

January 18, 2019

City of Duluth
City Clerk Office
411 W. 1st Street
Duluth, MN 55802

Re: Appeal of Planning Commission's approval of #PL 18-158; St. Luke's Expansion

I'm appealing St. Luke's expansion plan, **specifically the heliport** which is planned for the top of the parking structure adjacent to Building A at 1012 E. 2nd Street. I believe that building this new heliport as proposed will violate Duluth's **Comprehensive Plan Policies, Principles #7 and #8**. While the Noise Screening Report prepared for St. Luke's meets the letter of the law, per Code 50-20.5 E (FAA guidelines), it doesn't meet the *spirit* of the law, as stated in our city's Comprehensive Plan's Governing Principles. The sound analysis presented in the report fails to take into account two critical factors which will significantly impact the noise levels experienced by residents in my neighborhood.

#1: It fails to take into account the *ground level* height of the helipad. The current helipad is four stories high with no homes/people at that same level. Because sound travels mostly upward and out, the people/homes nearby are less impacted. The proposed heliport is planned to be two stories high, and at the *same ground level* as homes directly across the street and nearby. It is actually *lower* than the homes on 3rd Street and on up the hill. This will cause the sound waves to reach the homes *directly*, having maximum impact.

#2-The report fails to take our *hill* into account. The helipad sound will actually reflect off the hill, amplifying the noise.

The FAA-designed tool used to calculate the noise levels reported in the Noise Report has underestimated what the noise levels will actually be throughout the neighborhood under the proposed helipad, because it fails to take these two factors into account.

Comprehensive Plan Principle #8-Encourage a mix of activities, uses and densities-

UD-1. To ensure that different land uses "mix well"...

D. Keep sufficient separation between clearly incompatible uses, such as between industrial or auto-oriented commercial and residential neighborhoods.

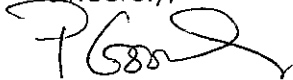
Having to experience this level of noise *in one's own home* is incompatible with good health and quality of life, and does not "mix well" with this proposed heliport. There is a vast amount of research validating the negative impacts of loud noise on physical and psychological health, hearing loss and brain development. This is especially true for children, as their bodies and brains are developing.

Principle #7-Create and maintain connectivity-This principle addresses the importance of "non-vehicular modes" of connecting/transportation, ..."**sidewalks and other public ways... critical to the creation of useable pedestrian systems**".

In addition to the noise, there will be "rotor wash" (**wind and wind-driven debris**) generated by the helicopters which will create a "**nuisance condition on the sidewalk**", per St. Luke's own proposal. Winds are expected to be less than 10-35 mph, but what the velocity will actually be is unknown.

I believe that both the Planning Commission and St. Luke's did not have enough accurate information to make the best plans/decisions for the residents and visitors of my neighborhood. Please look carefully at these problems which would occur with the new heliport plan, and reconsider this decision.

Sincerely,



Penelope Gooch
1210 E. 3rd Street
goochpjpg@gmail.com
218-724-3971