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**July 29, 2019**

**To: Helena City Commission**

**From: The Helena Citizens Council**

**Subject: HCC Recommendations to City Commission on Streetlight Replacements**

At the HCC's monthly meeting on July 24, 2019, following the discussion at the Commission's Administrative meeting, the HCC considered the issue of streetlight replacements. The focus was in response to member and public concerns with the impact of the new cobra head LED lights on the historic character of Helena's neighborhoods, potential health concerns (see attached Council of Science and Public Health report on Human and Environmental Effects of light Emitting Diode (LED) Community Lighting"), and the overall quality of life in all of the City's neighborhoods. Additional concerns with the new streetlights and their potential for added future impacts are associated with the loss of foliage on street trees in the Fall, replacement of all Green Ash street trees with more diverse species but much smaller trees according to the City's tree replacement plan, and the glare and lighting effects of the new LED lights when the snow arrives. Furthermore, other cities including Seattle, Phoenix, and Davis California, have made the costly mistake of installing cold-white LED streetlights and later had to replace them due to public outcry.

At the HCC meeting, presentations were made by a District 1 Representative and a citizen both living in the neighborhood that has already received the new streetlights, and reports were presented by HCC attendees at the Commission's earlier discussion of the topic. In addition, the HCC had previously received written information and recommendations from two District representatives and a citizen.

Based on available information and discussions, the HCC unanimously recommends the following actions to the Commission:

- **The new streetlights must comply with the City's ordinance regarding Dark Skies and Light Trespass.** Northwest Energy (NEW) clearly was aware of the City's ordinance when making its decision about the cobra head replacements and decided to avoid compliance and presented arguments that they do not have to be in compliance. Furthermore, NWE suggested that they would do their best to comply, but after the replacement process was completed or respond to complaints, rather than deal with the issues in a more cost-effective manner before all the lights are replaced. In fact, the NWE representative said they could deal with the Light Trespass problem by adding shields to the new Cobra heads. **NWE should show and prove compliance with the City's Title 10 street light Dark Skies and Light Trespass provisions before replacing the existing street lights with new LED Cobra fixtures and replace or retrofit those already installed; and**

- **The maximum rating of replacement lights should not exceed 2700 Kelvin.** The issue is not with the fact that LED bulbs are more efficient but with the effect that the color spectrum of the lights has on the character of Helena's neighborhoods and residents. Bulbs with lower Kelvin ratings provide a warmer color spectrum, though the amount of light from a 2700 Kelvin bulb may not be that different when compared to the 3000 Kelvin LED bulbs that NWE is utilizing as replacements. The attached information from Carnegie Mellon University addresses the differences in "color temperatures" at different Kelvin levels. **NWE should demonstrate that the color spectrum level would not be warmer if 2700 Kelvin and lower LED bulbs were used as replacements as compared to the 3000 Kelvin bulbs that the company is utilizing.**