

VIRGIN TOWN, UTAH

PLANNING COMMISSION STAFF REPORT

TO:	Virgin Town Planning Commission
FROM:	Ryker Steglich, Town Planner, Sunrise Engineering
DATE:	September 1, 2026
SUBJECT:	Sign Permit Application — Zion Adventures Secondary Sign, 1055 E Highway 9
MEETING:	Regular Planning Commission Meeting

At a Glance

Application	Sign Permit — Building-Mounted Secondary Sign (backlit channel letters)
Subject	Backlit powder-coated aluminum channel letters with acrylic faces — “ZION,” “Adventures,” “THE ORIGINAL,” and ZA logo — individually mounted to the building at 1055 E Highway 9, Virgin, UT 84779
Applicant	Zion Adventures / Rainbow Sign & Banner
Prepared By	Ryker Steglich, Town Planner, Sunrise Engineering
Next Step	Planning Commission action — approval, approval with conditions, or denial

I. Background and Description

An application for a sign permit has been submitted for a building-mounted secondary sign to be installed at 1055 E Highway 9, the location of Zion Adventures. This application is for the secondary sign only. Per the applicant’s site plan, a primary freestanding monument sign is anticipated as a separate or amended application at a later date and is not part of this review.

The proposed secondary sign consists of four components installed as individual channel letters and elements: the word “ZION,” the word “Adventures,” the phrase “THE ORIGINAL,” and the circular ZA logo. Each letter and element is constructed of powder-coated aluminum with acrylic faces and is mounted to the building as an individual form without a connecting backing panel. The letters and logo are backlit, with concealed LED modules illuminating the acrylic faces from within each channel. The components extend 7 inches from the face of the building and are electrified through a single junction box.

The sign is subject to review under VMC Chapter 52, Sign Regulations (Ordinance 2025-06, adopted February 18, 2025), and VMC Chapter 50, Lighting (Ordinance 2025-07, adopted April 15, 2025). The Planning Commission is the reviewing authority for sign permits under VMC §52.9.5.

II. Findings and Recommendation

Finding 1 — Applicable Code Framework

Two ordinances govern this application. VMC Chapter 52, Sign Regulations (Ord. 2025-06, adopted February 18, 2025) establishes sign standards, including the illumination provisions of VMC §52.6(D) and

the dimensional standards for building-mounted signs. VMC Chapter 50, Lighting (Ord. 2025-07, adopted April 15, 2025) establishes the Town’s dark sky lighting standards and, at VMC §50.10(F), expressly permits backlit signs and sets standards for them. VMC §52.6(D) further provides that all sign lighting shall comply with the Town’s outdoor lighting standards — now Chapter 50 — incorporating those standards by reference for signs.

Finding 2 — Illumination: Apparent Conflict

VMC §52.6(D) provides that signs may be unlighted or lighted externally, and that no sign shall be internally lighted. The VULU 2.12 definition of “Internally Lighted Sign” describes a sign illuminated by a concealed light source within the sign that projects light through the sign face. Chapter 50’s adopted definition of “Internally illuminated” similarly describes, as to signs, any sign with a light source entirely enclosed within the sign and not directly visible to the eye. At the same time, VMC §50.10(F) expressly permits backlit signs and establishes standards for them. A backlit channel-letter sign, in which concealed LEDs illuminate acrylic faces from within, falls within the literal terms of both the internal-illumination prohibition and the backlit-sign allowance. The two provisions are therefore in conflict as applied to this sign.

Finding 3 — Illumination: Conflict Resolution

The conflict is resolved in the applicant’s favor under ordinance-interpretation principles recognized by the Utah appellate courts, consistent with the Town Attorney’s analysis of the same conflict in a prior sign application.

Later-adopted, conflicting ordinance controls. Chapter 52 (Ord. 2025-06) was adopted February 18, 2025. Chapter 50 (Ord. 2025-07), which expressly permits backlit signs, was adopted later, on April 15, 2025, and contains a repealer clause providing that all Town ordinances or parts thereof in conflict are repealed. A court would assume the Town Council acted advisedly and intentionally in adopting the later provision, and would hold the later-adopted Chapter 50 controlling over the conflicting earlier provision.

Specific governs general. Within Chapter 50, the specific backlit-sign standards of VMC §50.10(F) control over the general prohibition on internal illumination. The specific provision addressing the precise subject — backlit signs — governs over the general one. The proposed sign is a backlit sign and is permitted under VMC §50.10(F).

Finding 4 — Illumination: Fully-Shielded and Uplighting Standards Do Not Apply to the Sign Face

Chapter 50’s general dark-sky provisions include the fully-shielded fixture standard at VMC §50.08(A), which requires outdoor lighting to be directed downward with no light emitted above a horizontal plane extending from the bottom of the fixture, and the prohibition on uplighting of buildings and structures at VMC §50.20(A). Staff has considered whether these standards apply to the proposed sign and finds that they do not, for the following reasons.

- Sign illumination is governed by the specific standard at VMC §50.10(F), which expressly permits backlit signs and establishes its own performance criteria. Under the rule that specific provisions govern over general ones, §50.10(F) controls sign lighting over the general fixture-shielding provisions of §50.08.
- The fully-shielded fixture standard is directed at luminaires — lamps within housings that illuminate surfaces or areas and can be shielded and aimed downward. A backlit channel letter is

not such a luminaire; the sign face is itself the illuminated element. The horizontal-plane shielding standard has no coherent application to a sign face, which necessarily emits toward viewers.

- The uplighting prohibition at §50.20(A) addresses lighting directed to illuminate buildings, structures, or vegetation — architectural and landscape up-wash — not signs, which are separately addressed as a permitted lighting application under §50.06(B)(6) and governed by §50.10(F).
- Applying the fully-shielded standard to signs would prohibit all backlit and internally illuminated signs entirely, nullifying the express allowance in §50.10(F). A construction that renders an express provision meaningless is disfavored; the Town plainly did not intend that result.

Accordingly, VMC §50.08(A) and §50.20(A) do not apply to the sign face, and the sign is evaluated under the backlit-sign standards of §50.10(F). All components of the sign, including the ZA logo, are governed uniformly under this standard.

Finding 5 — Compliance with Backlit Sign Standards

Applying the backlit sign standards in VMC §50.10(F)(2):

- **Standard (a) — Light source not visible:** The LED modules are enclosed within the channel letters and logo and are not directly visible to the viewer. The standard is met.
- **Standard (b) — Indirect illumination only:** Illumination passes through the acrylic faces, which diffuse the light so that only indirect illumination emanates from the sign rather than harsh, direct illumination. The standard is met.
- **Standard (c) — Low lumen light sources:** The specified 0.8-watt LED modules are low-output light sources. The standard is met.

Finding 6 — Color Temperature

VMC §50.10(F)(3) and §50.06(C) require all sign light sources to have a color temperature no greater than 3,000 degrees Kelvin. The application as submitted specifies a 4,200K LED module, which exceeds this maximum. The applicant's own product specifications include a 2,700K option within the same module line, which conforms. Compliance with the 3,000K maximum is addressed as a condition of approval.

Finding 7 — Sign Area

VMC §52.8.1(B)(3)(a) limits a building-mounted secondary sign in commercial and resort zones to a maximum area of 20 square feet. Sign area is measured under the VULU 2.12 definition of "Area of Sign" — the number of square feet enclosed within the smallest rectangle within which the sign face, including background, can be enclosed, with all areas totaled where the sign consists of more than one section or module. Measured by this method, the four sign components total 19.933 square feet, within the 20 square foot maximum. The standard is met.

Finding 8 — Dimensional and Mounting Standards

- **Projection (§52.8.1(B)(3)(c)):** The channel letters are mounted flat to the wall and extend 7 inches from the building face, within the 12-inch maximum for flat-mounted signs. The standard is met.
- **Roofline (§52.8.1(B)(3)(b)):** The sign does not extend beyond the roofline or parapet at its highest point. The standard is met.

- **Engineering (§52.9.4):** Because the sign projects more than three inches from the face of the building, drawings bearing the wet stamp of a licensed engineer are required. This is addressed as a condition of approval.
- **Primary/secondary pairing (§52.8.1):** Each licensed business is allowed one primary and one secondary sign. The anticipated primary sign is a future freestanding monument sign; the secondary sign is therefore properly building-mounted. The standard is met.

Finding 9 — Additional Chapter 50 Standards

- **Luminance (§50.10(F)(4)):** No sign shall have a luminance greater than 100 nits (100 candelas per square meter). The application does not include a luminance certification. This is addressed as a condition of approval.
- **Sign illumination curfew (§50.10(F)(5)):** Sign illumination must be turned off one hour after sunset or close of business, whichever is later, and remain off until one hour prior to sunrise. The applicant's lighting plan commits to a timer. Compliance is addressed as a condition of approval.

RECOMMENDATION

Staff recommends **approval with conditions** of the sign permit application for the Zion Adventures secondary sign. The proposed sign is a backlit sign permitted under VMC §50.10(F), meets the 20 square foot area maximum for a building-mounted secondary sign under VMC §52.8.1(B)(3)(a), and conforms to the applicable dimensional and lighting standards subject to the conditions below. The following conditions shall apply:

- Prior to permit issuance, the applicant shall provide a corrected product specification confirming that the installed LED modules do not exceed 3,000K color temperature, as required by VMC §50.10(F)(3) and §50.06(C). The 2,700K module option shown in the submitted specifications satisfies this requirement.
- Prior to permit issuance, the applicant shall provide sign drawings bearing the wet stamp of a licensed engineer, as required by VMC §52.9.4 for signs that project more than three inches from the face of the building.
- Prior to permit issuance, the applicant shall provide a manufacturer's specification or certification confirming that the sign face luminance does not exceed 100 nits (100 candelas per square meter), as required by VMC §50.10(F)(4).
- The sign illumination shall be controlled by an automatic timer programmed to turn off illumination no later than one hour after sunset or close of business, whichever is later, and to remain off until no earlier than one hour prior to sunrise, in conformance with VMC §50.10(F)(5). Evidence of timer installation shall be provided prior to final inspection.
- Any future modification to the sign's illumination system, including substitution of the LED modules with higher-output fixtures, shall require a new sign permit and re-evaluation for compliance with VMC Chapter 50.

Sign Dimensions and Details - Total Square Footage

The Zion Adventures proposed secondary sign is executed utilizing four main sign components or sections. Each section will be attached to the exterior wall as individual components that make up the secondary sign. Each individual letter in “Zion” and “Adventures” is its own, individual form. They will be attached to the wall separately without a backing. This total area draws one rectangle around each module and totals them to 19.933 sq. ft. The figures presented are the built measurements of the sign.

Total Area: 19.933 sq. ft.

- a. 5.653 sqft
- b. 5.688 sqft
- c. 2.75 sqft
- d. 5.842 sqft

(fig. a) “Zion”



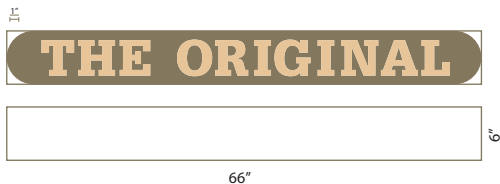
- a. $w = (52.5\text{in})/12 = 4.375\text{ft}$
- b. $h = (15.5\text{in})/12 = 1.292\text{ft}$
- c. $A = 4.375 \times 1.292$
- $A = 5.653 \text{ sqft}$

(fig. b) “Adventures”



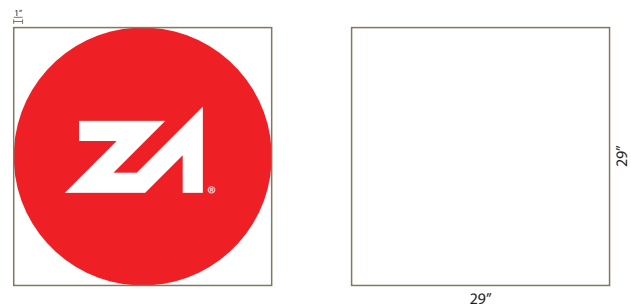
- a. $w = (78\text{in})/12 = 6.5\text{ft}$
- b. $h = (10.5\text{in})/12 = 0.875\text{ft}$
- c. $A = 6.5 \times 0.875$
- $A = 5.688 \text{ sqft}$

(fig. c) “The Original”



- a. $w = (66\text{in})/12 = 5.5 \text{ ft}$
- b. $h = (6\text{in})/12 = 0.5 \text{ ft}$
- c. $A = 5.5 \times 0.5$
- $A = 2.75 \text{ sqft}$

(fig. d) “ZA Logo”



- a. $w = (29\text{in})/12 = 2.417\text{ft}$
- b. $h = (29\text{in})/12 = 2.417\text{ft}$
- c. $A = 2.417 \times 2.417$
- $A = 5.842 \text{ sqft}$

Lighting Plan

The secondary sign (building mounted channel letters) will be backlit. To adhere to DarkSky Innitiative reccomendations, the follow- ing will be applied in order to do our part in respecting the natural enviornment. These reccomendations come from the “DarkSky Approved Luminaries Program”, the “DarkSky Innitiative Guidance for Electronic Message Centers (EMCs)”, the “DarkSky and Illu- minating Engineering Society Joint IDA - IES Model Lighting Ordinance (MLO) with User Guide”. I also reached out to James Brigagli- ano at the DarkSky Innitiative regarding internally illuminated signs and their specific reccomendations, as none of the previously mentioned documents pertain directly to internally illuminated signs. It was reccomended that we use the EMC Guidance. Listed below are the cumulative reccomendations that pertain to Zion Adventures® signage that we are happy to impliment.

- 1. There will be no animated and/or rapidly cycling messages to distract drivers, cyclists, or pedestrians, nor harm any wild life.
- 2. The LED’s installed behind the acrylic facing will adhere to the reccomended manufacturer specs as communicated by the DarkSky Innitiative’s EMC guidelines, . This includes both the lumen/nit output as well as the CCT temperature.
- 3. The sign will be turned off by 11pm consistently using a pre-set timer and remain off until one hour before sunrise OR one hour before operating business hours, as per DarkSky Innitiative reccomendations.
- 4. The sign will have dimming capabilities so we can dial it to the correct luminance level for day, then dim to the correct lumi- nance level at night. This means there will be two “modes” of luminance established.

Below are the manufacturer specs for the exact LED lights that will be used on this sign. They are labeled as “G2G United II 0.8watt White 4200K 12V 1.5 Mods/Ft 70 Mods/46.67’ Bag”. 130.2 Lumens per module. 195.3 Lumens per foot.

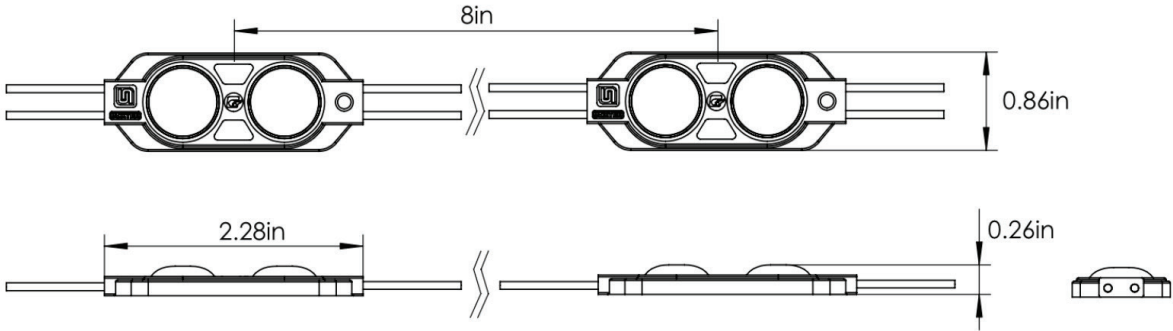
Options

Model	Color	Lumen / module	Lumen / foot
UNITED II 0.8W	7100K	133.9lm	200.9lm
	6300K	135.3lm	203.0lm
	4200K	130.2lm	195.3lm
	2700K	127.6lm	191.4lm
UNITED II 1.2W	7100K	187.6lm	281.4lm
	6300K	189.5lm	284.3lm
	4200K	183.6lm	275.4lm
	2700K	180.2lm	270.3lm

Modules Population Guide

Channel Letter Depth (in)	Multiple Rows (rows spacing)	Clearance	Mods per Ft
3"	7"	4"	2
4"	10"	5"	1.5
5"- 6"	12"	6"	1.5
7"- 10"	15"-18"	7"	1.5

Dimensions



Zion Adventures®
Proposed Sign Permit Application - Secondary Signage
1055 E Highway 9, Virgin UT 84779

Rendering of Proposed Sign - Attempted Night Time Simulation



Site Plan - Proposed Primary and Secondary Sign Location

Primary Sign Location marker is intended to indicate the estimated proposed location of the sign. This marker is a placeholder. This permit application does not include primary sign plans. The Primary Sign application will be submitted at a later date as a separate or amended application.

