

Ms. Jantz-Sell,

I am writing you this letter as the President of Lighting Design Alliance, a major lighting designer with offices in multiple cities and clients around the world. Over the past 30 years we have cultivated a wide base of clients that appreciate the impact that quality lighting can have on their spaces.

I directly oppose the current direction of treating light sources like appliances. Lumens per watt is not the correct metric to be using when evaluating a light source. I have first-hand knowledge of a client that invented in over 15,000 LED replacement LED lamps only to watch them turn green over the first year. Yes the connected energy use was initial reduced, but the cost and life cycle replacement effects on the environment did not offset the savings.

I definitely endorse the education and the recommended design practices that will greatly reduce our dependence on energy. Being based in Los Angeles, we have a fair, but tough energy code that has greatly impacted our energy usage in the built environment. Establishing performance standards of a light source, without context does not make sense. An efficient source, misapplied, can be totally inefficient. The end goal for true efficiency is to provide the correct amount of light needed to do a task, in the correct location and only on when needed. In other words, efficient sources tied with advanced lighting controls are the only way to meet our net-zero energy goals, not appliance based standards.

Having said that, there are more factors than just lumens per watt. As the type and quality of light can directly affect the occupant's, other factors must be considered. While lumen output is important and should be considered, so is lamp life, color temperature, spectrum of light and perhaps most importantly, the color rendering properties. If a source meets your current efficiency standard, but is deficient in color properties, then it should not be mandated. Or efficient sources that have enhanced color rendering properties should not be banded because of their bottom-line efficiency. Designers should have the flexibility to select the appropriate source for their applications and end users should have their right to purchase high color rendering or full spectrum lamps for their spaces. Perhaps a two tier efficiency standard can be evaluated so that high quality sources, that are still efficient, can be used when appropriate.

As the impacts of high quality lighting is continually evolving, so is our research. The human aspects of proper and high quality lighting must be considered. Please note that at no time have I asked to use inefficient lamps, or to strike the ban on typical incandescent lamps. We just want and need the ability to use high quality lighting that will create spaces for people.

I would highly recommend that you contact or involve the Illuminating Engineering Society as they are the best source of knowledge on the lighting industry and can provide unbiased assistance in this issue. Thank you for your time and consideration.

Sincerely,

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