



EMERGENCY SERVICES
LOUISVILLE, KENTUCKY

GREG FISCHER
MAYOR

EDWARD J. MEIMAN, III
EXECUTIVE DIRECTOR

March 14, 2019

To: Lacey Gabbard, PDS Case Manager
From: Beth Allen, Louisville Metro Emergency Services
Re: 19WAIVER1007

Lacey,

Metro Emergency Services has reviewed the waiver request associated with 19WAIVER1007 to allow the proposed street name of Southpointe Commons Boulevard to exceed the limit of 16 characters per LDC Chapter 6.3.5.1. Our agency is not in support of approval of this waiver for the reasons itemized below.

- Our agency maintains that the 16-character street name limit was established to protect public health and safety. Names are limited in length for several reasons:
 - To maximize visibility for drivers including emergency responders
 - If the sign becomes too long it becomes susceptible to twisting/bending/damage by high or heavy winds
 - On signs longer than 16 characters the sign mounting hardware isn't capable of withstanding the loading and the sign can come unmounted from the post and potentially hurt someone; especially with heavy winds. Additionally, the life expectancy is decreased for these reasons as well as the fact that a longer sign is more likely to be hit. Metro cannot even allow the developer to enter into a license agreement to install longer signs according to the Metro Public Works Sign Shop because the safety of our citizens is still at risk if the sign is installed (Longer signs were allowed historically but with the adoption of the overhauled LDC in 2003 this regulation was added to mitigate these problems)
- While this is a private access drive, it does intersect in at least one prominent location with a public one (Bardstown Rd). For private roads that intersect with public, Metro (not the developer or KYTC) still produces and installs the street signage at the public street intersection
- As soon as our agency became aware of the applicant's proposed name choices (Southpointe Commons Boulevard and Southpointe Boulevard) in June of 2018, we informed them of the conflicts and suggested alternatives such as reducing the number of characters in the street name to meet the regulation (Southpoint Common Boulevard). These suggestions were not taken.
- Finally, our agency has concerns about the precedent that would be set should this waiver request be granted. Should future applicants request similar waivers, what basis would there be for denial?

Beth Allen
GIS Specialist
Metro Emergency Services

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