

Comment to the Initial Study

The LEFT HAND COLUMN below is verbatim text from the Initial Study. Page numbers precede the quoted material and boldface emphasis has been added to highlight significant portions. Unrelated phrases have been omitted and replaced with an ellipsis, but in no instance has the omission of irrelevant material altered the substantive meaning of the text. [Bracketed words] have been included for clarification.

The RIGHT HAND COLUMN points out the error or omission in the corresponding Initial Study section and raises questions to be answered in the Draft Environment Impact Report.

Text from the Initial Study:	Comments and Questions:
<p>(P8) Project Operation [A]s the program reaches full maturity, four to five years from inception, SFGH anticipates that the hospital may experience as many as approximately 700 (53+400+240=693) landing and takeoff cycles per year⁷, with an expected maximum of three landings per day on the rarely occurring peak air-transport day.</p>	<p>Peak Air-Transport Day One of the closest heliports to SFGH is the Concord Airport. This facility houses both Calstar and REACH helicopters and services the Bay Area. The Calstar Chief Pilot, Tim Tatman, reports that Emergency Medical Services (EMS) helicopter transport is much more frequent during summer months due to outdoor recreational mishaps. “Some days there are 8 or 9 calls, while during winter months there may be a string of days with zero flights.” A great many of the statistics used throughout the Initial Study are derived from the inaccurate “maximum of three landings per day” prediction. In fact, the 3 landings/takeoffs per day is actually a yearly average.</p> <ul style="list-style-type: none"> • What is the contingency plan if there are more than 3 flights during a 24-hour period? • Would the SFGH helipad be imposing a limit of three flights per day? <p>If no such limit is adopted, please adjust all Draft EIR conclusions to account of the probable increase in flights to SFGH during the summer months.</p> <p>Additionally, the 3 landings/takeoffs per day average estimate if based upon historical data, does not adequately account for the exponential growth of Bay population and the medical helicopter business.</p> <ul style="list-style-type: none"> • What is the projection for future number of flights per day based on the rate of growth in the “medical catchment area” to be served by SFGH?
<p>(P9) Flight Paths Helicopter emergency medical service (HEMS) flights originate from many directions in the greater Bay Area. Helicopters primarily follow major surface arterials and freeways from a pickup site....For optimum performance, helicopters would take off and land into the wind. In San Francisco, the wind is</p>	<p>Wind direction The EIR must resolve the multiple internal contradictions found in the single paragraph in the left column, which points out that a helicopter should:</p> <ul style="list-style-type: none"> • take off and land “into the wind”, <p>and also states:</p> <ul style="list-style-type: none"> • the wind is “predominately westerly”. <p>But then states:</p>

<p>predominantly westerly (from the west) to northwesterly..... Since wind typically comes from the north/northwest direction, helicopters would generally approach the medical helipad from the south, as a northbound flight</p>	<ul style="list-style-type: none"> • “Since wind typically comes from the north/northwest direction, helicopters would generally approach the medical helipad from the south”. <p>While wind direction presents a safety issue, that will conflict with this Initial Study assertion:</p> <ul style="list-style-type: none"> • “Helicopters primarily follow major surface arterials and freeways from a pickup site.” <p>Following major freeways to lessen the noise disturbance created below will not be possible if the helicopters “take off and land into the wind”, an important safety practice. As was noted by the Feasibility Study, it is important for helicopters to avoid taking off or landing with a crosswind or tailwind.</p> <ul style="list-style-type: none"> • How will the dilemma between flight safety with regard to wind direction and the promise to follow major traffic routes be resolved? • How will the flight path be routed to lessen the impact upon several schools that are directly adjacent to the 101 freeway (see schools section, below)? • What is the altitude that the EMS helicopters will maintain as they approach the SFGH helipad? • Will this height vary depending upon the origin of the flight and route used to reach the hospital?
<p>(p13) Potential Environment Impacts Effects Found Not To Be Potentially Significant The following effects of the SFGH medical helipad project have been determined to be either insignificant or to be mitigated to less-than-significant levels through mitigation measures identified herein: land use, visual quality, population, transportation/circulation, air quality/climate, utilities/public services, biology, geology/topography, water, energy/natural resources, and cultural resources. These issues are discussed below and require no further environmental analysis in the EIR, except, as noted, some may be included for informational purposes</p>	<p>Potentially Significant Effects On The Environment</p> <p>Contrary to the Initial Study’s mistaken conclusion, land use, air quality/climate, energy/natural resources, biology and cultural resources will each be significantly affected by the addition of helicopter landings and takeoffs. The EIR must include analysis of the impact of each, as discussed more fully below.</p>
<p>(P14) San Francisco Planning Code Permits to construct new buildings... may not be issued unless</p> <ol style="list-style-type: none"> (1) the proposed project conforms to the Planning Code, (2) an allowable exception is granted pursuant to provisions of the Code, or (3) amendments to the Code are included as part of the project. 	<p>San Francisco General Plan Elements The San Francisco General Plan goals are set forth in a statement of objectives and policies to be attained through a series of elements. The helipad proposal fails to conform to the “Environmental Protection” element of the San Francisco General Plan: http://www.sfgov.org/site/planning_index.asp?id=25526</p> <p>Under the section entitled, “Objectives and Policies”</p>

<p>The proposed project does not require variances, special authorizations, or changes to the City Planning Code</p> <p>(P15) Plans and Policies The <i>San Francisco General Plan</i>, which provides general policies and objectives to guide land use decisions, contains some policies that relate to physical environmental issues. The current project would not obviously or substantially conflict with any such policy.and no amendment would be required.</p>	<p>the General Plan explains: “The Transportation Noise Plan is directed toward achieving an environment in which noise levels will not interfere with the health and welfare of people in their everyday activities.”</p> <p>OBJECTIVE 11 PROMOTE LAND USES THAT ARE COMPATIBLE WITH VARIOUS TRANSPORTATION NOISE LEVELS.</p> <ul style="list-style-type: none"> • How does the SFGH helipad proposal adhere to the Land Use policy guidelines set out in the “Land Use Compatibility Chart for Community Noise”? <p>This chart is found in The General Plan, Environment Element, POLICY 11.1, which states: “Discourage new uses in areas in which the noise level exceeds the noise compatibility guidelines for that use. (Land Use Compatibility Chart for Community Noise)”</p> <p>The Land Use Chart lists the acceptable decibel level for each type of use. The existing land uses in the areas adjacent to SFGH, includes thousands of residential buildings, dozens of schools, numerous churches. According to the Chart, the noise level compatible with this residential and classroom land use is no more than 65 dBs,</p> <ul style="list-style-type: none"> • Why does the Initial Study maintain that the helipad project would not conflict with “policies that relate to physical environmental issues”?
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<p>(P15) Plans and Policies In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the City Planning Code to establish eight Priority Policies. These policies are preservation and enhancement of neighborhood-serving retail uses; protection of neighborhood character; preservation and enhancement of affordable housing; discouragement of commuter automobiles; protection of industrial and service land uses (P16) from commercial office development and enhancement of resident employment and business ownership; maximization of earthquake preparedness; landmark and historic building preservation; and protection of open space.</p>	<p>Priority Policies The proposed helipad project is inconsistent with the following Priority Policies:</p> <ul style="list-style-type: none"> • Historic building preservation; As pointed out in Art. 11, Sec. 1101 of the City Planning Code, buildings in San Francisco “have a special architectural, historical, and aesthetic value. These buildings contribute substantially to San Francisco’s reputation throughout the United States as a City of outstanding beauty and physical harmony.” Although many have not yet been officially designated as “Significant or Contributory Buildings” pursuant to Art. 11, Sec. 1102, the eastern edge of the Mission, near SFGH, has numerous single family homes that are Queen Anne Victorians constructed by William Hollis in the early 1870’s. The helicopter subsonic vibrations will have significant destructive effect upon these aged structures. The EIR should specifically address
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<p>Prior to issuing a permit for any project that requires an Initial Study under the California Environmental Quality Act (CEQA); prior to issuing a permit for any demolition, conversion, or change of use; and prior to taking any action that requires a finding of consistency with the General Plan, the City is required to find that the proposed project or legislation is consistent with the Priority Policies.</p>	<p>damage to such historic pre-1906 neighborhood homes.</p> <ul style="list-style-type: none"> • Protection of neighborhood character (discussed below)
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<p>(P16) Environmental Effects I. Land Use - Could the project:</p> <p style="padding-left: 20px;">b. Have any substantial impact upon the existing character of the vicinity?</p> <p>(p17) Neighborhood character near the project site is influenced by a mixture of land use intensities, which include multi-unit residential buildings and neighborhood-serving commercial uses adjacent to SFGH, and by Potrero Avenue and U.S. Highway 101 roadways adjacent to the west and east, respectively, which carry heavy traffic volumes during peak periods. News station helicopters often monitor traffic conditions along the roadways, particularly the segment of U.S. Highway 101 adjacent to SFGH referred to as "hospital curve".</p>	<ul style="list-style-type: none"> • Existing Character of the Vicinity Contrary to the impression created by the SFGH neighborhood description given in the Initial Study, the area immediately surrounding SFGH is predominately two story single-family homes with land adjacent. Most have no noise insulation or air-conditioning and would be severely impacted by frequent helicopter noise, which would have serious detrimental effect upon the character of the vicinity. <p>Contrary to the Initial Study's assertion, news helicopter do NOT often fly over the "hospital curve" area. According to Gari Firenze, pilot for KGO News/Traffic helicopter, the 101 hospital curve is not a traffic "choke point" and is rarely visited by helicopters; twice a month, at most. Additionally, the helicopters used for Emergency Medical Services (EMS) are twin-engine and thus approximately 50% larger than the single-engine helicopters used by the KPIX and KGO News. Most importantly, the news helicopters maintain an altitude of 1400 feet in order to avoid disturbing residents below. Therefore, the Initial Study's reliance upon news helicopter flyovers in support of its position that EMS landings at SFGH would not impact the existing character of the neighborhood is erroneous. The addition of frequent helicopter landings and takeoffs would have very significant land use impact. Therefore, the EIR must address the following questions regarding the change in the character of the impacted neighborhood: How will the neighborhood character The effect of a SFGH helipad on the character of the neighborhood MUST be included in the EIR.</p>
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<p>(p36) Environmental Effects (cont.) a) Noise - Could the project:</p> <p style="padding-left: 20px;">a. Increase substantially the ambient noise levels for adjoining areas?</p> <p><u>TO BE DETERMINED</u></p>	<p>Helicopter NOISE Impacts The California Environmental Quality Act (CEQA) specifically addresses the issue of NOISE: § 21001. Additional legislative intent The Legislature further finds and declares that it is the policy of the state to: (b) Take all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities, and freedom from excessive</p>
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A detailed study of noise generated by the proposed operation of a medical helipad at SFGH is being prepared. This study, which will address existing area noise including aircraft noise and the impact of noise and vibration on the surrounding neighborhoods.....

noise.

With this legislative intent in mind, the EIR must address the follow bulleted questions concerning the helicopter noise impact:

- **How can the helipad proposal be reconciled with the objectives and goals of the San Francisco General Plan?**

As discussed on p.1, above, the Introductory section of the San Francisco General Plan, Transportation Noise Section, specifically states:

“We are learning that not only does noise annoy, it can endanger our physical and even mental health. Because of this potential health hazard, some people are becoming convinced that we are as much entitled to a quiet environment as to unpolluted air and water and pure food.”

http://www.sfgov.org/site/planning_index.asp?id=25526

The affected neighborhood is “residential” and according to the [Land Use Compatibility Chart for Community Noise](#) incorporated into **Policy 11.1** of the General Plan,

(http://www.sfgov.org/site/planning_index.asp?id=25526),

if the decibel level produced by the new project is 65 dB or higher in a residential neighborhood, then “new construction or development should generally not be undertaken.”

- **Do the noise level measures used by the Draft EIR accurately gauge the immediate effect of the helicopter noise upon the residents below?**

The helicopter noise levels must be measured NOT as a Day/Night Level (DNL), or using the Community Noise Equivalent Level (CNEL) metric, because both of these methods average the helicopter noise into the ambient sound over an entire 24-hour period. The relevant measurement is the “Single Event Noise Exposure Level (SENEL)” as that is defined by the State Noise Standards, Title 21 Section 5001(n). This will fairly gauge the actual helicopter noise event to which the residents will be exposed.

- **What is the effect of repeated helicopter noise upon children, specifically their sleep patterns and the disruption of their classroom learning experience?**
- **What is the effect upon people and housing caused by the subsonic vibration element of the helicopter noise?**
- **What will be the physical and psychological health effects of the helicopter noise?**
- **Specifically,**
 - What will be the effect of the repeated and regular annoyance created by the helicopter noise?
 - How will the helicopter noise influence social behavior

(aggressiveness, protest and helplessness)?

- What are the effects, on a long and short-term basis, produced by repeated and regular sleep disturbances to the neighbors of SFGH helipad?
- What cardiovascular effects may result?
- What will be the affect upon the hormonal responses (stress hormones) and on metabolism (nutrition) and the immune systems of the SFGH neighbors exposed to the helicopters' noise?
- How will frequent helicopter noise affect the performance at work and/or school of SFGH neighbors?.

Numerous studies have found detrimental physical and psychological effects related to noise. See: The World Health Organization (WHO) guidelines, which identify the main health risks of noise <http://www.who.int/mediacentre/factsheets/fs258/en/>

- **How do the answers to each question posed above, change when more than 3 helicopter landings occur in a 24 hour period?**

As pointed out on Page 1, above, there will likely be far more than the Initial Study's "expected maximum of three landings per day" during summer months; the noise impact of these additional flights must be evaluated. The EIR should deal with these probable half dozen or more flights during summer months, when home windows will be open at night.

- **What documentation can be cited by the EIR in support of the "maximum of three flights a day" hypothesis?**
- **What are the plans for any increase in helicopter flights over this three day maximum?**
- **What is the projection for future number of flights per day based on the rate of growth in the "medical catchment area" served by SFGH?**
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(P36)

Environment Effects (cont.)

6. **Air Quality/Climate** - Could the project:
- a. Violate any ambient air quality standard or contribute substantially to an existing or projected air quality violation?
 - b. Expose sensitive receptors to substantial pollutant concentrations?
 - c. Permeate its vicinity with objectionable odors?

(p37)

Ambient Air Quality

The Bay Area Air Quality Management District (BAAQMD) ...measures the ambient concentrations of criteria pollutants including ozone.....and **inhalable and fine particulate matter (PM₁₀ and PM₂₅)**.....

Potrero Hill Air Quality Monitoring Station

The Potrero Hill Air Quality Monitoring station, is located at 10 Arkansas x 16th street, approximately 1 mile from the proposed helipad. It is uncontested that helicopters burn jet fuel at the rate of 1 gallon per minute, which produces significant PM₁₀ and PM_{2.5}. as well as precursors to ozone.

- What are the exact emissions of PM10 and PM2.5 produced by the twin engine helicopters used by Emergency Medical Services?
- Where and how where have such emission measurements been obtained?

<p>There are two monitoring stations in San Francisco: ... one on Arkansas Street in the Potrero Hill neighborhood.....</p> <p>The State-level annual average standards [for PM₁₀] are exceeded at the Arkansas Street station.</p> <p>the Bay Area is designated as a State-level nonattainment area for PM₁₀ and PM₂₅.</p> <p>For State-level air quality planning purposes, the Bay Area is classified by the ARB as a serious nonattainment area for ozone. The “serious” classification triggers various planning requirements and transportation performance standards. To improve ozone conditions, the BAAQMD maintains the Clean Air Plan (CAP), which outlines control measures for stationary sources and mobile sources, as well as transportation control measures for land use and transportation planning. Because aircraft emissions are managed by the U.S. EPA, the Clean Air Plan (CAP) does not include measures to reduce emissions that contribute to ozone from these sources. The California Air Resources Board (ARB) does not require local attainment plans to address violations of the State-level inhalable particulate (PM₁₀) standards.</p>	<ul style="list-style-type: none"> • The Initial Study maintains that “the California Air Resources Board (ARB) does not require local attainment plans to address violations of the State-level inhalable particulate (PM₁₀) standards.” However, SB 656, passed in 2004, requires each district to adopt and implement control measures to reduce PM_{2.5} and PM₁₀ from stationary, area, and mobile sources, and to make progress toward attainment of state and federal particulate matter standards. • In view of the fact that the State-level annual average standards [for PM₁₀] are already exceeded at the Arkansas Street station, how will the increase caused by helicopter takeoff/landing at SFGH be consistent with the San Francisco 656 legislative mandate? <p>As noted by the Initial Study, San Francisco already has a “serious” ozone and particulate matter PM₁₀ problem.</p> <ul style="list-style-type: none"> • How will multiple helicopter landings/ takeoffs each day aggravate this problem in direct contravention of California’s Clean Air Plan? • What will be the air quality impact upon the immediate SFGH neighborhood?
<p>(P. 38) Emissions from Helicopter Operations Operation of the medical helipad project would lead to increased helicopter use and would cause aircraft emissions.The helicopters accessing SFGH would typically be twin-engine models, operated on jet fuel.</p> <p>(P. 39) As Table 4 shows, the maximum daily helicopter emissions caused by the proposed project, individually and cumulatively, would not cause an exceedence of the thresholds of significance established by the BAAQMD.</p> <p>Emissions from the project would not cause a significant air quality impact. Therefore, the EIR will not address air quality impacts of project operation further.</p>	<p>Study Emissions Data Source is Outdated</p> <ul style="list-style-type: none"> • What is the source of the helicopter emissions statistics listed in Table 4? • How were these emission measurements obtained? • If the source for the helicopter emissions statistics displayed in Table 4 is given in fn. 28, p. 38, then that data is over 25 years old. <p>The FAA currently offers The Emissions and Dispersion Modeling System (EDMS), which is the “preferred guideline” model since 1993.</p> <ul style="list-style-type: none"> • What is the helicopter emissions levels when the EDMS modeling system is utilized? • In order to adhere to the Table 4 statistics, would three flights per 24-hour day be the upper limit placed upon the number of helicopter landings at SFGH?
<p>(p40) Exposure to Toxic Air Contaminant Emissions/Objectionable Odors Jet fuel exhaust odors may be noticeable in the immediate vicinity of the helipad; they would be sufficiently diluted with fresh air before reaching off-campus locations... Therefore, no substantial exposure to toxic air contaminant</p>	<p>Exhaust Odor and Toxic Contaminants</p> <ul style="list-style-type: none"> • What study has been used to quantify the level of emission odors? • What is the basis of the conclusion that “Jet fuel exhaust odors...would be sufficiently

emissions or objectionable odors would occur with the proposed project, and no significant impact would occur from toxic air contaminants or odors. Therefore, the EIR will not address this issue further.	diluted with fresh air before reaching off-campus locations” ?
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<p>(P.44) Environment Effects (cont.)</p> <p>8. Biology - Could the project:</p> <p>b. Substantially diminish habitat for fish, wildlife or plants, or interfere substantially with the movement of any resident or migratory fish or wildlife species?</p> <p>Collisions between birds and helicopters occasionally do occur, primarily during the cruising phase of a flight rather than during landings or takeoffs. Generally, helicopters fly low enough and have adequate maneuverability to avoid bird strikes.³²</p> <p>....Therefore, there would be no significant biological impact, and biology will not be discussed in the EIR.</p>	<p>Resident Bird Populations</p> <ul style="list-style-type: none"> • How will the helicopter traffic in the area affect the willingness of birds to live and nest in the SFGH neighborhood? • How will a decrease in local bird populations affect the rodent and insect problem in the area? • How will the helipad affect the hawks that currently frequent the SFGH rooftop? • How will the parrot flock that lives in the park on Potrero Hill be affected by the helipad?
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<p>(p47) Environment Effects (cont.)</p> <p>11. Energy/Natural Resources - Could the project:</p> <p>a. Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful</p> <p>Use of helicopters to provide emergency medical access would result in additional fuel consumption, but not in large amounts and not in a wasteful manner.</p>	<p>Wasteful use of Fuel and other Resources</p> <p>With a usage rate of 1 gallon of jet fuel per mile, the fact that helicopters use large amounts of fuel is incontrovertible. The EIR must address whether that fuel is used “in a wasteful manner”.</p> <p>The Initial Study maintains the fuel use is not wasteful. However, recent studies in respected journals have concluded that helicopter patient transport is overused and is wasteful. In January, 2005, the journal Prehospital Emergency Care, which is the official Journal of the National Association of EMS Physicians, published an abstract reporting that a study of 37,500 helicopter-transported patients determined that two out of every three transports had only minor injuries and that 25% of transport had injuries too minor to require hospital admission.</p> <p>http://www.naemsp.org/publications-pec.asp</p> <p>This is unquestionably a wasteful use of Fuel, personnel and other limited resources.</p>
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	<p>Whether Helicopter emergency medical services (HEMS) actually benefits patients, is a matter of ongoing EMS debate See <i>The Utility of Helicopter Transport of Trauma Patients from the Injury Scene in an Urban Trauma System</i>. Journal of Trauma-Injury Infection & Critical Care. 53(5):817-822, November 2002.</p> <p>This study concluded “a maximum of 22.8% of the study population possibly benefited from helicopter transport. The helicopter is used excessively for scene transport of trauma victims in our metropolitan trauma system.”</p>
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	<p>Air-transport industry leaders, including Stephen Thomas, a physician and associate medical director of Boston MedFlight, an emergency medical air-transport service, attribute the high rate of minimally injured patients to the difficulty of conducting accurate injury assessments at the scene of accidents—especially considering that such calls often are made not by physicians but by paramedics and even police.</p> <p>Additionally, it appears that the jet fuel used by the helicopters is being wasted if the SFGH Emergency Room would not be capable of accepting any more patients. As was noted by the Academic Senate Clinical Affairs Committee Report, May 17, 2001: “Revenues have also decreased because diversions from the Emergency Department have shifted paying patients to other hospitals”</p> <p>In light of these and numerous other studies, the EIR must address the issue of overuse of helicopter patient transfers, in order to reliably respond to the question posed by Section 11, (a) regarding the wasteful use of energy and natural resources.</p>
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<p>(P50) Environment Effects (cont.)</p> <p>12. Hazards - Could the project: C. Create a potentially substantial fire hazard?</p> <p>Aircraft Safety [T]he potential for helicopter crashes and response measures in the event of an aviation accident, will be discussed in the EIR.</p>	<p>Helicopter Crashes</p> <p>The Federal Aviation Administration agency launched an inquiry earlier this year into the rapidly expanding air ambulance industry, which by March 2005 had suffered more than 100 helicopter crashes and at least 92 fatalities since 1995, according to FAA and National Transportation Safety Board statistics. In 2005 alone there have been 170 injury producing helicopter accidents, 20 of those involved fatalities. See: http://www.nts.gov/nts/query.asp</p> <p>The EIR must address this FAA air ambulance inquiry. It must discuss the potential of crashes that might kill or injure the patients being transported, neighborhood residents, hospital and helicopter personnel.</p> <p>Specifically, the EIR should discuss:</p> <ul style="list-style-type: none"> • What are the weather conditions that would prohibit helipad operations and what is the frequency of such conditions? • What precautions would be instituted to ensure that helicopter patient transfers did NOT occur during dangerous weather conditions? • How frequently would the phenomena of “wind shear” or fog be a problem? • What is the percentage probability of a helicopter crash in the surrounding neighborhood. • What is the possibility of neighborhood fire(s) caused by a helicopter crash and the likelihood that the jet fuel on board will explode? • How many neighborhood houses would be destroyed by such an event? <p>As was noted by the Feasibility Study, it is important for helicopters to avoid taking off or landing with a crosswind or tailwind.</p> <ul style="list-style-type: none"> • How will this important safety factor be observed?
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(p51)

Environmental Effects

13. Cultural Resources - Could the project:

- a) Disrupt or **adversely affect a ...property of historic or cultural significance** to a community...?
- b) Conflict with established recreational, **educational**, religious or scientific uses of the area?

(p.52)

Installation and operation of a medical helipad on the roof of Main Hospital would not conflict with established recreational, educational, religious, or scientific uses of the area, and **this topic will not be discussed in the EIR.**

FN 38 The EIR will address the potential impact of vibration on the surrounding neighborhood and the SFGH Campus, including any impacts to hospital buildings, as indicated on p. 36 of the Noise section of this Initial Study

Educational and Religious Uses:

- Using the actual decibel level and duration, measured as a Single Event Level (SEL), how will repeated helicopter landings/takeoffs specifically affect the children in classrooms at the following schools all of which are located within approx. 1/2 mile of SFGH or from the flight path?

Preschools:

- Bryant Nursery & Childcare**
1060 York St, San Francisco, CA (0.11 miles away)
- Buena Vista Prekindergarten**
2641 25th St, San Francisco, CA (0.24 miles away)
- Forest Hill Montessori School**
819 Florida St, San Francisco, CA (0.30 miles away)
- 24th Street Head Start**
3013 24th St, San Francisco, CA (0.34 miles away)
- San Francisco Head Start**
824 Carolina St, San Francisco, CA (0.38 miles away)
- Mission Neighborhood Ctr**
3141 26th St, San Francisco, CA (0.56 miles away)
- Friends of Potrero Hill Nrsry**
1801 Mariposa St, San Francisco, CA (0.58 miles away)
- Kiddieland Happy Face Place**
637 Peralta Ave, San Francisco, CA (directly below the 101 flight path)

K-12 schools:

- Bryant Elementary School**
1050 York St, San Francisco, CA (0.11 miles away)
- Buena Vista Alternative Elem**
2641 25th St, San Francisco, CA (0.23 miles away)
- Meadows-Livingstone School**
1499 Potrero Ave, San Francisco, CA (0.33 miles away)
- Leonard R. Flynn Elementary School**
3125 Cesar Chavez, San Francisco, CA
- George R. Moscone Elementary**
2576 Harrison St
- Starr King Elementary**
1215 Carolina St.
- Enola Maxwell Middle School**
655 De Haro St
- Daniel Webster Elementary**
465 Missouri St
- St. Anthony Immaculate Conception School**
299 Precita Avenue(0.56 miles away)
- Caesar Chavez Elementary School**
825 Shotwell St., San Francisco, CA (0.49 miles away)
- Saint Peters Parish School**
1266 Florida Street, San Francisco, CA 94110
- International Studies Academy**

693 Vermont St, San Francisco, CA (0.44 miles away)
John O'Connell High School Te
 2355 Folsom St, San Francisco, CA (0.55 miles away)
Sr Martin College Preparatory
 2660 San Bruno Ave, San Francisco, CA (immediately adjacent to
 101 flight path approx. 2 miles south of SFGH)
St., John O'Connell High School
 2355 Folsom St
Live Oak School
 1555 Mariposa Street

It has been well documented that “Aircraft noise exposure was related to impaired performance in reading comprehension and recognition memory” and that “The reading age in children exposed to high levels of aircraft noise was delayed by up to two months in the UK for a five decibel change in noise exposure.”

see: http://www.qmul.ac.uk/news/newsrelease.php?news_id=133#top

- How will the SFGH neighborhood classroom experience be affected by a helicopter noise well above the maximum noise level found to be compatible with classrooms land use? See: “Land Use Compatibility Chart for Community Noise” found in The General Plan, Environment Element.

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Adverse effect upon culturally significant buildings

As pointed out in Art. 11, Sec. 1101 of the City Planning Code, there are buildings in San Francisco which “have a special architectural, historical, and aesthetic value. These buildings contribute substantially to San Francisco's reputation throughout the United States as a City of outstanding beauty and physical harmony.” Although many have not yet been officially designated as “Significant or Contributory Buildings” pursuant to Art. 11, Sec. 1102, the eastern edge of the Mission, near SFGH, has numerous single family homes that were built by William Hollis in the early 1870's. These are Queen Anne Victorians and the helicopter subsonic vibrations will have significant destructive effect upon these aged structures.

- What will be the long-term vibration damage to vintage Pre-1906 neighborhood homes?
- What negative impacts will the helipad have on the potentially historic district that is the East Mission neighborhood? ,

(p54)
ALTERNATIVES

CEQA requires that an EIR evaluate a reasonable range of feasible alternatives to the project, or to **the location of the project**, that would attain most of the basic project objectives, but that could avoid or substantially lessen any of the significant effects of the project, so that the merits of each alternative are compared to those of the proposed project.

Hunters Point Naval Shipyard Helipad (Pier 94)

An alternative, which the EIR should discuss, is reactivation of the Hunter's Point Naval Shipyard Helipad located on Pier 94. The Port of San Francisco operates it as a container terminal. It is currently being used by Hanson Aggregates, a private company, for unloading materials for the new Bay Bridge. As noted by the Initial Study (p1), this helipad closed in July 2004. Prior to that closure, it had not been used by helicopters transporting severely injured patients, because "a secondary transfer to a ground ambulance and the subsequent trip to the trauma center would add transport time and risk, potentially compromising the patient's ability to survive the injury."

However, while still in use, the Hunters Point Helipad delivered "approximately **240 additional patient transports**" each year. After landing at Hunters Point, these patients were transported by ambulance to a specialty hospital in San Francisco, not SFGH. The 2003 Feasibility Study pointed out that Hunters Point helipad was "poorly lighted" and that access required "a bumpy ride over railroad tracks and roads in disrepair". Clearly, the alternative of adding sufficient lighting and road repair should be thoroughly explored, as well as the addition and modification of traffic signals, in order to facilitate a high-speed transport via ambulance from Hunters Point helipad to SFGH emergency room. This is a trip of merely 2.2 miles and with that appropriate traffic signal and road repairs should require less than 5 minutes. Currently, even with stoplights not sequenced or triggered, the trip takes just 7 minutes in normal midday traffic.

Another Alternate Helipad Location:

Pier 80 lies just north of Pier 94 across Islais Creek. The southeast end of Pier 80 is the Port of San Francisco North Container Terminal. An area on the northeast end of the Pier, which is currently used only by the Moscone Convention Center for truck parking, would be a ideal helipad location. It is already city-owned.

The distance between Pier 80 and SFGH is just **1.5 miles** and currently takes 5 minutes in midday traffic. Improved ambulance access speed could easily be obtained with some simple road repairs and traffic signal modifications, including the emergency triggering of all lights and the installation of a traffic signal at the Cesar Chavez/Vermont St. intersection.

Advantages of Pier 80:

- Pier 80 already belongs to the City and County of San Francisco.
- Since UCSF has planned a Mission Bay Trauma Unit, with helipad access, this location would work well and also makes access to care faster and easier from Hunters Point.
- This property is available now.
- The heliport would not be located atop a building, which could be compromised by an earthquake.
- The Pier 80 Heliport is a greater distance from residential housing than Pier 94, or SFGH.
- The Cesar Chavez St. ambulance route is an industrial area.
- This location does not necessitate an earthquake rebuild to be permanently up & running.

	<ul style="list-style-type: none"> • Pier 80 helicopter landing/takeoff would not necessitate a tight landing adjacent a major freeway artery into and out of the City of San Francisco. <p>The helicopter flight path to either of these helipad alternatives would be over the San Francisco Bay. The Evans and Cesar Chavez Street ambulance route to SFGH is through a primarily industrial neighborhood. See Appendix A and B (attached).</p>
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<p>(p54) In addition to the No Project alternative required by CEQA, the EIR will discuss the Decreased Volume of Flights alternative.</p> <p>(p8) SFGH could expect to receive approximately one patient by helicopter per week from the scene of an emergency incident, or about 53 patients annually.</p> <p>Approximately 240 additional patient transports may be received for tertiary referrals to other San Francisco hospitals as a result of the decommissioning of the Bayview Hunters Point Public Safety Helipad in July 2004. Patients in this category may include burn patients requiring transport to the America College of Surgeons Verified Bum Center at Saint Francis Memorial Hospital; patients requiring extremity re-implantation at Davies Medical Center; and women, children, and infants requiring UCSF Medical Center tertiary care services.</p>	<p>Decreased Volume of Flights alternative</p> <p>Resuming the use of the Hunters Point helipad, or the alternative helipad location at Pier 80 for the 240 tertiary referral patients could “substantial lessen” the noise impact in the Mission/Bernal/Potrero neighborhoods and therefore should be evaluated by the EIR.</p>
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Appendices A and B on following pages, attached.