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Submitted values are:

Date: Friday, January 04, 2019
To: His Worship the Mayor and Members of City Council
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Province: Saskatchewan
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Name of the organization or agency you are representing (if applicable): Sask LPA Committee
Subject: Objection to recommendation 8.2.1 Proposed Decorative Lighting Rate Bylaw Change [CK. 1905-3 x 6300-1]
Meeting (if known): STANDING POLICY COMMITTEE ON ENVIRONMENT, UTILITIES AND CORPORATE SERVICES
Comments: We have an objection to agenda item 8.2.1. Please provide the attached letter to the Committee.
I *do not* request to speak at the meeting.
Attachments:
lighting_extension_objection.pdf:
https://www.saskatoon.ca/sites/default/files/webform/lighting_extension_objection.pdf

The results of this submission may be viewed at:
https://www.saskatoon.ca/node/398/submission/273280
January 4, 2019

Saskatchewan Light Pollution Abatement Committee
c/o 127 Maple Street
Saskatoon, SK S7J 0A2

RE: January 7, 2019 meeting of Environment, Utilities, and Corporate Services Agenda item 8.2.1
Proposed Decorative Lighting Rate Bylaw Change (CK. 1905-3 x 6300-1) pp. 22 - 25 — OPPOSITION to
the recommendation.

Dear Committee:

Our organization strongly objects to the proposed change to Bylaw 2685 to extend decorative lighting to
dusk-to-dawn from a controlled time of 07:00 — 09.00 and 18:00 — 24:00. Justification has not been
presented by the report.

Unfortunately, with the time available to respond, we cannot provide extensive reasoning as to why the
recommendation is a bad idea, but we will summarize below.

1. The Winter City Strategy is meant to provide decorative and inviting lighting FOR PEOPLE, and
people are generally not around between midnight and 7 am in the business districts since
nothing is open except for a few bars. It might make some sense to extend controlled lighting
hours to 1:30 am until bars close, but extending the lights-on period to all-night lighting serves
absolutely no purpose from a people-centric, festive point of view. Thinking that all-night
lighting somehow makes people more festive, who are generally sleeping during this time, is a
gross misinterpretation of the Winter City Strategy. (Note also that the Winter City Strategy has
not set any baseline/guideline rules for lighting use/time-of-use at this point. Winter City
Strategy needs to include light-off periods. This is just common sense.) The original bylaw
hours were there to address the issue of nuisance that that over-night lighting potentially
causes. This really needs to be kept in mind.

2. From the power usage point, extending to all night usage (an approximate 100% increase in time
and power) is waste. Under the Environmental Implications section of the report to Committee,
the change to simple sensors states that power usage will increase, but the City’s GHG goals are
for REDUCTION of power usage. In paragraph 2 of the report, it is stated, “It is estimated that
removing the timers and their circuits would reduce operational costs in proportion to the
increased energy costs from the longer illumination cycle and seasonal timeframe.” We’d like to
see the actual calculation. “Estimated” seems to be wishy-washy in terms of whether or not this
actually saves power, so how much power is saved, and is this change truly viable? If the difference is simply a wash with no large benefit in changing to sensors from controllers, then the large capital cost of conversion cannot be justified. But the all-night lighting (human environmental) aspect also has to be weighed with the issues below in mind.

3. Under Other Considerations/Implications, it is stated that there are no CPTED implications or considerations. Indeed there ARE CPTED implications. Light is used to invite activity, and lit areas at night are more prone to abuse by crime, nuisance and graffiti. In point 1 above, lights-off at 1:30 should tell bar patrons that “it’s time to go home.”

4. The Business Improvement Districts, where the lights are located, also have upper floor residential apartments that are already affected in the later evening hours by the high-up decorative lighting positioned to shine directly into their windows. Having this lighting on all night provides the residents with zero relief from the lighting. BIDs CEOs and staff do not live in these areas, and likely even don’t visit the areas overnight, to see the negative effect. Unless sometime is happening between midnight and 7 am, there is no reason for these lights to be on. If BIDs want this option, they need to clearly demonstrate what benefit if gained by extended lighting hours and also how this reduces GHG emissions.

5. We also do not see any concurrence or recommendations by Urban Planning in the report, particularly from the Planning Section that is looking a decorative lighting projects in the City and how BIDs areas would integrate with an overall lighting strategy.

6. Arguments that the lighting is LED technology, thus “energy-efficient”, is not a good argument, since the efficiency aspect of the lights has resulted in a huge increase in usage everywhere for decorative purposes. A NASA SUOMI satellite study of lighting shows a world increase in power usage of 2.2% per year over the last 5 years due to the changeover to LEDs and their subsequent over-usage, where LED changeover was originally justified to reduce power. The study states that much of the overuse is a result of increased decorating in holiday period and extension of time-of-use justified by lower-energy consumption. (You really need to look at the link in the footnote.) This can be seen city-wide in Saskatoon by the marked increase in commercial and residential Christmas lighting and now the extension to night-lighting throughout the year. The City should be leading by example by not wasting power, by not lighting during times where no one is around, and by not using the Winter City Strategy to justify poor decisions.

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1 https://www.space.com/38872-light-pollution-increasing-globally.html