Date: August 15, 2021

To: Ivins City Council
From: Mike Scott
Re: Proposed Outdoor Lighting Ordinance

Here are recommended changes to the proposed Outdoor Lighting Ordinance that is attached to the Agenda for the August 19, 2021 City Council meeting.

Page 3 – Backlighted Sign or Lettering. There was a discussion at a recent City Council meeting about what is a "backlighted" or "front lighted" or "internally illuminated" or "halo" sign at least with regards to what type of sign was going to be installed at Canyon Crossing. I don't think things were clarified at the meeting and nothing has been added to the draft ordinance to clarify the definitions. Suggestion: To eliminate confusion, include photos of acceptable examples for each of these definitions.

Page 4 – Add definition for "correlated color temperature (CCT). It is referenced on page 7 so there should be a definition, such as: A measure of the color properties of light emitted by lamps expressed in degrees kelvin (K).

Page 4 – Front lighted lettering or sign. See comments for backlighted sign or lettering. To eliminate confusion, include a photo of an acceptable example.

Page 5 - IESNA. The organization now goes only by IES, the Illuminating Engineering Society. Also change references to IESNA in 7 other places in the document.

Page 5 – Add definition for internally illuminated sign. The term is used on page 14 section 20(d). Suggested definition: "A sign using semi-opaque materials for sign text and logos such that the light emanating from the sign is diffused and the light source is concealed. Transparent or clear materials are not allowed for sign text and logos. Non-text portions of the sign (e.g., background and graphics other than the logo) shall be made of completely opaque material." See comments for backlighted sign or lettering. To eliminate confusion, include a photo of an acceptable example.

Page 7 – (1) Type of Lights Recommended: LED Lamps and other lighting technologies, current or future, that have similar or even preferable better energy efficiencies. (Eliminate "even preferable")

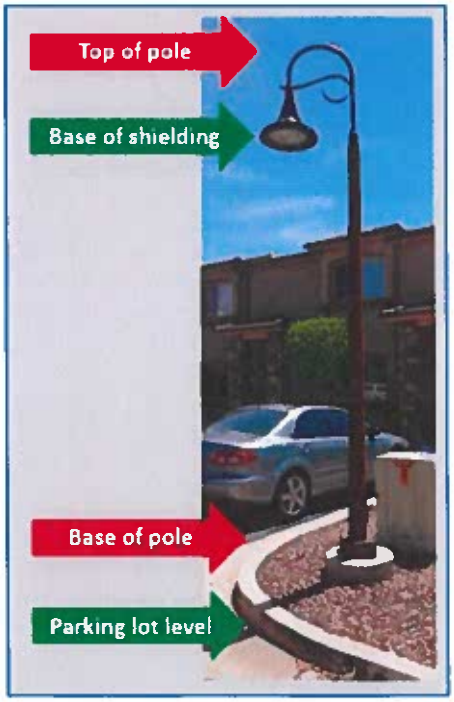
Page 7 – (3) Color/Temperature: Simplify this to state, "All residential and non-residential outdoor lighting shall have a correlated color temperature (CCT) of not more than 3,000 degrees Kelvin." Note: Do not require 3000K plus or minus 200 degrees as stated in the draft – just make that the maximum so lighting may be as much lower than 3,000K as people want. Eliminate 3(a) and 3(b).

Page 11 – 11(b) – Highlighting, Backlighting. This states, "Lights must be partially shielded" but there is no definition of partially shielded. Suggested wording: "The light source must be shielded so that it is not visible beyond the property boundary."

Page 12 – 13(b) Residential security lighting. Should versus shall. Suggestion: Use shall, particularly since this section gives the option of timers or motion detectors. Also, whether you decide on should or shall also state that "Motion detectors shall not be triggered by movement or activity located off the property on which the light is located and set to turn off no more than 5 minutes after detected motion ceases."

Page 13 – 17(d) Parking lot lighting. This section states, "Height of parking area light poles should be in proportion to the building mass and height, and no more than fourteen (14) feet high."

1. I'm not a grammarian, but since the sentence uses "should" for one requirement, it might be interpreted that "should" also applies to the 14-foot height limit. Even if it doesn't, and the 14-foot limit is the limit, clarifying this by adding a "shall" for the height limit avoids confusion for non-grammarians like me.
2. Some "ornamental" poles have the top of the pole extending above where the light source is located, as shown in this picture. I believe the goal is to limit how high the light source can be, not the pole.
3. Some parking lot poles are mounted on a concrete pad, or berm, or some other built-up structure. The pole in this photo is mounted at least a foot above the parking lot surface. So, a pole may meet the 14-foot requirement, but the luminaire may be more than 14 feet above the surface it is meant to illuminate. Rocky Vista University is another example, where the poles are 16 feet but mounted on a 4-foot concrete base, making the luminaire 20 feet above the parking lot.
4. Solution for #2 and #3 above – change the wording to: "Height of parking area light poles should be in proportion to the building mass and height and the point where light is emitted from the luminaire shall be no higher than 14 feet above the level of the parking lot surface."



Page 13 – 19(b) Residential security lighting. Should versus shall. Suggestion: Use shall, particularly since this section gives the option of timers or motion detectors. Whether you decide on should or shall, also state that "Motion detectors shall not be triggered by movement or activity located off the property on which the light is located and set to turn off no more than 5 minutes after detected motion ceases."

Page 13 – 19(c) Private sports court lighting: The pole height should include the more detailed definition of height suggested for parking lot poles. The higher the luminaire is from the sport surface, the more the light will spread and the farther away the light source will be visible. That was one of the reasons the Rocky Vista lighting was so noticeable. Suggestion: Instead of 20 feet use 14 feet for pole height for private sports lighting.

Page 14 – 20(d) Internally illuminated signs. Suggestion: Change wording to match the definitions: "Are preferred to signs lit by a spotlight. Backlighted signs or front lighted signs are allowed as long as there is no glare, and the sign meets the maximum lumens restriction above."

P14 – 21(e) Take out "(f)"

Page 14 – 22(b) Prohibited lighting. There should be a definition for "holiday." Merriam-Webster has a couple of definitions. One is, "a day on which one is exempt from work." So, every day is a holiday for retired people. Another is, "a day marked by a general suspension of work in commemoration of an event." Leaving holiday undefined is problematic. Defining holiday using Merriam-Webster's first version is too open and the second version is too limited. I don't have a suggestion. Good luck.

Page 14 – 22(f) Prohibited lighting. After prohibiting neon lights, the new draft eliminates the prohibition of "linear fluorescent lamps" that is in the current ordinance as a generally prohibited light. I recall from the Council's discussion about this that the Council thought these lights are no longer available. This type of light appears to be more commonly called "fluorescent tube lights." The St. George Home Depot currently has many of them in stock, so they are still readily available. Most are "linear," but some are u-shaped or have other shapes. Maybe the intent of the original ordinance was to only prohibit linear lights but not prohibit other shapes, but that doesn't seem logical. Suggestion: Continue the prohibition with the revised name of "fluorescent tube lights."