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To: [Andy Newkirk \(anewkirk@cityofgoleta.org\)](mailto:anewkirk@cityofgoleta.org)
Subject: FW: Comments for Feb 12 2019 DRB hearing
Date: Monday, February 11, 2019 5:49:00 PM
Attachments: [ZO Sign Ordinance Comments Feb 2019.doc](#)
[ZO Design Review Section comments.doc](#)
[February 2019 Lighting Ordinance Comments.doc](#)

From: Cecilia Brown <browncnight1@cox.net>
Sent: Monday, February 11, 2019 11:53 AM
To: Mary Chang <mchang@cityofgoleta.org>
Cc: Masseybarb@aol.com; browncnight1@cox.net
Subject: Comments for Feb 12 2019 DRB hearing

Hi Mary! Would you please ensure that the DRB receives the comment letters at the 3 attachments. This submission is being made jointly by Barb Massey and me on the proposed zoning ordinance pertaining to lighting, signs, and Design Review, all under the purview of the DRB. Ms. Massey will be at the DRB to provide comments and I hope, because there is much material to be discussed, that she is given ample time to do that. We spent much time over the weekend to get our comments to you and we hope that the DRB takes as much time as needed in reviewing the proposed ordinance and our comments. There is much material and detail to be considered.

I hope each DRB member was given a hard copy of the proposed zoning to facilitate their review. , Also, to facilitate their review, a draft ordinance should be available since we reference certain sections in that document without full replication of the information we reference.

For us retired DRB members (both Barb and I have served on the DRB at various times) and for many community members, we know and appreciate the work of the DRB which strives to maintain and determines the character of our community.

The new zoning ordinance will facilitate that, but “devil is in the details” and it is important to consider the details in this document.

Because there are many issues addressed in the three sections of the ordinance and there has been little time for public review of them, we are requesting that the DRB continue their hearing to another date to facilitate further public comment.

Thank you very much,
Cecilia Brown
Barbara Massey

February 2019

Comments on draft Zoning Ordinance Chapter 17.58 Design Review

Please accept my comments as outlined below. As a decade long member of the DRB, I understand and appreciate the role the DRB plays in the design review process and would appreciate your full consideration of my comments. Thank you, Cecilia Brown

Section 17.58.050 DRB Levels of Review

1. Reconsider the appeal point in review process: Most valuable to your process for achieving well designed projects is the revised format for review, that is the return to the Conceptual, Preliminary, and Final review sequence. This was the process the DRB used at its inception and used for many years. It worked well. The truncated version later employed didn't achieve its purpose for a variety of reasons. However, when initially used by the DRB, the appeal point was at Preliminary Review, not at Final as currently envisioned. Setting the appeal point at Final Review when working drawings have been made means that should an appeal be filed on project design, the entire set of working drawings may have to be redone. This is time and expense to the applicant. It would be preferable to set the appeal at Preliminary Review when working drawings have not been made but the design has generally been vetted. Usually it is the design elements of the project that are appealed and these are well known at the end of the Preliminary Review.

Request: Change the appeal point for the design review process to Preliminary Review.

2. Storypoles: The addition of storypoles in the conceptual review process is needed and welcomed. Thank you! However, there needs to be storypole guidelines established to assist in understanding the size, bulk, scale of a project, determining neighborhood comparability, and impacts to views. Please see the link to storypole guidelines from the County of Santa Barbara and a copy provided at end of this document.
<http://sbcountyp Planning.org/PDF/Story%20Pole%20Guidelines%20Final%201-09-09.pdf>

Request: Develop storypole guidelines to assist applicants in erecting storypoles.

Section 17.58.060 Findings for Approval

1. Lighting Plan needed in order to assist DRB in making their findings. DRB tasked with reviewing exterior lighting for dark sky compliance. In order to do that DRB needs to see a lighting plan which depicts various aspect of the lighting components for the project (e.g., Cut sheets of proposed fixtures, whether there is light trespass at property boundary, etc.). DRB historically reviewed and currently reviews lighting plans in order to make their dark sky compliant and other findings. Might be impossible without such a plan. Please see my comments on Zoning Ordinance Chapter 17.35 and

Request: Add Lighting Plan requirements in Chapter 17.35 Lighting

County of Santa Barbara Storypole Guidelines

Story Pole Guidelines

Purpose Story poles are a tool to assist decision-makers, staff, and the public in the review of development projects. They assist in making findings regarding appropriate mass, bulk and scale, neighborhood compatibility, and/or minimization of impacts to important public scenic views. Therefore, the accuracy, readability, and articulation of story poles are important to fully understand the proposed project. However, actual site improvements are subject to compliance with approved plans, rather than with representations from the story pole installation.

When Required Story Poles are most commonly requested, on a case by case basis, by the Board of Architectural Review. This document provides guidelines for the installation of story poles. Each of the County Boards retain jurisdiction to modify the requirements for individual cases.

Standards

1. Story Pole Plan – A story pole plan shall be reviewed by County staff (and the BAR chair where appropriate) in coordination with the applicant prior to installation of story poles. The plan shall include the following:
 - a. Placement of story poles: Sufficient to show the mass, bulk, height and scale of the structures and measured from a permanent benchmark on or near the proposed project. The story poles do not have to and should not depict all the articulations of the building. Major building corners, finished floor levels, significant elements, length of façade within a specific view shed, ridgelines, and a scale should be shown. It may be necessary to stake more than just the four corners of a structure if significant spans are involved. Outline the building footprint with stakes and construction netting or other visible project element. Changes proposed in grade, with finished height and elevations, should be shown by color coding the stakes/poles.
 - b. Materials proposed to be used for story poles. Story poles should be made of 2x lumber (PVC piping is acceptable in some instances) or other sturdy material and 12” wide snow or construction netting. In addition, they should be braced for safety purposes. The orange construction/snow fencing connections should clearly depict the roofline and ridgelines Installed story poles, site key, and associated flagging and/or netting shall be of materials and method of installation to withstand reasonably foreseeable weather or other site factors (i.e. grazing) for the required duration of display.
 - c. Legend: For large or complex projects (at the discretion of the BAR), a story pole plan and legend (11” x 17” black and white) will be posted on the project site and the County’s website to inform viewers about the project.
 - d. Proposed date of installation: The plan is to include the date the story poles are proposed to be installed, as well as the length of time the story poles will remain on site.

2. Story Pole Installation – The story poles shall be installed according to the story pole plan, and:

- a. Certification: The Story pole installation shall be certified by the licensed professional (surveyor, architect, landscape architect, or contractor) who prepared the story pole plan and/or installed the story poles. The certification shall be submitted to staff after installation of the story poles, but before review by the Board of Architectural Review or other review body.

- b. Timeframe for installation: Story poles shall be installed at least three days prior to the BAR meeting.

- c. Story poles shall remain in place for a minimum of seven days after the BAR meeting.

- d. If story poles are damaged, replacement may be required as directed by the BAR.

Staff Responsibility 1. Notification of Planning Commission or Zoning Administrator if story poles are installed for a project on which they are the decision maker. 2. Photo-documentation of the installed story poles

February 2019

Comments on Revised Zoning Ordinance Chapter 17.35 Lighting

The language in Section 17.35.040C Light Trespass: (All lighting must be directed downward and shielded to prevent light trespass and glare onto adjacent properties....) doesn't reflect nor is it consistent with the language used in the General Plan Visual Resource section (see below) which requires lighting to be "**Fully Shielded, full cut-off, and...to prevent sky glow**" and to be consistent with the ZO language in Chapter 17.58 Design Review where findings the DRB needs to be make in their project review is "**dark sky compliant exterior lighting**" (section 17.58.030 B. 10) and "**all exterior lighting....is dark sky compliant**" (Section 17.58.060 I).

References: General Plan policies: **VH 1.4 Protection of Mountain and Foothill Views**. [GP/CP] and **VH 1.5 Protection of Open Space View** use the following language for lightening: **Downcast, fully shielded, full cut off lighting of the minimum intensity needed for the purpose.** Another emphasis on "Dark Sky" lighting standards is found in policy **VH 4.12 Lighting: A. Fixtures shall be fully shielded and have full cut off lights to minimize visibility from public viewing areas and prevent light pollution into residential areas or other sensitive uses such as wildlife habitats or migration routes. B. Direct upward light emission shall be avoided to protect views of the night sky."**

Request change in Section 17.35.040C to be consistent with General Plan and other zoning ordinance policies.

Light Trespass wording must be changed to" All lights must be directed downward, and fully shielded and full-cut off to prevent light trespass or glare onto adjacent properties and to prevent sky glow."

Section 17.35.020 Applicability

Request making changes as described below in the Exemption section

4. Other jurisdictions, like the county and school districts, need to be included in this section. See the draft ZO with more complete language
5. Holiday Lights: What holiday period is being considered here, it is not clear, it is Valentines Day, July 4th? The draft zoning ordinance language about limiting the use of holiday lights during the holidays at year end needs to be restored.
6. Temporary Exemptions: The section must include reason for the requested exemption. Number of renewals must be limited.

Recommend a new exemption for LED string lighting on trees be considered.

Section 17.35.030 Prohibitions

There should be a prohibition on unshielded string bulb lighting like that seen on the patio of the Goodland Hotel. Request prohibition of this kind of unshielded lighting be added to this section.

Section 17.35.040 General Requirements. The language in this section states that the color temperature of each lamp must not exceed 3,000K. Request review how was this standard chosen and for what use? To have 3,000K in anything but parking lot lighting is excessive. City will be using 2800K in streets lighting in their new street lights replacing SCE street lights.

Section 17.35.050 Supplemental Requirements

D. How was the 5.0 foot candle determination made? Is this based on the use of LED lighting standards or some older types of lighting? Request review this standard and change to a more relevant standard.

The DRB is responsible for reviewing outdoor lighting. There needs to be a way for them to do that and that is through a lighting plan. They review such plans now and adding a section on lighting plans would codify that practice. To assist in thinking about what requirements might be on the lighting plan, and there may be others required under the California building Code, the City of Goleta Outdoor Lighting Guidelines has a list of what is required and are repeated below as an example. Request a new section be added to the lighting ordinance so that DRB can do their review of lighting projects.

Section 17. XX. XXX Outdoor Lighting Plans

An outdoor lighting plan is required as part of a development application or land use permit with an application for all new outdoor lighting installations on commercial, industrial, office, City of Goleta property and certain residential applications (e.g., multi-family housing). Submittals for other types of projects may be required by the City due to project location, size or proposed use as necessary.

1. An outdoor lighting plan shall include at least the following.
 - a. A site plan showing the location of all buildings, parking and pedestrian areas or other areas where lighting is proposed on the site.
 - b. The proposed location, mounting height and aiming point and angle (in the landscape plan to demonstrate coordination of fixtures and tree plantings. The location of light fixtures and landscaping on adjacent properties and on the street right of way that effect lighting/landscaping on the project is also necessary. For pole lights, a composite drawing of the base, pole, and fixture with the drawing to extend from the ground surface adjacent to the light assembly to its highest point. Foot candle illumination throughout the property and at the property line needed to ensure understanding of light trespass at property lines and lighting levels throughout the parking lot
 - c. Manufacturer specification sheets, cut-sheets, or other manufacturer provided information for all proposed outdoor lighting fixtures to show fixture diagrams, lamp types, wattage, initial lumen output, vertical cut-off level, and shielding information.

Elevations of the building with mature landscaping, poles and fixtures superimposed. If building elevations are proposed for illumination, drawings for all relevant elevations showing the fixtures, the portions of the elevations

February 2019

Comments on Revised Zoning Ordinance Chapter 17.40 Signs

There is no information about the differences between what is now permitted in the City's current ordinance and what is in the proposed sign ordinance. These differences need to be known in order for decision-makers and the public to understand the implications of what is being proposed (e.g., Are there changes in square footage allowances from what currently exists?). And some signs proposed in the draft ordinance were eliminated.

In some cases, proposed ordinance language is contrary to the policies in the General Plan. Below are those policies against which proposed regulatory language must be vetted. If the standards don't meet these policies, then they must be eliminated or changed in order that the proposed sign ordinance is consistent with the General Plan.

General Plan Policies regarding signage

Policy VH 1.4 Minimize structural intrusion into the skyline

Policy VH 2.3 for development along scenic corridors... (101 and Hollister) limit height and size of structures and minimize usage of signs

Policy VH 3.7 Community Design Character mentions that "character is enhanced through the use of restrained and tasteful signage that conveys an orderly and attractive appearance and enhances city image

Policy VH 4.13 Signage

c. Signs shall not detract from views ...or streetscape. Protrusion of signs and/or sign structures into the skyline should be minimized.

f. Internally illuminated cabinet signs shall be prohibited

g. Billboards and other off-premise signs prohibited

Review and provide comments or recommended changes to our questions on each of the sections of the proposed sign ordinance addressed below.

Section 17.40.030 Exempt Signs

D. Construction signs Where were the numerical standards obtained? Please review the standard for 8ft max height for construction signs in non-residential areas. This seems excessive.

E. Directional Signs: The draft ordinance had a better definition of directional signs, why was it changed? This one in the revised ordinance is too truncated to know what is allowed on a directional sign. Reinstate the draft ordinance language

H. Government Signs. The draft allowed other types of regulatory signs needed on commercial establishment windows and doors. Why was this information deleted?

Equipment signs: Why was this section eliminated in the draft ZO? What is occurring is that advertising signs are appearing on gas station pumps, like the small TVs on the gas station pumps at the Gas Depots. These kinds of signs are pure advertising, have nothing to do with equipment identification and add to the visual clutter of the area...

Window Signs in Commercial Areas. The draft ordinance restricted signage on commercial window signs as follows: “In non-residential zones, window signs not exceeding 10 percent of the area of the window and transparent door frontage on any building façade (were exempted). Any sign either hung within two feet of a window or attached to a display located within two feet of a window is considered a window sign and must be counted as part of the permitted signage.”

The proliferation of all kinds of signs on non-residential storefronts, most of which are primarily advertising, add clutter to shopkeeper’s windows, degrade the streetscape and allow encroachment of sign area promulgated elsewhere in the ordinance, and is contrary to the General Plan policy about ionizing signage...

Explain why this important standard for signs in non-residential areas was eliminated?”

17.40.040 Prohibited Signs Request is to add additional prohibited types of lighting
Add to **E. Other Light Types. Light Bulb Strings.** External displays which consist of unshielded light bulbs, festoons, and strings of open light bulbs. These kinds of lights are not dark sky compliant.

Add to **L. Roof Signs.** “Signs on rooftops structures such as penthouses, walls, or mechanical enclosures.

Add to **O.** “Signs within five feet of a fire hydrant, street sign, or traffic signal.”

Add to this section the prohibition of **Billboards and other off-premise signs.**

17.40.060 General Provisions for All Sign Types

K. Materials. Description of materials isn’t sufficient to prohibit signs to be made of less than durable materials. Now, some signs are being covered up with plastic-like covers when sign face needs to be updated to a new tenant or sign content changed, like the sign covering the cabinet sign pole sign at Calle Real and Kellogg. There needs to be explicit language to prohibit the use of less than durable materials for signs. There was such language in the draft ordinance. Request add additional standard for sign materials.

I. Changeable Copy Signs. Review height standards, color considerations and possible prohibition along scenic corridors.

1. Besides gas stations, indoor theater marquee signs, there are time and temperature signs in the city, these later types of signs need to be included in this section, particularly because they change copy more frequently than the 2x per day, an ordinance standard.

2. Color: what color is allowed for electronic changeable copy signs? One color, like the red in the gas fuel pricing signs or the theater marquee sign or white in the time and temp signs. The intent should be just one color for the changeable copy.

Prohibit color changes throughout the day for the electronic changeable copy signs..

3. Height: Existing fuel pricing signs and marquee signs are currently higher than the 10ft height limit of the ordinance. Also, height for an electronic changeable copy sign for a public/quasi public use (change language in draft ordinance from semi-public use to quasi public since no definition for semi-public use) not might mean a freestanding sign at 10ft. This is too tall and not in accordance with general plan standards addressed elsewhere. Review these standards.

4. Prohibition in certain areas: There is a General Policy Plan policy to minimize the use of signage along scenic corridors (i.e., Hollister Ave). Changeable copy signs should be prohibited along these corridors.

5. There is no mention of the glare from any of these LED electronic changeable copy signs because of the intensity and quantity of LED lights as in the gas pricing signs, like the one at the Fuel Depot. Request you address this in the ordinance.

Section 17.040.080 Signage allowances for specific Uses and Special Signs

Freestanding Signs. If a freestanding sign is allowed to be 4ft tall and a max 100sq. feet for sign area, then that means the length would be 25ft. Or if the sign is allowed to be 6ft area dimensions need to be reviewed since not appropriate considering General Plan visual policy standards to “minimize signage.” Review max area for dimensions.

Menu Boards: Missing from this or any section in the ordinance is the provision for “Menu Board for drive through restaurants” sign in the current ordinance. These kinds of signs are in use in the City and need to be added to the proposed ordinance. Even though there won’t be many drive-through restaurants in the future, standards for such signs must be allowed. Request that Menu Boards be added to proposed sign ordinance.

Below are some standards from the SB County ordinance 35.38.100e. p. 3-79 that could be used for review...

1. Not to exceed two on-site single face signs
2. Locations limited to adjacent vehicle queuing lane for the service point of the drive-through
3. Free standing menu board shall not exceed eight feet in height as measured from the finished elevation of the vehicle queuing lane.
4. Menu board wall signs shall not exceed the height of the eave of the roof over the wall on which the sign is located
5. Not to exceed 36 square feet total in combined area of both signs unless a sign modification.

17.40.090 Standards for Specific Sign types

A-Frame Signs These are portable signs and not allowed per section 17.40.040. Resolve the discrepancy of prohibiting and then allowing them in this section.

Prohibit these signs in the public right of way or on any walkway on private property.

Section 17.40.110 Non Conforming Signs

A. **Continuance and Maintenance.** Does this section include allowance for a new sign face if there is no other maintenance or repair needed on the sign? DRB has allowed and reviewed throughout its history a new sign face on pole signs, which are prohibited under this ordinance. Address when a new sign face is allowed on legal non-conforming signs.

Additional Consideration not addressed in the proposed Sign ordinance.

Why is there no mention of Old Town guidelines in the proposed sign ordinance? This needs to be corrected... There is a General Plan Policy VH 4.2 Old Town which applies. It states that all design shall be consistent with the three pages of the sign guidelines in the Old Town Heritage District Architecture and Design Guidelines.