



December 6, 2019

***Draper City Planning Division
Administrative Interpretation***

RE: Moda Town Center Street Lighting Interpretation

This letter is in regards to a question that has arisen regarding lighting standards for street lights on public rights-of-way. Moda Town Center is a live/work development currently under construction at 12553 South Fort Street. The site plan for the development was approved by the Planning Commission on January 25, 2018 and included a lighting plan. The lighting plan not only included on-site lighting but also street lighting of the Fort Street public right-of-way. The Engineering Division has stated that the lighting quantity and locations approved on the lighting plan for Moda Town Center Photometric drawing do not meet engineering standards.

The Draper City Municipal Code (DCMC) addresses street lighting in at least two places -- DCMC Title 9 Land Use and Development Regulations and the DCMC Title 11 Streets and Public Improvements.

The lighting standards contained within DCMC Chapter 9-20 apply to "streets" However, the design standards in DCMC 9-20-040 are designed for on-site lighting. These standards include pole height limits, numbers, and illumination restrictions. In addition, illumination restrictions are required to be calculated to a parcels property line, not into the adjacent street. None of the design standards refer to the location and spacing of street lights in the public right-of-way.

9-20-020: SCOPE:

All outdoor/exterior lighting shall be in compliance with the regulations established by this chapter and any other chapters of this title. These regulations shall apply to all outdoor lighting, including, but not limited to, buildings and structures, recreational areas, parking lots, landscaping, streets, and signage.

DCMC Title 11 requires all streets and roadways to comply with the standards found within Title 11. This title sets and adopts specific standards for streets, including street light type, distance and spacing standards. In addition, DCMC Section 11-3-010 states that Title 9 standards shall apply to streets and roadways.

11-2-020: DEVELOPMENT STANDARDS, TECHNICAL SPECIFICATIONS AND STANDARD DRAWINGS:

The city council, on February 18, 1988, did adopt by resolution 2-18-88, certain development standards, technical specifications and standard drawings which shall be applicable to all streets and roadways within the boundaries of Draper City. These standards, specifications and drawings are prepared in booklet form so as to be available



to the public and those interested parties. All such streets, roadways, or public transportation corridors which come within the purview of these standards, specifications and drawings shall comply with those drawings, specifications and standards.

11-3-010: APPLICATION OF LAND USE AND DEVELOPMENT REGULATIONS:

The land use and development regulations of Draper City, Utah, which comprise [title 9](#) of this code, which apply to roads, streets and passageways, and in particular those dealing with streets, alleys and bridges, shall be applicable and binding on all streets, roadways, and public transportation corridors which shall be constructed, established, and designed within the boundaries of Draper City.

The engineering specifications adopted with DCMC Title 11 has two light standards for streets within the city. These standards set base, pole, lamp and luminaire standards for each street light type. Engineering regulations also set specific spacing standards for street lights, with them typically located at street intersections.

DCMC Chapter 11-2 specifically addresses the placement and spacing of street lights. It is the Zoning Administrators position that the Engineering specifications and regulations promulgated pursuant to DCMC Chapter 11-2 apply to lighting within public streets and roadways. The street lights on Fort Street shall follow those standards found within the Engineering specifications and regulations and not DCMC Chapter 9-20. Street lights in general should not be approved with the photometric drawings required under DCMC Title 9-20, and shall be reviewed by the Engineering Division against their specification and regulations.

If you have further questions, please contact me at jennifer.jastremsky@draper.ut.us or at 801-576-6328.

Respectfully,

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Cc File