

Alex Baker, MSc, LC, IESNA  
Lighting Program Manager, ENERGY STAR  
EPA/OAR/OAP/PPD/ESLB  
202.343.9272 (voice), 202.343.2200 (fax)  
baker.alex@epa.gov www.energystar.gov  
Mail: 1200 Penn. Ave NW 6202J, Washington, DC 20460  
Overnight: 1310 L St NW 927K, Washington, DC 20005

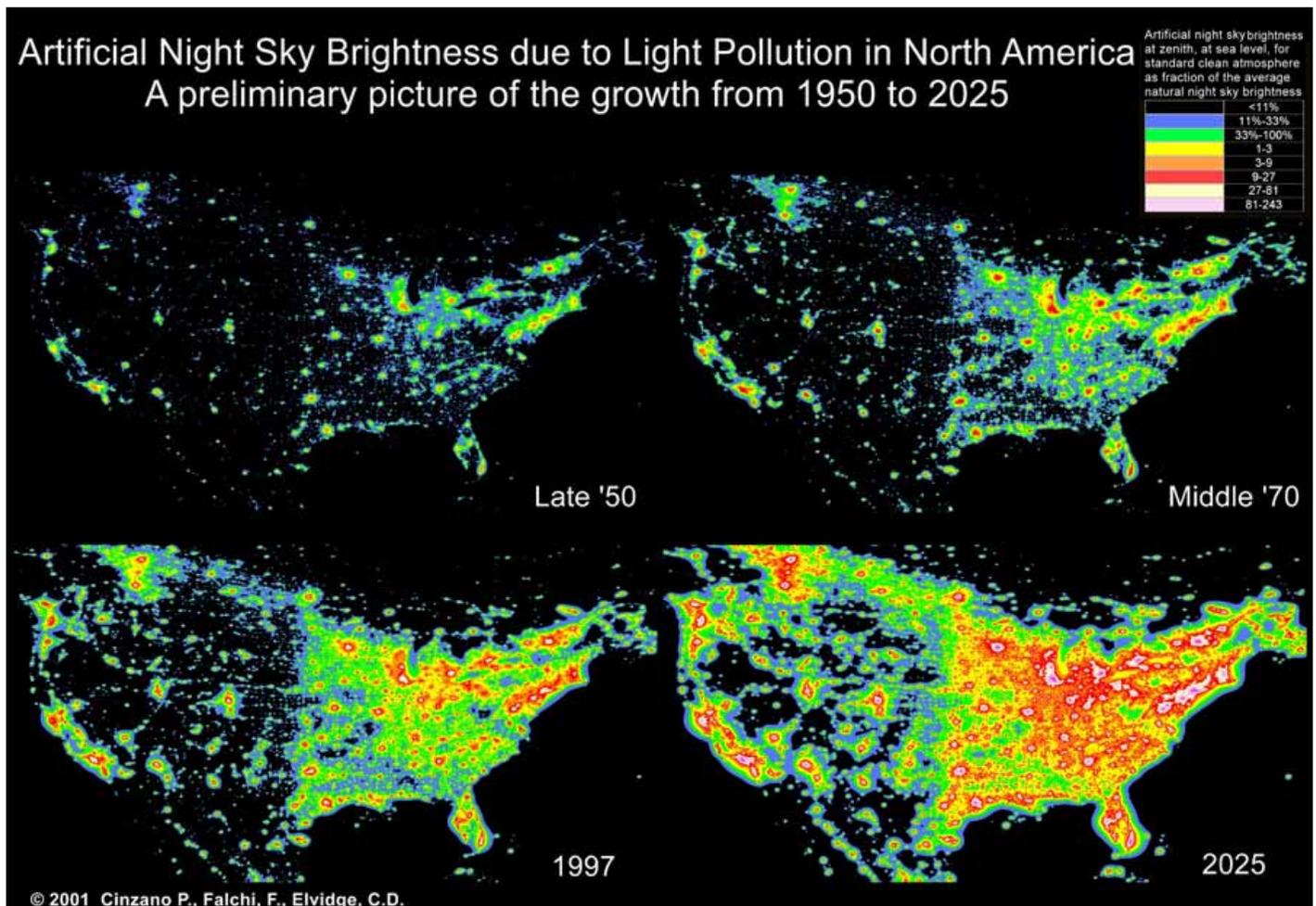
August 25, 2008

RE: Comments on revisions to the Energy Star Residential Lighting Fixture Specifications

Dear Alex Baker,

I would like to express concern over the proposed specifications. While LED lights have the promise of well-controlled, directional lighting; the Energy Star program appears to be ignoring good environmental design in favor of maintaining and promoting light polluted skies.

The National Park Service's website (<http://www.nature.nps.gov/air/lightscapes/>) mentions visibility conditions are worsening and natural night-time visibility conditions will disappear by 2025 for most of the contiguous US. Many Federal Class 1 Areas protected by the Clean Air Act have atmospheric discoloration so bad that the night sky has become orange or grey in permanent twilight and most of the stars are no longer visible (<http://mcrol.trianglealumni.org/class1.html>). Based on 1997 numbers, we have found that over half of the 149 Class 1 Federal Areas analyzed have moderate to severe light pollution problems.



The EPA in its October 1979, *Protecting Visibility: An EPA Report to Congress* first mentioned the problem of increased night sky brightness. Although bound by the Clean Air Act's requirement to return Federal Class 1 Areas to "natural visibility conditions" and the Prevention of Signification Deterioration in various others, the opposite appears to be occurring.

I would like to request the Energy Star program reevaluate its goals and criteria for exterior illumination and ensure it fits within the Clean Air Act's return to natural visibility conditions for 159 Federal Class 1 Areas and the prevention of significant deterioration in many others. Additionally, I would like to call your attention to the attached PDF discussing the negative effects on human health due to exposure to low light levels at night similar to those found in current exterior light fixtures that do not have good directional control.

References: <http://www.yosemite.org/naturenotes/NALightPollution.htm>  
[http://vista.cira.colostate.edu/improve/publications/Principle/EPA\\_Report/epa\\_report.htm](http://vista.cira.colostate.edu/improve/publications/Principle/EPA_Report/epa_report.htm)

Report on Class 1 Areas: <http://mcrol.trianglealumni.org/class1.html>

Sincerely,

A handwritten signature in black ink that reads "Robert A. Wagner". The signature is fluid and cursive, with the first name being the most prominent.

Robert Wagner  
9005 N Chatham Avenue  
Kansas City, MO 64154  
Missouri Night Sky Protection Act Homepage:  
<http://missourinspa.googlepages.com/>

Attached – Letter From Steven Lockley