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December 27, 2025

BY EMAIL

Paloma Aguirre, County Supervisor
San Diego County
District1community@sdcounty.ca.gov

Re: Pedestrian Safety – LED Lights

Dear Supervisor Aguirre,

The Soft Lights Foundation writes to you in support of your efforts to improve pedestrian safety. We believe that the switch to high-intensity Light Emitting Diode (LED) lighting has reduced pedestrian safety due to the glare created by LED lights.

Rectangular Rapid Flashing Beacons – RRFBs emit high intensity, rapidly flashing yellow light that impairs driver vision and may trigger seizures, migraines, and panic attacks in individuals with disabilities. The purpose of an RRFB is to “command” drivers to stop at pedestrian crossings, but the use of such intense flashing lights is a violation of the Americans with Disabilities Act (ADA - 28 CFR § 35.164) which requires communication with individuals with disabilities to be just as effective as with others, and a violation of the California Disabled Persons Act (DPA - Cal. Civ. Code § 54) which requires that individuals with disabilities have full and equal access to streets and sidewalks. The Soft Lights Foundation recommends the removal of any RRFB devices.

Auxiliary Vehicle Flashing Lights – Federal motor vehicle safety regulations (49 C.F.R. 571.108(S6.2.1) prohibit the use of auxiliary vehicle flashing lights such as on police cars, fire trucks, ambulances, and utility vehicles. Despite this prohibition, local government agencies across California use these flashing lights, putting the lives of first responders and the public at risk. The use of auxiliary vehicle flashing lights also violates Cal/OSHA workplace safety regulations, the ADA, and DPA. The Soft Lights Foundation recommends the elimination of all auxiliary vehicle flashing lights.

Blue-rich Streetlights – Blue-rich LED streetlights create glare which is a photobiological hazard and an environmental carcinogen. 3000K and 4000K LED streetlights impair driver vision because blue wavelength light has high energy and LED streetlights often do not have proper shielding or diffusion. The use of 3000K and 4000K LED streetlights is not aligned with State public health policy which states that individuals should avoid blue-rich light. (See Blue Light Awareness Day proclamation (https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200SCR73)). The Soft Lights Foundation recommends removing all blue-rich LED streetlights and recommends the use of bollard lighting fixtures with amber (1800K – 2200K) light sources.

Light Pollution - The switch to powerfully intense LED lighting has created hazardous and dangerous nighttime lighting conditions in San Diego County. The Soft Lights Foundation recommends the following actions by the San Diego County Board of Supervisors:

- A) **Blue Light Awareness Day Proclamation** – The County should issue a Blue Light Awareness Day proclamation to align County public health policy with the State’s. Here is a link to a Blue Light Awareness Day proclamation template: (<https://www.softlights.org/wp-content/uploads/2025/12/Blue-Light-Awareness-Day-Proclamation-Template.docx>).
- B) **Lighting Ordinance** – The County should adopt a strong lighting ordinance that protects public health, safety, and civil rights. Here is a link to a Lighting Ordinance template: (<https://www.softlights.org/wp-content/uploads/2025/11/Proposal-for-City-Lighting-Ordinance-Anytown-USA.pdf>).

In conclusion, the widespread introduction of LED lighting has created significant safety hazards, health hazards, and civil rights violations. San Diego County would greatly improve the lives of its residents by adopting public health, safety and civil rights policies related to the use of LED lights.

Sincerely,

/s/ Mark Baker

President

Soft Lights Foundation

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