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Subject: Comments on Proposed Lighting Ordinance
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First of all, congratulations on completion of all the planning commission workshops. Surely this effort has been a test of endurance and fortitude for all the planning staff involved, but who nonetheless remained enthusiast until the end. Appreciate the accessibility of staff to the public throughout. The benefit of your robust outreach strategy is there seems to be more community interest and participation (even beyond the RV issue) in city land use issues. This is really good for the community, so thanks for all..

Since I was unable to stay for Thursday's planning commission workshop and their discussion on lighting, I would appreciate your accepting my comments below.

At a previous planning commission hearing on lighting, I was left with the impression that staff was going to incorporate some of the language and considerations from the International DarkSky Association (IDA) Model Lighting Ordinance (MLO), <https://www.ies.org/product/model-lighting-ordinance-mlo-with-users-guide/>

I would hope this is the case since this MLO provides current thinking on lighting standards, particularly the use of lighting zones to delineate appropriate light levels in various kinds of land uses (i.e., residential, commercial, etc., see page 5 of the MLO). If this scheme has not already been incorporated into the proposed final lighting ordinance, I request its addition. There is much value in this approach since one of its purposes is to eliminate overlighting and to promote dark sky standards, among other worthy considerations to long to address here.

Interestingly, no where in the MLO is there any one standard used for the correlated color temperature of lighting. While there is a place in a lighting ordinance for discussing the effects of color temperature, I believe it is inappropriate to codify a single numerical standard. One standard such as 3000K won't work everywhere. It all depends upon the site and the purpose of the lighting. Higher color temperature lamps are currently found in shopping center parking lots, like the Calle Real Center which recently upgraded their parking lot lighting to LEDs. It is not 3000k by the looks of the whitish bluish light coming from the luminaires. Other lighting in commercial uses like car dealer parking lots and under gas station canopies probably have and need higher color temperature lamps also.

It is a worthy intention to limit the blue rich light in white LEDs because of their effect on human health and in preserving dark sky standards in the city . Rather than codifying one numerical standard in the ZO, I would think it would be preferable to have a section discussing LED color temperature, its applicability in certain sites/situations and the reasons for limitations on very high color temperatures. To assist DRB decisionmakers who review lighting plans in making findings, I recommend the addition of such language in a revised DRB finding. (I've taken the liberty of proposing a complete revision to the exterior lighting finding since the current one needs updating and included is a section on LEDs.)

Revised DRB Findings for Approval Section 17.58.060

Exterior lighting: dark sky compliant; uses the least amount of light needed for the purpose and the site; minimizes offsite impacts and glare; the luminaire is appropriate in design, size,

height, location, and properly installed; has adaptive controls like dimmers, timers and motion sensors and is turned off at night; and any LED lighting minimizes blue light emissions.

Thank you for your consideration of my comments. I look forward to the completion of the Zoning Ordinance as I am sure you do too!

Best wishes,
Cecilia Brown