



## Billboard Code Revisions

### REVISED STAFF REPORT

<b>Applicant:</b>	City of Tacoma, Community & Economic Development Dept
<b>Contact:</b>	Shirley Schultz, 591-5121
<b>Type of Amendment:</b>	Regulatory Code Text Change
<b>Current Land Use Intensity:</b>	City-wide
<b>Current Area Zoning:</b>	City-wide
<b>Size of Area:</b>	City-wide
<b>Location:</b>	City-wide
<b>Neighborhood Council area:</b>	All
<b>Proposed Amendment:</b>	Revising the regulations which apply to billboards (off-premises signs) to permit digital billboards in exchange for a significant reduction in standard billboards.

#### General Description of the Proposed Amendment:

The proposed amendments apply to the regulation of billboards. Some of the proposed changes apply to all billboards, and others are meant to implement an exchange program whereby digital billboards would be permitted if existing standard billboards are removed and/or permits for standard billboards are relinquished. The framework and impetus for the proposal is a negotiated settlement agreement between Clear Channel Outdoor and the City which was approved by the City Council in 2010. The proposed changes build upon the intent of that Agreement and propose additional performance criteria for both the initial phase of the agreement (the installation of the first 10 digital billboards) and for any future installation of digital billboards.

Billboards are off-premises signs, which means that they are not located on the premises of the use or activity to which the sign pertains. Digital billboards operate like large digital picture frames – a single image is displayed for a certain amount of time, and is then replaced by a different image. As proposed, digital billboards would not be able to have any animation (moving pictures) or flashing lights, like some other electronic signs might have. A billboard “face” is one side of a billboard sign and consists of one screen. A single billboard structure may have more than one face.

The proposed changes would modify the Land Use Regulatory Code (Sections 13.06.520 - .522). In addition to adding new provisions for permitting digital billboards, the proposed changes would modify and add definitions, consolidate and relocate sections for retaining or exchanging billboards, and revise provisions for non-conforming off-premises signs. The proposed changes would apply city-wide; however, they would apply especially to the zoning districts where billboards are currently allowed:

- C-2 (General Community Commercial)
- M-1 and M-2 (Light and Heavy Industrial)
- PMI (Port Maritime Industrial)

Under the current regulations, existing billboards are allowed to relocate within these four zoning districts, subject to certain restrictions which are further discussed below. The proposed regulations would also allow new *digital* billboards to be erected on properties within these four zoning classifications, again subject to certain restrictions. The overall intent of the proposed changes is a substantial reduction in the number of existing billboards, in exchange for allowing the placement of digital billboards. If the program is continued to its fullest extent, the number of billboards within the city could drop from 253 to 38; all of which would be digital billboards. In addition, the digital technology will allow almost instantaneous communication on multiple signs for Amber Alerts and other emergency announcements.

The major components of the changes are set forth in the next few subsections. The following should be read in conjunction with explanatory notes on the Public Review Draft of the code, which is attached as Exhibit A.

#### **Changes to Definitions section and general sign regulations:**

1. Currently the definition of “billboard” is related to its content. That is, a billboard is a billboard because it contains a commercial message for a product or service. Billboards may be regulated based on their size or location – but not based on what they say. A new definition is proposed that doesn’t rely on what a billboard says, but more upon where it is and how big it is. The changes to the billboard definition also require changes in several other definitions in the section. Based upon a review of definitions used by other cities, the proposed changes should improve the City of Tacoma regulations, making them more consistent internally and making them more comparable to other cities in the state.
2. Currently, the code only briefly mentions the State regulations regarding signage, in the intent section. The State of Washington has laws and administrative rules related to the federal Scenic Vistas Act, which controls signs that are visible from certain state and federal highways. Off-premises signs and electronic signs require special review and permitting when located in these areas. An additional subsection is proposed that strengthens the reference to State law and notes that, notwithstanding any provision in the City’s Code, State laws apply and may supersede local regulations. This is meant as a reminder to any applicant for a sign in Tacoma that other regulations may apply, depending on the type and location of sign.

#### **Changes to Billboards Section:**

1. Substantial changes are proposed to the way the City regulates billboards. In general, introductory phrases have been added to the beginning of each section in order to highlight the purpose of that section. Also, throughout the code, text has been modified to emphasize and regulate the number and size of billboard *faces* rather than referring to faces and structures. Use of a consistent reference throughout streamlines the regulations and allows accurate comparisons between removed signage and installed signage. Language within the code has also been rearranged to place “like with like” – for instance, all the regulations about locations where billboards may be constructed have been grouped together, and all the regulations about performance standards (height, size, etc.) have been situated near each other. Some language has been consolidated as well.
2. A great deal of language relating to the former exchange program has been removed. This deletion updates the code in light of the presently proposed changes, and also puts an end to the system of relocation certificates.
3. The existing cap on the number of billboard faces and total square footage for billboard signs is not proposed to change, nor is the existing 1:1 exchange program for standard billboards. A new section

is proposed for the exchange of standard billboard faces for digital faces. The ratio operates as follows:

Digital Billboards	Existing Faces Removed	Relocation Certificates surrendered	Remaining faces/Certificates
Initial 10	<del>53</del> 54*	100	<del>199</del> 200/69
Next 7	At least 35	Up to 69	<del>164</del> 165/0
Final 21	Up to <del>468</del> 164	0	0/0

Briefly, for each digital billboard face proposed after the first 10 permitted digital faces, a minimum of 5 standard faces must be removed and relocation certificates surrendered for a total of 15 faces, until all relocation certificates have been remitted. At that point 8 faces must be removed for each digital billboard face constructed. Demolition permits for the faces to be removed must be issued and inspected prior to construction of a new digital billboard face.

- The first ~~53~~ 54\* billboard faces to be removed are listed in the settlement agreement and are specified in the draft code revisions. The next 25 faces to be removed are at the discretion of Clear Channel Outdoor according to the terms of the settlement agreement. After that, the proposed changes indicate a priority preference for removals to those faces that are close to residentially zoned areas or other sensitive uses, followed by those which are close to the relocated billboard, and then those which are outside the four allowed zoning districts. This means that, after the initial 78 faces are removed, the first billboards to be removed should be those which are 250 feet or less from a residential zone, school, church, park, open space, or historic district. (There are currently about 100 existing billboards that don't meet these buffering standards.)
- Performance standards are added to address digital billboard faces and sign lighting. These lighting standards would apply to all digital billboards constructed in the city. They regulate static image time (the amount of time a single picture is displayed on the screen), the transition time between images (to avoid complicated scrolling or animation on the screens), the motion on the screen (none is allowed), and the brightness of the screen. Brightness is proposed to be measured in two ways – first, from a light-meter reading taken from a certain distance from the sign to ensure the sign isn't creating an undue increase in the light levels in the area. The second is a measurement at the surface of the sign and the level of light actually emitted from the device. The operating hours of billboards are also limited. The proposed regulations would require the digital image to be turned off between the hours of 10 pm and 5 am.

These regulations are developed from research of other jurisdictions and are also somewhat based upon industry standards. Traffic safety studies also contribute to these standards, showing how quickly a message may change without becoming a distraction and hazard. Brightness regulations are intended to minimize excess lighting in the vicinity of the sign as well as to avoid glare or nuisance to people who are looking at the sign. All digital billboards will have a light sensor integrated into their electronics which will adjust the brightness of the sign based upon the amount of light in the surrounding area. For example, signs will be brighter on a sunny day than they are during the nighttime hours.

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\* *Note: the original staff report and analysis were based upon an incorrect copy of Exhibit 2 to the Settlement Agreement. The corrected exhibit resulted in one additional face being removed. In addition, 10 sites would be affected differently – either more faces would be removed at the site than were originally noted, or no faces would be removed from sites where removal had been previously noted.*

6. No changes are proposed to the existing allowable height and size of billboard structures and faces for the new digital billboards; it was determined that these regulations should be the same for both digital billboards and standard billboards. The maximum height is 30 ft except in PMI (Port Maritime Industrial), where the maximum height is 45 ft. The maximum size of a billboard face is 300 square feet. It should be noted that the size limits will not apply to the first 10 permitted billboards installed in the special receiving areas (see below).

These regulations on size and height were instituted in the 1980s and have been in place since then. Many billboards which were constructed prior to that date are larger or taller than currently allowed. While many of the billboards located in the city are 288 square feet per face, the larger billboards are 672 square feet per face. For examples of billboards throughout the city, see the document titled “Billboard Tour” on the Planning Division’s website: [www.cityoftacoma.org/planning](http://www.cityoftacoma.org/planning).

7. Dispersal regulations – i.e. how far billboards must be from other billboards – has been simplified from the existing code. The existing code measures dispersal in four different ways: it limits the number of faces within a certain distance, it states that structures must be 100 feet apart, it sets out a minimum “appropriate zoning” distance to locate billboards, and it specifies the appropriate zoning across the street from a proposed billboard face. The proposed language limits billboard faces to 500 feet between faces, unless they are on the same structure, and maintains the existing opposite-side of the street zoning requirement. Dispersal will be calculated on a radius, and might work roughly as shown in the drawing below. The goal of dispersal regulations is to limit the concentration of billboard faces in any one neighborhood. This benefits both the neighborhood (less signage) and also the advertisers and sign company (fewer signs competing for attention).



8. Buffering regulations, meaning how far new billboards must be from “sensitive uses,” are not proposed to change. Currently, the code says that a new billboard face must be located 250 feet from a residential zoning district, a school, park, church, or other public use, and 375 feet from a shoreline district. (For reference, a typical block is about 330 feet by 240 feet.) Those same buffers would apply to digital billboards, except for the first 10 permitted billboards in the special receiving areas.

Therefore, even if a billboard was proposed for an appropriate zoning district, like the C-2 district, it could not go everywhere in that district. It would have to be off-set from sensitive uses by 250 feet. The attached map that shows zoning districts (Exhibit C) as dark purple lines also includes the buffers, with the left over area shown as lavender. These are the areas where a new billboard could be located.

9. Special receiving areas for the first ten (10) digital billboards were determined in the Settlement Agreement. These areas are shown on the map attached as Exhibit B. In these areas – where up to 10 and only 10 digital faces may be located – the standard size regulations do not apply. The agreement states that the first ten digital billboards will be “bulletin” billboards, which are defined as up to 672 square feet. These areas were chosen by both Clear Channel Outdoor and the City Council. Most of the locations already have other billboards, and all of them are along arterials.
10. Under the current code a billboard may be nonconforming to buffering (located too close to a sensitive use), dispersal (located too close to other billboards), zoning (located in the wrong zoning district), and/or performance standards (too big or too tall).
11. Revisions to nonconforming sign regulations are proposed to reflect the changes to the billboard exchange program for digital billboards. Currently, changes to off-premises signs are very restricted; language has been added to allow maintenance and repair or replacement, as well as to allow for installation of digital billboards in compliance with the code. Also, the current code prohibits any new signage on a site where a nonconforming billboard is located. This restriction is regardless of ownership of the site or the buildings on the site – meaning, for instance, if a tenant moving into an existing building wanted new signage at the site, they would be denied permits until the billboard was brought into compliance (typically, removed). The other option for someone requesting signage would be to sign a legal agreement with the City that they would terminate their lease with the billboard company as soon as possible.

The goal of the revised billboard code is to have removal of billboards occur over time and not place the burden of removal on a business owner, who might not have any control over the billboard lease on the property.

The code also requires that, when a site or structure is being substantially altered, nonconforming billboards are brought into compliance or removed. This language will remain in the code, but will be changed to reflect redevelopment thresholds that are in other parts of the zoning code. Specifically, the amount of work that can be completed within a two-year period has been revised to reflect either a “level II” or a “level III” alteration, similar to that level of work which would require compliance with certain design and landscaping standards. This language is consistent with other sections of the zoning code that talk about nonconforming uses and structures and when they need to be brought into compliance.

12. Only minimal changes would be made to the sign code tables. Digital Billboards (other than the initial 10) would only be allowed in the “C-2” General Community Commercial, “M-1” Light Industrial, “M-2” Heavy Industrial, and “PMI” Port Maritime Industrial districts. A map of these zones – including the remaining areas after the existing buffer requirements are applied – is attached as Exhibit C.

### **Additional Information:**

The City of Tacoma made major amendments to its sign code for billboards in the mid-1980s and the mid-1990s. The number of billboards that can locate in the city and their total square footage has been

capped since 1988. No new billboards are permitted but existing billboards can be relocated. In the 1997 code changes, the City instituted an exchange program by which a nonconforming billboard could be removed and exchanged for a building permit or a “relocation certificate” in a conforming location. Billboards and relocation certificates could be transferred to other owners. This means that if someone wants to install a billboard on their property, they must own or purchase another billboard that they can remove.

The 1997 code also instituted an amortization clause which stated that all nonconforming billboards must be removed by 2007.

Currently, there are 253 billboard faces in the City and relocation certificates for 169 more. Approximately 193 of the existing billboard faces are nonconforming for one reason or another.

The sign code placed strict limitations on nonconforming billboards regarding their maintenance and alteration. On sites where billboards were located, other uses were not allowed to have any new signage unless the billboard was removed or a legal agreement was put into place promising the removal of the billboard.

Enforcement of these regulations resulted in a lawsuit in 2007 from the owner of nearly all the billboards and all the relocation certificates, Clear Channel Outdoor. The suit claimed that the City’s code was unconstitutional as it was based on the content of the sign, that the adopted amortization provision was not adequate compensation for their billboard inventory and that the Scenic Vistas Act did not allow amortization in the manner dictated by the City’s Code. Following more than two years of negotiation, the City Council determined that a legal settlement, which substantially reduces billboards across the City, was in the best interest of the City. The terms of the agreement provide a framework for the proposed revisions to the sign regulations. This Settlement Agreement is available on the Planning Division’s website: [www.cityoftacoma.org/planning](http://www.cityoftacoma.org/planning).

The key terms of the agreement set forth the intent and created a framework for the proposed changes. There are two parts to the exchange program for billboards under the agreement: the first ten digital billboard faces and then subsequent digital billboard faces. Many of the standards for the first ten (10) digital billboard faces were set forth in the settlement agreement. These first ten billboard faces will be 672 square feet in area and the possible locations for them are also determined – these locations are referred to in the draft code as the “special receiving areas.” These “special receiving areas” are also shown on the map attached as Exhibit B.

In exchange for permits to install these first ten digital billboard faces, Clear Channel Outdoor will remove ~~53~~ **54<sup>†</sup>** faces throughout the city. These ~~53~~ **54** faces are located on ~~33~~ **30** different ~~structures~~ **sites**. In cases where this represents removal of all the faces on a billboard structure, the structure will be removed to ground level. **The removal list includes approximately 25 full structures to be removed, as well as 5 rooftop billboard faces.** Clear Channel Outdoor will also give up the relocation certificates for 100 billboard faces.

For all billboards which come after the first ten, a permit can be issued for a digital billboard on the condition that at least five faces are removed and enough relocation certificates are given up to total 15 billboard faces surrendered.

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<sup>†</sup> *Note: the original staff report and analysis was based upon an incorrect copy of Exhibit 2 to the Settlement Agreement. The corrected exhibit resulted in one additional face being removed. In addition, 10 sites would be affected differently – either more faces would be removed at the site than were originally noted, or no faces would be removed from sites where removal had been previously noted.*



Another 25 standard billboard faces will be removed within 5 years after the agreement is executed, whether or not permits for additional digital billboards beyond the first 10 faces are issued.

Per the Agreement, the City is also considering code revisions to regulate certain aspects of digital billboards, including for the initial ten (10) faces, such as regulations regarding lighting, static image time, and emergency communication. These regulations would also apply to subsequent digital billboards if, and when, they are installed. In addition, the proposed regulations would adopt size, height, and location standards for the additional digital billboards (which can be considered a secondary phase).

If the Agreement is carried out to its fullest extent, the eventual number of billboard faces in Tacoma could be as little as 38. Regardless of future installation of digital billboard faces, there will be a reduction of 78 ~~79~~ standard billboard faces within the first five years.

The draft code amendments were compiled based upon research of other cities in Washington and how they regulate billboards and other signs. Additional information was garnered from court cases regarding billboards, and technical information was received from sign companies, billboard owners, and city engineers. Traffic safety measures have been reviewed and incorporated where appropriate in the draft amendments. This research and information was provided to the Planning Commission in their decision-making process to direct the drafting of the code.

#### **Public Outreach:**

City staff have met with representatives from the Cross-District Association (Design Committee) and the Community Council – representatives from all the Neighborhood Councils. A general public meeting was held on January 31. Approximately 35 people attended; the notes from that meeting are attached as Exhibit D.

#### **Applicable Provisions of the Growth Management Act (and other state laws):**

Sign regulation is a typical part of zoning and land use controls authorized under state law. In addition, the State regulates certain signs that are visible from certain highways. These laws are contained in Chapter 47.42 RCW: Highway Advertising Control Act – Scenic Vistas Act and the implementing rules at Chapter 468-66 WAC – Highway Advertising Control Act. These regulations will further restrict billboards visible from Interstates 5 and 705, as well as State Routes 7 and 16. Nothing in the proposed changes conflicts with these State laws and State regulations will supersede City regulations where applicable.

#### **Applicable Provisions of the Comprehensive Plan:**

The *Comprehensive Plan* discusses signage in the context of urban design, aesthetics, and pedestrian orientation in several sections of the *Plan*. In most cases it sets forth goals and policies for integrating signage plans into sub-area development plans, ensuring high quality signage, and encouraging pedestrian-scaled signs in mixed-use districts. Commercial district design goals are to integrate signage into the overall design and scale of the district, and ensuring that commercial district development does not act as a detriment to surrounding neighborhoods. The *Plan* states outright that billboards should be prohibited in the Shoreline districts and freestanding signs should be prohibited in the UCX-TD district (Tacoma Dome Urban Center Mixed-Use).

Individual signs proposed for some of the special receiving areas (specifically, those proposed for location in the UCX-TD between “D” and “G” Streets along Puyallup Avenue) could be seen as in conflict with the stated goal of the *Comprehensive Plan* to not allow freestanding signs in these areas. In

addition, to the extent that billboards are considered to be auto-oriented (that is, they are directed toward busy streets and the attention of motorists), it can also be argued that they are not appropriate for location in mixed-use districts generally. Six of the 19 Special Receiving Areas are located in mixed-use districts and one is located in a Downtown district. These proposed locations are along busy arterial streets with high volumes of vehicular traffic. See Exhibit B.

Certain special receiving areas also are located within the required buffer distance from residential districts. Digital billboards placed in these locations may impact the residential area – depending on how the sign is designed and oriented.

In the aggregate, however, the exchange program should result in fewer billboards overall (both digital and traditional) in the city, with fewer billboards located close to residential districts and fewer billboards in all districts – including mixed-use districts. While some areas may be impacted temporarily or permanently by additional billboards, overall the city will see a reduction.

### **Applicable Provisions of the Land Use Regulatory Code:**

The proposed changes to the Land Use Regulatory code are intended to meet the intent of the Settlement Agreement – achieve an overall reduction in the number of billboards in the city by allowing the installation of digital billboards. The proposed changes are limited to Sections 13.06.520-.522, the Sign Code.

The intent of this section of the zoning code is to establish regulations which support land use objectives, to recognize signs as important communication devices, to protect safety and welfare, and to promote an attractive community. The objectives of the section are to provide for uniform and balanced requirements, to ensure compatibility with surroundings, to balance sign users' needs with aesthetics, and to achieve quality design and maintenance for all signs in the city.

The Sign Code is comprised of an intent section, a definitions section, a general regulations section, a section which applies to regulation of signs by type, and a section which applies to signage per district (the tables). Modifications are proposed to each section.

The proposal is intended to better meet the stated intent of the Sign Code by meeting the sign user's need (in this case Clear Channel Outdoor and its clients) and at the same time improving the aesthetics of the community overall. The reduction in the number of billboard faces in the city will benefit neighborhoods throughout the city. In addition, changes proposed to the nonconforming billboards section will remove some of the existing disincentives for sign maintenance and repair. The existing regulations regarding aesthetics are proposed to be somewhat strengthened, as well, and new digital billboards will be controlled for brightness, light pollution, and noise.

The proposal is intended to support the implementation of *Comprehensive Plan* goals for mixed-use centers, as, over time, most the billboards in these areas will be removed in exchange for billboards in other districts. The same can be said for billboards which are located close to residential districts – thus promoting the protection of residential areas as set forth in the *Comprehensive Plan*. Digital billboards will also be regulated so that they do not present a safety hazard – with lighting restrictions, minimum static image times, prohibition of interfering with or imitating a traffic control device, and the like.

Further, the proposed changes to the code should streamline the review of billboards in general. Changes are proposed to simplify the regulations for dispersal (how far billboards have to be from one another), and changes are proposed to the definitions to clarify what a billboard is and remove the focus on content.



## **Amendment Criteria:**

*Applications for amendments to the Comprehensive Plan and Land Use Regulatory Code are subject to review based on the adoption and amendment procedures and the review criteria contained in TMC 13.02.045.G. Proposed amendments are required to be consistent with or achieve consistency with the Comprehensive Plan and meet at least one of the eleven review criteria to be considered by the Planning Commission. The following section provides a review of each of these criteria with respect to the proposal. Each of the criteria is provided, followed by staff analysis of the criterion as it relates to this proposal.*

### **1. There exists an obvious technical error in the pertinent Comprehensive Plan or regulatory code provisions.**

Staff Analysis: There are technical errors and inefficiencies in the current code. The definition of “billboard” is defined by its content. Given court cases about commercial free speech under the Constitution, it has been determined to be an inappropriate definition. Further, there is not adequate distinction between off-premises and on-premises signs. Language regarding billboards is organized poorly – for example, subsections regarding location are not placed together, and redundant language is included and can be consolidated.

### **2. Circumstances related to the proposed amendment have significantly changed, or a lack of change in circumstances has occurred since the area or issue was last considered by the Planning Commission.**

Staff Analysis: An amortization clause was adopted in 1997 stating that all nonconforming billboards were to be removed by August 1, 2007. That clause was challenged when the deadline passed. Court cases regarding commercial free speech, content-based regulation, and property takings have been adjudicated since that time. Pursuant to the legal challenge, and in light of court cases subsequent to the 1997 ordinance, the City Council determined that a settlement was in the best interest of the City.

### **3. The needs of the City have changed, which support an amendment.**

Staff Analysis: The amendment is needed to implement a Settlement Agreement, that compromise which is intended to avoid protracted legal issues.

### **4. The amendment is compatible with existing or planned land uses and the surrounding development pattern.**

Staff Analysis: In most cases, digital billboards are planned to be located where traditional billboards already exist. In all cases, digital billboards are planned for high-traffic locations, along arterial street routes with a high volume of automobile traffic. The initial 10 billboards are not necessarily compatible with the planned development of the area, as some of them are within mixed-use districts; however, the exchange program as a whole is consistent with the intent of the sign code and with aesthetic improvements city-wide.

### **5. Growth and development, as envisioned in the Plan, is occurring faster, slower, or is failing to materialize.**

Staff Analysis: This criterion is not applicable.

**6. The capacity to provide adequate services is diminished or increased.**

Staff Analysis: This criterion is not applicable.

**7. Plan objectives are not being met as specified, and/or the assumptions upon which the plan is based are found to be invalid.**

Staff Analysis: The 1997 code changes anticipated exchange of billboards at a 1:1 ratio and the removal of all nonconforming billboards by 2007. Very few billboards have been relocated, and the remaining nonconforming billboards have not been removed.

**8. Transportation and and/or other capital improvements are not being made as expected.**

Staff Analysis: This criterion is not applicable.

**9. For proposed amendments to land use intensity or zoning classification, substantial similarities of conditions and characteristics can be demonstrated on abutting properties that warrant a change in land use intensity or zoning classification.**

Staff Analysis: This criterion is not applicable.

**10. A question of consistency exists between the Comprehensive Plan and its elements and RCW 36.70A, the County-wide Planning Policies for Pierce County, Multi-County Planning Policies, or development regulations.**

Staff Analysis: This criterion is not applicable.

**Economic Impact Assessment:**

The economic impacts of the proposed amendment are difficult to anticipate and quantify. Certain land owners will lose income as their leases for standard billboards are terminated. Other landowners may receive new leases for digital billboards. In addition, the City will benefit in that digital billboards will be made available for emergency services alerts. The owners of digital billboards will benefit greatly from the increased advertising revenues on digital billboards, which can support several advertisers at once, compared to a traditional billboard with just one advertiser. At the same time, parties wishing to use billboard advertising will benefit from more opportunities on those digital billboards.

**Staff Recommendation:**

Staff recommends that the draft amendment (Exhibit A) be released for public review in preparation for a public hearing on March 16, with the recognition that changes may be made to refine the language before a final recommendation is forwarded to the City Council.

**Exhibits:**

- A. Draft Code Amendments, annotated
- B. Map of Special Receiving Areas for the first 10 digital billboards
- C. Map of allowed zoning districts, with buffers, for subsequent digital billboards
- D. Notes from the public meeting on January 31, 2011