

December 16, 2019

Dear Mayor Perotte and Council Members,

The General Plan has many excellent policies to protect and enhance Goleta's visual and aesthetic character. Many of these policies have been incorporated with robust development standards into the NZO. However, the Design Review Board needs several additional "tools," development standards and "findings," to use in the review process and in decision-making. Please consider what I present below and include the additional standards in the NZO that will protect, preserve and enhance the community character of our fair City.

Regrettably I won't be able to attend Tuesday's meeting to testify on these items and hope what I have written is helpful and informative as to the importance of what I discuss. I want to express my appreciation for all your efforts in the 6-year long NZO process, particularly in welcoming the public "to the table" to have their concerns heard, acted upon and incorporated into the NZO. Thank you! Best wishes for the holiday season and the New Year!

Cecilia Brown

Viewshed Protection: Please support staff's addition of story pole guidelines in the Public Notification section 17.52.050 as well as their response to Councilmember Kasdin's interest in increased viewshed protection thru a revision to the NZO text to include structure height limitation on a protected public viewshed.

In addition to the story pole guidelines, it is important that the DRB have viewshed protection findings to use during project review. *None now exist for them to use.* Therefore, the proposed addition of two viewshed protection measures into their findings would further enhance protection of viewsheds. Below are two proposals for consideration:

: J. Story poles have evaluated the visual impact of proposed development on views along scenic corridors. (This finding would be used in concert with the newly proposed story pole guidelines.)

K. Views from locations identified on the General Plan Scenic Resources Map, General Plan Figure 6-1 are protected by minimizing any impairment that results from new development (this is General Plan Policy VH 1.2)

Request incorporate these measures into Section 17.50.80 Required Findings

Section 17.35.060 Lighting

A purpose of the lighting ordinance is to provide development standards to control outdoor lighting, reduce over-lighting, and to help achieve "Dark Sky" lighting standards. Numerical standards in the NZO which are to be set by the city for the type of lighting the City wants to achieve for various kind of land uses are needed for each kind of City land use (e.g., car dealership outdoor display areas, neighborhood commercial areas). Unfortunately the NZO lacks many standards for project lighting to ensure such compliance.

A recent lighting project reviewed by the DRB illustrates the dilemma of the NZO not having a complete set of standards for them to use in project review: A convenience store next to a residential area was the subject of neighborhood complaints because the parking lot lighting

the applicant had installed (without city review) was too bright. To remedy the situation, the applicant was going to install new lighting and needed DRB to review its lighting plan. A requirement of the lighting ordinance is a lighting plan which includes a “total site lumens” value.

But The NZO provides no “total site lumens” development standards either for the applicant to use in designing his project or for the DRB to use in reviewing the applicant’s lighting plan. The applicant had to make an educated guess as what might work and the DRB had to guess at what is appropriate for “total site lumens” value for the parking lot in its project review. Will the “guess” the applicant or the DRB has to make be good enough or even appropriate to ensure it meets the standards the City envisions for its lighting ordinance to ensure the parking lot isn’t over-lighted?

Remedy this uncertainty: The NZO is a document of precise numerical standards in all its many applications and one is needed for “total site lumens” in the lighting ordinance. Not having one to use is unacceptable. In my Nov 5th letter, I gave the City a way to get standards for “total site lumens:” Use the International Dark Sky Association Model Lighting Ordinance (MLO) below.
https://www.darksky.org/wp-content/uploads/bsk-pdf-manager/16_MLO_FINAL_JUNE2011.PDF

The MLO has several methods the city could use to set its standards. But regrettably staff in responding to my comments in their Nov 15th document misunderstood how the MLO parameters could be applied to city land uses. Thus a valuable approach to setting illumination levels for various types of lands used to minimize adverse impacts of lighting was dismissed as not workable and thus the absence of having any such standard to use in the NZO.

City council wanted a “Dark Sky” lighting ordinance as I recall during earlier hearings, but it is not achievable without complete lighting ordinance development standards. As an interim measure, the Lighting Guidelines (see link below) the DRB developed for their use a decade ago could be updated easily <https://www.cityofgoleta.org/home/showdocument?id=1928> and be used until the City decides how and when it wants to proceed in devising 21st century lighting ordinance development standards and putting them into the NZO.