

**Government of the District of Columbia**  
**ADVISORY NEIGHBORHOOD COMMISSION 3/4G**

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**ANC 3/4G Resolution**

**Requesting that the Office of Planning**  
**Address Lighting Pollution Directly in the**  
**Comprehensive Plan Amendments**

1. ANC 3/4G has a long-standing interest in the effect of street lighting on the health, safety, and well-being of the community. In 2014, the Commission created an LED Alley/Street Light Task Force to better understand the District's plans and to provide a communication channel to the many residents who had expressed interest and concern about proposed new lighting's color and brightness.<sup>1</sup> More recently, the Commission has deferred to the Mayor's Streetlight Advisory Panel and its members to represent our residents' interests.
2. The Commission shares the concerns expressed by Laura Phinizy, our Street Light Task Force Co-Chair and member of the Mayor's Streetlight Advisory Panel (the "Panel"), along with Delores Bushong, the Founder of the DC Streetlight Task Force and a member of the Mayors Streetlight advisory Panel, and Bonnie Garrity of the citywide Streetlight Task Force with the Office of Planning's (OP's) proposed amendments to the Comprehensive Plan's Environmental Protection Element (<http://bit.ly/2UspxG1>) as it relates to light pollution.<sup>2</sup> The Commission concurs in the requests made by these members of the Panel and citywide Streetlight Task Force for the following changes to the draft amendments.
3. Light pollution warrants its own category in the Environmental Protection Element, just as Controlling Noise (Section E-54.3), Managing Hazardous

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<sup>1</sup> See ANC 3/4G January 13, 2014 Meeting Minutes, available at <http://bit.ly/31ms1ab>.

<sup>2</sup> See Comments about Draft Comprehensive Plan: Environmental Elements/Light Pollution, submitted by Delores Bushong, Bonnie Garrity, and Laura Phinizy, December 12, 2019.

Substances and Materials (Section E-54.4), and Reducing Water Pollution (Section E-54.2) have dedicated sections. Light pollution is mentioned in Section E-54.7, Other Hazards and Pollutants, and Section E-54.7.3, but those separated sections overlap and may be confusing. As the Panel members described in their comments, light pollution is a significant problem that should be highlighted in the Comprehensive Plan with a separate section on Controlling Light Pollution.

4. The Commission also joins the Panel members in asking that OP include the following provisions in the Environmental Protection element in a section on Controlling Light Pollution:

624.1 Light has both beneficial and detrimental impacts on residents in the city. LED lights are the most recent light technology and are highly efficient in providing light using less wattage, which conserves energy and results in a significant cost savings. They also last longer than the incandescent, florescent, or high-pressure sodium lights that we have used in the past and require less maintenance. Appropriate lighting provides safety and a sense of security. However, with these benefits come challenges for the city. Excessive lighting affects the general health and well-being of District residents.

624.2 Outdoor lighting often surpasses the boundaries where it was meant to provide illumination. Light pollution can result from the combined illumination from streetlights, public buildings, businesses, and private homes. Excessive light levels at night can be detrimental to health and the enjoyment of a person's property. Where lighting is required or desired, steps can be taken to use energy efficient LED lights to provide the correct amount of lighting for the desired purpose and direct the lighting appropriately. With proper design and installation, warm temperature LED lights can deliver quality lighting that illuminates our streets adequately without negatively impacting health or the environment.

624.3 Policy E-4.7.1: Protecting Human Health. The District shall control light trespass onto private property, shall work to curb excessive levels of light, and shall choose the warmest color of light that is feasible in order to minimize the negative impacts of outdoor lighting on human health.

624.2 Policy E-4.7.2: Protecting Wildlife. Excessive lighting can also harm urban wildlife. Consistent with the goals of Sustainable DC, maintain regulations for outdoor lighting to lessen harm to wildlife, particularly migratory birds and pollinators.

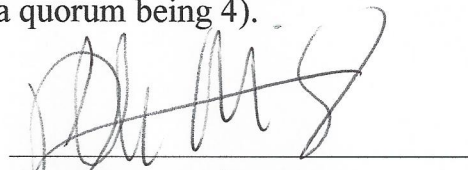
624.3 Policy E-4.7.3: Reduce Sky Glow. Ensure that the US Naval Observatory can meet its operational needs related to national security by choosing low color temperature of LEDs (less than 2700 Kelvin), reducing light levels to



closely follow Illuminating Engineering Society's recommendations, dim or turn off light when not needed, and promoting use of vegetation throughout the city.

- 624.4 Action E-4.7.A: Managing Light Pollution. Continue to evaluate light pollution levels to identify possible regulatory and programmatic improvements, including increased education and outreach. Study the possibility of adopting features of the Model Lighting Ordinance endorsed by both the Illuminating Engineering Society and the International Dark Sky Association.
- 624.5 Action E-4.7.B: Evaluation of Light Pollution. Continue to evaluate the District's light pollution control measures to identify possible regulatory and programmatic improvements, including increased education and outreach on light standards and requirements.
- 624.6 Action E-4.7.C.: Enforcement of Light Regulations. Pursuant to the DC Municipal Regulations enforce regulations pertaining to light trespass onto residential property.
- 624.7 Action E-4.7.D: Measuring Light Pollution. Require evaluation of light impacts and light exposure when large-scale development is proposed, and when capital improvements and transportation facility changes are proposed.

Approved by ANC 3/4G after a discussion at its regularly scheduled and noticed February 10, 2020 meeting by a vote of 6 to 0 (a quorum being 4).

  
Randy Speck, Chair  
Abe Clayman, Secretary

cc: Andrew Trueblood, Director, Office of Planning  
Council Chair Phil Mendelson  
Councilmember Mary Cheh  
Councilmember Brandon Todd  
Councilmember Robert White  
Councilmember Elissa Silverman  
Councilmember David Grasso  
Councilmember Anita Bonds