

**ATTACHMENT 5
PUBLIC COMMENTS**



April 30, 2025

Humboldt County Planning Commission
825 Fifth Street
Eureka, CA 95501
Sent via email

Subject: Comments on Humboldt County Draft Inland Outdoor Lighting Ordinance

Thank you for your thorough review of the draft light ordinance and for incorporating public input during the March 20th meeting. We especially appreciate your attention to color temperature and we strongly support the proposed 2700 K limit. We also support extending the ordinance's coverage to include County and public facilities.

To strengthen the Inland Outdoor Lighting Ordinance, we support incorporating limits on brightness (intensity) and including street lights under County jurisdiction.

Brightness (Intensity)

Incorporating brightness limits for both commercial and residential properties is critical to effectively reduce light pollution. Even without light trespass, excessive brightness can disrupt the circadian rhythms of residents and wildlife and obscure the night sky.

Dark Sky International (DSI) recommends maximum luminous intensity levels of <3000 lumens for commercial areas (roughly 40–75W LED bulbs) and <1000 lumens per luminaire for residential areas (16–25W LED bulbs). Most modern bulbs include lumen ratings on their labels.

General Plan Guidance on Light Pollution

Chapter 10 (Conservation and Open Space Element) directs the county to develop regulations for intensity, directional control, signage, enforcement, and incentives:

- SR-IM5: "A. Intensity – Acceptable standards shall be defined for various land uses and development types specifying the maximum allowable total lumens per acre." (p. 10-51) [or a similar measurement consistent with the draft ordinance, such as foot-candles (candle/square foot) or lux (lumens/square meter)]

The County General Plan measures were shaped with considerable public input, and they should be incorporated into the ordinance.



Street Lighting

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The current draft does not include street lights, although the County General Plan provides relevant guidance in Chapter 5 (Community Infrastructure and Services):

- IS-P20: "Street lighting shall be required when necessary to improve public safety in urban and suburban areas and Village Centers." (p. 5-7)
- IS-S9: "Where development is required to install streetlights, they shall be designed to block upward transmission of light, avoid light trespass, and achieve design illumination in prescribed areas with limited scatter." (p. 5-9)
- IS-IM17: "Prepare street lighting standards that allow for community-specific priorities and standards and that specify when streetlights are required based on intersection type and functional classification. Establish lighting design criteria, considering AASHTO and International Dark-Sky Association guidelines." (p. 5-11)

Thank you for the opportunity to comment, and your attention on this important measure to reduce light pollution in Humboldt County.

Sincerely,

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