



August 28, 2025

File No.: 060.17344.A19719.062 2025 08023

Mr. Mark Baker, President
Soft Lights Foundation
1520 East Covell Boulevard, Suite 5 – 467
Davis, CA 95616

Dear Mr. Baker:

This letter is in response to your Petition to Set Maximum Intensity for Vehicle Warning Lamps that is dated August 2, 2025.

Per the Soft Lights Foundation petition dated August 2, 2025:

The petitioner "...request[s] that the Commissioner of the California Highway Patrol ("CHP") publish a maximum limit on luminance for flashing warning lamps in the California Code of Regulations Title 13 Section 817 – Photometric Requirements."

"...the Petitioner requests that the CHP amend California Code of Regulations Title 13, Division 2, Section 2, Article 22, Section 817 – Photometric Test Requirements by changing the text 'NOTE: Maximum anywhere in yellow shall not exceed 4,000 cd over any area larger than that generated by a radius rotated 0.25 deg.' to say 'NOTE: Maximum luminance of the emitting surface of a flashing warning lamp shall not exceed 20 candela per square meter.'"

The enclosed August 2, 2025, petition request was submitted pursuant to Section 11340.6 of the California Government Code, which states:

Except where the right to petition for adoption of a regulation is restricted by statute to a designated group or where the form of procedure for such a petition is otherwise prescribed by statute, any interested person may petition a state agency requesting the adoption, amendment, or repeal of a regulation as provided in Article 5 (commencing with Section 11346). This petition shall state the following clearly and concisely:

- (a) The substance or nature of the regulation, amendment, or repeal requested.*
- (b) The reason for the request.*



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(c) Reference to the authority of the state agency to take the action requested.

The Department appreciates the sentiment of the petition; however, after thorough review and careful consideration, the Department is denying the request, in whole, because the August 2, 2025, petition lacks technical specificity and fails to satisfy the requirements of California Government Code Section 11340.6(a) – (c). (Section 11340.6 of the California Government Code; see also, California Code of Regulations, Title 1, Section 16).

The Department is committed to providing the highest level of Safety, Service, and Security, and has sought to achieve a balance between the essential duty of first responders to preserve life and the need to protect the public. I appreciate the opportunity to assist you with this matter. The Department will make a copy of your petition and this denial available to the Office of Administrative Law and any interested party. Please contact our Commercial Vehicle Section with any questions regarding this letter or requests to obtain a copy of the petition, at (916) 843-3400.

Sincerely,



18227 For/

M. W. HEADRICK, Chief
Enforcement and Planning Division

Enclosure

cc: Office of Administrative Law

