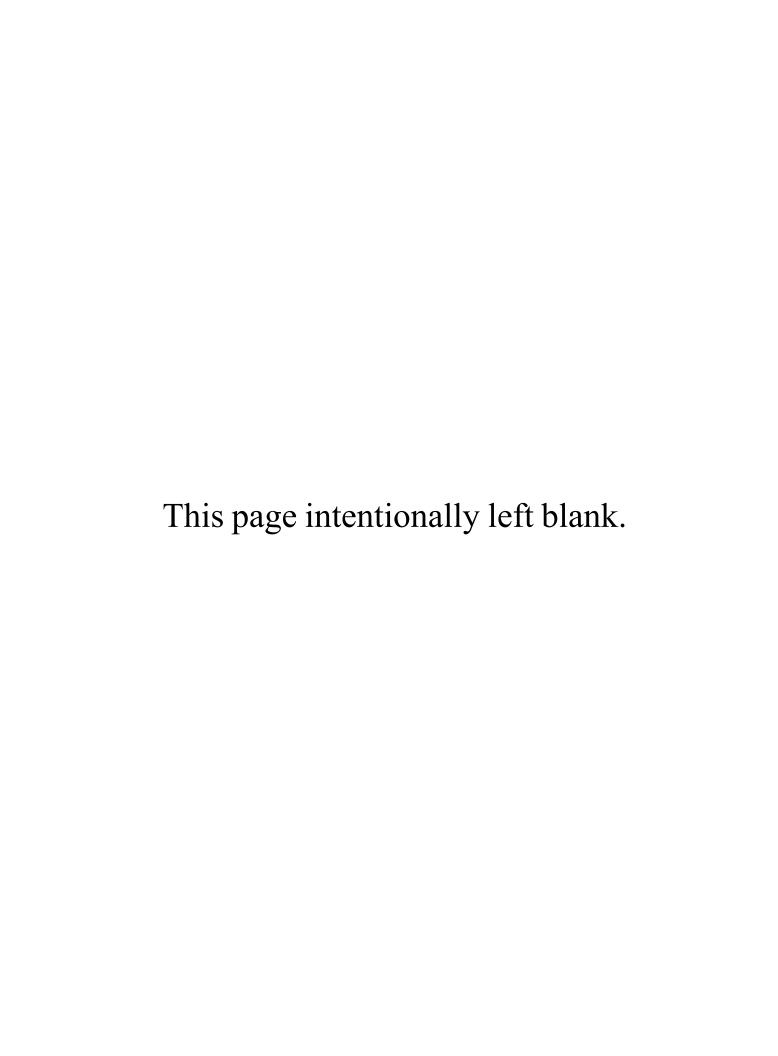
# Exhibit C



#### **PYLON SIGN HEIGHT VARIANCE REQUEST**

# SALA ROAD PROJECT (PLN180441)

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## Sala Road Project Pylon Sign Height Variance Request

## Introduction

The Monterey County Planning Department has commented that sign height within the Light Commercial zoning district is limited to 35 feet. The original application for the Sala Road Project (PLN180441), included a proposed pylon sign height of 100 feet. This was subsequently reduced to 75 feet, in significant part in response to initial County staff comments, with a sign height variance for this height submitted as part of the Supplemental Application for the project. Subsequent to that variance request submittal, the applicant and the County further discussed the sign height issue and the sign design provided as part of the first variance request. The sign height was then reduced to 73 feet and the sign design style modified, with a second revised sign height variance request submitted to reflect the second design. County staff and the applicant then further discussed the sign height and County staff concerns about its ability to recommend that the revised variance be granted. In further response, the applicant has undertaken new analyses of the original proposed sign location and revised the 73-foot sign height design. The result, summarized in the Current Proposed Pylon Sign Design Height section below, is a substantial 16-foot reduction in the maximum sign height – from 73 feet to 57 feet. This current (third) Pylon Sign Height Variance Request reflects the current sign height and replaces the prior revised variance request.

As described in the following section, there is no sign height standard in the Monterey County Zoning Code that would limit a freestanding pylon sign height to 35 feet. The information and findings that are needed for the County to approve a sign height variance are presented later in this document. The County's sign height standards are first reviewed. The applicant's current proposed sign height and new information developed as evidence to support the current proposed 57-foot height is then presented.

## **Review of County Sign Height Standards**

As has been discussed with Planning Department Staff, County zoning code chapter 21.60, section 21.60.065 identifies regulations applicable to all signs, and section 21.60.090 identifies regulations applicable to commercial zoning districts in particular. Nowhere in these regulations is it stated that sign height in a light commercial zoning district is limited to 35 feet. Planning Department staff's reference to a 35-foot height limit for signage in this zoning district is not explicitly stated in any

zoning code regulation. The Planning Department Staff's inference of a 35-foot limit appears to stem from two different zoning code standards. The first, section 21.60.065(D), states:

D. Height. Signs may be attached to a structure providing the sign does not project above the peak of the roof of the structure or above the parapet of the wall and are in conformance with all other applicable provisions of this Chapter.

The second is the building height limitation in a light commercial zoning district as found in section 21.18.070(A), which states:

- A. Structure Height and Setback Regulations.
  - 1. The maximum structure height is thirty-five (35) feet unless superseded by a structure height limit noted on the zoning map (e.g., "LC/(24')" would limit structure height to twenty-four (24) feet).

If these two standards are combined, it appears that Planning Department Staff is inferring that where signs are attached to buildings that are a maximum permitted height of 35 feet, the signs also may also not exceed 35 feet. The standard explicitly applies only to signs attached to a building.

The applicant is proposing a free-standing pylon sign. Pylon signs are exceedingly common, particularly along major transportation corridors and state and federal highways in particular, and even more particularly to advertise businesses that are immediately accessible from highway interchanges and highway-serving oriented. There are <u>no</u> references to pylon sign standards in the zoning code. There are six references to "freestanding" signs in the zoning code, all of which are in Chapter 21.60. It is plausible that a pylon sign would be considered one type of freestanding sign. However, <u>none</u> of these references are applicable to the pylon sign type being proposed – the standards reference nameplates, real estate signs, and construction signs.

In summary, there are <u>no</u> standards in the zoning code that specify height limits for pylon or freestanding signs in a light commercial zoning district.

# **Current Proposed Pylon Sign Design Height and Supporting Visual Analysis Information**

As described above, the applicant has now further reduced the sign height to 57 feet as shown in Attachment A and has maintained the sign architectural style and materials designed to match the project buildings. Two new evaluations conducted by the applicant, summarized below, are the bases for reducing the sign height and provide evidence for why the sign height must still exceed County standards.

## **Sign Height Simulation**

To field check sign height requirements, the applicant produced videos to identify sign visibility from the highway. A boom crane was used to elevate a 12-foot wide by 8-foot tall wood placard

above the ground to identify height at which the lowest tenant sign panel can be seen from both directions on the highway. Videos were taken from a car in both directions for this purpose. Videos referenced in the discussions below have been forwarded to the County via Dropbox.

In the first "test", the top of the placard was raised to 35 feet. None of the placard is visible in the northbound direction on U.S. Highway 101 until after the viewer passes under the Sala Road overpass. Prior to this point, and most importantly, prior to the northbound Sala Road offramp, the view to the placard is blocked by the overpass and by landscaping that Caltrans has planted at the top end of the northbound Sala Road offramp where it meets the Sala Road overpass. The vegetation partially blocks the line of sight to the placard. As the vegetation matures, it could begin to block views of the lower panel(s) of the sign previously that previously was planned at 55 feet.

In the southbound direction, the top of the placard is not visible until the viewer passes next to the northbound Sala Road exit – views are blocked by an intervening soundwall and by trees planted along the eastern side of the highway. At this point, there is no opportunity to exit the highway once the sign becomes visible.

## **Change in Pylon Sign Location**

Based on the 35-foot placard test results, the applicant investigated other locations along the highway within the project site where the northbound line of sight to the sign would be less impaired by the overpass and landscaping and where the bottom of the sign might be visible below a height of 55 feet.

A location further north along the western site boundary adjacent to the highway was selected for additional testing. The 45-foot top-of-placard test video shows the next increment of height above 35 feet that was tested for the new location. As can be seen, from the northbound direction, the bottom of the placard is entirely visible above the Sala Road overpass and landscaping. With the top of the placard at 45 feet, the bottom of the placard is at about 37 feet, or about 18 feet lower than bottom of the lowest panel (55 feet) per the prior sign design.

In the southbound direction, at the 45-foot top-of-placard height, the entire placard is blocked until about 50 yards prior to the Sala Road offramp exit. The sign height would not be sufficient to safely capture a significant percentage of the southbound traffic via the Sala Road exit. To further test southbound sign height, the applicant raised the top of the placard to 65 feet. Except for a very brief moment, none of the placard is visible over the intervening soundwall and trees until a point approximately 100 yards before the southbound Sala Road offramp exit – likely to capture an incrementally higher percentage of southbound trips than the 45-foot height, but not likely a majority of trips that might otherwise exit with earlier sign visibility. The same test was conducted for a top-of-placard height of about 75 feet with a result similar to the 65-foot test.

In short, pylon sign visibility is highly constrained in the southbound direction at all placard test heights. In the northbound direction, at the new proposed sign location, a pylon sign with the bottom of the lowest tenant panel at about 37 feet would be visible in sufficient time for drivers to have a much higher probability of safely exiting the highway at Sala Road. Consequently, the applicant has redesigned the pylon sign to reduce its height from 73 feet to 57 feet, with its location also changed to enable the height reduction. Attachment B, Revised Proposed Site Plan, shows the new sign location.

The proposed pylon sign location is the only site plan feature that has been modified. The Proposed Site Plan is Sheet A3 of the applicant's architectural design plan set. Attachment B should replace Sheet A3 of the most recent architectural design plan set submitted to the County.

## **Sign Height Variance Request Findings**

The information and findings that are needed for the County to approve a building height variance are as follows:

The application for a variance in the pylon sign height shall be accompanied by statements, plans, and other evidence supporting the variance request. Variance shall only be granted based upon the following findings:

- That because of special circumstances applicable to subject property, including size, shape, topography, location or surroundings, the strict application of this Title is found to deprive subject property of privileges enjoyed by other properties in the vicinity and under identical zone classification;
- 2. That the variance not constitute a grant of special privileges inconsistent with the limitations upon other property in the vicinity and zone in which such property is situated; and
- 3. A variance shall not be granted for a use or activity which is not otherwise expressly authorized by the zone regularly governing the parcel of property.

Proposed findings, including statements and evidence in support of the variance request, are provided below.

## Finding 1 - Special Circumstances

There are several special circumstances associated with the Sala Road project purpose and site location, site visibility, and similarly situated, common, and comparable signage examples that warrant granting of the sign height variance.

#### **Project Purpose and Location**

The fact that the County designated the site for light commercial use clearly indicates that its location at a new U.S. Highway 101 was seen by the County as opportune for highway-serving commercial development. This is precisely the orientation of the proposed/planned project uses.

The economic viability of highway-oriented commercial uses, and the magnitude of sales tax they generate for local agencies, is highly correlated with the extent to which highway travelers can not only identify the services provided, but do so in time to exit the highway at the interchange that provides direct access to the services. This is certainly the case with the Sala Road project. Travelers in both directions on the highway must have as much visual access to signage for the project tenants for as long as possible to exit the highway at the Sala Road interchange. This imperative is less pronounced for other types of commercial uses along a highway that are not inherently highway serving and for which traveler recognition of the business service is not highly time sensitive. In short, visible signage is fundamental to the economic viability of the Sala Road project and to the sales tax revenue it generates for the County, and the signage required for it is differentiated from more "common" types of signage for businesses whose viability is not fundamentally dependent on capturing business from highway travelers.

The special circumstance regarding the height of the Sala Road overpass and its impact on visibility of local business, was acknowledged by the County in its Resolution No. 21-001 for approving a sign height variance for the Salinas Self Storage Project (PLN190348) in 2021. That site is similarly situated to the Sala Road site in that it is located just south of the Sala Road site, between the highway and Harrison Road. The constraints posed by the overpass were stated in the County staff report as follows:

In September 2004, construction of the Sala Road Interchange and southbound Highway 101 Overcrossing at Russell Road and Espinosa Road in north Salinas was completed by Caltrans. The work was done to ensure safer travel along Highway 101 between Sala Road and Boronda Road in north Salinas. Part of that construction involved an off-ramp from Highway 101 adjacent to the subject site. With the elevated construction of this off-ramp, it created a limited view of the Salinas Self Storage business in addition to covering up most of the current 35-foot pole sign. It now appears the sign is sitting 10 feet off the ground instead of 35 feet because the construction of the ramp created an approximately 20-foot change in elevation between the highway surface and the property. According to Caltrans data, the clearance for the bridge connecting to the adjacent off ramp is at 19'9" and the roof of the bridge is at 23'5". As such, by adding the additional height to the sign, the view of the signage from Highway 101 would be similar to the pre-interchange views of the 35-foot sign; and

Special circumstances are applicable to this property due to the substantial change in grades introduced by the highway improvements that significantly limit the visibility of any signage from Highway 101 which would meet the height limits for this site. (emphasis added)

This self-storage variance allowed an increase in sign height from 35 feet to 50 feet, only seven feet lower than the current proposed Sala Road project pylon sign.

A self-storage business is not inherently highway serving. More importantly, the signage needs of a single business not comparable to those of a highway-oriented commercial center with multiple tenants, where signage for each individual tenant is vital to their individual financial viability and to the sales tax derived from the commercial center as a whole. As can be seen from the revised Sala Road sign design in Attachment A, the lowest individual tenant sign panel for the commercial center is planned at 37 feet – sufficient to be seen by northbound highway travelers above the Sala Road overpass. The same prior design modifications, including relocating the commercial center name from the crown of the pylon sign to below the lowest tenant panel, and reducing the number of individual minor and major tenant signs, have been retained.

## Finding 2 – No Grant of Special Privileges

Please refer to Finding 1 above.

Granting the sign height variance for the Sala Road project would not constitute a special privilege to the project applicant or function of the commercial center. The variance request is simply being made to support the economic viability of the project and to support the County's interest in generating tax revenue from the project.

As mentioned previously, highway-oriented commercial/retail uses have a common economic viability characteristic – their presence must be known to the traveling public and that presence must be known in sufficient time to easily access the uses. There are many examples of highway pylon signage along major highways in the region for similarly situated multi-tenant, commercial centers. The proposed project sign has a similar design. While the heights of such signs vary, heights much greater than being proposed by the applicant are common. Representative examples are found along all of the U.S. highways in the region, including U.S. highways 880, 101, 580, and 680, in counties adjacent to Monterey County and counties further north and further south. Such signs are also common in circumstances where there are fewer obstructions in driver line-of-sight to the signs.

The tallest, existing sign in the immediate vicinity is the self-storage sign at 50 feet. A 50-foot-tall pylon sign that is similar to the proposed Sala Road sign was approved (but is as of yet not constructed) by the City of Salinas for the Salinas Travel Center at the U.S. Highway 101/Airport Road interchange. A lower sign height is possible there and warranted because views to that site in both the northbound and southbound directions on U.S Highway 101 are not obstructed; at 50 feet tall, that sign would be visible for a significant duration of time sufficient time for drivers to safely exit the at the Airport Boulevard ramps.

Resolution No. 21-001 for approving the self-storage sign height variance makes the following finding for that 50-foot-high sign variance request:

This circumstance does not constitute a grant of special privilege inconsistent with other properties in the vicinity and zoning area since nearby businesses have similar commercials signs which were not affected by the elevation change of Highway 10 I and are still visible. (emphasis added)

This finding clearly acknowledges the signage visibility constraint posed by the interchange overpass height <u>AND</u> that the extent of the visibility constraint is locally limited. The Sala Road commercial center site is uniquely and clearly similarly situated as the self-storage business. Granting the sign height variance request for it would similarly not constitute a grant of special privilege.

There are a very limited number of additional properties of notable size within Monterey County that are zoned to allow commercial center development at interchanges on U.S. Highway 101. Exceptions are properties located in the Prunedale area at the State Route 156/U.S. Highway 101 and the San Miguel Canyon Road/U.S. Highway 101 interchanges, a property in Soledad at the U.S. Highway 101/Front Street interchange, and a property in Gonzales at the U.S. Highway 101/Gloria Road interchange. The Prunedale area sites are built out with retail and other commercial uses. While factually unknown, it is unlikely that these properties would, in the foreseeable future, seek to redevelop with new commercial centers such that height variances would be requested. The Soledad and Gonzales sites are in locations adjacent to agricultural land where tall pylon signs would not be necessary, as views to these sites would be largely, if not completely unobstructed.

## Finding 3 – Variance Request for Authorized Use

The applicable Light Commercial zoning district regulations accommodate a broad range of commercial and retail uses. The proposed pylon sign height would support the economic viability of uses that are consistent with the Light Commercial zoning district regulations.

The variance would not grant a use not authorized within the Light Commercial zoning designation since Commercial zoning districts in Monterey County allow advertising for businesses.

#### **PYLON SIGN SIZE VARIANCE REQUEST**

# SALA ROAD PROJECT (PLN180441)

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## Sala Road Project Pylon Sign Area Variance Request

## Introduction

As part of its application review, the Monterey County Planning Department has commented that the total area of sign faces currently being proposed for the Sala Road commercial center (PLN180441) pylon sign exceeds County standards. The proposed sign is shown in Attachment A. This Pylon Sign Area Variance Request is being submitted as a supplement to the project application to enable the pylon sign area needed to meet the unique needs of this highway-oriented commercial center project.

## **Review of County Sign Area Standards**

As has been discussed with Planning Department Staff, County zoning code chapter 21.60, section 21.60.090(C)(2) identifies sign area limits of 75 square feet per sign (total for both sign faces, or 37.5 square feet per face). Staff has also identified section 21.60.100(A) regulations as applicable in that they address signage for "...property adjacent to any state highway or freeway that approaches, passes through or goes near a city or community..." These regulations stipulate that maximum sign area may not exceed 400 square feet.

## **Proposed Pylon Sign Design**

### Sign Face Area

The applicant's original sign design submitted with the original project application showed individual signs for six major tenants and six minor tenants, with individual sign face areas of 110 square feet and 25 square feet, respectively, for a total of 810 square feet per overall sign face, or 1,620 square feet of total sign face area. After subsequent discussions with County staff, the sign design was modified to include only four major tenants and four minor tenants, with individual sign faces of 80 square feet and 16 square feet, respectively, for a total of 384 square feet per overall sign face, or 768 total square feet of sign face area. Total sign face area exceeds the section 21.60.100(A) limitation of 400 square feet of total sign face by 368 square feet.

Currently, a total of 16 tenants are anticipated. Eight total tenant signs substantially underrepresent the total number of tenants that would benefit from signage visible from U.S. Highway 101. However, the applicant has made this change in the interest of working with the County on sign design, despite the potential for reduced project and County sales tax revenue.

#### Sign Face Area - Sign Lighting/Visual Effects

The County's interest in limiting sign face area is, in significant part, driven by visual effects of signage. Visual effects of signage are affected by the subjective judgment of sign attractiveness, and by scale and lighting. Sign lighting is a particular concern in the evening hours where such has potential to create glare that is a component of a project's visual resource effects.

The original and second pylon sign designs both included full internal illumination of each major and each minor tenant sign panel. To respond to County staff concerns about the glare and aesthetic impact that could occur from fully illuminating 768 square feet of sign face, the applicant has redesigned the sign a third time. As shown in Attachment A, the current design eliminates the complete internal illumination of each sign panel and only allows for the illumination of the individual tenant logos and the lettering of each tenant name on each panel. In other words, only those parts of each tenant sign needed to identify the tenant will be illuminated. As a result, the total sign face area to be illuminated will be drastically reduced. This is demonstrated in Attachment A, which for comparison purposes, includes both day and nighttime illustrations of the original full internal illumination design and the current limited logo/name only illumination design. This change results in two major benefits: 1) the sign design is simplified and less "busy", and 2) potential for evening glare as a visual concern in dramatically reduced. In fact, lighting from other common project sources (parking lots, building lighting, etc.) would, in total, likely be more pronounced than from the proposed pylon sign. Further, as shown in Attachment B, there are several sources of existing nighttime lighting in the immediate project vicinity. While the project site and land to the east of it are undeveloped with no existing lighting sources, the proposed sign would contribute to the existing lighting environment, not represent a unique or prominent source of evening lighting in the immediate vicinity.

In sum, the current sign design substantially mitigates aesthetic and visual resource concerns previously raised by County staff. The changes have been made despite their potential detriment to the financial strength of the commercial center; fully internally lit panels are more readable at distance than are the proposed, limited internally lit tenant logos and names.

### Sign Area Variance Request Findings

The information and findings that are needed for the County to approve a variance from the above-referenced sign area regulations are as follows:

 That because of special circumstances applicable to subject property, including size, shape, topography, location or surroundings, the strict application of this Title is found to deprive subject property of privileges enjoyed by other properties in the vicinity and under identical zone classification;

- 2. That the variance not constitute a grant of special privileges inconsistent with the limitations upon other property in the vicinity and zone in which such property is situated; and
- 3. A variance shall not be granted for a use or activity which is not otherwise expressly authorized by the zone regularly governing the parcel of property.

Proposed findings in support of the variance request are provided below.

## **Finding 1 - Special Circumstances**

There are several special circumstances associated with the Sala Road commercial center project function, location and site visibility that warrant granting of the sign size variance.

The fact that the County designated the site for light commercial demonstrates that its location at a new U.S. Highway 101 interchange was seen as opportune for highway-serving commercial development, very likely in the form of a commercial center with multiple tenants. This is precisely the overall orientation of the proposed project.

The economic viability of highway-oriented commercial uses and the tax revenue to the County that they would generate is highly correlated with the extent to which travelers can identify the services provided and do so in time to safely exit the highway at the interchange that provides direct access to the services. This is certainly the case with the Sala Road project. Travelers in both directions on U.S. Highway 101 must have visual access to signage that identifies the project tenants in sufficient time to exit the highway at the Sala Road interchange. This imperative is much less pronounced for other types of typical commercial uses along a highway that are not inherently highway serving and not highly dependent on informing highway travelers of their services in a highly time-sensitive manner. In short, highly visible signage is fundamental to the economic viability of the Sala Road project and the County's economic benefit, the County anticipated a project of its type at the proposed location, and the signage required for it is differentiated from more "common" types of signage for single businesses whose viability is not fundamentally dependent on capturing business from highway travelers.

There no known vacant sites in Monterey County at U.S. Highway 101 interchanges that are designated for commercial development and are of sufficient size to accommodate a highway-serving commercial center with multiple tenants. The County's sign regulations do not appear to contemplate free-standing pylon signage needs that are common for advertising the presence of multiple tenants within a single commercial center. The regulations appear oriented to signage needs of individual businesses with single signs. For the proposed project, multiple sign faces of sufficient size for multiple tenants (e.g., major end users and minor end users) are required that

are readily visible at distances before the Sala Road/U.S. Highway 101 offramps to enable travelers sufficient time safely exit the highway to access the commercial center.

The total proposed sign face area reflects the fact that multiple individual tenant signs are needed and that individual tenant sign sizes must be large enough to inform highway travelers of commercial center services at distances from the U.S. Highway 101 offramps at Sala Road that enable travelers to safely exit the highway in a timely manner.

As described above, the applicant has undertaken multiple sign redesign efforts to reduce sign face area and to reduce potential effects of night time sign lighting that could otherwise be of aesthetic concern. Though the proposed sign face area exceeds County standards, the potential for glare from the sign will be substantially reduced by limiting internal illumination only to the individual tenant logo and tenant name lettering.

## Finding 2 – No Grant of Special Privileges

With no known, similarly situated vacant sites within the County designated for commercial uses at U.S. Highway 101 interchanges that are of sufficient size to accommodate a multi-tenant commercial center, the Sala Road commercial center circumstance unique.

Highway-oriented commercial/retail uses have a common economic viability variable – their presence must be known to the traveling public and that presence must be known in sufficient time to easily access the uses. The northbound exit at Sala Road is located approximately .30 miles north of the planned pylon sign location. For drivers to see the signage in sufficient time to make a decision to exit, the signage should be visible for a minimum of up to .25 miles before the offramp, or a minimum of about .55 miles from the site itself. Signage must be of sufficient size at this distance for travelers to identify the commercial center tenants.

The requested sign size variance is unique to the project location and type. The County's granting of the variance request would not convey special privileges to the applicant, as there is little to no anticipated need for such a variance elsewhere in the county and failing to grant the variance would deprive the applicant of the privilege of developing a financially viable, uniquely situated commercial center that is a permitted use and foreseen development type for the project site.

## Finding 3 – Variance Request for Authorized Use

The Light Commercial zoning district regulations that apply to the Sala Road commercial center site accommodate a broad range of commercial and retail uses. The proposed pylon sign would support the economic viability of uses that are consistent with the Light Commercial zoning district regulations. The variance would not grant a use not authorized within the Light Commercial zoning designation since Commercial zoning districts in Monterey County allow advertising for businesses.

## Sala Road Project - Hotel Building Height Variance Request Findings

The Monterey County Planning Department comment on inconsistency of the proposed hotel height with height standards for the Light Commercial zoning district identifies the information and findings that are needed for the County to approve a building height variance. These are as follows:

The application for a variance in the height of the proposed hotel structure shall be accompanied by statements, plans, and other evidence supporting the variance request. Variance shall only be granted based upon the following findings:

- That because of special circumstances applicable to subject property, including size, shape, topography, location or surroundings, the strict application of this Title is found to deprive subject property of privileges enjoyed by other properties in the vicinity and under identical zone classification;
- 2. That the variance not constitute a grant of special privileges inconsistent with the limitations upon other property in the vicinity and zone in which such property is situated; and
- 3. A variance shall not be granted for a use or activity which is not otherwise expressly authorized by the zone regularly governing the parcel of property.

Proposed findings, including statements and evidence in support of the variance request, are provided below.

### Finding 1 – Special Circumstances

There are several special circumstances associated with the Sala Road project site location, proposed hotel use, and comparable developments that warrant granting of the height variance request.

Relative to the vast majority of properties zoned Light Commercial in the county, the Sala Road project/hotel site is uniquely placed at a major highway interchange. Because of its unique location, the proposed project is designed to be highway-oriented and visitor-serving, but would also provide services for local residents. A 35′ building height limit

would not commonly be a constraint to the financial feasibility of typical light commercial developments, especially those that are not highway oriented. However, to be financially feasible, a highway-oriented, visitor-serving branded hotel is typically a minimum of about 90 rooms. The proposed Sala Road hotel has 96 rooms. To assure adequate visibility from the highway and accommodate the minimum number of rooms and associated support uses, a typical highway-oriented hotel is four to five stories high. This is equivalent to a height of 40′-45′, with additional height needed to accommodate elevator equipment housing.

Another local branded hotel project demonstrates the validity of the Sala Road project building height variance request. The City of Salinas recently approved a highway-oriented, visitor-serving travel center project at the Airport Boulevard/U.S. Highway 101 interchange at the southern edge of the city. That project includes a 94-room, highway-oriented, branded hotel of a type similar to that planned for the Sala Road project site. The City zoned the travel center hotel site Commercial Retail. City of Salinas Municipal Code Table 37-30.100, Commercial (C) Districts Development Regulations, shows that there are is no building height limit for development within that zoning district. The travel center hotel approved by the City is 50′ in height – the same building height being requested for the Sala Road project hotel. While the Sala Road site is not currently immediately adjacent to the existing urban edge of the city, it is likely to be annexed to the city in the foreseeable future. This is evidenced by the City's request that the applicant enter into a pre-annexation agreement.

The travel center site has better visibility from the U.S. Highway 101 than does the Sala Road project site. Views to the travel center site in both travel directions on the highway are largely unobstructed. Conversely, much of the Sala Road project site is blocked from view from the northbound direction of travel on U.S. Highway 101 by the Sala Road overpass embankment. Ensuring adequate visibility of site improvements and signage, particularly from that direction of travel, is important to the financial viability of the proposed project, including the hotel.

In summary, the proposed Sala Road project site and hotel location is similarly situated to the travel center site and hotel due to its highway orientation, location at a highway interchange, and adjacency to nearby urban development. The proposed height of Sala Road project hotel is the same as that of the travel center hotel. Both are branded hotels that are similar to other branded hotels found along major transportation corridors/interchanges in the vicinity, region and across the state, whose financial feasibility rests in significant part on their room number, height and visibility, and convenient access. By approving the hotel building height variance request, the County would demonstrate that it allowing the same privileges that are afforded to the same use types found in other similar local, vicinity, and regional and statewide situations.

## Finding 2 - No Grant of Special Privileges

Please refer to Finding 1 above.

There are a limited number of properties of notable size within Monterey County that are zoned Light Commercial that are also located at interchanges on U.S. Highway 101. Exceptions are properties located in the Prunedale area at the State Route 156/U.S. Highway 101 and the San Miguel Canyon Road/U.S. Highway 101 interchanges. These areas are built out with retail and other commercial uses. While factually unknown, it is unlikely that these properties would, in the foreseeable future, seek to redevelop with a hotel such that height variances would be requested. The Sala Road project height variance request would; therefore, not be inconsistent with existing limitations of other similarly zoned and situated properties on which hotels are currently planned or foreseeable.

## Finding 3 – Variance Request for Authorized Use

The Light Commercial zoning district accommodates a broad range of uses. Hotels are a conditionally permitted use in this zoning district.