

July 9, 2024

Knox County Planning Staff  
Engineering & Public Works  
205 W Baxter Ave  
Knoxville, TN 37938

Subject: Response to Staff Comment on Site Lighting Requirements

Dear Knox County Planning Staff,

I am writing in response to the staff comment dated 7/3/2024 regarding the site lighting for the project located at 1025 Concord Road File # 6-B-24-UR. We appreciate your detailed feedback and have taken the necessary steps to address the concerns raised.

All lights specified have (0) uplight per the BUG rating classification (Backlight-Uplight-Glare) as indicated on the photometric. A rating of (0) in the U category is the current expression for 'full cutoff' indicating that these lights have zero uplight causing light pollution and are compliant with the International Dark-Sky Association (IDA).

Regarding the height of the site lighting, we understand the recommendation for all pole and building-mounted lighting fixtures to have a maximum height of 15 feet from the finished grade, excluding the lighting installed on the underside of the gas pump canopy. Mounting the lights at 15 feet does not allow the light to illuminate the paved surface below and with this the minimum of 0.2fc will not be met. This light level of 0.2fc is a recommended standard for parking lots per the IES RP-8-21, table 17-2.

It is our recommendation, as the manufacturer of the specified lights as well as the lighting designers who created the photometric meeting the IES standards, to mount the lights higher so the light can spread more evenly and obtain the minimum 0.2fc on the paved surface for the safety of the patrons using the site.

Should you have any further questions or require additional information, please do not hesitate to contact me at 513-372-3153 or [sarah.fox@lsicorp.com](mailto:sarah.fox@lsicorp.com). Thank you for your attention to this matter, and we look forward to your feedback.

Sincerely,



**Sarah Fox, NCIDQ, LC, IES**

Director of Technical Design Services

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