

A Study of Local Regulation of Outdoor Advertising in 215 U.S. Jurisdictions

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EXECUTIVE SUMMARY

This study examined the type and extent of land use regulation of outdoor advertising for 215 cities in the 46 states that do not impose a state-wide ban on commercial outdoor advertising.¹ The group of 215 cities was selected by: (1) identifying all cities in these states with a population of 150,000 or greater based on the U.S. Census Bureau's 2009 population estimates (2) for those states that do not have at least five cities of that size, up to five cities with a population less than 150,000 but greater than 100,000; and (3) for states that have no cities with a population greater than 100,000, the two cities in that state with the largest populations.

This study found that 66.5% of the 215 cities allowed new outdoor advertising to be constructed while 6.5% had adopted regulations aimed at entirely eliminating outdoor advertising. The study also found that each of the cities allowing the construction of new signs regulates the “physical” aspects of outdoor advertising by imposing some form of restriction on the location, size, height, illumination, etc. of signs.

A statistical summary of the Study's most critical findings appears below:

- 84 of 215 cities (39.0%) permit new sign construction “as-of-right.”
 - 75 of these 83 cities (90.4%) permit new signs of at least 300 sq. ft.
 - 49 of these 83 cities (59.0%) permit new signs of at least 672 sq. ft.
 - 18 of these 83 cities (21.7%) permit new signs of at least 750 sq. ft.
- 28 of the 215 cities (13.0%) permit new sign construction as a “conditional use.”
- 31 of the 215 cities (14.4%) condition the construction of new signs on the removal or relocation of one or more existing signs.
- 72 of the 215 cities (33.4%) totally prohibit the construction of new signs, with 46 of these 72 (63.9%) concentrated in 6 states.²
- Only 14 of the 215 cities (6.5%) have adopted ordinances that seek to eliminate outdoor advertising entirely.

I. Description of Study

¹ All states except Alaska, Hawaii, Maine and Vermont.

² Arizona (5), California (20), Florida (7), Texas (7), Virginia (3) and Washington (4).

This study was conducted between July 18, 2009 and January 4, 2010. I constructed a study list of 215 cities utilizing the 2009 population estimate figures from the U.S. Census Bureau. The study list comprises: (1) all cities with an estimated population of 150,000 or greater in the 46 states that do not impose a state-wide ban on outdoor advertising; (2) for those states that do not have at least five cities of that size, up to five cities with a population less than 150,000 but greater than 100,000; and (3) for states that have no cities with a population greater than 100,000, the two cities in that state with the largest populations.

After requesting and obtaining from each city in the Study a copy of its official code(s) addressing land use regulation of outdoor advertising, I determined the type and extent of land use regulation or outdoor advertising for each jurisdiction. In all instances where ambiguities or omission in the official governmental publication(s) made it difficult to determine the type and extent of land use regulation outdoor advertising from the documents alone, my Research Assistant or I contacted the jurisdiction by telephone and spoke with an appropriate official prior to making the determination.

II. Zoning Regulation of Outdoor Advertising Signs

A. Overview

All 215 cities in the Study regulates the “physical” aspects of outdoor advertising by imposing some form of restriction on the location, size, height, illumination, etc. of outdoor advertising signs [hereinafter “signs”]. For 72 of the cities, such regulation takes the form of a ban on construction of all new signs. In the great majority of cities, these regulations are found in the jurisdiction’s zoning or land development code. In a smaller number of cities, the regulations are found in a separate sign code that is distinct from the zoning or land development code. In a relatively few cases, there is a separate code specifically for outdoor advertising signs.

As a general matter, the Study cities’ regulation of the location, size, height, illumination, etc. of signs is best described as a continuum; i.e., in most cases there are very slight differences at each interval between the most restrictive and least restrictive jurisdictions on a particular regulatory issue. Below, I have identified the most common types of sign regulations and indicated the range of the regulatory continuum for each type.

B. Regulation of Sign Locations

All of the Study cities regulate the zoning districts where new signs may be constructed and/or existing signs are allowed to remain. The most common form of regulation permits the construction of new signs in one or more non-residential districts while prohibiting their construction in residential districts and other specified districts. It is also common for cities to prohibit new signs in some portion(s) of zoning districts in which they are otherwise permitted. Among the more common terms for such areas are: “sub-area,” “overlay district,” or “scenic corridor.”

Location regulations also restrict the sites (i.e., lots or structures) where signs may be located within the zoning districts where they are permitted. These provisions normally state minimal distances that must be maintained between a site containing a sign and specified land uses or natural features, e.g., parks, residential districts or structures, scenic districts, specified roadways, rivers, lakes, etc.

Location regulations also specify where sign structures may be located on a lot or structure. Such regulations typically require setback from property lines and prohibit signs in the public right-of-way or in “visibility triangles” at traffic intersections. More restrictive regulations may also prohibit signs painted on building walls or on roofs of buildings. Another form of restrictive regulations is to restrict signs only to lots that have no other structure.

Location regulations also may impose horizontal and/or vertical “spacing” or “separation” requirements. For example, requiring that sign structures be spaced at least 500 (or 600 or 1,200, etc.) feet from each other or prohibiting signs that are “stacked” one on top of another or placed together horizontally “end-to-end” or “side-by-side.”

C. Dimensional, Structural and Operational Regulations

All of the Study cities that allow new sign construction or the maintenance of legal nonconforming signs impose one or more of the following regulations on sign structures, dimensions or operations.

1. Restrictions on the area, height, or width of the sign structure, including regulation or prohibition of “stacked” or “end-to-end” or “side-by-side” signs, or specifying a permissible maximum angle for “V-type” signs.
2. Restrictions on the number and/or type of support columns.

3. Regulation of the appearance of structural components (e.g., support columns, ladders, walkways, bracing, ends, etc.) as regards screening, landscaping, color, etc.
4. Regulation of means, direction, and intensity of illumination.
5. Regulation of color or reflectivity of a sign's structural components.
6. Restriction or regulation of "flashing, blinking or animated" and "tri-vision" signs.
7. Regulation of the directional orientation of the sign-face towards either the street frontage or specified roadways.
8. Regulation of "embellishments," "extensions," or "cut-outs" (temporary size extensions).
9. Requirements for maintenance and/or landscaping of the base of the sign structure.

D. Comparative Evaluation of Maximum Permitted Size of New Signs

Aside from prohibition on new construction (see III below), the regulatory mechanism that is most suitable for comparative evaluation based solely on the text of the regulation is the maximum permitted size of the new signs. 84 of the 215 Study cities (39.0%) permit new construction "as-of-right."³ While the maximum permitted size of new signs in these cities varied dramatically, from a low of 72 sq. ft. to a high of 1,500 sq. ft. in size, 48 of these 83 (57.8%) permit a maximum size of at least 672 sq. ft. and 91.5% – 76 of 83 – permit a maximum size of at least 300 sq. ft.⁴

1. Examination of 48 cities permitting a maximum size of at least 672 sq. ft.

- a. 25 of the 48 cities (52%) adopted 672 sq. ft. as the maximum size, with the remaining 23 (48%) allowing signs over 672 sq. ft.
- b. 18 of the 48 cities (37.5%) permitted signs of at least 750 sq. ft. and 6 of the 48 cities (12.5%) permitted signs over 1,000 sq. ft.

³ New construction is permitted "as-of-right" if a permit to construct a new sign is issued when an applicant meets prescribed objective standards for locational and other regulatory criteria and the permit is not conditioned on the removal of any existing sign(s).

⁴ These correspond to industry standards for a "painted bulletin" (672 sq. ft.) and "30 sheet" poster (300 sq. ft.)

- c. The 48 cities were geographically dispersed throughout the United States.
- 2. Examination of 28 cities permitting a maximum size of at least 300 sq. ft. but less than 672 sq. ft.**
- a. 23 of the 28 cities (82%) permitted a maximum size over 300 sq ft., with 14 of these 23 (61%) permitting a maximum size between 400 and 600 sq ft.
 - b. 5 of these 28 cities (18%) permitted a maximum size of exactly 300 sq. ft.
 - c. As with the 48 cities permitting maximum sizes of at least 672 sq. ft., the 28 cities permitting a maximum size of at least 300 sq. ft., but less than 672 sq. ft., were geographically dispersed throughout the United States.

III. Prohibition on New Construction and Regulation of Nonconforming Signs

As previously stated, the various locational, dimensional, structural and operational regulations for outdoor advertising enacted by the Study cities are best described as occupying a continuum. Significant distinctions among the Study cities do appear, however, when the combined effect of a jurisdiction's regulation of new sign construction and legal non-conforming signs⁵ is considered. Below, I have identified the most common approaches to regulating new sign construction and legal nonconforming signs. In each case, these approaches are ordered from least to most restrictive.

A. Regulation of New Construction

- 1. New Construction Permitted "As-of-Right":** A permit to construct a new sign will be issued so long as an applicant meets prescribed objective standards for locational and other regulatory criteria.
- 2. New Construction Conditionally Permitted:** A permit to construct a new sign is made subject to a discretionary decision that an applicant has met both objective and subjective standards for locational and other regulatory criteria.
- 3. New Construction Must Meet "Cap and Replace" Requirements:** In addition to meeting all applicable locational and other regulatory criteria, the

⁵ A "legal non-conforming sign" is a sign that, when erected, was in conformity with all applicable regulations, but is not in conformity with regulations that were subsequently enacted.

construction of new signs is permitted only if one or more existing sign(s) is removed or “relocated” for each new sign constructed.

- 4. New Construction Prohibited:** Construction of new signs is totally prohibited.

B. Regulation of Legal Non-Conforming Signs

- 1. Legal Non-Conforming Signs Permitted to Remain:** Legal Non-Conforming signs are permitted to remain, but may not be rebuilt if “damaged” or “destroyed” and must be removed if “abandoned.”⁶
- 2. Legal Non-Conforming Signs Permitted to Remain if Greater Conformance is Possible:** Only those legal non-conforming signs which can be brought into greater compliance with current regulations are permitted. Such regulations often take the form of stating that a legal non-conforming sign may be replaced, relocated, or renovated at its current location if such action will bring the structure into greater conformance and outdoor advertising is a permitted use at the location.
- 3. Legal Non-Conforming Signs Permitted to Relocate:** Legal non-conforming signs may be “relocated” to a different site if the new sign will conform to existing regulations at such site.
- 4. Legal Non-Conforming Signs “Amortized”:** Legal non-conforming signs must be removed after a specified “amortization” period, which may range up to twenty years, with the most common periods falling between five and fifteen years. Such amortization provisions may either be for specified districts (*e.g.*, non-conforming signs in residential districts)⁷ or apply city-wide. Normally, monetary compensation is required when a sign is amortized only when applicable federal, state or local law requires such compensation.

⁶ Typical provision requires that a sign be removed if the sign structure is totally destroyed or suffers damage equal to 50% or more of the replacement cost of the sign structure or if the sign face is found to be abandoned because it remains blank for a period of time, which may range from 90 days to one year or more.

⁷ See, *e.g.*, Section 17.104.050 of the Oakland, CA Planning Code: Amortization of Advertising Signs in Residential Zones.

C. Comparative Evaluation of Regulation vs. Prohibition of New Sign Construction in Study Cities

- 1.** 112 of the 215 cities (52.0%) permit the construction of new signs either “as-of-right” or as a “conditional use” in one or more zoning district, with 84 of the 215 cities (39.1%) permitting their construction “as-of-right”. Thus, over half of the Study cities allow new signs to be constructed, so long as applicable locational and other regulatory criteria are met, without any requirement that existing signs be removed or relocated.
- 2.** 31 of the 215 cities (14.4%) have adopted a “Cap & Replace” ordinance that conditions the construction of new signs on the removal or relocation of one or more existing signs. (See Appendix D).
 - a.** Location: The Cap & Replace cities are geographically concentrated, with 14 of the 31 (45.1%) located in four states.⁸
 - b.** Population: The 31 Cap & Replace cities represent all population groupings, ranging from cities having a population over 1,000,000⁹ down to cities with a population just under 60,000.¹⁰
- 3.** 72 of the 215 cities (33.4%) totally prohibit the construction of new signs. (See Appendix F).
 - a.** 45 of the 72 cities (62.5%) that totally prohibit new construction are geographically concentrated in just 6 states.¹¹
 - b.** Aside from their concentration in a small number of states, other patterns or groupings among the 72 are not clearly observable.
- 4.** When the 72 cities that prohibit construction and the 31 cities that condition new construction on the removal of one or more signs are considered as a single group of 103, their geographical concentration is pronounced. 64 of the

⁸ California (5), Montana (4), Texas (3) and Utah (2)

⁹ Philadelphia and San Antonio

¹⁰ Cheyenne, WY.

¹¹ Arizona (5), California (20), Florida (7), Texas (7), Virginia (3) and Washington (4).

103 cities (62.1%) are concentrated in just eight states,¹² with significant concentrations in specific regions within these states.¹³

D. Comparative Evaluation of Regulation of Legal Non-Conforming Signs in Study Cities that Prohibit New Sign Construction.

As noted previously, the most severe regulation of outdoor advertising signs occurs when a total prohibition on the construction of new signs is combined with the requirement that legal non-conforming signs be removed, without compensation, after a specified “amortization” period. Less than one-third of the 72 cities that totally prohibit new construction – 21 of 72 (29%) – also require the removal through amortization of all legal non-conforming signs not subject to state or federal compensation requirements. When viewed in light of the entire Study, the 21 cities that have adopted this most restrictive form of regulation for outdoor advertising account for less than ten percent (9.8%) of the 215 Study cities.

IV. Tri-vision and/or Electronic Message Center Code Provision

Relatively few of the codes in the database of 215 cities explicitly address Tri-vision and/or Electronic Message Centers (hereinafter EMC’s) in the context of regulating outdoor advertising. Thus, while I can speak with some confidence about those codes that address the issue explicitly, I have less confidence where a code does not contain an explicit provision permitting, regulating or prohibiting Tri-Vision and/or EMCs.

In many codes, for example, the language regarding sign faces is too ambiguous to state whether or not Tri-vision is permitted. For EMCs, while many codes contain explicit EMC provisions, these often appear outside of those code sections dealing with billboards and it is often difficult to determine from statutory language alone whether billboards with EMCs would or would not be permitted. In light of these uncertainties, I have classified the codes I examined from the more specific to the less specific.

¹² Arizona (6), California (25), Colorado (3), Florida (8), Texas (11), Utah (4), Virginia (3) and Washington (5).

¹³ For example: Southern California (Anaheim, Chula Vista, Corona, Garden Grove, Glendale, Huntington Beach, Irvine, Moreno Valley, Oceanside, Ontario, Pomona, Rancho Cucamonga, Riverside, San Bernardino, San Diego, and Santa Clarita) and the San Francisco Bay area (Fremont, Oakland, San Francisco, San Jose, Santa Rosa).

A. Tri-vision and/or EMC Categories

- **Category A.** Tri-vision and/or EMC Explicitly Allowed for Billboards
- **Category B.** Tri-Vision and/or EMC Explicitly Permitted as a Conditional Use for Billboards
- **Category C.** EMCs Permitted on Billboards but Limited to Time/Temperature/Public Service
- **Category D.** Tri-vision and/or EMC Explicitly Prohibited for Billboards or Billboards Prohibited
- **Category E.** EMCs Permitted – But no Explicit Reference to Billboards
- **Category F.** EMCs Permitted Only to Display Time/Temperature/Public Service Message Without Explicit Reference to Billboards or Limited to Uses other than Billboards
- **Category G.** Prohibition on Tri-vision and/or EMC With No Explicit Reference to Billboards
- **Category H.** Prohibition That Could Be Read as Allowing Tri-vision and/or EMC
- **Category I.** No Relevant Code Provision

B. Comparative Evaluation of Regulation vs. Prohibition of Tri-vision and/or EMCs in Study Cities

- Categories A, B and C comprising 40 of the 215 codes (18.6%) contain provisions that explicitly allow Tri-vision and/or EMC as applied to outdoor advertising.
- Categories E and H, comprising 79 of the 215 codes (36.7%) contain provisions that could possibly be interpreted as allowing Tri-vision and/or EMC as applied to outdoor advertising.
- Categories D, F and G comprising 87 of the 215 codes (40.4%) contain provisions that are least likely to be interpreted as allowing Tri-vision and/or EMCs. These codes either prohibit Tri-vision and/or EMCs explicitly – or limit EMCs to the display of time/temperature or public service messages – or prohibit new billboards generally.

- Category I, comprising 9 of the 215 codes (4.2%) contain no provisions that address whether EMC and/or Tri-vision are permitted on billboards.

C. Codes Permitting Tri-vision and/or EMC For Outdoor Advertising

Forty-one codes (19.1% of the total database) have an explicit provision allowing the use of Tri-vision and/or EMC. These codes take four basic regulatory approaches:

- (1) Tri-vision and/or EMC permitted as-of-right.
- (2) Tri-vision and/or EMC permitted as-of-right subject to location/operational constraints.
- (3) Tri-vision and/or EMC permitted as a conditional use.
- (4) EMC allowed but limited to time and/or temperature or public service announcements.

The most common “permissive” approach was to permit Tri-vision and/or EMC subject to durational and/or locational regulation. These regulations contained one or more of the following provisions.

Duration/Illumination – Found in most Codes

- 31 codes (14.4%) identified a minimum duration for an EMC image as lasting between three (3) and eight (8) seconds, with the majority at eight (8) seconds.
- 19 codes (8.8%) identified a minimum duration for an EMC image as lasting between nine (9) and sixty (60) seconds.
- 6 codes (2.8%) identified a minimum duration for an EMC image as lasting one (1) minute or more¹⁴.
- A prohibition on “flashing, blinking, scrolling, animation” etc.
- Requiring light intensity to remain constant during display or a message.
- Specifying the minimum amount of time a message must remain unchanged.
- Limiting the illumination as measured by lumens measured at “x” fee.

Operation/Size

- Requiring that moving parts remain within the boundary of the sign face an/or not project further than a specified distance from the sign face.

¹⁴ Aurora, CO (30 Minutes), Chesapeake, VA (3 Hours), Colorado Springs, CO (24 Hours), Grand Rapids, MI (5 Minutes), Kansas City, MO (12 Hours), Madison, WI (5 Minutes).

- Prohibiting movement that interferes with the effectiveness or obscures official signs or traffic-devices or requiring a ministerial review to insure compatibility with traffic safety.
- Limiting the size of an electronic display to a percentage of the sign face.

Location

- Requiring that signs be located only in specified districts and/or be set-back specified distances from named districts, normally residential, or roadway features such as intersections.
- Requiring that sign face be directed towards a specified roadway.
- Requiring that Tri-vision and/or EMC signs be “spaced” a specified distance from each other.

D. Codes Prohibiting Tri-vision and/or EMC For Outdoor Advertising or Prohibiting Outdoor Advertising

Eighty-seven codes (40.4%) explicitly prohibited Tri-vision and/or EMCs, or limited EMCs to the display of time/temperature or public service messages, but without reference to outdoor advertising, or contained an explicit prohibition on billboards.

E. Analysis

These findings suggest several opportunities for the industry.

First, the codes that explicitly regulate Tri-vision and/or EMCs as applied to outdoor advertising provide the industry with a “cafeteria” of options companies can use to address concerns over traffic safety or property value that opponents of Tri-vision and/or EMC might raise.

Second, the industry has an opportunity to document that Tri-vision and/or EMC, when “appropriately” regulated as to duration, location, etc. does not produce such negative effects as increases in traffic accidents and/or decreases in property values.

Third, given the large number of codes that prohibit “flashing” or “movement,” etc., the industry has an opportunity to set one or more precedents – either through lobbying/negotiation or litigation – that such terms do not prohibit EMCs.

Fourth, given that there is some favorable case law raising content-based concerns about limiting EMCs to time/temperature or public service announcements, the industry

has an opportunity – again either through lobbying/negotiation or litigation – to remove such restrictions.

V. Summary of Findings

This Study reveals several significant findings.

A. Regulation, not prohibition, is the norm among the 215 Study cities:

- Two-thirds of the cities (66.5%) provide opportunities for the construction of new signs.
- While 33.5% of the cities totally prohibit the construction of new signs, only 9.8% of the 215 cities in the Study have adopted the most restrictive form of prohibition for outdoor advertising by combining a prohibition on new construction with amortization of legal non-conforming signs not subject to state or federal compensation requirements.

B. There is a positive correlation between city size and permitting the construction of new signs. While 66.5% of *all* cities allow for construction of new signs, almost 76% of the cities with populations over 300,000 permit the construction of new signs.¹⁵

C. There is a positive correlation between city size and permitting the construction of large signs.

- 7 of the 10 largest cities¹⁶ permit a maximum size of at least 672 sq. ft.

D. Cities that regulate signs most stringently are geographically concentrated.

- 46 of the 72 cities (63.9%) that totally prohibit new construction are geographically concentrated in just 6 states.¹⁷
- 64 of the 103 cities (62.1%) that either prohibit new construction or condition new construction on the removal of one or more existing signs, are

¹⁵ 44 of 58 cities over 300,000 (75.8%) allow new signs to be constructed.

¹⁶ New York (1), Los Angeles (2), Chicago (3), Phoenix (5), Philadelphia (6), San Antonio (7), and San Jose (10). Note: Of these cities, Philadelphia, San Antonio and San Jose only allow new signs as a replacement for an existing sign.

¹⁷ Arizona (5), California (20), Florida (7), Texas (7), Virginia (3) and Washington (4).

concentrated in just eight states¹⁸ with significant concentrations in specific regions within these states.¹⁹

¹⁸ Arizona (6), California (25), Colorado (3), Florida (8), Texas (11), Utah (4), Virginia (3) and Washington (5).

¹⁹ For example: Southern California (Anaheim, Chula Vista, Corona, Garden Grove, Glendale, Huntington Beach, Irvine, Moreno Valley, Oceanside, Ontario, Pomona, Rancho Cucamonga, Riverside, San Bernardino, San Diego, and Santa Clarita) and the San Francisco Bay area (Fremont, Oakland, San Francisco, San Jose, Santa Rosa).

Appendix A
ALPHABETICAL LIST OF STUDY JURISDICTIONS (N=215)
Sources: U.S. Census Bureau Table SUB-EST2009-07

1. Akron, Ohio
2. Albuquerque, New Mexico
3. Allentown, Pennsylvania
4. Amarillo, Texas
5. Anaheim, California
6. Ann Arbor, Michigan
7. Arlington, Texas
8. Arlington, Virginia
9. Athens, Georgia
10. Atlanta, Georgia
11. Augusta, Georgia
12. Aurora, Colorado
13. Aurora, Illinois
14. Austin, Texas
15. Bakersfield, California
16. Baltimore, Maryland
17. Baton Rouge, Louisiana
18. Bellevue, Washington
19. Billings, Montana
20. Birmingham, Alabama
21. Bismarck, North Dakota
22. Boise, Idaho
23. Boston, Massachusetts
24. Bridgeport, Connecticut
25. Brownsville, Texas
26. Buffalo, New York
27. Cambridge, Massachusetts
28. Cape Coral, Florida
29. Casper, Wyoming
30. Cedar Rapids, Iowa
31. Chandler, Arizona
32. Charleston, South Carolina
33. Charleston, West Virginia
34. Charlotte, North Carolina
35. Chattanooga, Tennessee
36. Chesapeake, Virginia
37. Cheyenne, Wyoming
38. Chicago, Illinois
39. Chula Vista, California
40. Cincinnati, Ohio
41. Clarksville, Tennessee
42. Cleveland, Ohio
43. Colorado Springs, Colorado
44. Columbia, Missouri
45. Columbia, South Carolina
46. Columbus, Georgia
47. Columbus, Ohio
48. Corona, California
49. Corpus Christi, Texas
50. Dallas, Texas
51. Davenport, Iowa
52. Dayton, Ohio
53. Denver, Colorado
54. Des Moines, Iowa
55. Detroit, Michigan
56. Dover, Delaware
57. Durham, North Carolina
58. El Paso, Texas
59. Elizabeth, New Jersey
60. Erie, Pennsylvania
61. Eugene, Oregon
62. Evansville, Indiana
63. Fargo, North Dakota
64. Fayetteville, Arkansas
65. Fontana, California
66. Fort Collins, Colorado
67. Fort Lauderdale, Florida
68. Fort Smith, Arkansas
69. Fort Wayne, Indiana
70. Fort Worth, Texas
71. Fremont, California
72. Fresno, California
73. Garden Grove, California
74. Garland, Texas
75. Gilbert town, Arizona
76. Glendale, Arizona
77. Glendale, California
78. Grand Prairie, Texas
79. Grand Rapids, Michigan
80. Green Bay, Wisconsin
81. Greensboro, North Carolina
82. Gresham, Oregon
83. Gulfport, Mississippi
84. Hartford, Connecticut
85. Henderson, Nevada
86. Hialeah, Florida
87. Houston, Texas
88. Huntington, West Virginia

89. Huntington Beach, California
90. Huntsville, Alabama
91. Independence, Missouri
92. Indianapolis, Indiana
93. Irvine, California
94. Irving, Texas
95. Jackson, Mississippi
96. Jacksonville, Florida
97. Jersey City, Jersey
98. Joliet, Illinois
99. Kansas City, Kansas
100. Kansas City, Missouri
101. Knoxville, Tennessee
102. Las Cruces, New Mexico
103. Lafayette, Louisiana
104. Lakewood, Colorado
105. Laredo, Texas
106. Las Vegas, Nevada
107. Lexington-Fayette, Kentucky
108. Lincoln, Nebraska
109. Little Rock, Arkansas
110. Long Beach, California
111. Los Angeles, California
112. Louisville, Kentucky
113. Lowell, Massachusetts
114. Lubbock, Texas
115. Madison, Wisconsin
116. Manchester, New Hampshire
117. Memphis, Tennessee
118. Mesa, Arizona
119. Miami, Florida
120. Milwaukee, Wisconsin
121. Minneapolis, Minnesota
122. Missoula, Montana
123. Mobile, Alabama
124. Modesto, California
125. Montgomery, Alabama
126. Moreno Valley, California
127. Nampa, Illinois
128. Naperville, Illinois
129. Nashua, New Hampshire
130. Nashville, Tennessee
131. New Haven, Connecticut
132. New Orleans, Louisiana
133. New York, New York
134. Newark, New Jersey
135. Newport News, Virginia
136. Norfolk, Virginia
137. Norman, Oklahoma
138. North Las Vegas, Nevada
139. Oakland, California
140. Oceanside, California
141. Oklahoma City, Oklahoma
142. Olathe, Kansas
143. Omaha, Nebraska
144. Ontario, California
145. Orlando, Florida
146. Overland Park, Kansas
147. Oxnard, California
148. Peoria, Arizona
149. Philadelphia, Pennsylvania
150. Phoenix, Arizona
151. Pittsburg, Pennsylvania
152. Plano, Texas
153. Pomona, California
154. Portland, Oregon
155. Port St. Lucie, Florida
156. Providence, Rhode Island
157. Provo, Utah
158. Raleigh, North Carolina
159. Rancho Cucamonga, California
160. Rapid City, South Dakota
161. Reno, Nevada
162. Richmond, Virginia
163. Riverside, California
164. Rochester, Minnesota
165. Rochester, New York
166. Rockford, Illinois
167. Rockville, Maryland
168. Sacramento, California
169. Salem, Oregon
170. Salt Lake City, Utah
171. San Antonio, Texas
172. San Bernardino, California
173. San Diego, California
174. San Francisco, California
175. San Jose, California
176. Santa Ana, California
177. Santa Clarita, California
178. Santa Rosa, California
179. Savannah, Georgia
180. Scottsdale, Arizona

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| 181. Seattle, Washington | 199. Toledo, Ohio |
| 182. Shreveport, Louisiana | 200. Topeka, Kansas |
| 183. Sioux Falls, South Dakota | 201. Tuscan, Arizona |
| 184. South Bend, Indiana | 202. Tulsa, Arizona |
| 185. Spokane, Washington | 203. Vancouver, Washington |
| 186. Springfield, Massachusetts | 204. Virginia Beach, Virginia |
| 187. Springfield, Missouri | 205. Warren, Michigan |
| 188. Stamford, Connecticut | 206. Warwick, Rhode Island |
| 189. Sterling Heights, Michigan | 207. Washington D.C. |
| 190. Stockton, California | 208. Waterbury, Connecticut |
| 191. St. Louis, Missouri | 209. West Jordan, Utah |
| 192. St. Paul, Minnesota | 210. West Valley City, Utah |
| 193. St. Petersburg, Florida | 211. Wichita, Kansas |
| 194. Syracuse, New York | 212. Wilmington, Delaware |
| 195. Tacoma, Washington | 213. Winston-Salem, North Carolina |
| 196. Tallahassee, Florida | 214. Worcester, Massachusetts |
| 197. Tampa, Florida | 215. Yonkers, New York |
| 198. Tempe, Arizona | |

APPENDIX B
2008 CENSUS POPULATION OF STUDY CITIES

Over Two Million: 4 Cities

1. New York, NY	8,363,710
2. Los Angeles, CA	3,833,995
3. Chicago, IL	2,853,115
4. Houston, TX	2,242,193

Over One Million: 5 Cities

5. Phoenix, AZ	1,567,924
6. Philadelphia, PA	1,447,395
7. San Antonio, TX	1,351,305
8. Dallas, TX	1,279,910
9. San Diego, CA	1,279,329

500,000 – 1,000,000: 25 Cities

10. San Jose, CA	948,279
11. Detroit, MI	912,062
12. San Francisco, CA	808,976
13. Jacksonville, FL	807,815
14. Indianapolis, IN	798,382
15. Austin, TX	757,688

16. Columbus, OH	754,885
17. Fort Worth, TX	703,073
18. Charlotte, NC	687,456
19. Memphis, TN	669,651
20. Baltimore, MD	636,919
21. El Paso, TX	613,190
22. Boston, MA,	609,023
23. Milwaukee, WI	604,474
24. Denver, CO	598,707
25. Seattle, WA	598,541
26. Nashville, TN	596,462
27. Washington, DC	591,833
28. Las Vegas, NV	558,383
29. Portland, OR	557,706
30. Louisville, KY	557,224
31. Oklahoma City, OK	551,789
32. Tucson, AZ	541,811
33. Atlanta, GA	537,958
34. Albuquerque, NM	521,999

400,000 – 500,000: 10 Cities

35. Fresno, CA	476,050	74. Chandler, AZ	247,140
36. Sacramento, CA	463,794	75. St. Petersburg, FL	245,314
37. Long Beach, CA	463,789	76. Jersey City, NJ	241,114
38. Mesa, AZ	463,552	77. Scottsdale, AZ	235,371
39. Kansas City, MO	451,572	78. Norfolk, VA	234,220
40. Omaha, NE	438,646	79. Madison, WI	231,916
41. Cleveland, OH	433,748	80. Orlando, FL	230,519
42. Virginia Beach, VA	433,746	81. Birmingham, AL	228,798
43. Miami, FL	413,201	82. Baton Rouge, LA	223,689
44. Oakland, CA	404,155	83. Durham, NC	223,284

300,000 – 400,000: 15 Cities

45. Raleigh, NC	392,552	85. Lubbock, TX	220,583
46. Tulsa, OK	385,635	86. Chesapeake, VA	220,111
47. Minneapolis, MN	382,605	87. Chula Vista, CA	219,318
48. Colorado Springs, CO	380,307	88. Garland, TX	218,577
49. Arlington, TX	374,417	89. Winston-Salem, NC	217,600
50. Wichita, KS	366,046	90. North Las Vegas, NV	217,253
51. St. Louis, MO	354,361	91. Reno, NV	217,016
52. Tampa, FL	340,882	92. Gilbert town, AZ	216,449
53. Santa Ana, CA	339,130	93. Hialeah, FL	210,542
54. Anaheim, CA	335,288	94. Arlington City, VA	209,969
55. Cincinnati, OH	333,336	95. Akron, OH	207,510
56. Bakersfield, CA	321,078	96. Irvine, CA	207,500
57. Aurora, CO	319,057	97. Rochester, NY	206,886
58. New Orleans, LA	311,853	98. Boise, ID	205,314
59. Pittsburgh, PA	310,037	99. Modesto, CA	202,967

200,000 – 300,000: 46 Cities

60. Riverside, CA	295,357	100. Fremont, CA	202,867
61. Toledo, OH	293,201	101. Montgomery, AL	202,696
62. Stockton, CA	287,037	102. Spokane, WA	202,319
63. Corpus Christi, TX	286,462	103. Richmond, VA	202,002
64. Lexington, KY	282,114	104. Yonkers, NY	201,588
65. St. Paul, MN	279,590	105. Irving, TX	201,358
66. Newark, NJ	278,980		
67. Buffalo, NY	270,919		
68. Plano, TX	267,480		
69. Henderson, NV	252,064		
70. Lincoln, NE	251,624		
71. Fort Wayne, IN	251,591		
72. Glendale, AZ	251,522		
73. Greensboro, NC	250,642		

150,000 – 200,000: 49 Cities

106. Shreveport, LA	199,729
107. San Bernardino, CA	198,580
108. Tacoma, WA	197,181
109. Glendale, CA	197,176
110. Des Moines, IA	197,052
111. Augusta, GA	194,149
112. Grand Rapids, MI	193,396
113. Huntington Beach, CA	192,620
114. Mobile, AL	191,020
115. Moreno Valley, CA	190,871

116. Little Rock, AR	189,515	159. Lakewood, CO	140,989
117. Amarillo, TX	187,236	160. Syracuse, NY	138,068
118. Columbus, GA	186,984	161. Fort Collins, CO	136,509
119. Oxnard, CA	185,717	162. Bridgeport CT	136,405
120. Fontana, CA	184,984	163. Warren, MI	133,939
121. Knoxville, TN	184,802	164. Savannah, GA	132,410
122. Fort Lauderdale, FL	183,126	165. Cedar Rapids, IA	128,056
123. Salt Lake City, UT	183,698	166. Sterling Heights, MI	127,160
124. Newport News, VA	179,614	167. Columbia, SC	127,029
125. Huntsville, AL	176,645	168. Elizabeth, NJ	124,755
126. Tempe, AZ	175,523	169. Harford, CT	124,062
127. Brownsville, TX	175,494	170. Bellevue, WA	123,771
128. Worcester, MA	175,011	171. New Haven, CT	123,669
129. Fayetteville, NC	174,091	172. West Valley City, UT	123,447
130. Jackson, MS	173,861	173. Topeka, KS	123,446
131. Tallahassee, FL	171,922	174. Olathe, KS	119,993
132. Aurora, IL	171,782	175. Clarksville, TN	119,735
133. Ontario, CA	171,691	176. Stamford, CT	119,303
134. Providence, RI	171,557	177. Provo, UT	118,581
135. Overland Park, KA	171,231	178. Evansville, IN	116,309
136. Rancho Cucamonga, CA	171,176	179. Ann Arbor, MI	118,386
137. Chattanooga, TN	170,880	180. Lafayette, LA	113,656
138. Oceanside, CA	169,684	181. Athens, GA	113,398
139. Santa Clarita, CA	169,500	182. Charleston, SC	111,978
140. Garden Grove, CA	165,796	183. Independence, MO	110,440
141. Vancouver, WA	163,186	184. Manchester, NH	108,586
142. Grand Prairie, TX	160,641	185. Allentown, PA	107,250
143. Peoria, AZ	157,960	186. Waterbury, CT	107,037
144. Rockford, IL	157,272	187. Norman, Oklahoma	106,957
145. Cape Coral, FL	156,835	188. Cambridge, MA	105,596
146. Springfield, MO	156,206	189. West Jordon, UT	104,447
147. Santa Rose, CA	155,796	190. Billings, MT	103,994
148. Sioux Falls, SD	154,997	191. Erie, PA	103,817
149. Port St. Lucie, FL	154,435	192. South Bend, IN	103,807
150. Dayton, OH	154,200	193. Lowell, MA	103,615
151. Salem, OR	153,435	194. Gresham, OR	101,221
152. Pomona, CA	152,699	195. Green bay, WI	101,025
153. Springfield, MA	150,640	196. Davenport, IA	100,827
154. Eugene, OR	150,104	197. Columbia, MO	100,733
		198. Rochester, MN	100,413

100,000 – 150,000: 45 Cities

155. Corona, CA	149,923
156. Joliet, IL	146,125
157. Naperville, IL	143,117
158. Kansas City, KS	142,562

50,000 – 100,000: 15 Cities

199. Fargo, ND	93,531
200. Las Cruces, NM	91,865
201. Nashua, NH	86,576

202. Fort Smith, AR	84,716
203. Warwick, RI	84,483
204. Nampa, ID	80,362
205. Wilmington, DE	72,592
206. Gulfport, MS	70,055
207. Missoula, MT	68,202
208. Rapid City, SD	65,491
209. Rockville, MD	60,734
210. Bismarck, ND	60,389
211. Cheyenne, WY	56,915
212. Casper, WY	54,047
213. Charleston WV	50,302

Under 50,000: 2 Cities

214. Huntington, WV	49,185
215. Dover, DE	36,107

**APPENDIX C
STATES WITH MORE THAN FIVE STUDY CITIES**

California	31	North Carolina	06
Texas	16	Ohio	06
Florida	10	Virginia	06
Arizona	09		

**APPENDIX D
ALPHABETICAL LIST OF STUDY CITIES THAT CONDITION NEW SIGN
CONSTRUCTION ON REMOVAL OF ONE OR MORE EXISTING SIGNS**

- | | |
|----------------------|------------------------|
| 1. Athens, GA | 17. New Orleans, LA |
| 2. Billings, MT | 18. Omaha, NE |
| 3. Brownsville, TX | 19. Philadelphia, PA |
| 4. Charlotte, NC | 20. Rockford, IL |
| 5. Cheyenne, WY | 21. Sacramento, CA |
| 6. Cincinnati, OH | 22. Salt Lake City, UT |
| 7. Columbia, SC | 23. San Antonio, TX |
| 8. Denver, CO | 24. San Bernardino, CA |
| 9. El Paso, TX | 25. San Francisco, CA |
| 10. Fort Worth, TX | 26. San Jose, CA |
| 11. Glendale, AZ | 27. Springfield, MA |
| 12. Grand Rapids, MI | 28. Stockton, CA |
| 13. Green Bay, WI | 29. Tacoma, WA |
| 14. Jackson, MS | 30. Tallahassee, FL |
| 15. Little Rock, AR | 31. West Jordan, UT |
| 16. Missoula, MT | 32. West Valley, UT |

APPENDIX E
ALPHABETICAL LIST OF STUDY CITIES THAT REQUIRE CONDITIONAL
USE APPROVAL FOR CONSTRUCTION OF A NEW SIGN

- | | |
|--------------------------|------------------------|
| 1. Akron, OH | 22. Gulfport, MS |
| 2. Allentown, PA | 23. Henderson, NV |
| 3. Baton Rouge, LA | 24. Joliet, IL |
| 4. Billings, MT | 25. Las Vegas, NV |
| 5. Boston, MA | 26. Lincoln, NE |
| 6. Bridgeport, CT | 27. Lowell, MA |
| 7. Charleston, WV | 28. Lubbock, TX |
| 8. Charlotte, NC | 29. Norfolk, VA |
| 9. Chesapeake, VA | 30. Overland Park, KS |
| 10. Cheyenne, WY | 31. Oxnard, CA |
| 11. Cincinnati, OH | 32. Philadelphia, PA |
| 12. Clarksville, TN | 33. Port St. Lucie, FL |
| 13. Cleveland, OH | 34. Rochester, MN |
| 14. Colorado Springs, CO | 35. Rockford, IL |
| 15. Davenport, IA | 36. San Bernardino, CA |
| 16. Dayton, OH | 37. San Jose, CA |
| 17. Denver, CO | 38. Stockton, CA |
| 18. El Paso, TX | 39. Syracuse, NY |
| 19. Fontana, CA | 40. Topeka, KS |
| 20. Fresno, CA | |
| 21. Green Bay WI | |

APPENDIX F
ALPHABETICAL LIST OF STUDY CITIES THAT
TOTALLY PROHIBIT NEW SIGN CONSTRUCTION

- | | |
|-------------------------|--------------------------|
| 1. Anaheim, CA | 16. Fremont, CA |
| 2. Arlington, VA | 17. Garden Grove, CA |
| 3. Austin, TX | 18. Garland, TX |
| 4. Baltimore, MD | 19. Gilbert town, AZ |
| 5. Bellevue, WA | 20. Glendale, CA |
| 6. Bismarck, ND | 21. Grand Prairie, TX |
| 7. Cambridge, MA | 22. Hialeah, FL |
| 8. Cape Coral, FL | 23. Houston, TX |
| 9. Charleston, SC | 24. Huntington Beach, CA |
| 10. Chula Vista, CA | 25. Irvine, CA |
| 11. Corona, CA | 26. Irving, TX |
| 12. Dover, DE | 27. Jacksonville, FL |
| 13. Durham, NC | 28. Knoxville, TN |
| 14. Fort Collins, FL | 29. Lakewood, CO |
| 15. Fort Lauderdale, FL | 30. Laredo, TX |

- | | |
|-------------------------|--------------------------|
| 31. Madison, WI | 52. Raleigh, NC |
| 32. Mesa, AZ | 53. Rancho Cucamonga, CA |
| 33. Miami, FL | 54. Rapid City, SD |
| 34. Modesto, CA | 55. Reno, NV |
| 35. Moreno Valley, CA | 56. Riverside, CA |
| 36. Nampa, ID | 57. Rockville, MD |
| 37. Naperville, IL | 58. San Diego, CA |
| 38. Nashua, NH | 59. Santa Clarita, CA |
| 39. Newark, NJ | 60. Santa Rosa, CA |
| 40. Newport News, VA | 61. Savannah, GA |
| 41. North Las Vegas, NV | 62. Scottsdale, AZ |
| 42. Oakland, CA | 63. Seattle, WA |
| 43. Oceanside, CA | 64. Spokane, WA |
| 44. Olathe, KS | 65. Stamford, CT |
| 45. Ontario, CA | 66. Tampa, FL |
| 46. Orlando, FL | 67. Tempe, AZ |
| 47. Peoria, AZ | 68. Vancouver, WA |
| 48. Plano, TX | 69. Virginia Beach, VA |
| 49. Pomona, CA | 70. Warwick, RI |
| 50. Providence, RI | 71. Washington D.C. |
| 51. Provo, UT | 72. Yonkers New York |

APPENDIX G
SUMMARY OF MAXIMUM PERMISSIBLE SIGN SIZES IN 83 CITIES
ALLOWING NEW CONSTRUCTION AS-OF-RIGHT

Size (sq. ft.)	Number of Cities	Size (sq. ft.)	Number of Cities
Unlimited	01	925:	01
1,200:	04	900:	03
1,000:	01	825:	01
6 = Subtotal of cities allowing		800:	02
max. sign size of at least 1,000 sq. ft		750:	06
		19 = Subtotal of cities allowing max.	
		sign size of at least 750 sq. ft	
Size (sq. ft.)	Number of Cities		
720:	01	600:	02
700:	03	500:	02
675:	03	450:	01
672:	23	400:	08
		378:	03
49 = Subtotal of cities allowing		350:	01
max. sign size of at least 672 sq. ft.		320:	01
Size (sq. ft.)	Number of Cities	300:	08

26 = Subtotal of cities allowing max. sign size of at least 300 sq. ft. but less than 672.

75 = Subtotal of cities allowing max. sign size of at least 300 sq. ft.

Size (sq. ft.) Number of Cities

288:	01
250:	01
236:	01
200:	03
150:	01

7 = Subtotal of cities allowing max. sign size of at least 100 sq. ft. but less than 300 sq. ft.

Size (sq. ft.) Number of Cities

72:	01
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1 = Number of cities allowing max. sign size of less than 100 sq. ft.

APPENDIX H

MAXIMUM PERMISSIBLE SIZES FOR OUTDOOR ADVERTISING SIGNS IN 83 CITIES THAT ALLOW NEW CONSTRUCTION “AS-OF- RIGHT”

<u>City/State</u>	<u>Maximum Sign Area (sq. ft.)</u>
1. Albuquerque, New Mexico	672
2. Amarillo, Texas	900
3. Ann Arbor, Michigan	350
4. Arlington, Texas	672
5. Atlanta, Georgia	672
6. Augusta, Georgia	672
7. Aurora, Colorado	200
8. Aurora, Illinois	72
9. Bakersfield, California	300
10. Birmingham, Alabama	800
11. Boise, Idaho	378
12. Buffalo, New York	675
13. Casper, Wyoming	700
14. Cedar Rapids, Iowa	672
15. Chandler, Arizona	320
16. Chattanooga, Tennessee	378
17. Chicago, Illinois	1,000
18. Columbia, Missouri	288
19. Columbus, Georgia	672
20. Columbus, Ohio	672
21. Corpus Christi, Texas	672
22. Dallas, Texas	400
23. Des Moines, Iowa	672
24. Detroit, Michigan	500
25. Elizabeth, New Jersey	300
26. Erie, Pennsylvania	672
27. Eugene, Oregon	200
28. Evansville, Indiana	700
29. Fargo, South Dakota	1,200
30. Fayetteville, North Carolina	400
31. Fort Smith, Arkansas	600
32. Fort Wayne, Indiana	675
33. Greensboro, North Carolina	450
34. Gresham, Oregon	250
35. Hartford, Connecticut	750
36. Huntington, West Virginia	672
37. Huntsville, Alabama	400
38. Independence, Missouri	750
39. Indianapolis, Indiana	720
40. Jersey City, New Jersey	600

41. Kansas City, Kansas	925
42. Kansas City, Missouri	300
43. Las Cruces, New Mexico	400
44. Lafayette, Louisiana	300
45. Lexington-Fayette Urban County, Kentucky	400
46. Long Beach, California	675
47. Los Angeles, California	800
48. Louisville, Kentucky	750
49. Manchester, New Hampshire	500
50. Memphis, Tennessee	672
51. Milwaukee, Wisconsin	750
52. Minneapolis, Minnesota	672
53. Mobile, Alabama	300
54. Montgomery, Alabama	1,200
55. Nashville, Tennessee	675
56. New Haven, Connecticut	900
57. New York, New York	750
58. Norman, Oklahoma	672
59. Oklahoma City, Oklahoma	672
60. Phoenix, Arizona	672
61. Pittsburgh, Pennsylvania	750
62. Portland, Oregon	200
63. Richmond, Virginia	unlimited
64. Rochester, New York	236
65. Salem, Oregon	300
66. Santa Ana, California	300
67. Shreveport, Louisiana	672
68. Sioux Falls, South Dakota	672
69. South Bend, Indiana	672
70. Springfield, Missouri	400
71. St. Louis, Missouri	1,200
72. St. Paul, Minnesota	700
73. St. Petersburg Florida	672
74. Sterling Heights, Michigan	150
75. Toledo, Ohio	400
76. Tucson, Arizona	378
77. Tulsa, Oklahoma	300
78. Warren, Michigan	400
79. Waterbury, Connecticut	900
80. Wichita, Kansas	825
81. Wilmington, Delaware	672
82. Winston-Salem, North Carolina	672
83. Worcester, Massachusetts	1,200

APPENDIX I – TREATMENT OF EMC & TRIVISION

CATEGORIES A, B, AND C - 40 OF 215 CODES (18.6%)

[NOTE: These cities have various code provisions that explicitly allow Tri-vision and/or EMC as applied to outdoor advertising.]

- | | |
|----------------------------------|----------------------------------|
| 1. Akron, Ohio | 21. Las Vegas, Nevada |
| 2. Albuquerque, New Mexico | 22. Long Beach, California |
| 3. Allentown, Pennsylvania | 23. Madison, Wisconsin |
| 4. Birmingham, Alabama | 24. Minneapolis, Minnesota |
| 5. Boston, Massachusetts | 25. Mobile, Alabama |
| 6. Buffalo, New York | 26. New York, New York |
| 7. Charlotte, North Carolina | 27. Phoenix, Arizona |
| 8. Chattanooga, Tennessee | 28. Pittsburgh, Pennsylvania |
| 9. Columbus, Georgia | 29. Port St. Lucie, Florida |
| 10. Columbus, Ohio | 30. Rancho Cucamonga, California |
| 11. Corona, California | 31. Sacramento, California |
| 12. District of Columbia | 32. San Antonio, Texas |
| 13. Evansville, Indiana | 33. San Jose, California |
| 14. Fayetteville, North Carolina | 34. Stockton, California |
| 15. Fontana, California | 35. Tallahassee, Florida |
| 16. Grand Prairie, Texas | 36. Toledo, Ohio |
| 17. Green Bay, Wisconsin | 37. Tulsa, Oklahoma |
| 18. Huntington, West Virginia | 38. West Valley City, Utah |
| 19. Indianapolis, Indiana | 39. Saint Louis, Missouri |
| 20. Kansas City, Missouri | 40. Saint Paul, Minnesota |

CATEGORIES E AND H - 79 OF 215 CODES (36.7%)

[NOTE: These cities have various code provisions that could possibly be interpreted as allowing Tri-vision and/or EMC as applied to outdoor advertising.]

- | | |
|----------------------------|--------------------------|
| 1. Anaheim, California | 13. Cleveland, Ohio |
| 2. Atlanta, Georgia | 14. Dallas, Texas |
| 3. Augusta, Georgia | 15. Davenport, Iowa |
| 4. Baltimore, Maryland | 16. Dayton, Ohio |
| 5. Billings, Montana | 17. Denver, Colorado |
| 6. Bridgeport, Connecticut | 18. Des Moines, Iowa |
| 7. Cape Coral, Florida | 19. Detroit, Michigan |
| 8. Casper, Wyoming | 20. El Paso, Texas |
| 9. Cedar Rapids, Iowa | 21. Erie, Pennsylvania |
| 10. Chesapeake, Virginia | 22. Eugene, Oregon |
| 11. Chicago, Illinois | 23. Fargo, North Dakota |
| 12. Clarksville, Tennessee | 24. Fort Smith, Arkansas |

- | | |
|---------------------------------|-------------------------------------|
| 25. Fort Wayne, Indiana | 53. North Las Vegas, Nevada |
| 26. Fort Worth, Texas | 54. Oklahoma City, Oklahoma |
| 27. Glendale, California | 55. Omaha, Nebraska |
| 28. Grand Rapids, Michigan | 56. Peoria, Arizona |
| 29. Greensboro, North Carolina | 57. Philadelphia, Pennsylvania |
| 30. Gresham, Oregon | 58. Portland, Oregon |
| 31. Gulfport, Mississippi | 59. Reno, Nevada |
| 32. Independence, Missouri | 60. Richmond, Virginia |
| 33. Jersey City, New Jersey | 61. Rochester, New York |
| 34. Knoxville, Tennessee | 62. Rockford, Illinois |
| 35. Lafayette, Louisiana | 63. Salem, Oregon |
| 36. Laredo, Texas | 64. San Bernardino, California |
| 37. Lexington-Fayette, Kentucky | 65. San Francisco, California |
| 38. Lincoln, Nebraska | 66. Santa Ana, California |
| 39. Little Rock, Arkansas | 67. Santa Clarita, California |
| 40. Los Angeles, California | 68. Santa Rosa, California |
| 41. Louisville, Kentucky | 69. South Bend, Indiana |
| 42. Lowell, Massachusetts | 70. Springfield, Missouri |
| 43. Manchester, New Hampshire | 71. Sterling Heights, Michigan |
| 44. Memphis, Tennessee | 72. Syracuse, New York |
| 45. Miami, Florida | 73. Tacoma, Washington |
| 46. Moreno Valley, California | 74. Warren, Michigan |
| 47. Nashua, New Hampshire | 75. Waterbury, Connecticut |
| 48. Nashville, Tennessee | 76. Wichita, Kansas |
| 49. New Orleans, Louisiana | 77. Wilmington, Delaware |
| 50. Newark, New Jersey | 78. Worcester, Massachusetts |
| 51. Newport News, Virginia | 79. Saint Petersburg, Massachusetts |
| 52. Norfolk, Virginia | |

CATEGORIES D, F AND G - 87 OF 215 CODES (40.4%)

[NOTE: These cities have various code provisions that are least likely to be interpreted as allowing Tri-vision and/or EMCs. These codes either prohibit Tri-vision and/or EMCs explicitly – or limit EMCs to the display of time/temperature or public service messages – or prohibit new billboards generally.]

- | | |
|----------------------------|--------------------------------|
| 1. Amarillo, Texas, | 11. Bismarck, North Dakota |
| 2. Arlington, Texas | 12. Boise, Idaho |
| 3. Arlington, Virginia | 13. Cambridge, Massachusetts |
| 4. Athens, Georgia | 14. Chandler, Arizona |
| 5. Aurora, Colorado | 15. Charleston, South Carolina |
| 6. Aurora, Illinois | 16. Charleston, West Virginia |
| 7. Austin, Texas | 17. Cheyenne, Wyoming |
| 8. Bakersfield, California | 18. Chula Vista, California |
| 9. Baton Rouge, Louisiana | 19. Colorado Springs, Colorado |
| 10. Bellevue, Washington | 20. Columbia, Missouri |

- | | |
|----------------------------------|-----------------------------------|
| 21. Columbia, South Carolina | 55. Oakland, California |
| 22. Corpus Christi, Texas | 56. Oceanside, California |
| 23. Dover, Delaware | 57. Olathe, Kansas |
| 24. Durham, North Carolina | 58. Ontario, California |
| 25. Elizabeth, New Jersey | 59. Orlando, Florida |
| 26. Fort Collins, Colorado | 60. Overland Park, Kansas |
| 27. Fort Lauderdale, Florida | 61. Oxnard, California |
| 28. Fremont, California | 62. Plano, Texas |
| 29. Fresno, California | 63. Pomona, California |
| 30. Garden Grove, California | 64. Providence, Rhode Island |
| 31. Garland, Texas | 65. Provo, Utah |
| 32. Gilbert, Arizona | 66. Raleigh, North Carolina |
| 33. Glendale, Arizona | 67. Rapid City, South Dakota |
| 34. Hartford, Connecticut | 68. Rockville, Maryland |
| 35. Hialeah, Florida | 69. Salt Lake City, Utah |
| 36. Houston, Texas | 70. San Diego, California |
| 37. Huntington Beach, California | 71. Savannah, Georgia |
| 38. Huntsville, Alabama | 72. Scottsdale, Arizona |
| 39. Irvine, California | 73. Seattle, Washington |
| 40. Irving, Texas | 74. Shreveport, Louisiana |
| 41. Jackson, Mississippi | 75. Sioux Falls, South Dakota |
| 42. Jacksonville, Florida | 76. Spokane, Washington |
| 43. Joliet, Illinois | 77. Springfield, Massachusetts |
| 44. Kansas City, Kansas | 78. Stamford, Connecticut |
| 45. Lakewood, Colorado | 79. Tampa, Florida |
| 46. Lubbock, Texas | 80. Tempe, Arizona |
| 47. Mesa, Arizona | 81. Tucson, Arizona |
| 48. Milwaukee, Wisconsin | 82. Vancouver, Washington |
| 49. Modesto, California | 83. Virginia Beach, Virginia |
| 50. Montgomery, Alabama | 84. Warwick, Rhode Island |
| 51. Nampa, Idaho | 85. West Jordan, Utah |
| 52. Naperville, Illinois | 86. Winston-Salem, North Carolina |
| 53. New Haven, Connecticut | 87. Yonkers, New York |
| 54. Norman, Oklahoma | |

CATEGORY I - 9 OF 215 CODES (4.2%)

[NOTE: These cities have codes that do not address whether EMC and/or Tri-vision are permitted on billboards.

- | | |
|---------------------------|--------------------------|
| 1. Ann Arbor, Michigan | 7. Riverside, California |
| 2. Brownsville, Texas | 8. Rochester, Minnesota |
| 3. Cincinnati, Ohio | 9. Topeka, Kansas |
| 4. Henderson, Nevada | |
| 5. Las Cruces, New Mexico | |
| 6. Missoula, Montana | |