



Oct. 18, 2023

Humboldt County Planning Commissioners
Sent via email to Planningclerk@co.humboldt.ca.us

Re: Draft Sign Ordinance

Dear Commissioners,

I am writing on behalf of Humboldt Waterkeeper, which was launched in 2004 with a mission to safeguard coastal resources for the health, enjoyment, and economic strength of the Humboldt Bay community through education, scientific research, and enforcement of laws to fight pollution.

We have advocated for many years for better regulation of off-site billboards, digital signs, and lighting, particularly in unincorporated areas of the County in close proximity to Humboldt Bay, Elk River, and other coastal areas. We are thrilled to see that the policies, standards, and implementation measures adopted in the 2017 General Plan to protect our scenic views, night skies, sensitive habitats, and scenic areas from signage for advertising and other commercial uses of public spaces will finally be enacted by County ordinance. In particular, we support the prohibition on new digital and off-premise signs, protections for wetlands and other sensitive habitats during maintenance related to existing signs, and lighting requirements to protect the night sky for stargazers, people trying to sleep, and migrating birds, bats and other wildlife.

The lighting standards in the draft ordinance are weak and we recommend strengthening them, particularly in the Coastal Ordinance. After Planning Commission deliberation at numerous General Plan Update hearings, it became clear that the Dark Sky Society policies for protecting the night sky were wildly popular, gaining strong support from Commissioners Dennis Mayo, Ralph Faust, and everyone in between them, spanning the political spectrum.



600 F Street, Suite 3 #810
Arcata, CA 95521
(707) 499-3678
www.humboldtwaterkeeper.org



We strongly recommend that the County consider the policies adopted by the City of Eureka and approved by the Coastal Commission. Below is an excerpt of the City's sign ordinance, LCP-1-EUR-20-0072-2 that was approved by the Coastal Commission last year (the complete language is available at <https://documents.coastal.ca.gov/reports/2022/7/w11a/w11a-7-2022-exhibits.pdf>):

Brightness (p. 27):

- During daylight hours between sunrise and sunset, luminance is limited to 10,000 nits. At all other times, luminance is limited to 500 nits.
- Digital signs may produce no more than 0.3 foot-candle of light when measured from the distance using the following formula: Each sign must have a light sensing device that will automatically adjust the brightness of the display as the natural ambient light conditions change.

This language is more specific, enforceable, and protective than what is in the draft County Ordinance before you at 87.3.3.7.1.6: "Lighting shall use the **lowest light level necessary** and **when feasible** lighting should be on demand or shall only operate between sunrise and sunset or 30 minutes after closing, whichever comes first."

Illumination (p. 31):

The light source for externally illuminated signs must be positioned so that light does not shine directly on adjoining properties, and for signs located in the Coastal Zone, any environmentally sensitive habitat area or wetlands.

This language is again more specific, enforceable, and protective than what is in the draft County Ordinance before you at 87.3.3.7.1.5 "The light source for externally illuminated signs must be shielded and positioned so that light is only directed at the face of the sign and does not spill beyond where it is needed."

We also support the seven-year buyout period for phasing out billboards on a case-by-case basis to be determined by the County, but would much prefer to see the phase-out of all billboards that are not consistent with the new regulations, as was proposed in the draft ordinance we reviewed back in June, which said in part,

87.2.7.7 Off-premise signs not consistent with the above regulations shall be removed within 15 years from the effective date of this ordinance. Upon the expiration of the designated time period, the permit holder shall be required to remove the off-premise sign structure and restore the site to its original condition within 30 days...

Thank you for your consideration. We appreciate the opportunity to comment on this matter.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Kalt". The signature is written in a cursive, flowing style.

Jennifer Kalt, Executive Director
jkalt@humboldtwaterkeeper.org