



Board of Adjustment

**Staff Report
BOA-23916**

Hearing Date: August 12, 2025 (Continued from July 22, 2025)

Prepared by: Erin Roark
eroark@cityoftulsa.org
918-596-7618

Owner and Applicant Information

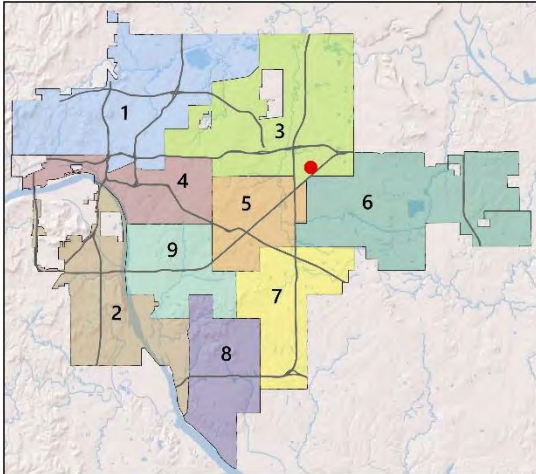
Applicant: Anna Sanger
Property Owner: Route 66 Hospitality LLC

Property Location

11525 East Skelly Drive
Tract Size: ±2.16 acres

Location within the City of Tulsa

(shown with City Council districts)



Elected Representatives

City Council: District 3, Jackie Dutton
County Commission: District 1, Stan Sallee

Public Notice Required

Newspaper Notice – min. 10 days in advance
Mailed Notice to 300’ radius – min. 10 days in advance

Request Summary

Variance to increase the maximum display area for outdoor advertising signs in the CS district (Section 60.080-C.3.b.1).

Zoning

Zoning District: CS
Zoning Overlays: N/A

Comprehensive Plan Considerations

Land Use

Land Use Plan: Local Center
Small Area Plans: N/A
Development Era: Late Automobile Era

Transportation

Major Street & Highway Plan: Residential Collector, Freeway
planitulsa Street Type: N/A
Transit: TOD Area
Existing Bike/Ped Facilities: N/A
Planned Bike/Ped Facilities: Sidewalks

Environment

Flood Area: N/A
Tree Canopy Coverage: 10-19%
Parks & Open Space: Stormwater facility

Staff Analysis

The applicant is requesting a variance to increase the maximum display area for outdoor advertising signs in the CS district (Section 60.080-C.3.b.1). The subject property has more than one sign, a billboard and a freestanding sign, and is located within the freeway sign corridor. Therefore, an aggregate sign budget of 1 square foot per 1 linear foot of street frontage, or 435 square feet, is allowed. The two signs are already on the subject property and are considered nonconforming, but the applicant plans to convert the billboard into a dynamic display sign. Nonconforming signs must be brought into conformance before they can be converted into dynamic display signs. The billboard has a display area of 672 square feet, and the freestanding sign has a display area of 288 square feet. The aggregate display area is 960 square feet, or 525 square feet above the allowed sign budget.

This case was initially scheduled to be heard on July 22, 2025, but was continued due to an error with the property’s legal description.

Section 60.080 Signs in Mixed-use, Commercial and Industrial Zoning Districts

60.080-C Sign Budget

3. Maximum Area

Lots with Frontage on Only Minor Streets

Signs allowed on lots with frontage on only minor streets may not exceed 32 square feet in area or 0.20 square feet of sign area per linear foot of street frontage, whichever is greater, but in no case may the sign exceed 150 square feet in area. The maximum sign area calculation must be based on the street frontage to which the sign is oriented.

Lots with Frontage on Major Streets

- (1) The maximum aggregate sign area of all on-premise projecting and freestanding signs and off-premise outdoor advertising signs allowed on lots with frontage on one or more major streets may not exceed the limits established in [Table 60-3](#):

Table 60-3: Maximum Aggregate Sign Area

| Zoning District | On-premise Projecting and Freestanding Signs & Off-premise Outdoor Advertising Signs (sq. ft. per linear foot of major street frontage) | | | |
|----------------------------|--|---------------------|------------------------------|---------------------|
| | Not Within Freeway Sign Corridor[1] | | Within Freeway Sign Corridor | |
| | If More than 1 Such Sign | If Only 1 Such Sign | If More than 1 Such Sign | If Only 1 Such Sign |
| MX, CO and CS | 1 | 2 | 1 | 2 |
| CG, CH, CBD, IL, IM and IH | 1 | 2 | 2 | 3 |

[1] Off-premise outdoor advertising signs are prohibited outside of freeway sign corridors and prohibited in MX districts.

Section 80.060 Nonconforming Signs

80.060-C On-premise Signs

Nonconforming on-premise signs may continue subject to the following provisions:

- 1. Nonconforming on-premise signs must be maintained in good repair and safe condition, in accordance with [80.010-D](#). No permits may be issued for upgrades or modifications of nonconforming signs.

2. If an on-premise sign is nonconforming by reason of restrictions on its brightness or illumination or its use of strobe or beacon lights, the sign must be immediately removed or made to conform.
3. A window sign that is nonconforming by reason of restrictions on its sign area must be immediately removed or made to conform.
4. If a nonconforming on-premise sign is damaged or partially destroyed to the extent of more than 50% of its replacement cost at the time of damage, the sign must be removed or made to conform to all applicable regulations within 90 days of the date of the date of damage or destruction.
5. If the on-premise sign is not used for advertising purposes for a period of 180 consecutive days, the sign is deemed abandoned and must be removed.

Relevant Case History

- BOA-21202, January 1, 2011; The board of adjustment verified the spacing requirement for a digital outdoor advertising sign of 1,200 feet from any other digital outdoor advertising sign facing the same traveled way.

Statement of Hardship

The applicant's statement of hardship is attached as a separate exhibit.

Comprehensive Plan Considerations

Land Use Plan

Local Centers serve the daily needs of those in the surrounding neighborhoods. This designation implies that the center generally does not serve an area beyond the nearby neighborhoods. Typical uses include commercial or retail uses that serve the daily needs of nearby residents. In order to introduce a regional trip generator, the entire local center designation should be amended to be Regional Center with significant input from all affected properties and nearby neighborhoods.

Surrounding Properties:

| <u>Location</u> | <u>Existing Zoning/Overlay</u> | <u>Existing Land Use Designation</u> | <u>Existing Use</u> |
|-----------------|--------------------------------|--------------------------------------|--|
| North | CS | Park and Open Space | Vacant |
| East | RS-3, CH | Employment | I-44, then Commercial |
| South | RS-3, CS, RT66 | Employment | I-44, then Commercial |
| West | CS | Local Center, Park and Open Space | Hotel, Event Center, Stormwater Facility |

Small Area Plans

The subject property is not within a small area plan.

Development Era

The subject property is in an area developed during the Late Automobile Era (1950s-present), which has grown since the mainstreaming of automobile-centric lifestyles, with a high degree of separation between residential and nonresidential uses, and low levels of street connectivity. In these areas, transportation is nearly exclusively concentrated on the mile-by-mile arterial grid, and major streets are often both transportation corridors and destination corridors, which can lead to traffic congestion. Nonresidential uses are predominantly located at the intersections of major arterial streets. Priorities in these areas include commercial revitalization, placemaking, community gathering opportunities, conservation of natural areas, a high degree of privacy, one-stop shopping, and commuting routes.

Transportation

Major Street & Highway Plan: East Skelly Drive runs parallel to the southwest side of the subject property and is classified as a Residential Collector, which has a planned minimum right-of-way width of 60 feet. I-44 runs parallel to the southwest side of the subject property and is classified as a Freeway, which has a planned minimum right-of-way width as per Oklahoma Department of Transportation Standards.

Comprehensive Plan Street Designation: N/A

Transit: This property is located in a Transit-Oriented Development Area identified as a potential corridor for bus rapid transit (BRT). Currently no routes run adjacent to the subject property.

Existing Bike/Ped Facilities: N/A

Planned Bike/Ped Facilities: Sidewalks are recommended along street frontages.

Arterial Traffic per Lane: N/A

Environmental Considerations

Flood Area: N/A

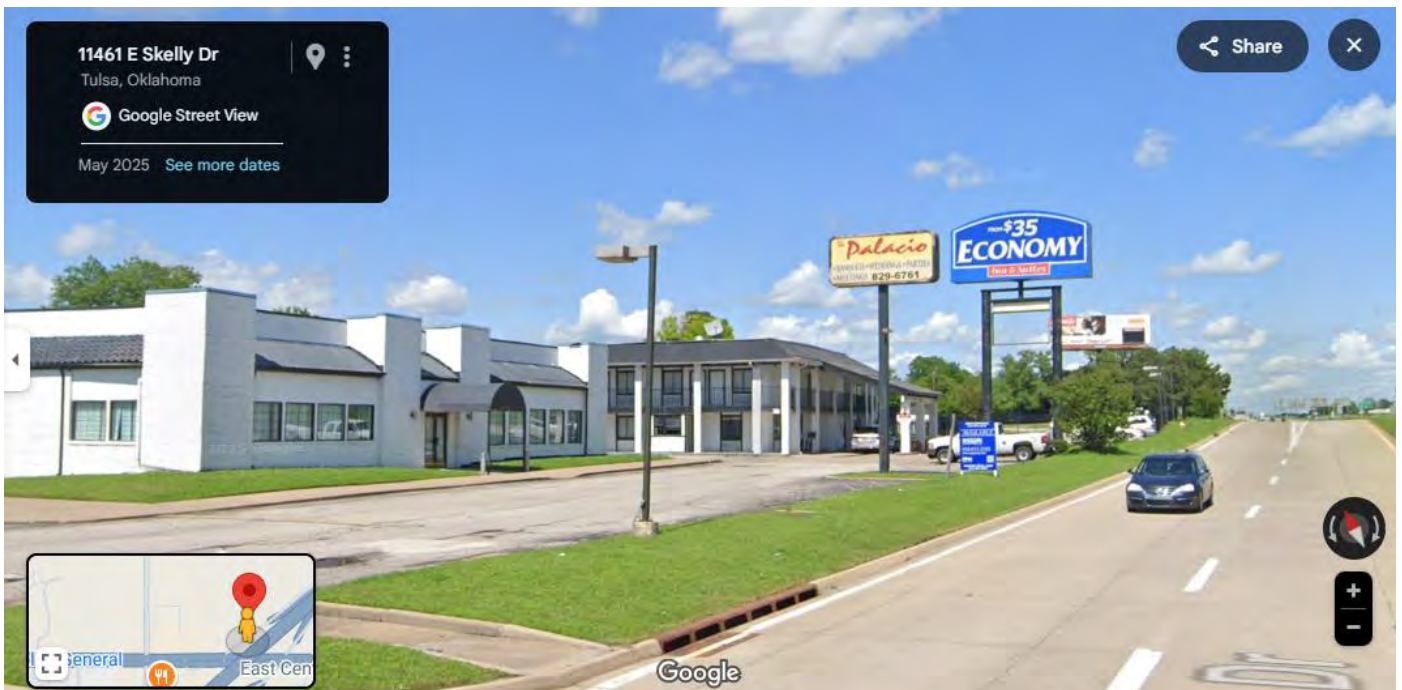
Tree Canopy Coverage: Tree canopy in the area is 14%. Preserving the limited existing canopy should be encouraged, as well as measures to increase the canopy through landscaping. Street-lining trees in particular should be encouraged to spread the benefit of the tree canopy to the pedestrian realm.

Parks & Open Space: A City stormwater detention facility is adjacent to the west of the subject property.

Site Photos



View west from I-44, April 2025 (Image from Google Street View)



View northeast from Skelly Drive, May 2025 (Image from Google Street View)

Sample Motion

I move to approve or deny a variance to increase the maximum display area for outdoor advertising signs in the CS district from 435 square feet to 960 square feet (Section 60.080-C.3.b.1),

- per the conceptual plan(s) shown on page(s) _____ of the agenda packet.
- subject to the following conditions (including time limitation, if any): _____.

The board finds the hardship to be _____.

In granting the Variance, the Board finds that the following facts, favorable to the property owner, have been established:

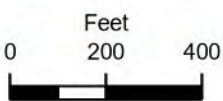
- That the physical surroundings, shape, or topographical conditions of the subject property would result in unnecessary hardships or practical difficulties for the property owner, as distinguished from a mere inconvenience, if the strict letter of the regulations were carried out;
- That literal enforcement of the subject zoning code provision is not necessary to achieve the provision’s intended purpose;
- That the conditions leading to the need of the requested variance are unique to the subject property and not applicable, generally, to other property within the same zoning classification;
- That the alleged practical difficulty or unnecessary hardship was not created or self-imposed by the current property owner;
- That the variance to be granted is the minimum variance that will afford relief;
- That the variance to be granted will not alter the essential character of the neighborhood in which the subject property is located, nor substantially or permanently impair use or development of adjacent property; and
- That the variance to be granted will not cause substantial detriment to the public good or impair the purposes, spirit, and intent of this zoning code or the comprehensive plan.

Property Description

PRT LT 1 BEG MOST ELY COR LT 1 TH SW435 W14.35 SW22.83 NW194.38 NE28.38 NW34.42 NE252.21 E182.50 SE130 POB BLK 1, CROSSROADS MALL ADDN, City of Tulsa, Tulsa County, State of Oklahoma.

Exhibits

- Case map
- Aerial (small scale)
- Aerial (large scale)
- Tulsa Comprehensive Plan Land Use Map



 Subject Tract

BOA-23916

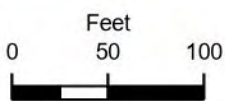
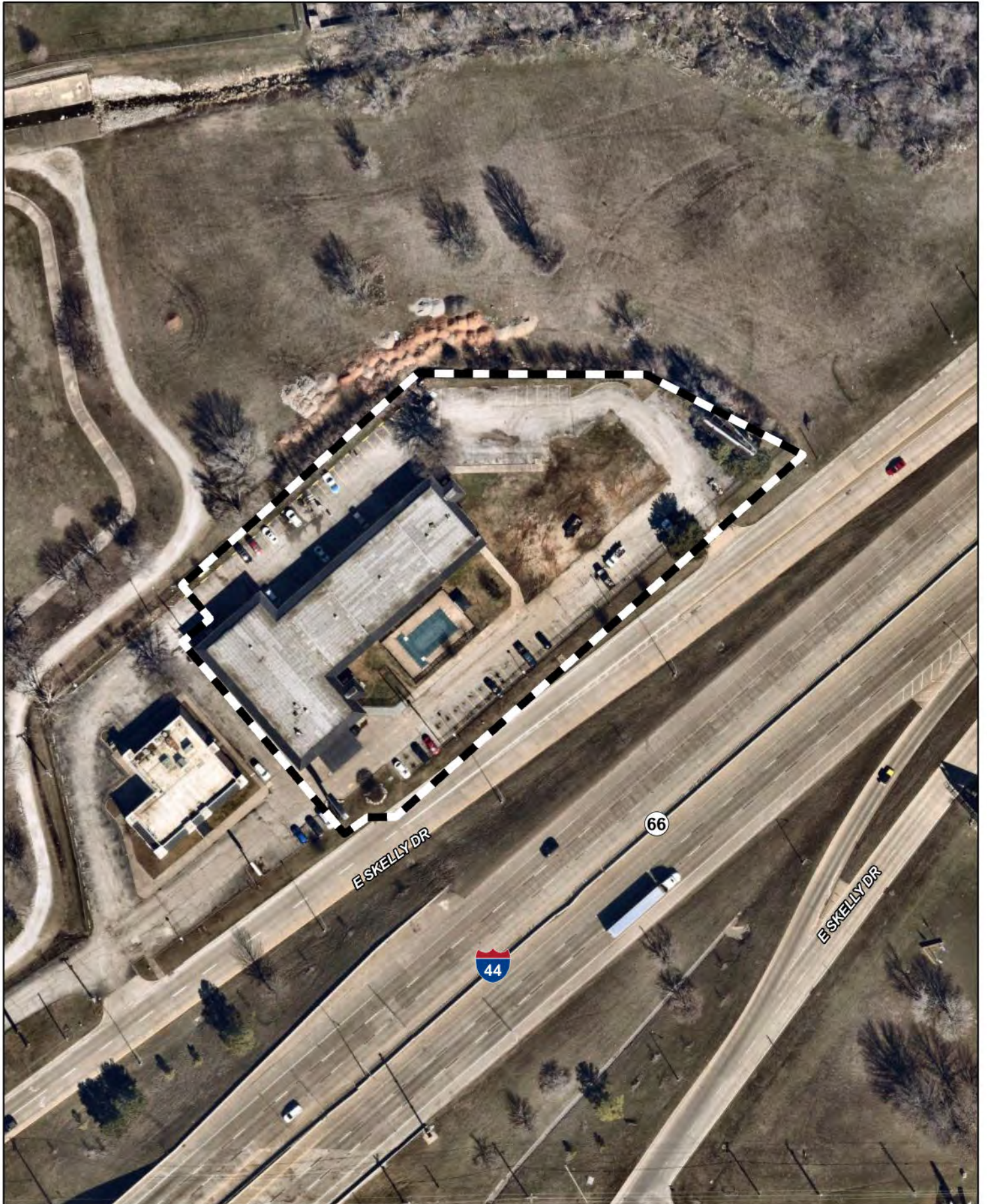
19-14 05

Note: Graphic overlays may not precisely align with physical features on the ground.

Aerial Photo Date: 2025



4.7



Subject Tract

BOA-23916

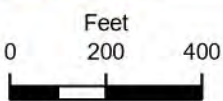
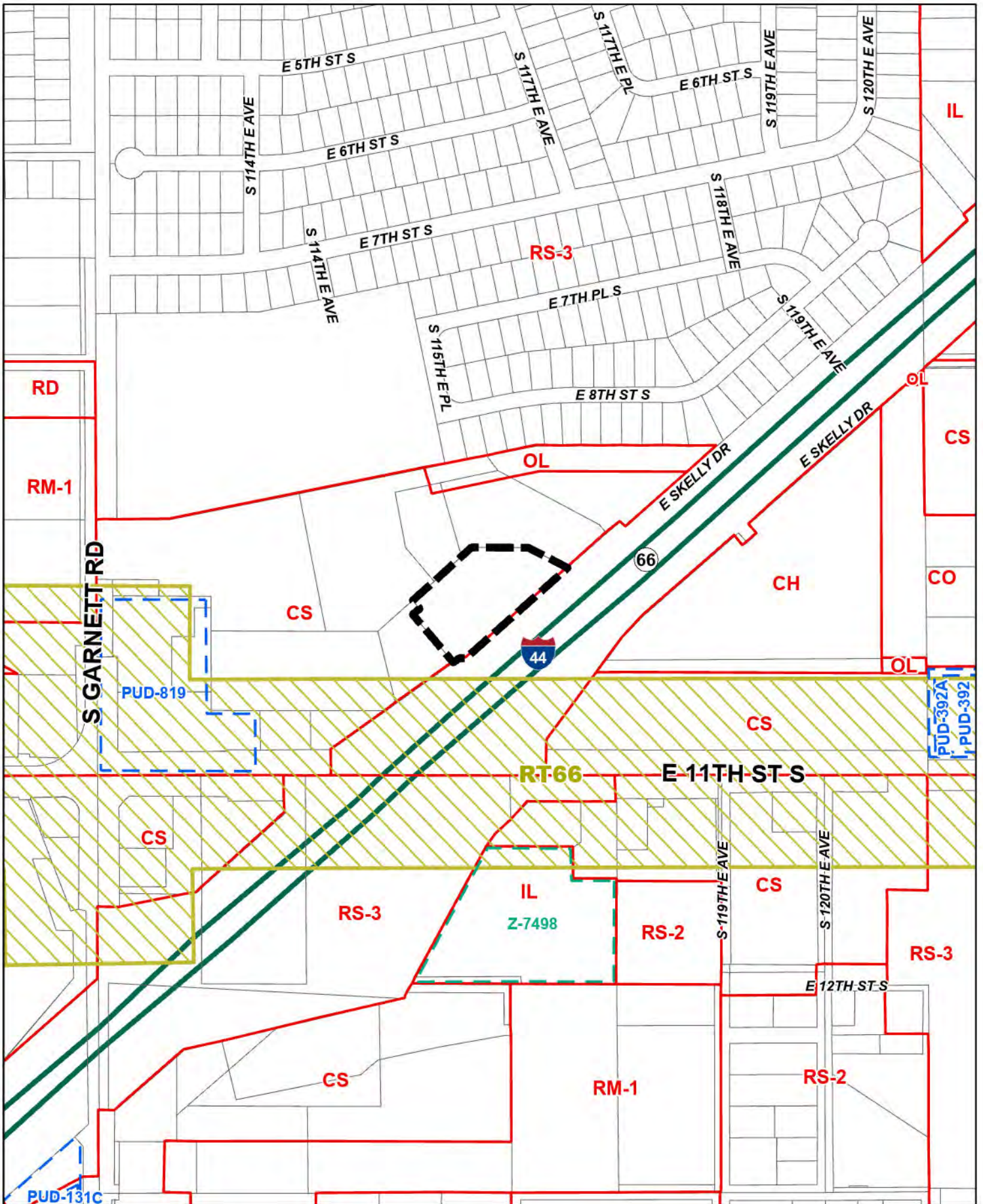
19-14 05

Note: Graphic overlays may not precisely align with physical features on the ground.

Aerial Photo Date: 2025



4.8



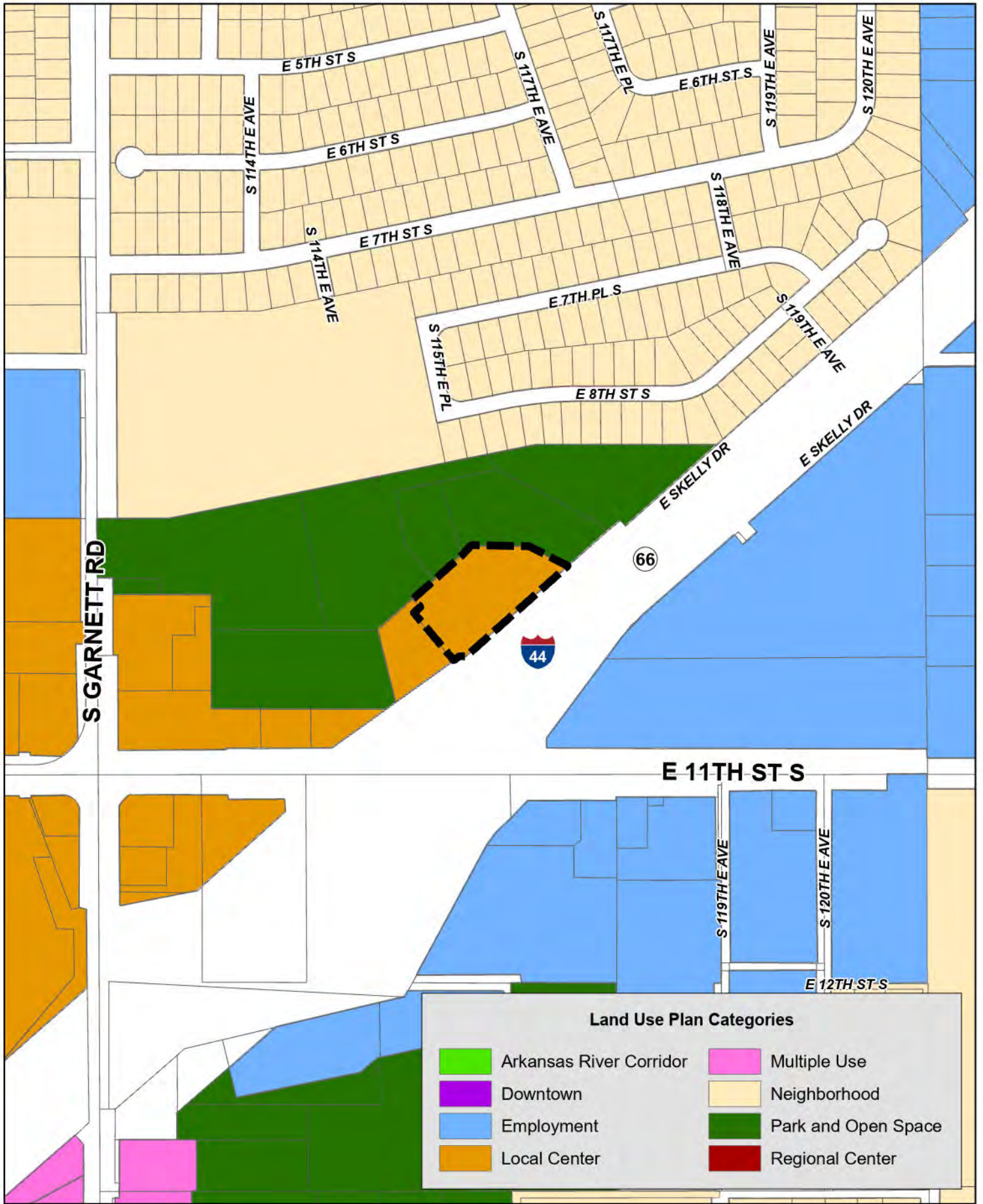
 Subject Tract









BOA-23916

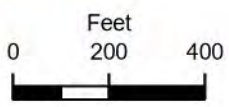
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4.9



| Land Use Plan Categories | | | |
|---|-------------------------|---|---------------------|
|  | Arkansas River Corridor |  | Multiple Use |
|  | Downtown |  | Neighborhood |
|  | Employment |  | Park and Open Space |
|  | Local Center |  | Regional Center |



 Subject Tract

BOA-23916

19-14 05



4.10

Variances

Proof of Hardship

The Board of Adjustment is allowed to approve variances only after determining that the following conditions exist. Below, describe how your request satisfies **each** of these conditions.

1. That the physical surroundings, shape, or topographic conditions of the subject property would result in unnecessary hardships or practical difficulties for the property owner, as distinguished from a mere inconvenience, if the strict letter of the regulations were carried out;

An outdoor advertising sign currently exists on the property with a sign area that exceeds the sign area permitted by Table 60-3, under Section 60.080-C of the Zoning Code. Given that a sign with the requested sign area already exists on the property, it would cause unnecessary hardship if the Property Owner were forced to remove or redesign the existing sign instead of using the current sign area.

2. That the literal enforcement of the subject zoning code provision is not necessary to achieve the provision's intended purpose;

The applicable Zoning Code provision limits the aggregate sign area when more than one sign exists on a lot, presumably to limit distractions caused by excessive sign area. Here, the second sign on the property is a smaller freestanding sign of a business located on the property, and the outdoor advertising sign (billboard) already exists with its current sign area. The requested variance would not add additional sign area to the existing sign area on the lot.

3. That the conditions leading to the need of the requested variance are unique to the subject property and not applicable, generally, to other property within the same zoning classification;

This property is unique because there are already two signs sitting on the lot with a fixed existing sign area. No other property has the same sign area, sign location on the property, or freeway corridor frontage.

4. That the alleged practical difficulty or unnecessary hardship was not created or self-imposed by the current property owner;

The Property Owner maintains an existing outdoor advertising sign with its current sign area, permitted by the City of Tulsa. The Property Owner did not and does not wish to increase the existing sign area and it would create an unnecessary hardship if the Property Owner were not allowed to use the existing sign area to display advertisements.

5. That the variance to be granted is the *minimum* variance that will afford relief;

The Property Owner does not wish to increase the existing sign area of any sign on the property, but to use only the existing sign area. The Property Owner is only using the sign space already physically available, and nothing more.

6. That the variance to be granted will not alter the essential character of the neighborhood in which the subject property is located, nor substantially or permanently impair use or development of adjacent property; and

Because the outdoor advertising sign already exists with its current sign area, this variance will not change the character or the neighborhood or impair use of any further development.

7. That the variance to be granted will not cause substantial detriment to the public good or impair the purposes, spirit, and intent of the zoning code or the comprehensive plan.

Because the outdoor advertising sign already exists with its current sign area, this variance will not cause detriment to the public good or impair the purposes, spirit, or intent of the Zoning Code or the Comprehensive Plan.

Good, Felicity

From: Anna Sanger <asanger@dsla.com>
Sent: Friday, August 1, 2025 4:19 PM
To: Good, Felicity
Cc: Roark, Erin; Nathan Cross; Kathryn Huddleston
Subject: RE: BOA-23916 & BOA-23917 [IWOV-ACTIVE.FID528298]

Felicity: Below find calculations of sign display area for the BOA cases 23916 and 23917.

10641 E. 31st St South – BOA 23917

Two signs on the property:

- Billboard: 14ft x 48ft = 672 sq ft
- Freestanding ground sign: 6 ft x 6ft = 36 sq ft

Total major street frontage of property: 465 ft
~~Total sign display area requested: 708 sq ft~~
~~Difference: 243 sq ft~~

11525 East Skelly Drive – BOA 23916

Two signs on property:

- Billboard: 14ft x 48ft = 672 sq ft
- Freestanding business sign: 12 ft x 24 ft = 288 sq ft

Total major street frontage of property: 435 ft
~~Total sign display area requested: 960 sq ft~~
~~Difference: 525 sq ft~~

Please let me know if you have questions or need more information. Have a great weekend -

DOERNER | SAUNDERS
DANIEL & ANDERSON
LLP LAWYERS

Anna M. Sanger | attorney

Two West Second Street, Suite 700 | Tulsa, OK 74103-3117 | p: 918.591.5337 | f: 918.925.5337
asanger@dsla.com | www.dsla.com

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TAX NOTICE: This communication may contain federal tax advice. IRS regulations require us to advise you that unless expressly stated otherwise, nothing in this communication was intended or written to be used and cannot be used or relied upon by any taxpayer to avoid any penalty under federal tax law or to promote, market or recommend any transaction or matter addressed herein. Only formal, written tax opinions meeting IRS requirements may be relied upon for the purpose of avoiding tax-related penalties. Please contact one of the firm's tax attorneys if you have any questions regarding federal tax advice.

"Site Plan"

OFF-PREMISE OUTDOOR ADVERTISING SIGN EXHIBIT

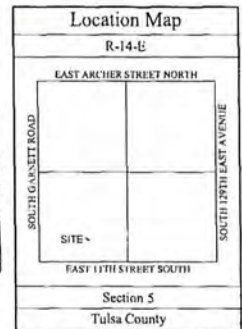
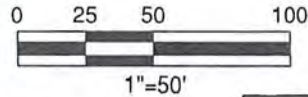
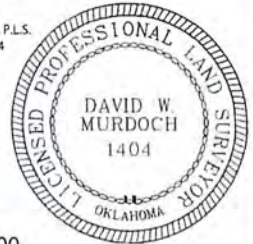
Other than shown hereon, there are no other outdoor advertising signs on the northwest side of Interstate Highway No. 44 within 1200' in either direction. There are no other dynamic display outdoor advertising signs within 1200' on either side of the highway, facing the same traveled way, as located on the ground and as measured in a straight line from center of respective sign structures .

There are no Residential Zoning Districts within 200', as measured horizontally in a straight line, of the nearest point on the existing sign structure.

I, David W. Murdoch, of Tulsa Engineering & Planning Associates, Inc. and a Professional Land Surveyor registered in the State of Oklahoma, hereby certify that this exhibit portrays the locations of and distances between existing outdoor advertising signs on the east side of U.S. Highway No. 169 and zoning as determined by field survey data gathered on the 8th day of April, 2025.

David W. Murdoch
 David W. Murdoch, P.L.S.
 2025.04.10 13:47:54
 -05'00"

David W. Murdoch
 L.S. 1404
 d.murdoch@tulsaengineering.com



Tulsa Engineering & Planning Associates
 9810 E. 42nd Street, Suite 100 Tulsa, Oklahoma 74146
 Phone: 918-252-9621 Fax: 918-340-5999
 Civil Engineering, Land Surveying, Land Planning
 Certificate of Authorization No. CA 531 PE/LS Renewal Date June 30, 2025

3345 Digital Upgrade
 U.S. Interstate Highway No. 44 &
 East 11th Street
 Lot 1, Block 1, Crossroads Mall Addition,
 Tulsa County, State of Oklahoma

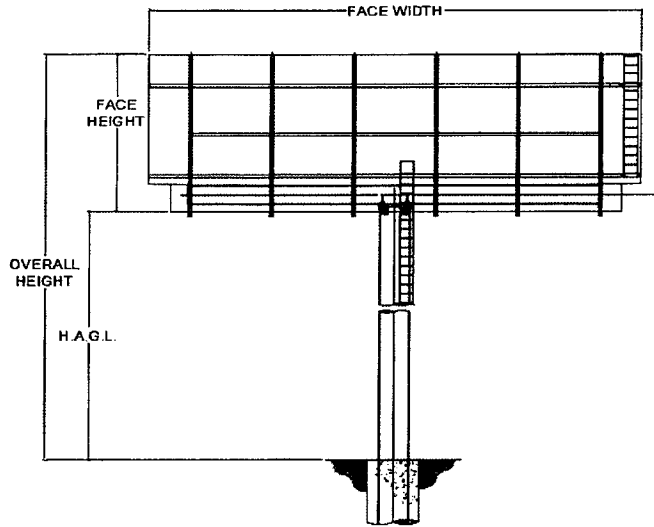


Job No: 25-031
 Scale: 1"=50'
 Date: 4/10/2025

| | | | | |
|--|---|--|-------------|--|
| | FJS ENGINEERING (FIRM CA #9139) PORTLAND, OR 520-490-3311 CONTACT@FJSENGINEERING.COM | CALCULATIONS CREATED FOR: RMG OUTDOOR 1430 E. MISSOURI AVE. #B160 PHOENIX, AZ | WIND DESIGN | |
| | PROJ. NO.: RMGO-25-040 DATE: Apr-25 | | PAGE NO.: 3 | |

SIGN INFORMATION

| | | |
|-----------------------------|-------|----|
| FACE WIDTH (B): | 48 | FT |
| OVERALL HEIGHT OF SIGN (h): | 50 | FT |
| HAGL: | 33 | FT |
| FACE HEIGHT: | 17 | FT |
| CLEARANCE RATIO (s/h): | 0.34 | |
| ASPECT RATIO (B/s): | 2.824 | |



FORCE COEFFICIENT DETERMINATION

| | | | |
|--------------------------|-------|---------------|-------|
| Case A and Case B | | Case C | |
| C_f | = 1.8 | Region | C_f |
| | | 0 to s | 2.54 |
| | | s to 2s | 1.66 |
| | | Balance | 1.15 |

| | | |
|----------|--------|---|
| K_{zt} | = 1.00 | Topographic factor |
| K_d | = 0.85 | Wind directionality factor |
| G | = 0.85 | Gust effect factor |
| V | = 109 | Basic wind speed |
| K_z | = 1.09 | Velocity pressure coefficient at height h |
| K_e | = 1.00 | Ground elevation factor |

VELOCITY PRESSURE DETERMINATION


$q_z = 0.00256(K_z)(K_{zt})(K_d)(K_e)(V^2) = 28.18 \text{ PSF}$ Velocity pressure at height z

DESIGN WIND PRESSURE DETERMINATION

p_w (Case A and B) = $q_z G C_f = 43.12 \text{ psf}$ For Global Design

p_w (Case C) = $q_z G C_f = 60.80 \text{ psf}$ For Element Design

(Case C is not applicable when aspect ratio is 2 or less)

| | | | |
|---|---|---|--------------------|
|  | FJS ENGINEERING (FIRM CA #9139) PORTLAND, OR 520-490-3311 CONTACT@FJSENGINEERING.COM | CALCULATIONS CREATED FOR: RMG OUTDOOR 1430 E. MISSOURI AVE. #B160 PHOENIX, AZ | COVER SHEET |
| | PROJ. NO.: RMGO-25-040 DATE: Apr-25 | | PAGE NO.: 1 |

| | |
|---|-----------------------|
| SIGN INFORMATION OWNER/APPLICANT: LAMAR ADVERTISING FACE SIZE (FT): 14 x 48 LOCATION: TULSA, OK OVERALL HEIGHT (FT): 50 H.A.G.L. (FT): 33 APRON HEIGHT (FT): 3 SIGN TYPE: <input checked="" type="checkbox"/> CENTER MOUNT <input type="checkbox"/> PARTIAL FLAG <input type="checkbox"/> FULL FLAG <input type="checkbox"/> COLUMN OFFSET <input checked="" type="checkbox"/> V-BUILD <input type="checkbox"/> BACK TO BACK <input type="checkbox"/> SINGLE FACE <input type="checkbox"/> MULTI-POST FOOTING TYPE: <input checked="" type="checkbox"/> ROUND <input type="checkbox"/> CUBE <input type="checkbox"/> SPREAD | RMG PROJ. NO. G-12794 |
|---|-----------------------|

| |
|--|
| DESIGN CRITERIA CODE: 2018 IBC DESIGN LOADS: DEAD: STATIC FACE: N/A PSF LED PANEL: 9000 LBS PIGEON PAN: N/A PSF OTHER MEMBERS AS NOTED IN CALCULATIONS LIVE: ON WALKWAYS: 40 PSF 300 LBS CONCENTRATED WIND: DESIGN WIND SPEED 109 MPH RISK CATEGORY II EXPOSURE CATEGORY C SOIL: IBC SOIL CLASS: 4 LAT. BEARING PRESS.: 300 PSF/FT VERT. BEARING PRESS.: 2000 PSF |
|--|

MATERIAL SPECIFICATIONS

| | |
|---|--|
| STEEL: W-SHAPES AND WT-SHAPES: ANGLES AND CHANNELS: RECT. AND SQUARE HSS: ROUND HSS: PLATES: PIPE: BOLTS: WELDING: CONCRETE: REINFORCING STEEL: | ASTM A992, F _y = 50 KSI ASTM A36, F _y = 36 KSI ASTM A500 GRADE B, F _y = 46 KSI ASTM A500 GRADE B, F _y = 42 KSI ASTM A36, F _y = 36 KSI ASTM A53B, A252 OR API 5LX, F _y AS NOTED ASTM A307, A325N AND/OR A490N AS NOTED SHALL CONFORM TO AWS D1.1, WELD FILLER METAL = E70XX f _c = 2500 psi AT 28 DAYS ASTM A706, GRADE 60 (F _y = 60 ksi) |
|---|--|

REVISIONS



Signed: 04/10/2025



DEVELOPMENT SERVICES

175 E 2ND ST., STE 405
TULSA, OK 74103
918-596-9456

CITY OF TULSA

PLAN CORRECTIONS SUMMARY

SIGN-211102-2025 (11525 E SKELLY DR S Tulsa, OK 74128)
Markup Summary #1

Sign Review (1)



Subject: Sign Review
Page Label: 1
Author: DWhiteman
Date: 4/29/2025 3:10:31 PM
Status:
Color: ■
Layer:
Space:

Section 60.080-C.3.b.1 Sign Budget, Maximum Area, Lots with Frontage on Major Streets. The maximum aggregate sign area of all on premise projecting and freestanding signs and off-premise outdoor advertising signs allowed on lots with frontage on one or more major streets may not exceed the limits established in Table 60-3.
Section 60.080-F.11.d, Dynamic Displays. A nonconforming off-premise outdoor advertising sign may not be modified, changed or converted into a dynamic display off-premise outdoor advertising sign unless it complies with all requirements of this zoning code, and all setback, spacing and separation requirements have been verified.

REVIEW COMMENT: This lot is zoned CS, has more than one sign, and is located within the freeway sign corridor. Per Table 60-3 they are allowed 1 square foot of sign display area per linear foot of major street frontage. Since this lot has 435 feet of major street frontage, the max sign display area allowed is 435 square feet; this is for the aggregate display area of both freestanding signs. The existing signs are non-conforming for display area and must be brought into conformance before the east face can be converted from static to a dynamic display. Please request a variance from the Board of Adjustment for this lot to exceed the allowable amount of square footage of sign display.

This constitutes a Plan Review to date in response to the information submitted with and after the above referenced application. Additional issues may develop when the review continues upon receipt of additional information requested in this letter or upon additional submittal from the client. Any code items not reviewed are still in force, and it shall be the responsibility of the owner and design professional(s) to ensure that all code requirements are satisfied.