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To: [Gillian Fennessy](mailto:Gillian.Fennessy)
Subject: FW: goletazoning.com Public Comments: Form Submission
Date: Monday, September 30, 2019 3:21:43 PM

From: donotreply@godaddy.com <donotreply@godaddy.com>
Sent: Wednesday, September 25, 2019 4:41 PM
To: Andy Newkirk <anewkirk@cityofgoleta.org>
Subject: goletazoning.com Public Comments: Form Submission

Name:

Brian S. Smith, PE (Santa Barbara)

Email:

brian@smithengineering.net

Subject:

Proposed Lighting Ordinance changes

Message:

I've had some recent discussions regarding 5355 Calle Real, and I have strong concerns that the proposed lighting ordinance is unrealistically strict with the property line maximum (0.1ftc). I also believe the pole height limitation will be problematic and in some cases make the constructed projects more offensive to neighbors (not less). I was originally told that the NZO is based on the Model Lighting Ordinance. While the MLO is also very tough to comply with, it is at least realistic. The MLO is based very closely on CA Title 24. The proposed 0.1ftc limit at the property line is not listed in the MLO. The MLO would classify Goleta as LZ3 which limits light at the property line to 0.8ftc. Even if you choose to reclassify Goleta as LZ2 (a process that is supposed to happen at the State level) the property line limit should be 0.3ftc. I have since learned that the 0.1ftc limit came out of a document prepared by the Dark Sky Society. While I admire much of the good the DSS has done, many of their recommendations are extreme and unrealistic. They largely ignore important safety concerns and focus entirely on aesthetics. Given that designers like myself, and the City of Goleta, can be found liable for injuries and assaults in which poor lighting played a role, I think it would be prudent to reconsider these extremely low criteria. Limits this low are especially unnecessary when the neighboring property is also commercial. I don't believe it makes good sense to draw a hard shadow line at the edge of a property when the adjacent owner would actually prefer to have some light spilling over. We should also consider the way this looks when driving through a commercial district, hard property lines of light and shadow, and the impacts to crime when you have areas of near total darkness adjacent to operating businesses. It may seem like a small difference but the difference between the 0.8ftc recommended in Title 24 and the 0.1ftc recommended by the The Dark Sky Society is actually a huge difference. You can think of it as visually roughly the same as the difference between 80ftc (laboratory clean rooms) and 10ftc (office bathrooms), or the difference between 8ftc (storage rooms) and 1ftc (a dimly lit parking lot). The eye perceives those visual ftc differences roughly the same. In addition to the very low property line ftc requirement, the pole height limit is going to require all exterior lighting poles be controlled by motion sensors to meet CA Title 24. While I feel that this is good design for some commercial properties (like an office building or business that closes at night), it isn't good design for a hotel or even some commercial properties adjacent to residential zones. The motion sensor requirement means the lights won't turn off entirely, they will drop to 50% power when there is no activity and then jump back up to 100% whenever anyone drives or walks through the parking lot. I really think that's going to be annoying for the neighbors and hotel guests. It's like having a next door neighbor who leaves a light on all night, versus one that has a light that turns on and off all night long. I think the latter condition is worse if you're trying to sleep. Most hotels avoid this requirement by putting the lights at 24ft. It would be very hard to sleep when the lights

outside your room go up and down all night. I will try to attend the meeting on 10/7/19 to express my concerns in person. If I am unable to make, please consider these written comments in your deliberations.

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<http://www.goletazoning.com/public-comments.html>

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