

From: [Gillian Fennessy](#)
To: [Gillian Fennessy](#)
Subject: FW: Comments on lighting ordinance
Date: Monday, September 09, 2019 10:01:45 AM

From: Cecilia Brown <brownknight1@cox.net>
Sent: Monday, September 09, 2019 9:50 AM
To: Kim Dominguez <kdominguez@cityofgoleta.org>
Cc: Anne Wells <awells@cityofgoleta.org>; Andy Newkirk <anewkirk@cityofgoleta.org>; Jay Ritterbeck <jritterbeck@cityofgoleta.org>
Subject: Comments on lighting ordinance

Hi Kim, please accept the attachment and forward to planning commissioners for tonights meeting.

Thank you, Cecilia

September 9, 2019

Re: Lighting Ordinance Comments for Sep 9th City of Goleta Planning Commission Hearing

Dear Madame Chair and Members of the Planning Commission

I was reviewing the city's lighting ordinance this weekend and re-read the Joint IDA-IES Model Lighting Ordinance (MLO). This document was part of public comment at one of the pc hearings on the city's proposed lighting ordinance. As a result, I think there are some further changes that are needed to the proposed lighting ordinance. I have used the MLO as a reference since it has contemporary and recognized lighting standards. Thank you for considering my comments. Cecilia Brown

1. Section 17.35.010 Purpose. One of the purposes of the lighting ordinance is to control the amount of lighting. My proposed addition below is consistent with standards in the lighting ordinance. I have italicized and underlined the proposed changes as well as slightly edited the sentence.

The purpose of this Chapter is to provide development standards to control outdoor lighting in order to maintain adequate visibility and safety, to conserve energy, to protect against glare, to limit excessive lighting and the amount of light that can be used and light trespass.

2. The proposed lighting ordinance has lighting standards only for Exterior Display/Sales Areas which is "that the average horizontal illuminance is no more than 5.0 footcandles." Missing are standards for parking lots and gas stations/convenience store aprons. From the City of Goleta Outdoor Lighting Guidelines the foot candle standards for parking lot lighting depending upon the use are from 0.2fc to 0.9fc and the one for gas stations/convenience store aprons and under canopies is 5.0 fc. Please advise if this was an inadvertent omission, but if not, what are the lighting standards for these uses?

3. I think there needs to be some qualifier in the opening paragraph of Section 17.35.060 Lighting Plans as to what kind of developments need a lighting plan. Single family homes don't, but one is needed for *all non-residential properties and for multiple residential properties having common outdoor areas* (MLO, p. 11).

The first sentence would then read: An outdoor lighting plan must be submitted with the permit application whenever exterior lighting is proposed or required as part of *all non-residential and for multiple residential development having common outdoor areas* not otherwise specifically listed as exempt from the requirements of this Chapter.....

4. The lighting plan in Section 17.35.060 A5 has a standard requiring the "total lumens and light temperature for each fixture and total square footage of areas to be illuminated." (I believe the sentence should read as information is presented in the MLO: "*the total luminaire lumens and the correlated color temperature for each light and the total hardscape area to be illuminated.*" The purpose of requiring the total lumens, as I understand it, is to ensure the site isn't being overlighted, that is, the lighting is not excessive. But to determine that, I believe the city needs to establish a total site lumen

limit for various uses. MLO has two methods for determining compliance (MLO p. 11). Also, without a total site lumen limit standard, how will decisionmakers reviewing lighting plans know what standard to use to ensure that the lighting plan complies with city standards to limit excessive lighting?

Since the lighting ordinance is proposing also to obtain the correlated color temperature for each light, I believe the lighting ordinance needs to have information about this topic, since there is now no information in the ordinance about the city's preferences and reasons for using/allowing certain correlated color temperatures for lighting in various uses. For example, in shopping center parking lots, 4000k is probably acceptable, but this correlated color temperature may not be acceptable in a parking lot of a multi-family residential project where 2700k might be more appropriate. I believe there needs to be information on what is expected for both applicants and decisionmakers added to the lighting ordinance, for this is an important topic with LED lighting now prevalent in most lighting uses.