digital signs. As with murals, the emerging principles of content neutrality make it difficult to allow this type of sign for some uses, such as gas stations, churches, and schools, without allowing them more widely in the community.

### 5.2 Internal Compliance Review

There are several inconsistencies and ambiguities in the treatment of sign regulations in the current code. Issues we have identified include:

- Different definitions and standards for abandoned signs in the Building Code, Sign Code, and Definitions;
- Code does not clearly define monument sign type;
- The metric for measuring allowances varies throughout the code, including business frontage, building frontage, street frontage, and gross floor area; and
- Unclear site plan review requirement for monument signs in residential districts.

### 5.3 External Compliance Review

State and federal law limits the City's ability to regulate signs. Federal standards include cases vindicating the rights of citizens to display signs under the First Amendment to the United States Constitution. State standards include several statutes relating to signs, including regulation of billboards, flags, and the advertising of petroleum products.

#### 5.3.1 Federal Standards for Content Neutrality

Courts apply the First Amendment's protections for free speech to many government regulations, and this protection extends to local governments' sign regulations. Recent decisions from the United States Supreme Court in *Reed v. Town of Gilbert* (2015) and *City of Austin v. Reagan National Advertising of Austin, LLC* (2022) and have focused on whether sign regulations are "content neutral." Generally, *Reed* requires that cities regulate signs without reference to the content of the sign or the identity of the user of the sign. The decision also emphasized that local governments must generally adopt a "content neutral" approach to sign regulation as part of the requirement that sign regulations must be content neutral time, place, and manner restrictions. Any revisions to current sign regulations should incorporate this principle of content neutrality.

*City of Austin v. Reagan National Advertising of Austin, LLC* interpreted the requirement for content neutrality in a sign code that distinguished between "on-premises" and "off-premises" signs. The City of Austin's code allowed digital on-premises signs and prohibited digital off-premises signs. In a divided ruling, the Supreme Court found that the on-premises/off-premises distinction was a location-based distinction and not a content-based distinction. This common distinction is present in the Federal Highway Beautification Act, most state highway beautification acts, and many municipal sign codes, including Reno's. On remand, the Fifth Circuit Court of Appeals decided upheld Austin's on-premises/off-premises distinction. *Reagan National Advertising of Austin, Inc. v. City of Austin*, Case No. 19-50354 (5th Cir. March 30, 2023). In deciding this case, the court found that traffic safety and aesthetics were substantial government interests sufficient to support the on-premises/off-premises distinction in Austin's sign code.



## 5. Task 1.5: Analysis of Sign Regulations

These two opinions provide important guidance for drafting sign codes and support many common zoning tools for sign regulations, such as districting, height, area, setbacks and lot placement, physical characteristics and features, screening/buffers, separation distance, and time for display. *Reagan National* suggests that a city may reasonably distinguish on-premises and off-premises signs. However, all sign regulations require narrow tailoring to support a significant governmental interest.

The Zoning Code RENOvation project revised many common content-based distinctions in the sign code, particularly for temporary signs. One common example of regulations that distinguish based on content are allowances for temporary “political signs” that allow different standards for display relative to the date of an election. The City’s definition of “freestanding sign” is a good example of a content-neutral regulation because it defines the use by the physical characteristics of a structure that is “supported by its own structure apart from a building.” The sign code update will further incorporate content neutrality in conjunction with feedback from City staff and the City Attorney’s office.

### 5.3.2 State Standards Related to Signs

The most important State limitation on sign regulations is in the area of billboards. The Nevada Legislature has placed a significant constraint on local government’s ability to regulate billboards through NRS § 278.0215. This statute requires a local government to pay just compensation or allow relocation of the billboard if it requires the removal of a nonconforming billboard. The statute prohibits the amortization of nonconforming billboards, which is the most common strategy for communities to phase out unwanted nonconforming uses. However, the statute does not apply to removal of billboards caused by the termination of a lease or damage to the billboard of 50% of the value if caused by a natural disaster. Practically, this statute makes it very difficult for Nevada municipalities to require the removal of billboards because it would be prohibitively expensive to compensate the owners for the value of this land use.

The Nevada legislature has adopted several statutes that regulate signs and billboards near State and Federal Highways. For example, NRS § 405.030 prohibits a person from placing signs in the right-of-way for state highways. In addition, NRS §§ 410.030 to .440 regulate outdoor advertising within a 660-foot buffer from Interstate and primary highways. A municipality should consider the effects of these requirements for particular districts and streets.

The Nevada legislature also has adopted a statute preventing prohibitions on displays of the United States flag in NRS § 278.02083. This statute preempts regulations that prohibit the display of the official United States flag, but it exempts its applicability for cases of commercial use and allows reasonable time, place, and manner restrictions.

Finally, the Nevada legislature has adopted many requirements for the display of branding and price information for gas stations through NRS §§ 590.160 to .330 (Advertisement of Motor Vehicle Fuel and Petroleum Products). The statutory requirements specify many details of the content that a gas station must display about branding and fuel grade, as well as requirements for the character size for visibility. A municipality should consider the need for gas stations to comply with these requirements in uniform allowance for all commercial district signs.

## 5.4 Proposed Approach for Sign Regulations

We recommend a complete revision of the current sign regulations. We propose a draft of these regulations with the following concepts in mind:

- Reorganize the sign code to provide uniform standards for on- and off-premises signs, including measurement standards and procedures that are duplicative. The substantive standards for off-premises signs will not be changed.

## 5. Task 1.5: Analysis of Sign Regulations

- Reorganize the code to follow the general outline:
  - a. Statement of Purpose
  - b. Applicability: defining exempt, allowed, and prohibited signs
  - c. Sign Standards: allowances and standards for particular sign types
  - d. Abandonment and Nonconformities
  - e. Procedures
- Ensure that all regulated sign classifications are content neutral.
- Consider a new hierarchical organization of physical sign types to consolidate regulations for on-premises and off-premises signs. An example could include these categories:
  - a. Freestanding signs
    - i. Monument signs
    - ii. Pole signs
  - b. Attached signs
    - i. Wall signs
    - ii. Projecting signs
    - iii. Window signs
  - c. Accessory Signs
  - d. Temporary Signs
  - e. Billboards
- Integrate the standards noted in Table 5-1 with the sections relating to the standards, such as the number and area standards of §§ 18.05.102 to .105.
- Consider sign setbacks to control the location and size of signs by district and conform the lot location standards with the Building Code.
- Simplify sign allowance metrics, which includes measurement standards based variously by street, building, and business frontages and also by GFA depending on the district or sign type.
- Develop new standards or clarify standards for:
  - a. Multi-user lots, such as shopping centers and office buildings;
  - b. Signs that are three-dimensional objects;
  - c. Architectural features that relate to the use of the building;
  - d. Window signs;
  - e. Minimal treatment for murals; and
  - f. On-premises accessory signage, such as directional signs.
- Update sign allowances:
  - a. Replace current five-foot height limitation for signs with area limitation;
  - b. Review measurement standard for wall signs and ratio of sign area to frontage; and
  - c. Revise mixed-use and professional office district standards.
- Allow but do not require master sign plans to minimize visual clutter for signs on multi-user lots.
- Clarify and conform abandonment standards of the Building Code and ALDC.
- Reorganize removal and enforcement provisions for clarity and effectiveness.
- Maintain the current approach to billboards based on settlement of *Scenic Nevada v. Reno* and other orders or agreements and clarify procedures for banked receipts based on current procedures.
- Clarify the distinction between special event signs and other temporary signs.
- Add illustrations, including:
  - a. Sign types;
  - b. Sign area computation; and
  - c. Measurement of business frontage and other measurement standards.

## 6 Conclusion

This memo summarizes the first phase of a three-phase process that begins with a diagnosis of the existing sign regulations, continues with several drafts of the new regulations, and concludes with adoption of the final regulations. Based on the currently available information, we propose to completely revise the sign regulations. Having completed the diagnosis phase of the sign code update, we will begin drafting the agreed approach to update the sign code.

## 7 Annotated Outline

This section provides a proposed annotated outline of new sign regulations. Each proposed section includes a correspondence to the current code and a brief description of the proposed regulations.

### Chapter 18.05: Signs

#### Article 1 : General Provisions

**18.05.101 Purpose.** This section will carry forward and update current §§ 18.05.101: Purpose, Scope, and Authority and § 18.05.201: Purpose and Intent. The Section will clearly identify the findings for the governmental purposes of sign regulations, including traffic safety and aesthetics.

**18.05.102 Applicability.** This section will combine and clarify the current applicability standards in various sections of the current code, including §§ 18.05.106: Regulated On-Premises Signs; 18.05.107: Permit Required; 18.05.214: Regulated Off-Premises Advertising Display; and 18.05.215: Permit Required.

**18.05.103 Exempt Signs.** This section will carry forward and generally update current § 18.05.108: Exempted On-Premises Permanent Signs to ensure content neutrality.

**18.05.104 Prohibited Signs.** This section will carry forward much of the content of current § 18.05.109: On-Premises Signs Prohibited. These prohibitions are common in many sign codes.

**18.05.105 Content Neutrality and Substitution.** This new section will specify that the regulations will apply in a content-neutral manner and that substitution of commercial for non-commercial messages is allowed (and vice versa).

**18.05.106 Sign Districts.** This new section will combine the existing zoning district into “sign districts” to regulate signs based on similar district typologies to simplify the sign allowance table while still allowing the standards to vary by district. Generally, we propose treating zoning districts with similar use profiles the same for the purposes of sign regulation. For example, a straightforward way to combine related existing zoning districts would be to divide them into the following groups: 1) detached residential, 2) mixed-use and attached residential, 3) neighborhood commercial, 4) downtown, and 5) highway commercial and industrial uses.

#### Article 2 : Sign Standards

**18.05.107 Sign Allowances by District.** This new section will provide a table for each sign district specifying the sign allowance for all sign types in that district. This will allow the user to quickly identify the types of signs, size allowances, and sign features that are available for a particular location. Technical details about each sign type and sign features will be set out in the sections following this one. Generally, the allowances will carry forward the current allowances for number, dimensions, etc. This will include allowances from various sections of the current code, including §§ 18.05.104: Number of On-Premises Signs; 18.05.107 Permit Required; and 18.05.113: Permanent On-Premises Sign Regulations by Zoning District.

**18.05.108 Freestanding Sign Standards.** This new section will carry forward and update sign standards for freestanding signs from various sections of the current code, including § 18.05.103: Location of Permanent On-Premises Signs.

- 18.05.109 Attached Sign Standards.** This new section will carry forward and update sign standards for attached signs from various sections of the current code, including §§ 18.05.103: Location of Permanent On-Premises Signs and 18.05.111: Canopies.
- 18.05.110 Billboard Standards.** This section will carry forward, combine, and clarify the limitations on Off-Premises Advertising Displays in §§ 18.05.202: Restrictions on Permanent Off-Premises Advertising Displays; 18.05.204: Permanent Off-Premises Advertising Displays: Permitted and Prohibited Locations; 18.05.205: General Standards for Permanent Off-Premises Advertising Displays; and 18.05.206: Prohibited Types of Off-Premises Advertising Displays. No substantive changes will be made, but permanent off-premises advertising displays will be restyled as “billboards” for simplicity and clarity.
- 18.05.111 Incidental/Accessory Sign Standards.** This new section will include standards for incidental/accessory on-premises signs and will provide standards by district for number, area, and location for these signs. A general allowance will be given for these signs without regard to their content. This will include standards for current signs like directional signs, directory signs, and drive-thru menu boards.
- 18.05.112 Temporary Sign Standards.** This section will significantly update the standards of §§ 18.05.110: Temporary On-Premises Signs and 18.05.208: Temporary Off-Premises Advertising Displays. This section will include standards for temporary signs and will provide standards that vary by zoning district for the number of signs, area, and duration of display for temporary signs without regard to content. Generally, larger temporary signs are allowed for more intensive uses, and smaller temporary signs are allowed for less intensive uses.
- 18.05.113 Sign Features.** This new section will expand on the standards in § 18.05.114: Additional Regulations for Animated Signs. It will address sign features such as lighting, electronic signs, digital signs.
- 18.05.114 Special Event Signs.** This section will carry forward the standards § 18.05.209: Temporary Off-Premises Advertising Displays for Special Events. The revision will attempt to ensure content neutrality for these signs.

### Article 3 : Administration And Enforcement

- 18.05.115 Administration.** This new section will clarify administration of this chapter.
- 18.05.116 Sign Permits.** This section will carry forward and clarify the requirement of current §§ 18.05.107: Permit Required and 18.05.215: Permit Required.
- 18.05.117 Expiration and Redemption of Banked Receipts.** This section will carry forward the procedures relating to current § 18.05.207: Expiration and Redemption of Banked Receipts; Litigation Stay.
- 18.05.118 Application Review.** This section will carry forward and clarify the procedures in §§ 18.05.119: Time Limitations on Review of Applications for On-Premises Signs; 18.05.122: Decisions Regarding On-Premises Signs; 18.05.211: Time Limitations on Review of Applications for Off-Premises Advertising Displays; and 18.05.213: Decisions regarding Off-Premises Advertising Display
- 18.05.119 Appeals.** This section will carry forward and clarify the procedures in §§ 18.05.120: Appeal of Administrator's Decision; 18.05.121: Judicial Review; and 18.05.212: Appeal of Administrator's Decision.
- 18.05.120 Sign Inspection And Maintenance.** This new section will provide inspection and maintenance standards for signs.

**18.05.121 Nonconforming Signs.** This section will carry forward the nonconforming provisions of §§ 18.05.115: Nonconforming On-Premises Signs; 18.05.116: Right to Maintain and Continue the Use of a Nonconforming On-Premises Sign; 18.05.117: Termination of Right to Nonconforming On-Premises Sign; 18.05.118: Alteration, Enlargement, or Relocation of On-Premises Sign; and 18.05.203 Nonconforming Permanent Off-Premises Advertising Displays.

**18.05.122 Abandoned Signs.** This section will clarify and expand current §§ 18.05.112 Removal of Abandoned of On-Premises Signs and 18.05.210 Abandoned Off-Premises Advertising Displays.

**18.05.123 Measurements.** This new Section will carry forward, update, and expand on measurement standards from various Sections of the current code, including §§ 18.05.102 On-Premises Allowable Sign Area and 18.05.105: Sign Area Computation for On-Premises Signs.

**18.05.124 Reserved.**

**Definitions.** The sign definitions in Chapter 18.09 will be revised to ensure content neutrality. Definitions will be clarified for all sign types as necessary, and some new sign types may be added.