

August 30, 2023

BY EMAIL

Diana Cortes, City Solicitor
Philadelphia, Pennsylvania
diana.cortes@phila.gov

Re: LED Streetlights Are Hazardous and Discriminatory

Dear Diana Cortes,

I am in receipt of your August 30, 2023, letter where you attempt to gaslight us and the public about the benefits of LED street lighting, while ignoring the harm. Your letter willfully and purposely ignores the concerns that we raised about the LED streetlight conversion project, showing a contempt for public comfort, health, and safety, and the rule of law.

Because you ignored the issues we raised, I request a response to direct questions about these issues.

1. How does the city of Philadelphia justify using LED streetlights provided by a company that has not applied for or received FDA approval?
2. How does the city justify installing LED streetlights which are known to cause seizures, migraines, nausea, headaches, anxiety, and other neurological harms?
3. How does the city justify withholding from the public the information about the switch in radiation types from incoherent radiation to partially coherent radiation?
4. What accommodation is the city providing for those with disabilities who cannot neurologically tolerate LED radiation?
5. Has the city contacted FDA CDRH OHT8 Director Robert Ochs about the hazards and lack of regulation of LED streetlights? What was the response?
6. How does the city justify switching to high-glare LED lights that impair driver vision and interfere with cognitive functioning?^{1,2}

In your letter you state, “Pays for itself through energy savings”. This is a false claim. There is no “energy savings”. Switching to LED streetlights means changing the radiation type from something like a basketball (point source, incoherent light), to something like a javelin (Lambertian source, semi-

¹ <https://www.youtube.com/watch?v=fqlwWnYjtiM>

² <https://www.youtube.com/watch?v=miOIVI5mJc8>

coherent light). Switching radiation types is not saving energy, just lowering the quality of the light. Failing to notify the public about this switch in radiation types is deceit and fraud.

You also wrote, "*The City is committed to enhancing quality of life for **all** Philadelphians*" [emphasis added]. Why, then, has the city chosen to abandon the civil rights of those who have epilepsy, autism, migraines, electromagnetic sensitivity, and other conditions which cause them to be incapable of tolerating LED radiation and can prevent them from accessing city services? What is the city doing to accommodate these individuals?

I notice that your letter says NOTHING about the lack of FDA approval. Are you sure that the city of Philadelphia is prepared to spend \$20 million on the LED streetlight conversion project knowing that the manufacturer of the streetlights has not secured FDA approval and that the FDA has not vetted LED streetlights for safety? Is the city of Philadelphia really going to move forward without notifying the public about this lack of FDA approval?

Sincerely,

/s/ Mark Baker

President

Soft Lights Foundation

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cc:

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