This is to urge NYCAC and NYSERDA to fully consider the environmental and public health aspects of the increasing non-essential helicopter traffic in NY State’s and New York City’s lower altitudes because:

* Today, there are almost 100,000 annual *nonessential* helicopter flights from the three NYC heliports. *Nonessential* flights include sightseeing, photography, and commuter flights to and from the NYC and NJ airports, NYC, Westchester County, NJ heliports and eastern Long Island. Essential helicopter flights include the police, news gathering and military flights.
* These helicopters burn leaded fossil fuels, banned by the EPA 25 years ago -- and each helicopter dumps approximately 950 pounds of CO2 per hour on the neighborhoods and parks below their flight paths. Each helicopter burns more than forty times the fuel that a passenger car burns per hour. While the City attempts to limit the influx of vehicles to reduce pollution and greenhouse gasses, the city allows helicopters to freely pollute the City’s atmosphere with carbon and noise.
  + According to the FAA, leaded aviation fuel makes up “the largest remaining aggregate source of lead emissions into the air in the U.S.”
  + Even non-lead fueled helicopters are a significant source of particulate air pollution. Small airborne particulates emitted by piston engine helicopters have long been known to impact respiratory and cardiovascular functions. Exposures increase the cumulative risk of chronic disease and death. <https://www.greenmatters.com/p/are-helicopters-eco-friendly>
* The three operating City heliports are the: The 30th St West Side Heliport, the Wall St Pier 6 Downtown Manhattan Heliport, and the 34th St East Side Manhattan Heliport [Heliports (ny.gov)](https://www.dot.ny.gov/divisions/operating/opdm/aviation/directories/heliports)
  + The West Side Heliport, owned by the Hudson River Park Trust, the largest, is unbelievably *located within Hudson River State Park*. The West Side Heliport has eleven runways, is *always open*, and provides jet fuel type A. The West Side Heliport emits exhaust and fuel fumes and pollutes the atmosphere the walkers, joggers, cyclists, and kayakers in and near the park next to it breathe every day! The west side heliport was to have been closed and removed according to the original Hudson River Park plans; but it has never been closed and removed – possibly because the Trust does not want to forgo the income. In the meantime, there are increasing income-producing developments and activities opening with the park that could make up for any loss of heliport rental income. The state and city must find a way to facilitate the closing of that environmental and health hazard.
  + The Downtown Manhattan Heliport , owned by the NY Economic Development Corporation, (NY EDC), with one runway, open weekdays 7am to 7pm, weekends on-call, still allows 30,000 sightseeing helicopter flights a year -- flights that pollute the NY Harbor, Stature of Liberty, Ellis Island, Governors Island, South Street Seaport, Hudson River Park, Central Park, and the neighborhoods along the Hudson River with carbon emissions and noise pollution.
  + The East Side Heliport, owned by the NY EDC, managed by Macquarie Aviation International, has five runways and provides type A1 jet fuel. The East Side Heliport is open weekdays 8 am to 8 pm, closed on weekends.
* The adverse impacts of air pollutants fall especially hard on people living in NYC’s Environmental Justice neighborhoods, many of which are directly under the paths of commuter and tourist helicopters.
* Some of these are Manhattan's Three Bridges, Brownsville in Brooklyn, and Old Astoria in Queens. There are higher rates of childhood and adult asthma, even premature death due to environmental factors, such as air pollution and noise pollution.
* Noise pollution is another environmental public health threat, referred to as the ‘new secondhand smoke.’ A recent Robert Wood Johnson Medical School study found that heart attack rates were 72% higher in areas with high levels of transportation noise. Helicopters are uniquely loud because of:
  + The low frequency vibration roars created by the rotating blades;
  + Their low altitude flights over our homes, neighborhoods, parks, and waterways; and
  + Heliports being in densely populated areas.
* New York faces more threats of climate-change-caused catastrophes, as we experienced during Hurricanes Sandy and Ida. Therefore, in accordance with this law’s purpose, every source of NY transportation pollution must be held to a new and strict environmental standard.
* If New York is serious about decarbonization and reaching zero emissions, the final NYCAC scoping plan must focus on reliable, sustainable mass transportation for all -- including high-income commuters and sightseers. It must include an immediate ban of carbon-intense nonessential helicopter transport. To continue allowing fossil-fuel based sightseeing and commuter flights is an injustice to all New Yorkers.

Suzanne Wertz

(after Melissa Elstein)