



INTERNATIONAL DARK-SKY ASSOCIATION

**International Dark-Sky Association**  
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7 August 2019

Ms. Emma Gonzalez-Laders  
Division of Building Standards and Codes  
New York Department of State  
99 Washington Ave.  
Albany, NY 12231-0001

Dear Ms. Gonzalez-Laders:

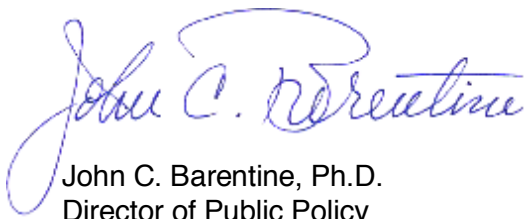
On behalf of the International Dark-Sky Association, I respectfully submit this letter in support of adopting the proposed Light Pollution Controls requirement (new subsection C405.2.6.5) of the New York State Energy Code.

Light directed toward any area other than the target surface serves no useful purpose and represents substantial energy waste. The use of fully shielded light fixtures substantially reduces the adverse ecological impacts and potential human health consequences caused by light pollution.

Other states such as California, Connecticut and New Mexico have adopted amendments to their energy codes to require fully shielded lighting in all commercial applications. Fully shielded light fixtures are available at no cost difference to the architect or product specifier; adopting this light pollution control requirement would therefore impose no financial burden.

IDA encourages adoption of the proposed code change to require light pollution controls for all outdoor light fixtures on all new commercial projects going forward.

Respectfully,



John C. Barentine, Ph.D.  
Director of Public Policy

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