



STATE OF HAWAII
DEPARTMENT OF EDUCATION
KA 'OIHANA HO'ONA'AUAO
P.O. BOX 2360
HONOLULU, HAWAII 96804

Date: 02/12/2026

Time: 01:00 PM

Location: CR 229 & Videoconference

Committee: EDT/EIG

Department: Education

Person Testifying: Keith T. Hayashi, Superintendent of Education

Title of Bill: SB2987, RELATING TO LIGHT POLLUTION.

Purpose of Bill: Beginning 7/1/2027, establishes outdoor light fixture requirements throughout the State.

Department's Position:

The Hawaii State Department of Education (Department) appreciates the opportunity to offer testimony in support of SB 2987 with comments.

The Department fully supports the intent of SB 2987 to protect Hawaii's natural habitat, which includes seabirds, sea turtles, pollinators, bats, and coral reefs, and to respect and maintain native Hawaiian cultural practices and traditions. As stewards of 258 public school campuses facilities across the state, many of which are located near the state's most pristine coastline or in hilly terrain, the Department recognizes that its outdoor lighting can inadvertently cause unintended impacts on native wildlife and the environment.

The Department offers the following comments to ensure that the transition to safer lighting is sustainable, safer for our students, and financially responsible, while still supporting the intent of this bill:

- The Department supports the requirement for downward-facing, shielded fixtures and the use of warm-colored LED lights. While reducing light pollution is crucial, school campuses must remain safe and secure for evening educational activities, and custodial services. The Department would support the use of motion sensors, which allow lights to remain off or dimmed during late-night hours, but provide directional, full illumination when necessary for safety.
- The Department requests that the implementation timeline for its compliance with this bill be tied to appropriate funding for design and/or installation, to allow for the replacement of fixtures upon natural breakage, and for or during scheduled infrastructure upgrades. To avoid impacting existing school needs, please consider appropriations that do not impact existing Department requests to avoid significant unfunded budgetary impacts on public school operations.
- The Department requests an exemption for specific emergency or security lighting on its campuses to protect school property, similar to those outlined in the bill for

airports, highways, and harbors as school campuses are many times used as civil defense shelters in times of natural disasters and emergencies.

The Department is committed to acting as a responsible environmental partner to protect Hawaii's unique biodiversity. With reasonable timeframes and resources to convert existing infrastructure, the Department believes this bill can protect Hawaii's natural habitat while maintaining safe, well-lit environments for our students and staff.

Thank you for this opportunity to provide testimony in support of SB 2987 in support with comments.

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII'
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA
P.O. BOX 621
HONOLULU, HAWAII 96809

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LAND
STATE PARKS

Testimony of
RYAN K.P. KANAKA'OLE
Acting Chairperson

Before the Senate Committees on
ECONOMIC DEVELOPMENT AND TOURISM
and
ENERGY AND INTERGOVERNMENTAL AFFAIRS

Thursday, February 12, 2026
1:00 PM
State Capitol, Conference Room 229

In consideration of
SENATE BILL 2987
RELATING TO LIGHT POLLUTION

Senate Bill 2987 establishes outdoor light fixture requirements throughout the state, beginning July 1, 2027. **The Department of Land and Natural Resources (Department) offers comments on this measure.**

The Department acknowledges the importance of dark skies for Hawaii's residents and wildlife. Artificial light pollution affects wildlife, including seabirds and turtles, and interferes with astronomy, stargazing, and cultural practices.

The Department recommends removing lines 18-19, page 8 (section (m)(2)):

~~[(2) This section shall not apply to counties with populations of less than one hundred thousand persons.]~~

This provision excludes the County of Kaua'i. Notably, the County of Kaua'i supports about 90 percent of the remaining 'A'o (Newell's shearwater) population, a species listed as threatened under both state and federal law. This species is highly vulnerable to collisions with structures due to disorientation caused by artificial lighting. Implementing these requirements statewide would offer more comprehensive protection for sensitive species and ensure fair benefits for all residents and ecosystems across Hawai'i.

The Department recommends lines 6 to 7, page 6, be amended as follows:

(1) Designated as Turtle Lighting, ~~[Eero Uplight]~~ Zero Uplight fixtures on the DLC-LUNA list; or

The Department recommends lines 14 to 16, page 6, be amended as follows:

(B) Has a maximum ANSI/IES Uplight Rating of U0 and a maximum glare rating of [~~B4~~] G1 per ANSI/IES TM-15-20, unless otherwise stated;

The Department recommends lines 16 to 19, page 7, be amended as follows:

(j) Bollards shall have a maximum light output of 1,000 lumens and the ANSI/IES Glare Rating of [~~B0~~] G0. All bollards that face the shoreline shall be shielded so that the light source is:

The Department strongly supports efforts to reduce light pollution and protect dark skies throughout the State as outlined in this measure.

Mahalo for the opportunity to comment on this measure.



UNIVERSITY OF HAWAII SYSTEM

‘ŌNAEHANA KULANUI O HAWAII

Legislative Testimony

Hō'ike Mana'o I Mua O Ka 'Aha'ōlelo

Testimony Presented Before the
Senate Committee on Economic Development and Tourism
and
Senate Committee on Energy and Intergovernmental Affairs
Thursday, February 12, 2026 at 1:00 p.m.

By
Doug Simons, Director
Institute for Astronomy
and
Vassilis L. Syrmos, PhD
Interim Provost
University of Hawai'i at Mānoa

SB 2987 – RELATING TO LIGHT POLLUTION

Chairs DeCoite and Wakai, Vice Chair Chang, and Members of the Committees:

The University of Hawai'i (UH) **strongly supports SB 2987**, which establishes statewide outdoor lighting requirements to protect Hawai'i's dark night skies, safeguard native wildlife, reduce energy waste, and preserve the cultural and scientific value of natural darkness across the islands.

Hawai'i's night sky is a globally unique resource. It is essential to astronomy and other scientific research, native wildlife, Native Hawaiian cultural practices, public health, and education. The University's Dark Skies Protection Advisory Committee—established under Act 185 (2017)—has studied these issues in depth and SB 2987 implements the committee's recommendations including CCT limits, upright limits, shielding, dimming, turtle-safe lighting, and alignment with the DLC-LUNA Qualified Products List. This product list also emphasizes energy efficiency and energy savings.

The University of Hawai'i Institute for Astronomy (IfA) conducts research in astronomy using telescopes located on Haleakalā, Maunakea and Mauna Loa that are operated by IfA and partner institutions. These sites are among the best in the world for astronomical research because of their elevation, clear skies, favorable atmospheric conditions, and low levels of light pollution. Hawai'i-based observatories have played major roles in the advancement of astronomy and astrophysics for over 50 years and are well positioned to remain at the forefront of astronomical research for decades to come.

UH respectfully suggests an amendment to clarify implementation details for this legislation. This proposed amendment modernizes the approach by adopting the IES RP-8-25 activity-based zoning. This ensures we aren't just 'dimming the lights,' but applying the correct 'light-at-the-right-time-and-place' strategy currently used as internal best practice at leading research universities.

*** AMENDMENT ***

“(e) Outdoor light fixtures shall be extinguished or dimmed by a minimum of seventy-five per cent during curfew hours, unless otherwise superseded by county building codes. Light trespass shall not occur, and outdoor light fixtures shall be extinguished or dimmed during the curfew hours of:

(1) Between 10:00 p.m. and sunrise for residential uses;

(2) Between 10:00 p.m. and sunrise for all commercial users, unless normal operating hours end or begin within the hours of curfew, in which case light trespass restrictions shall apply until one hour after closing or one hour before opening; and

(3) For all university, college, or school campuses, beginning one hour after a building closes until sunrise for each respective building and its associated grounds; provided that lighting within these campuses shall be governed by the following activity zones as defined by the most recent ANSI/IES RP-8 (Recommended Practice: Lighting Roadway and Parking Facilities):

(A) Primary Zones (High Pedestrian Activity): Areas of frequent student and faculty traffic, including housing complexes, event plazas, and main pathways and thoroughfares, shall utilize zero uplight (i.e., U0 Rating per ANSI/IES TM-15-20) fixtures with a correlated color temperature not to exceed 3000 (K) Kelvin. To ensure safety and visibility pursuant to ANSI/IES RP-8-25 Annex K, these fixtures may utilize motion sensor controls to temporarily restore illumination to target levels during occupied periods, provided they return to an extinguished or seventy-five per cent dimmed state after 20 minutes during curfew hours;

(B) Secondary Zones (Moderate Pedestrian Activity): General walkways, internal campus roads, and parking facilities shall utilize zero uplight (U0 Rated) fixtures with a correlated color temperature not to exceed 2700 K. During curfew hours, these fixtures shall be dimmed by at least seventy-five per cent of maximum output power, except where motion sensors are utilized as described in subparagraph (A); and

(C) Tertiary Zones (Low Pedestrian Activity or Sensitive Environments): Campus perimeters, natural areas, and research-sensitive zones shall utilize zero uplight (U0 Rated) fixtures with a correlated color temperature not to exceed 2200 K, or phosphor-converted amber (pc-amber) LED fixtures. For campuses adjacent to turtle nesting beaches the turtle lighting requirements in other parts of this bill apply. Lighting in these zones shall be motion-activated and remain off during curfew hours unless human presence is detected.”

In summary SB 2987 strengthens Hawai‘i’s leadership in science, conservation, and cultural stewardship, protects UH astronomical research, supports wildlife researchers, enhances education, promotes sustainable tourism, and reduces energy consumption. SB 2987 represents a balanced, science-based, and culturally grounded approach to protecting one of Hawai‘i’s most irreplaceable resources. The University of Hawai‘i urges the Legislature to pass this measure.

Mahalo for the opportunity to testify.



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Keeping Hawai'i clean,
green and beautiful
since 1912

February 10, 2026

Re: Testimony In Strong Support Of SB2987 — Relating To Light Pollution with recommended amendments

Dear Chair, Vice Chair, and Members of the Committee:

My name is Winston Welch, Executive Director of The Outdoor Circle, and I submit testimony on behalf of **The Outdoor Circle in strong support of SB2987 with recommended amendments.**

For more than a century, The Outdoor Circle's adopted public policies have supported efforts to protect and enhance the natural environment and quality of life for Hawai'i's residents — including controlling the spread of nighttime lighting from adjacent buildings and other sources.

Poorly designed outdoor lighting — unshielded fixtures, excessive brightness, and uncontrolled light spill — produces glare, wastes energy, disrupts sensitive wildlife behavior, and degrades the nighttime environment without improving safety. The solutions are well understood: direct light only where it is needed, properly shield fixtures, and limit unnecessary illumination.

As coastal development and nighttime illumination continue to expand across the islands, the absence of consistent lighting standards risks accelerating these impacts.

SB2987 reflects these recognized practices by establishing performance-based requirements tied to recognized industry standards, limiting correlated color temperature, requiring shielding to prevent glare and light trespass, and incorporating dimming or curfew controls where appropriate. These provisions provide clarity for property owners and public agencies while directly addressing the harms associated with light pollution.

Importantly, SB2987 is designed to reduce unnecessary lighting while preserving public safety needs — through exemptions for emergency lighting and by allowing lighting required for normal operating hours, while still preventing glare and light trespass.

While light pollution is an issue in many places, its effects are especially significant in Hawai'i. Our islands' unique ecosystems — including native seabirds, sea turtles, and other wildlife — rely on natural darkness for navigation and reproductive behavior. Artificial lighting can interfere with these fundamental processes.

Dark skies are also part of Hawai'i's scenic heritage and sense of place — a shared public resource valued by residents and visitors alike. The visibility of the night sky also supports Native Hawaiian cultural practices that have long relied on celestial observation.

Lighting that spills into neighborhoods and public spaces likewise affects community livability. Consistent with The Outdoor Circle's longstanding work to protect Hawai'i's scenic character, we support measures that minimize adverse visual and environmental impacts from excessive nighttime lighting.

To ensure the bill fully advances its stated purpose and avoids unintended consequences, we respectfully offer the following recommendations:

Outdoor advertising lighting and searchlights

The Outdoor Circle has a long and well-established history of protecting Hawai'i's scenic character and opposing the expansion of outdoor advertising. While we strongly support the intent of SB2987, we are concerned that provisions allowing certain internally illuminated outdoor advertising signs — and permitting the use of searchlights for advertising purposes — could establish or expand a category of promotional lighting that contributes to skyglow, visual clutter, and degradation of the nighttime environment.

Searchlights, in particular, are designed to attract attention rather than provide functional illumination and are fundamentally inconsistent with the bill's goal of reducing light pollution. The Outdoor Circle does not support the creation or expansion of any category of outdoor advertising lighting, regardless of fixture type, because such lighting serves a promotional purpose rather than a public safety or operational need.

Accordingly, we respectfully urge the Legislature to remove the advertising-searchlight exemption entirely and to prohibit new outdoor advertising lighting that is not demonstrably necessary for safety or essential operations. Doing so will ensure the measure fully aligns with Hawai'i's longstanding commitment to protecting scenic resources and preventing the incremental expansion of visual pollution.

Statewide Applicability

SB2987 states that it shall not apply to counties with populations under 100,000. **Because this provision could exclude Kaua'i, we respectfully encourage the Legislature to reconsider this approach and ensure the bill's core protections apply uniformly across all counties** so that protections are not unintentionally uneven across islands.

SB2987 establishes an important statewide baseline for responsible outdoor lighting while allowing counties to adopt more protective standards where appropriate. With these targeted refinements, the measure will better deliver on its intent to protect Hawai'i's dark night skies as a natural, cultural, and quality-of-life resource.

For these reasons — consistent with The Outdoor Circle’s longstanding mission to keep Hawai’i clean, green, and beautiful — **we strongly support SB2987, provided the recommended changes outlined above are adopted.**

The Outdoor Circle appreciates the Legislature’s continued leadership in protecting Hawai’i’s environmental quality and scenic character.

Thank you for your consideration of this testimony.

Respectfully,

A handwritten signature in black ink, appearing to read 'W. Welch', with a long, sweeping horizontal stroke extending to the right.

Winston Welch, Executive Director



**TESTIMONY OF TINA YAMAKI, MANAGING DIRECTOR
HAWAII TRANSPORTATION ASSOCIATION
FEBRUARY 12, 2026
SB 2987 RELATING TO LIGHT POLLUTION.**

Aloha Chair DeCoite and Chair Wakai and members of the Senate Committee on Economic Development & Tourism and the Senate Committee on Energy and Intergovernmental Affairs. I am Tina Yamaki, Managing Director of the Hawaii Transportation Association and I appreciate this opportunity to testify.

The Hawaii Transportation Association (HTA) was founded in 1938 and incorporated in 1963, and is a private, non-profit trade organization dedicated to the service and assistance to the commercial ground transportation industry in the State of Hawaii. Our members include family owned small and medium sized businesses, independent owner operators, and national motor carriers range from delivery services to passenger carriers - as well as allied industry partners.

We understand the rationalization of this measure that requires all outdoor light fixtures to be fully shielded; creates exemptions for certain outdoor lighting; repeals the Night Sky Protection Strategy; and appropriates funds.

While we are in support of our environment and native wildlife, we do not support SB 2987 as we have concerns regarding this measure.

There has to be a balance between the safety of the environment and our businesses. Many of our members are ports and freight yards, warehouses and logistics. We depend on good lighting to be in compliance with OSHA rules and regulations, to operate at night as well as to deter theft and other illegal activities. These retrofits will conflict with workplace safety and productivity.

We also have concern as to how this will be enforced as it is our understanding that some expertise is needed to measure things like lumens, kelvin ratings and shielding angles.

To change our or to retrofit outdoor light fixtures will place a financial burden on many of our small mom & pop businesses, that are our members. Full cut-off shielding, spectrum LEDs, lower Kelvin ratings ($\leq 2200-2700K$) often mean full fixture replacement, not just changing a bulb. This would also include hundreds of pole mounted luminaires, yard and perimeter security lighting at warehouses and logistic yards. Should these businesses compensate by installing more fixtures at lower intensity, this would offset any expected energy savings and increase capital outlay.

The cost will most likely be passed on to the our customers – wholesalers, retailers... who will eventually pass that cost to the consumer who will now be paying more for their groceries, building supplies, clothing and other goods.

Mahalo for this opportunity to comment.

Testimony of Matson Navigation Company, Inc.
Comments on SB2987
Before the Committees on Economic Development and Tourism and
Energy and Intergovernmental Affairs
February 3, 2026

Dear Chair DeCoite, Chair Wakai, Vice Chair Chang, and Members of the Committees:

Matson Navigation Company, Inc. (Matson) appreciates the opportunity to provide comments on SB2987, which establishes outdoor light fixture requirements throughout the State, and including at our commercial harbors.

As an island state, Hawaii is very dependent upon our commercial harbors to ensure the continued and unimpeded flow of cargo in and out of our State. It is estimated that over 90 percent Hawaii's imported goods pass through our commercial harbors, including consumer goods, motor vehicles, construction materials, and fuel. Given the critical role of our commercial harbors, it is imperative that the State support safe, dependable, and efficient cargo transportation and handling to serve our residents and businesses.

Matson's operations run twenty-four hours a day, seven days a week to ensure that goods are available to the public as quickly as possible. We are also expanding and upgrading our Sand Island Container Terminal, including installing and replacing existing light fixtures. Matson is committed to providing a safe environment for both employees and the public. While we appreciate the measure's intent, we believe that it should be amended to exclude commercial harbors from the light fixture requirements to provide the flexibility to ensure that our operations may continue uninterrupted and in the safest manner possible.

Thank you for considering our comments.



WRITTEN TESTIMONY ONLY

February 12, 2026

Senator Lynn DeCoite, Chair
Senator Glenn Wakai, Vice Chair
Senate Committee on Economic Development and Tourism

Senator Glenn Wakai, Chair
Senator Stanley Chang, Vice Chair
Senate Committee on Energy and Intergovernmental Affairs

RE: SB 2987 – RELATING TO LIGHT POLLUTION
Hearing date: February 12, 2026, 1:00 p.m.

Aloha Chair DeCoite, Chair Wakai, Vice Chair Chang, and Members of the Committee:

Thank you for the opportunity to submit testimony on behalf of Young Brothers, LLC (“YB”) offering **COMMENTS** on **SB 2987**, which would establish new outdoor light fixture requirements throughout the State – including at YB’s facilities at commercial ports.

YB is a water carrier that transports cargo by tug and barge between the islands of O’ahu, Hawai’i, Kaua’i, Maui, Moloka’i, and Lāna’i. Since 1900, customers across the state have relied on YB’s frequent, regular, and universal sailings to serve as the bridge that connects all communities in this island-state. YB’s operations span seven commercial ports across the state, and we often work around the clock to support the cargo movement that is critical to local commerce – including during evening hours and other periods when natural light might be limited.

It is important that YB continue to have access to adequate and reliable lighting during all hours to protect the safety of our employees to minimize any disruptions to YB’s port operations. While YB appreciates the importance of mitigating light pollution to protect the environment and surrounding communities, YB respectfully requests an amendment to exclude commercial ports from these proposed requirements to secure the continuity of our operations in the safest manner possible.

Thank you for your service to the State of Hawaii, and for the opportunity to testify offering comments on this measure.

Sincerely,

Kris Nakagawa
Vice President, External and Legal Affairs



LATE

Testimony to the Committees on Economic Development and Tourism &
Energy and Intergovernmental Affairs on
Senate Bill 2987 – Relating to Light Pollution
Thursday, February 12, 2026, 1:00 p.m.

Aloha Chairs DeCoite and Wakai, Vice Chair Chang, and Members of the Committees,

The undersigned leaders of the Maunakea Observatories appreciate the opportunity to share our **strong support** of Senate Bill 2987 to protect Hawai'i's dark night skies.

Dark night skies are among the factors that make Maunakea the best place in the world from which to study the universe and humanity's place in it. It is equally important to manage light pollution to minimize human impact on native wildlife and protect Hawai'i's cultural practices and traditions tied to the night sky. The regulations proposed in this measure achieve those aims.

Light pollution is a recognized issue in areas of the globe where significant astronomical research takes place, and many of those areas have regulations to protect those regions as windows through which we can study the universe. We would like to recognize the County of Hawai'i for being a leader in regulation of light pollution since the 1980s, with many of the principles of this measure included in the Hawai'i County Code.

This measure provides updated guidance with the evolution of new lighting technology (such as ultra-white LEDs) and standardizes light pollution control measures across multiple counties. This measure will establish Hawai'i as a global leader in protecting dark night skies.

We would also like to recognize the advocates and experts who contributed their time and energy to dark sky efforts over the years, as well as the introducers of this measure.

Mahalo.

Handwritten signature of Jean-Gabriel Cuby in black ink.

Jean-Gabriel Cuby, Director
Canada-France-Hawai'i Telescope

Handwritten signature of Rich Matsuda in black ink.

Rich Matsuda, Director
W. M. Keck Observatory

Handwritten signature of Doug Simons in black ink.

Doug Simons, Director
UH Institute for Astronomy

Handwritten signature of Warren Skidmore in black ink.

Warren Skidmore, Deputy Director
NASA Infrared Telescope Facility

Handwritten signature of Watson P. Varricattu in black ink.

Watson P. Varricattu, Head of Science Operations
UKIRT Observatory



SB 2987 – RELATING TO LIGHT POLLUTION

LATE

Chairs DeCoite and Wakai, Vice Chair Chang, and Members of the Committees:

The DesignLights Consortium applauds the sponsors for **SB 2987**, which establishes statewide outdoor lighting requirements to protect Hawai'i's dark night skies, safeguard native wildlife, reduce energy waste, and preserve the cultural and scientific value of natural darkness across the islands.

As a 501c3 non-profit organization with deep lighting science expertise, the DLC was honored to contribute to The University's Dark Skies Protection Advisory Committee, created under Act 185 (2017). SB 2987 puts the committee's recommendations into action, including limits on color temperature and uplight, requirements for shielding and dimming, turtle-safe lighting standards, and alignment with the DLC-LUNA Qualified Products List. That product list represents market available, high performance, light pollution-mitigating and energy efficient commercial lighting.

The DLC respectfully suggests an amendment to correct details for this legislation.

The correction of Sections 201-5.g2a: 330nm-700nm, should be 380 nm-730 as appropriately visible to the human eye.

Section 201-5.g2b: A maximum Glare rating of "B1" should be represented by G1, for Glare. Similarly,

Section 21-5.j: Change a maximum glare rating of "B0" to "G0" for Glare.

Typo in Section 201-5.g1: "Eero-Uplight" should be "Zero-Uplight"

In conclusion, SB 2987 reinforces Hawai'i's leadership in science, conservation, and cultural stewardship while aligning with suitable lighting performance standards. The bill protects public spaces, research, supports wildlife and environmental priorities, enhances educational opportunities, promotes sustainable tourism, and advances energy efficiency goals.

By incorporating clear, science-based lighting criteria and aligning with the DLC LUNA Qualified Products List, SB 2987 represents a practical and technically grounded framework for protecting Hawai'i's night sky, a valuable and irreplaceable resource.

Mahalo for the opportunity to testify.

SB-2987

Submitted on: 2/10/2026 6:17:54 PM

Testimony for EDT on 2/12/2026 1:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Johnnie-Mae L. Perry	Individual	Support	Written Testimony Only

Comments:

I, Johnnie-Mae L. Perry Support

2987 SB RELATING TO LIGHT POLLUTION.

SB-2987

Submitted on: 2/11/2026 7:47:02 AM

Testimony for EDT on 2/12/2026 1:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Juan Carlos Guerra	Individual	Support	Written Testimony Only

Comments:

I support this bill. Light pollution at night has been worsening and this measure helps by introducing reasonable standards. Excessive artificial light at night, especially on the blue side of the light spectrum, affects wildlife, human health, astronomy, and cultural practices and connections with the night sky. This bill helps preserve these and is quite reasonable as far as a state wide measure goes. A lower kelvin temperature of 2200K to 2500K would be better, especially for sensitive areas, but this is a good start and I support SB2987.

Hawaii State Legislature
Bill: SB2987
2/10/2026

Honorable Committee EDT/EIG

I do support a Statewide plan for Dark Skies protection, but I do not support SB 2987 in its current form. I recommend that the committee include architects & engineers from the design community to give comments on this ordinance as it will affect future designs for the state.

- DLC-LUNA is a paid listing for this certification.
- (e) calls for outdoor fixtures to be extinguished or dimmed by minimum of 75% during curfew hours unless otherwise superseded by County building codes.
 - Safety and security will be an issue.
 - Which outdoor fixtures?
 - Roadways? Parks? Airports?
 - Restaurants? Ala Moana shopping center?
 - Prison yards? Parking structures (Pearlridge)?
 - Golf Driving ranges
 - Hilton Hawaiian Rainbow tower façade?
- Limiting all pole mounted outdoor lights fixtures to a maximum of 10000 lumens.
- Wall mounted or ceiling mounted or canopy mounted to have a maximum of 2500 lumens.
- Bollards to have a maximum of 1000 lumens.
 - All three are very limited on safety and security in lighting.
 - If this is defined in areas for turtles, then define this for Outdoor lighting in clearly defined Turtle friendly districts.
- Curfew hours for residence uses? 10pm to Sunrise?

Dark Skies protection strategy should be done in zones, given the variety of densities in the State. A shoreline on the Big Island would be different from Kalakaua Avenue in Waikiki. Also, various applications and approaches should be considered for the variety of outdoor lighting applications.

Sincerely,

Eric Miyasato, P.E
808-226-5973