



**RULE INTERPRETATION DETERMINATION**

**Determination #:** 2019-007

**Title:** Digital Sign Displays Using Projection Technology

**Drafted by:** DSD, Signs Section; Office of Historic Preservation, Design Review

**Rule in Question:** UDC Section 35-678 – Signs and Billboards in the RIO

**Department Action:** This RID serves to clarify that digital signs using projection technology are allowable under City code within certain parameters and provided that all other permitting requirements are met.

Michael Shannon, PE, CBO  
Development Services Director

9-19-19  
Date

Shanon Shea Miller  
Director, Office of Historic Preservation

9.19.19  
Date

**Effective Date of Determination:** *(Immediately or identify specific date)*

*Please note RIDs often result in direct or related UDC amendments to codify the clarification addressed within the RID. RIDs can also be superseded by subsequent RIDs or UDC amendments. The Development Services Department will remove RIDs from the website when they are no longer valid.*

**Staff Analysis:** Digital sign displays are regulated both in the City’s Code of Ordinances as well as the Unified Development Code as it relates to historic properties, public property, or properties zoned within the River Improvement Overlay District. The purpose of the regulations is to promote and enhance the scenic quality of the urban environment by preventing undesirable or distracting digital displays. As technology advances, new methods for sign installation and lighting occasionally prompt an updated interpretation or revisions to both the Sign Code and the Unified Development Code.

UDC Sections 35-612(6), 35-645(f), and 35-678(j) all include similar prohibition language relating to “digital and/or LED lighted signs” located on historic properties, public property, or properties located within a River Improvement Overlay District. Staff finds that this intent of this language is to restrict the use of digital message boards, flashing or moving signs, and digital monitor displays. At the time it was written, digital projection was an emerging technology and was not anticipated as a method for permanent sign installation. Section 28-6 of the City Code further distinguishes a digital sign or digital display as a separate method than a digital projection.

Chapter 28 Section 28-48 (2a) Use of digital projection is prohibited on displays greater than thirty-two (32) square feet. Projected signs can appear similar to traditional signs when lit at night but allow for greater flexibility for property owners to revise content. Furthermore, projected signs may be a more appropriate and reversible solution for historic buildings since it eliminates the need for invasive installation methods such as drilling or anchoring.

UDC Section 35-681 specifically addresses signs on the Riverside of Properties abutting the San Antonio River or San Pedro Creek. This section goes as far to restrict roof-mounted signs, large-scale wall signs, and signs featuring internal-illumination on wall planes oriented toward the San Antonio River Walk. Because digital signs are expressly prohibited for all properties located within the RIO, the language is not repeated in this more-specific section. UDC amendments may be needed to clarify that projected signs are not allowed under 35-681 specifically which staff finds to be the intent of this section. This interpretation is consistent with similar prohibitions of temporary digital displays located in Alamo Plaza or the River Walk Area.

**Staff Position and Interpretation:** The use of digital projection as a method for permanent sign installation is permissible provided that the content consists of static imagery limited to the definition of an on-premise sign, is not located on any building or structure face oriented toward the San Antonio River Walk, and meets all other permitting requirements and relevant guidelines for signage.

**Future UDC Amendments:** Update to 35-681 to include restrictions of digital displays and digital projects on the River Walk consistent with other sections of City code.