



DOCKET ITEM #6
Text Amendment #2018-0007
Lighting for Congregate Recreational Facilities

Issue: (A) Initiation of a text amendment and (B) Public Hearing and Consideration of a Text Amendment to the Zoning Ordinance to: add new section 2-129.1 defining congregate recreational facilities; amend section 6-105 to delete the definition of congregate recreational facilities in the POS/Public open space and community recreation zone; add a new subsection 6-105(K) to replace special uses in the POS/Public open space and community recreation zone not included in the proposed congregate recreational facilities definition; and add a new subsection 6-403(F) to add lighting for congregate recreational facilities as a special use in height districts.	Planning Commission Hearing:	October 2, 2018
	City Council Hearing:	October 13, 2018
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Staff recommendation: Initiation and APPROVAL of the Text Amendment subject to compliance with all applicable codes and ordinances.

I. Issue

The purpose of this proposed zoning text amendment is to allow the use of taller light poles when the additional height will reduce light spillage impacts on neighboring properties. This proposed text amendment does not expand the number or type of recreation facilities for which lighting may be approved, nor does it make it easier for lighting to be approved on these facilities.

To accomplish this goal, the proposed text amendment:

Clarifies the definition of “congregate recreational facilities.” These are facilities such as athletic fields, dog parks, swimming pools and other recreation areas which require an expanse of unobstructed area. The text amendment would move the existing references to “congregate recreational facilities” from Section 6-105(B) into a new definition (section 2-129.1) and amend Section 6-105 to distinguish more clearly between “active” and “congregate” recreation uses.

Adds a new subsection 6-403(F) to add allow poles for lighting congregate recreational facilities up to 80 feet with a special use permit. The recommend change is intended to allow increased height for lighting structures for congregate recreational facilities that reduce the impacts of glare and light spillage, and to provide clarity for regulating such structures.

Poles for lighting are not specifically addressed in the zoning ordinance. The height of poles is regulated in accordance with the limits for building height in the applicable zoning district where the poles are located. The proposed amendment sets appropriate standards regarding height, placement, and visual impact of lighting for congregate recreational facilities, and clarifies requirements for a Special Use Permit.

The limitation on height as it applies to poles for lighting poses a challenge for lighting recreational facilities such as athletic fields, game courts, and other large open recreational areas where lighting is desired. Such facilities are limited in the placement of light poles in order to preserve open play space and require additional space for placement of the poles on the perimeter of such areas in order to maintain safety by keeping the lighted area clear of obstructions. In such recreational settings, the light pattern provided by the lights must consistently span the usable area of the field and provide uniform lighting. This requirement contrasts with lighting for parking lots, car dealerships, pedestrian paths, and other lighted uses where it is possible to place the light poles linearly or otherwise make accommodations for them within the spaces being illuminated.

Using shorter poles to light a large area requires the lighting to be aimed at an oblique angle. This causes glare for users of the facility, and glare and light spillage onto surrounding properties. Additional impacts caused by utilizing shorter poles includes higher energy use because more light is needed to project farther distances and the light is not being optimized to illuminate the intended surface, which in turn also increases the amount of reflected light.

In essence, the shorter that a light pole is in comparison to the distance from the light pole to its target (i.e. the width to the center of the field), the closer to horizontal the light must be cast. Without something to block it, such as a building or trees, the light may be perceived beyond

the “target” as glare or light spill. In contrast to shorter poles, taller poles allow the lighting to be directed at a more acute downward angle, or the light being cast is closer to vertical. In doing so, a higher proportion of the light being cast by light fixtures on a taller pole is “blocked” by the ground surface. Adding in technological advances in light fixture design such as shielding and reflective optics, the more-vertical angle of the taller lights may be leveraged to greater effect in reducing the impacts of glare and light spill.

The popularity of youth and group sports activities and outdoor recreation is placing an increased demand on field space in the City. Facilities where these activities take place are by nature usually located in the midst of residential areas where they can be conveniently used by the public. However, outdoor lighting if improperly designed can have a negative quality of life impact on the surrounding residents. Thus the design of lighting for such facilities must address the unique challenge of providing the high-quality, convenient recreational amenities that the general public demands and associates with a high quality of life, without diminishing the quality of life of the public located near the facilities.

Changes in technology pertaining to lighting for athletic fields and recreational uses allows better light control if greater heights are used. The zoning ordinance currently does not have a mechanism to allow greater height in order to accommodate better technology that helps mitigate the impact of lighting in terms of light spillage and glare. The zoning ordinance requires modification to keep pace with lighting design to create a standard approach for regulating lighting for congregate recreational facilities, and to reduce the impacts of lighting associated with this use.

II. Background

A. Current regulations

Light poles are currently regulated by the height regulations of the underlying zoning district for buildings or structures. The maximum permitted heights for districts where city recreational facilities are commonly found are shown in the following table.

Table 1
Existing Height Regulations

Zone	Maximum Height
Zone R-20, R-12, R-8, R-5 or R-2-5 and used for single-family dwellings	35 ft. *
Zone RA, multifamily	45 ft.
Zone RB, townhouse	45 ft.
Zone RM, RS, RT townhouses	35 ft.
Zone RC, apartments	150 ft.
Zone RCX, apartments	50 ft.
Zone POS, parks, recreation, open space	15 ft. **
Zone WPR, parks, recreation, open space	30 ft.

* 40 ft. for schools/churches. 60 ft. for schools w/SUP

** 30 ft. for bldg. or structure w/SUP

Most existing sites utilizing outdoor lighting for congregate recreational facilities are in the POS/Public open space and community recreation zone, single-family (“R”) zones, or in mixed use coordinated development districts (CDD). These facilities include places such as Witter Field, Hensley Park, Simpson Field and lighted fields and courts at Minnie Howard School which are located in the POS zone. Other facilities are located in residential zones such as T.C. Williams High School tennis courts (R-20), and William Ramsey School and Recreation Center (RA). CDD zones with various congregate recreational facilities include Ben Brenman Park (CDD9), Potomac Yard (CDD10), Carlyle (CDD1) and others. The types of existing lighted facilities include soccer fields, baseball fields, tennis courts, basketball courts, and dog parks. Numerous facilities may also be found on private property such as apartment or condominium complexes.

The proposed text amendment would not impact existing facilities, nor would it allow new congregate recreational facilities unless it was already a use permitted in the underlying zoning district. The amendment allows additional height with a special use permit, but there is no guarantee that such height would be granted. Other existing regulations pertaining to lighting still apply.

Some existing lighted congregate recreational facilities in the City, or portions thereof, such as Simpson Field are nonconforming in regards to their lighting and predate the requirements for an SUP or DSUP. In other instances the height of the existing lighting is not precisely known. The proposed text amendment provides clarity for future upgrades or replacement of lighting should lighting analyses indicate that additional height for light poles is desirable.

B. Outreach

The issues surrounding lighting for athletic fields were considered and discussed during the series of T.C. Williams Stadium Modernization Community Meetings. Staff attended the meetings, which were facilitated by Alexandria City Public Schools and held seven times throughout 2017

and 2018 in preparation for the DSUP application associated with the project. The proposed text amendment was still in the research and draft phases during the series of community meetings. While the proposed language was not presented at those events, ACPS communicated to attendees during the process that a text amendment was under consideration from the City. Staff considered feedback from the community discussions in formulating the proposed text amendment.

The Department of Parks, Recreation, and Cultural Activities has provided input to the proposed text amendment through the interdepartmental review process and RPCA staff also attended T.C. Williams Stadium Modernization Community Meetings.

The proposal is scheduled to be presented before the Parks and Recreation Commission on September 20, 2018, and the Federation of Civic Associations on September 26, 2018. Since these meetings will be after the publication of this report, feedback received will be included in a separate memo if needed.

III. Discussion of Proposed Text Changes

A. Article II – Definitions and Standards

Staff proposes an amendment to definitions and standards with the addition of section 2-129.1 defining congregate recreational facilities. With the proposed definition amendment, staff intends to provide more clarity in applying and interpreting the ordinance for both staff and the public.

A precedent for terminology pertaining to congregate recreational facilities is currently found in the POS/Public Open Space and Community Recreation Zone (section 6-105(B)) as a use permitted in the zone with a Special Use Permit. The existing definition includes numerous uses under the subsection heading “active and/or congregate recreational facilities.” The definition otherwise is not currently used elsewhere in the zoning ordinance.

The amended definition includes existing uses currently found in section 6-105(B) which staff considers congregate recreational uses while removing certain uses more appropriately considered active uses. The amended definition includes new language clarifying the nature of congregate recreational facilities in addition to stating those uses such as they are currently named in the existing definition.

B. Section 6-105 – Special Uses

Staff proposes amendments to the POS/Public open space and community recreation zone section 6-105(B) to remove the specific uses and facilities listed under the definition of congregate recreational facilities and allowed in the POS zone pursuant to a special use permit. Section 6-105(B) retains congregate recreational facilities as an allowable use in the POS zone, but references the proposed definition of congregate recreational facilities in section 2-129.1 to

describe what those uses and facilities are. These uses are not specific or exclusive to the POS zone and may be permitted in numerous zones.

An additional amendment creates section 6-105(K) to list two types of special uses that were part of the former definition of congregate recreational facilities in the POS zone special uses section prior to proposed amendment. These include indoor and outdoor roller skating and ice skating rinks and miniature golf courses. The addition of section 6-105(K) was created to maintain these as special uses within the POS zone so there would be no removal of existing allowable uses from the zone.

Staff notes that uses in section 6-105(K) (skating rinks, miniature golf courses) are already part of existing section 2-111 entitled “amusement enterprise.” However, the uses are listed and retained separately since adding the definition amusement enterprise to the allowable special uses in POS would create a new series of uses in the POS zone which were not previously allowed. This is because the definition amusement enterprise includes several other uses in addition to skating rinks and miniature golf courses.

C. Section 6-403 – General Regulations and Exceptions

Staff proposes amending section 6-403 to add lighting for congregate recreational facilities and dog parks to the general regulations and exceptions section of section 6-400 pertaining to height districts. Section 6-403 is a set of miscellaneous regulations pertaining to height, such as additional height or number of penthouses, and other mechanical equipment subordinate to the main building.

Section 6-403(F) would add regulations for lighting for congregate recreational facilities and dog parks to allow such lighting to be constructed to a height which otherwise exceeds that permitted by the zone, with a special use permit, and subject to additional limitations. Staff determined that Section 6-403 of the ordinance was the most appropriate section for these provisions since Article VI regulates special and overlay zones which may apply citywide, and which do not remove or add to uses otherwise permitted or prohibited by underlying residential, commercial, or mixed-use zones.

In addition to congregate recreational facilities Staff included dog parks in the subsection title to distinguish them from congregate recreational facilities but add them among the new lighting regulations. Dog parks are defined in the *City of Alexandria Plan for Dog Parks and Dog Exercise Areas* as adopted in 2000 with updates in 2011. The guidelines for new dog areas are a minimum one-half acre (21,789 square feet), with specific setbacks from residential property lines, streambeds or water sources. Dog parks are fenced, whereas dog exercise areas are not. There are six (6) City-managed dog parks in the city at present. At present two (2) existing dog parks have lighting. Dog parks are not specifically referenced in the zoning ordinance, but Staff considered the inclusion appropriate since dog parks have similar geometric requirements and are located in the same park areas and zones as congregate athletic facilities.

The amended section permits a maximum height of 80 feet for light poles for congregate recreational facilities and dog parks, with a special use permit. This maximum height has been

found to be an industry standard for the type of facilities and areas that exist or that could be anticipated in the City. The 80-foot height limit includes all luminaires and any associated equipment or hardware that might be installed on the poles. The proposed maximum height would also not create any non-conformities since there are no known poles in the City used for lighting congregate recreational facilities that exceed 80 feet.

The setback requirements for poles for congregate recreational facilities are a minimum of 25 feet from any right-of-way or residential property line. These standards align with existing increased setback requirements at zone transitions between commercial or industrial buildings and residential zones (section 7-900). Staff notes that additional regulations or factors will likely inform the placement of light poles to locations that exceed the required setback. There are additional setback and screening provisions for congregate athletic facilities near residential properties, and dog parks have additional setback regulations.

Lighting for congregate recreational facilities must comply with existing City ordinances. Code of Ordinances Section 13-1-3 regulates light spillage onto residential properties from adjacent residential or commercial properties. The maximum light spillage is 0.25 horizontal footcandles into the rear or side yard of the property used for residential purposes when measured seven (7) feet beyond the property line.

IV. Recommendation

The proposed text amendments reordain the terminology for congregate recreational facilities and provide additional clarification of the nature of the use. The proposed text amendment provides a standard process to permit additional height for light poles associated with congregate recreational facilities in the interest of reducing light spillage and glare if additional height serves that purpose through the Special Use Permit process, which includes Planning Commission and City Council review of such cases and required public hearings. The proposed text amendment for congregate recreational facilities does not conflict with or remove existing regulations pertaining to the compliance with existing lighting regulations.

Staff **recommends** initiation and approval of the text amendment.

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V. Proposed Text Changes

Note: **New text is bold and underlined**

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Article II. - Definitions

Section 2-100 – Definitions.

2-129.1 Congregate recreational facilities

A use devoted to recreational activities typically or often pursued as a group or team, such as athletic fields, children's play apparatus areas, archery ranges, court game facilities, indoor and outdoor swimming pools, amphitheaters, band shells, and outdoor theaters, not including drive-in theaters.

Article VI. – Special and Overlay Zones

Section 6-100 – POS/Public open space and community recreation zone.

Section 6-105 – Special uses.

The following uses may be allowed in the POS zone pursuant to a special use permit:

- (A) Public park and community recreation buildings, including enclosed and semi-enclosed shelters and pavilions, providing functions and facilities such as gymnasiums, meeting rooms, game rooms, arts and crafts centers, and dining and dancing facilities;
- (B) ~~Active and/or e~~**C**ongregate recreational facilities ~~such as:~~
 - (1) ~~Athletic fields, children's play apparatus areas, archery ranges and court game facilities;~~
 - (2) ~~Indoor and outdoor swimming pools;~~
 - (3) ~~Indoor and outdoor roller skating and ice skating rinks;~~
 - (4) ~~Amphitheaters, band shells and outdoor theaters, not including drive-in theaters;~~
 - (5) ~~Miniature golf courses and similar amusement and recreational facilities;~~
- (C) Commercial facilities customarily incidental and subordinate to the operation of public recreational uses, such as refreshment stands and small shops providing sporting goods and related services.

- (D) Cultural facilities such as botanical gardens, arboretums, nature centers, conservatories, historic sites, archeological sites, monuments and memorials;
- (E) Plant, tree and flower nurseries;
- (F) Public utility rights-of-way, man-made lakes, ponds and water courses, and similar public works compatible with the purposes of the POS zone;
- (G) Facilities for the lighting of any area in the POS zone for nighttime use;
- (H) Outdoor food and crafts market;
- (I) Temporary public school classroom trailers in conjunction with adjacent public schools. This subsection shall expire on June 30, 2006. Any trailers permitted under the authority of this subsection shall be removed by that date.
- (J) Public recycling center, provided that the director finds that the use does not interfere with an established active or passive recreation area; that no trees will be removed to accommodate the use, unless such removal is approved by the director of parks, recreation and cultural activities, and that uses adjacent to the recycling site are compatible with recycling activities.

(K) Indoor and outdoor roller skating and ice skating rinks, miniature golf courses.

Section 6-400 – Height districts.

Section 6-403 – General regulations and exceptions.

- (A) *Relationship of height to setback.* In all height districts, the allowable height of a building at any point shall not exceed twice the distance from the face of the building at that point to the centerline of the street facing such building.
- (B) *Mechanical appurtenances.* Chimney, towers, tanks, machinery, equipment, penthouses or other necessary mechanical appurtenances to a main building may be erected as a part of the main building to their required heights, regardless of any other height provisions or restrictions of this ordinance, provided that the following requirements are met.
 - (1) All necessary rooftop mechanical appurtenances and penthouses shall be concealed by or constructed of exterior architectural materials or features of the same type of quality used on the exterior walls of the main building in question.
 - (2) The following limitations apply to rooftop mechanical penthouses:
 - (a) Only one penthouse is permitted unless the number is increased by a special use permit;
 - (b) The penthouse shall not exceed 15 feet unless the height is increased by a special use permit;
 - (c) The penthouse must be limited in size to the minimum space required to house necessary mechanical equipment; and

- (d) No equipment may be placed above the roof of the penthouse to increase its height if such equipment could be located on the roof of the building itself.
- (3) For buildings located within the Old and Historic Alexandria District or the Parker Gray District, or for buildings outside such districts designated pursuant to section 10-300, the board of architectural review having jurisdiction of the matter may, after public hearing, waive or modify the screening requirement of subsection (B)(1) of this section, if the board finds such requirement to be architecturally inappropriate. The board of architectural review for the Parker Gray District may delegate the waiver authority under this subsection (3), making it an administrative determination pursuant to the requirements of section 10-203 of this ordinance.
- (C) *Church steeples.* No church building shall exceed the height for each zone, as limited by the Height District Maps, except that a church steeple may be erected to a height of 90 feet, or to a height in excess of 90 feet but not in excess of 150 feet with a special use permit. For purposes of this section 6-403(C), steeple shall mean a decorative or symbolic architectural component including a tower, spire, belfry or similar component extending above the ridge line of the building roof, or the highest point of the roof of the building.
- (D) *Reception or transmission structures.* All radio and television reception or transmission structures may be erected only in compliance with section 7-1205 and section 7-1206.
- (E) *Noncomplying buildings and structures.* Any building or structure lawfully in existence on June 24, 1992 which does not comply with the provisions of this section 6-400, shall be categorized as a noncomplying structure subject to section 12-100; provided, however, that any building or structure in existence on June 24, 1992 and immediately prior to such date categorized as an illegal building or structure because of height, shall continue to be so categorized.

(F) Lighting for congregate recreational facilities and dog parks.

(1) Subject to the limitations in subsection (2) below, poles for lighting the following uses may be constructed to a height which otherwise exceeds that permitted by the zone with a special use permit:

(a) Congregate recreational facilities and

(b) Dog parks.

(2) The following limitations apply:

(a) Poles include luminaire assemblies;

(b) Poles may be up to 80 feet in height;

(c) The applicant shall demonstrate that the increased pole height will mitigate the impact of lighting in terms of spillage and glare;

(d) Poles shall be setback a minimum of 25 feet from any right-of-way or residential property line; and

(e) Poles may be located in any zone.