

APPENDIX R

COMMENTS/RESPONSES

The comments received by the FAA on the Draft Environmental Impact Statement document are presented in this appendix. The comment period started on October 19, 2005 (Public Hearing date) and continued for 60 days through November 8, 2005. To assist the reader, each comment has been scanned and is presented with the corresponding FAA response to the comment presented next to it. Below is a table showing the number of the comment and the submitting person/agency for reference.

Table R.1
COMMENTS RECEIVED ON THE DRAFT EIS DOCUMENT

Number	Comment Submitted by Person/Agency
1	Jim Matheson, Congress of the United States House of Representative
2	Meghan Holbrook, Utah Air Travel Commission
3	Kirk Nielson, PE; Utah Division of Aeronautics
4	D. Larry Anderson, P.E.; State of Utah Department of Natural Resources
5	Lowell Elmer, Dixie Metropolitan Planning Organization
6	John Williams, Five County Association of Governments
7	James Eardley, Alan Gardner, Jay Ence; Washington County Commission
8	Larry Gardner, St. George City Council
9	Gerald Schiefer
10	Daniel Smith & Micheline Smith
11	Mark Ahrenholtz
12	Voin Campbell
13	Scott Lee
14	George Linden
15	Kenneth Mackay
16	Paul "West" Martin
17	Bill Hudson
18	Dr. Sheldon & Mrs. LaVerna Johnson
19	R. Paul & Geniel Thompson
20	Troy & Kerrie Bowler
21	Gilbert Jennings, P.E.; Fort Pierce Business Park
22	Royce Jones
23	Don Shelline, Shelline Studios
24	Mary Thompson
25	Royden Wittwer
26	Bruce VanderWeff, Springdale Town Council
27	Donald Falvey
28	Lin Alder, Alder Photo & Writing
29	Wayne Staab, Ph.D.; Dr. Wayne Staab & Associates
30	Thomas Bailey

Table R.1, Continued
COMMENTS RECEIVED ON THE DRAFT EIS DOCUMENT

Number	Comment Submitted by Person/Agency
31	Jim McGuire; Washington City Community Development
32	Richard Pratt & Ed Burgess; Desert Canyons Group
33	Jeff Klein
34	John Brems; Parsons Kinghorn Harris, P.C.
35	William Black, M.D.
36	Lois Graham
37	Chaitna Sinha, Southern Utah Wilderness Alliance
38	Tom Thompson
39	Richard Spotts
40	Scott Marshall
41	Larry Svoboda, USEPA
42	Hal Hilburn
43	Zack Russell
44	Wanda Magleby
45	Scott Florence, Bureau of Land Management
46	Jock Whitworth, National Park Service
47	Dick Hingson, Grand Canyon Trust; Steve Bosak, National Parks Conservation Association
48	Dan McGuire, Town of Rockville
49	Jim Case
50	John Singleton
51	Lisa Zumpft
52	Candida Bush
53	Megan & Bob Orton
54	Terry Swanson
55	Kathleen Corr
56	Barry Sochat
57	Leonard (Leo) Gallia
58	Steven Parker, UNLV
59	Jane Whalen
60	Marcel Rodriguez
61	Lisa & Alan Rutherford
62	Paul Bevan
63	Cornelia Kallerud
64	Jay Rich
65	Mike McClure, transcript
66	Roxie Sherwin, transcript
67	Voin Campbell, transcript
68	Eric DeVita, transcript
69	Scott Hirschi, Washington County Economic Development Council; transcript
70	Roene Wilkinson, transcript

Congress of the United States
House of Representatives
Washington, DC 20515-4402

November 8, 2005

The Honorable Marion Blakey, Administrator
Federal Aviation Administration
800 Independence Avenue, SW, Room 1022
Washington, D.C. 20591

Dear Administrator Blakey:

I am pleased to offer these comments in response to the Draft Environmental Impact Statement (EIS) for the proposed St. George replacement airport. As southern Utah's Congressman, I am very interested in moving this project forward.

I have had the opportunity to work closely with many stakeholders who have advocated for the new airport. I share their interest in this important issue because it is clear that a new airport is a critical component of meeting the needs of this booming community. St. George City has already undergone an unnecessarily long process because it was initially advised that an Environmental Assessment would be adequate. The courts said that this assessment was not enough and the city found itself once again embarking on a lengthy and costly process to ensure that the environmental consequences of this project were fully considered.

This draft Environmental Impact Statement carefully analyzes the likely effects of a new replacement airport on the surrounding community and nearby natural resources such as Zion National Park. Stakeholders should be able to agree that the Federal Aviation Administration and the National Park Service have assisted in the preparation of analysis that finds that the new airport will not adversely impact Zion, which is an important resource for St. George City and the Washington County area.

I recognize that there remain several important issues regarding the impact of the growth of the St. George area on Zion National Park which have not yet been resolved, but these issues are beyond the scope of this draft EIS. While these issues are significant, I do not believe that outside concerns or agency turf battles should affect this EIS process. The City of St. George has fully considered the effects of the replacement airport and only the relevant issues should be considered at this time.

I encourage the participants in this process to work cooperatively and swiftly to bring this EIS to conclusion.

Sincerely,


JIM MATHESON
Member of Congress

WASHINGTON OFFICE:
1222 LONGWORTH HOUSE OFFICE BUILDING
WASHINGTON, DC 20515-4402
PHONE: (202) 225-3011
FAX: (202) 225-5638

SALT LAKE OFFICE:
240 EAST MORRIS AVENUE (2430 SOUTH) #235
SOUTH SALT LAKE, UT 84115
PHONE: (801) 486-1236
FAX: (801) 486-1417

SOUTHERN UTAH OFFICE:
321 NORTH MALL DRIVE #E1018
SAINT GEORGE, UT 84790
PHONE: (435) 627-0880
FAX: (435) 627-1473

EASTERN UTAH OFFICE:
120 EAST MAIN STREET
PRICE, UT 84501
PHONE: (435) 636-3722
FAX: (435) 613-1834

PRINTED ON RECYCLED PAPER

1. Thank you for your interest in this project. Your comment has been noted.



State of Utah

THE UTAH AIR TRAVEL COMMISSION

138 North 2400 West
Salt Lake City, Utah 84116
(801) 715-2200
(801) 715-2270 Fax

05 UATC Support for St. George Replacement Airport

Meghan Z. Holbrook
Chair

William G. Gibbs
Legal Counsel

Monte R. Yeager
Executive Vice-Chairman

MEMBERS

Fred Bell

R. Lana Beattie

Allen Bradshaw

H. David Burton

Hai M. Clyde

Keith O. Christensen

Andrew Gallagher

Theodore Goad G. Mahone

Daniel D. McArthur

Mark Miller

Mark Black

Scott R. Steymaker

Derek Smith

R. Anthony Swain

John (Jack) E. Tanner

Baldon Young

November 2, 2005

DAVID FIELD
Manager, Planning/Programming Branch
Airport Division
FAA, Northwest Mountain Region
1601 Lind Avenue, S.W., Suite 315
Renton, Washington 98055-4056

Re: UATC Support for St. George Replacement Airport

Dear Mr. Field:

The Utah Air Travel Commission (UATC) is the official body designated by the State of Utah, the Salt Lake City Corporation, and the Salt Lake City Chamber of Commerce to promote, support and represent Utah's interest for improved air service.

This commission has actively supported the new St. George Replacement Airport since its inception in the mid-1990's.

Furthermore, this commission supports the conclusions of Landrum & Brown as identified in the Executive Summary of the recently completed Draft Environmental Impact Statement. Namely:

"The proposed replacement airport would provide for an airport configuration that allows for operations of larger aircraft and commercial regional jets in order to accommodate existing and future airport demand in a safe and efficient air traffic environment. The environmental analyses conducted as part of this Draft Environment Impact Statement (DEIS) have shown that the construction and operation of the proposed replacement airport at St. George would result in no significant environmental impact. Therefore, the construction of the proposed replacement airport would meet the needs identified by the sponsor and the Federal Aviation Administration (FAA) without any significant environmental impact to the built or natural environment." See Page ES-10, ES. 6, *Conclusions*.

The study concluded that "noise generated by aircraft operations for either the existing or replacement airport made very small contributions to the total aviation noise levels already present with the initial area of investigation (IAI)." See page ES-7, ES.3.2, *Noise Analysis*.

1. Thank you for your interest in this project. Your comment has been noted.

1

Also, regarding Zion National Park, the new St. George replacement airport would have little effect on cumulative aircraft noise above ambient noise levels. In fact: "The cumulative amount of time that aviation noise would be above the existing or natural ambient levels would be by one percent, calculated as the difference between operating the existing airport and operating the replacement airport in future years. In 2010, the change would be an increase of less than one minute a day and in 2020, the change would be approximately two minutes a day. None of these increases would result in a substantial incremental change in aircraft-related noise impact to Zion National Park and would not be considered a substantial impairment to any resource of the park." See page ES-8, ES.5.2.1, *Zion National Park*.

The Utah Air Travel Commission believes the new St. George replacement airport will provide a much needed safe, and efficient facility to accommodate future air service needs, including the operations of tour operators and SkyWest Airlines commercial regional jets. Also, the new facility will become an essential link within the Utah air transportation system.

Sincerely,



Meghan Holbrook
UATC Chairwoman

cc:

Dan McArthur, Mayor of St. George
Jerry Atkin, President & CEO, SkyWest Air Lines
Jon Huntsman, Governor of the State of Utah
Rob Bishop, U.S. Congressman, District 1
Jim Matheson, U.S. Congressman, District 2
Chris Cannon, U.S. Congressman, District 3
Robert Bennett, U.S. Senator, Utah
Orrin Hatch, U.S. Senator, Utah
John L. Valentine, Senate President
Thomas Hatch, State Senator
John W. "Bill" Hickman, State Senator
David Clark, State Representative
Mike Noel, State Representative
Stephen Urquhart, State Representative
Ross "Rocky" Anderson, Mayor of SLC



State of Utah

JON M. HUNTSMAN, JR.
Governor

GARY R. HERBERT
Lieutenant Governor

DEPARTMENT OF TRANSPORTATION

JOHN R. NJORD, P.E.
Executive Director

CARLOS M. BRACERAS, P.E.
Deputy Director

October 27, 2005

Mr. David Field
Manager, Planning/Programming Branch
Airports Division
FAA, Northwest Mountain Region
Renton, Washington 98055-4056

Dear Mr. Field,

The replacement airport for St. George, Utah is important locally and nationally. The St. George area is the fastest growing area in Utah and one of the fastest growing areas nationally. The existing St. George airport does not meet local, state or national needs. The current airport cannot expand to meet the demands of modern aircraft, and therefore can no longer be utilized as an integral part of the local, state or national transportation system. It is imperative to have an airport in the St. George area that can meet current and future transportation demands.

There are many basic facts that have been clouded by the expanded scope of the Environmental Impact Statement (EIS). First, the St. George area is going to continue to grow placing more demands on an inadequate piece of transportation infrastructure. If a replacement airport is not built, more flights in and out of the existing airport will be needed. More flights equals more noise! The use of Larger Aircraft will make it possible for the airlines to reduce the frequency of commercial flights. In this respect we can compare airports to highways. In essence those who oppose the replacement airport, also oppose busses and mass transit. They are essentially saying "we rather have 20 cars on the road than one bus". The new airport will accommodate larger aircraft such as the 50 or 70 passenger (busses) replacing the smaller 30 seat Brasilia turboprop airplanes (cars).

In the last few years the usage of corporate aircraft has been growing at an unprecedented rate. All airports are seeing these aircraft. As the population grows so does the economy in the Southern Utah. The number of corporate aircraft utilizing the St. George airport is also growing. The corporate aircrafts are going to use the airport regardless of the location. The replacement airport will offer a much safer environment for them to operate.

The scope of the noise study conducted as part of the EIS for the replacement airport has been excessive. Noise measurements and noise modelling that are inaudible are unnecessary! If you can't hear it how can it be an impact? Modeling all the over flights from all aircraft, not just the aircraft utilizing the St. George Airport is costly and

1. Thank you for your interest in aviation. Your comment has been noted.



State of Utah

ION M. HUNTSMAN, JR.
Governor

GARY R. HERBERT
Lieutenant Governor

DEPARTMENT OF TRANSPORTATION

JOHN R. NIORD, P.E.
Executive Director

CARLOS M. BRACERAS, P.E.
Deputy Director

in my opinion ridiculous. The St. George replacement airport should focus on the replacement airport not the national airways, airspace or national parks.

The basic facts for the replacement airport should be the only considerations. The basic facts have been overlooked and diluted by those opposed to the replacement airport. Basic facts remain the same.

Basic facts

1. The population in Southern Utah is going to continue to grow.
2. Growth in population increases the demand on transportation infrastructure.
3. Growth in population will increase the noise in the local national parks. People, automobiles, and aircrafts will all contribute to the increase in noise in the parks.
4. Noise impacts from aircrafts affecting the park are small. Much of the time these impacts are under 1 minute of impacts in a 24 hr period and at times this noise may be inaudible. Noise from streams and people exceed the noise generated by aircrafts in many areas of the park.
5. If a replacement airport is not built, more flights in and out of the existing airport will be needed. More flights equals more noise!

Geographically Utah is a large state. The State has only a handful of commercial service airports the serve the entire population of the state. A Commercial Service airports' primary role is to provide airline service to the traveling public. In terms of importance to the state air transportation infrastructure, the St. George airport is second, only behind Salt Lake International. It is very important to the state to have a safe and efficient airport in the St. George area to meet the transportation needs of the population and Southern Utah's economy

Thank you for taking my comments into consideration.

Sincerely,

Kirk Nielsen, PE
Utah Division of Aeronautics - State Aeronautical Planner



State of Utah

Department of
Natural Resources

MICHAEL R. STYLER
Executive Director

Division of
Water Resources

D. LARRY ANDERSON
Division Director

JON M. HUNTSMAN, JR.
Governor

GARY R. HERBERT
Lieutenant Governor

September 28, 2005

David Field
Manager, Planning/Programming Branch
Airports Division
Federal Aviation Administration
Northwest Mountain Region
1601 Lind Ave., S.W., Ste. 315
Renton, Washington 98055-4056

Mr. Field:

Thank you for the opportunity to review the St. George Municipal
Airport Draft Environmental Impact Statement. The Utah Division of Water
Resources finds nothing in this document of concern to us.

We do not need to see any further correspondence or documents
regarding this proposal. If you have further questions, please contact Eric
Millis, Assistant Director, at 801-538-7298.

Thank you,

D. Larry Anderson, P.E.
Director

1. The FAA has noted that your office does not need to see any further documentation on this project.

Suzanne Allen
Chair, Transportation Executive Council
Michael Shaw
Chair, Transportation Advisory Committee
Lowell Elmer
Director, Transportation Planning Office



November 7, 2005

Mr. David Field, Manager
Planning/Programming Branch, Airports Division
FAA, Northwest Mountain Region
1601 Lind Ave., SW, Suite 315
Renton, WA 98055-4056

Re: St. George, Utah Municipal Airport
Subj: Draft EIS

Dear Mr. Field:

The Dixie Metropolitan Planning Organization (DMPO) conducts long range transportation planning for the urbanizing area of southwestern Washington County. One of our high priority projects is the completion of the 'southern corridor' expressway which will access the proposed site of this replacement airport. The purpose and need statement of this highway corridor includes providing access to land use, including this airport in a timely way, if not concurrently. The goal of the area partners in developing viable transportation systems linking land use and supporting social and economic viability and livability is very important. This airport is a critical element in meeting community and regional goals.

The scope and detail of this DEIS addresses each environmental issue and concern more than adequately. The process that this project has gone through has delayed the schedule of completion as previously hoped for. Any additional delay will only add to the costs of the facility and the land still needing to be purchased. Our growth models suggest that St. George may be the largest city in Utah by the year 2050, consequently the need for this airport as outlined in the purpose and need is enhanced.

We encourage FAA to move this DEIS through the decision making phase to a record of decision as soon as possible without further indirect or incidental delay. The increased capability and air travel capacity is needed now to keep up with the impressive growth occurring in Washington County and surrounding areas.

Our MPO members thank you for the opportunity to make comment on this draft environmental document.

Sincerely,

Lowell Elmer, Director
Dixie Metropolitan Planning Organization
St. George, Utah UZA

Dixie Transportation Planning Office
Five County Association of Governments
1070 W. 1600 S., Bldg. B
P.O. Box 1550, St. George, UT 84771
(435) 673-3548

1. Thank you for your interest in this project. Your comment has been noted.

Five County Association of Governments

1070 West 1600 South, Building B
St. George, Utah 84770

Fax (435) 673-3540



Post Office Box 1550
St. George, Utah 84771

Office (435) 673-3548

November 1, 2005

Mr. David Field, Manager
Planning/Programming Branch, Airports Division
Federal Aviation Administration, Northwest Mountain Region
1601 Lind Avenue, SW, Suite 315
Renton, WA 98055-4056

Dear Mr. Field:

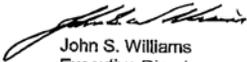
The Five County Association of Governments supports the development of the St. George, Utah Replacement Airport and wishes to submit the following comments relative to the draft environmental impact statement (DEIS).

The scope and detail of the DEIS shows a commitment to address each environmental concern that has been raised. I understand that this DEIS far exceeds any other relative to the noise analysis. Along with that analysis, all others from topography to Cultural Resources have provided a detailed response and have answered each and every issue that can be foreseen. Additionally, selection of the preferred alternative was reached through a very comprehensive process.

I encourage any efforts that can be made to help bring this project to the construction stage quickly as the need for an increase in air travel capability in our area is upon us now.

Thank you for the opportunity to comment.

Sincerely,


John S. Williams
Executive Director

1. Thank you for your interest in air travel. Your comment has been noted.

1

BEAVER GARFIELD IRON KANE WASHINGTON



WASHINGTON COUNTY

197 East Tabernacle ♦ St. George, Utah 84770
Telephone: (435) 634-5700 ♦ Fax: (435) 634-5753

COMMISSION

JAMES J. BARDLEY
Chairman
jbardley@washco.state.ut.us

ALAN D. GARDNER
adgardner@washco.state.ut.us

JAY ENCE
jence@washco.state.ut.us

November 3, 2005

Mr. David Field, Manager

Planning/Programming Branch, Airports Division
Federal Aviation Administration, Northwest Mountain Region
1601 Lind Avenue, S. W., Suite 315
Renton, Washington 98055-4056

Subject: St. George Municipal Airport Draft Environmental Impact Statement

Dear Mr. Field:

The Washington County Commission strongly supports the construction of the replacement airport in the south-east area of the St. George valley. We have had the opportunity to review the St. George Municipal Airport Draft Environmental Impact Statement which addresses the environmental impacts of a replacement airport for the St. George Municipal Airport currently located in the "downtown" area of the City of St. George, Utah. The original airport was constructed at a time when the population of Washington County was nearing 9,000 residents. While this airport has been expanded a number of times over the years it has reached its maximum expansion capability which is insufficient to meet the current need for air service to the County.

Since the airport was originally built, St. George City has increased to over 75,000 residents. For the past two years the St. George metropolitan area has been designated as the fastest growing urban area in the United States. During the same time period, Washington County has increased to the present population in excess of 135,000 residents. The need for increased airport facilities in this County is obvious. To take no action on the request of the City for re-location of the airport is unacceptable to the County. Because a new airport must be constructed in this County, we strongly support the location proposed by St. George City.

The County has had the opportunity to be involved during the development of the EIS and the plan for development of the airport and the area surrounding it. While it is intended to be located in the City of St. George, much of the surrounding area is presently in the unincorporated area of Washington County. The County not only supports the airport re-location site for the airport, but we also support the plans for access to the airport and the development of the land surrounding it. It is anticipated that the land currently in the unincorporated area will be annexed to St. George

1. Thank you for your interest in this project. Your comments have been noted.

1

Mr. Davis Fields - page two

City. The County is in favor of this anticipated annexation. With the continued growth and development of Washington County, the location of an airport of sufficient size to support the needs of the County is imperative.

The County submitted a resolution supporting the original DEA filed by the City. This DEA was approved by the Federal Aviation Administration only to be stopped by the decision of a judge in the U.S. Court of Appeals for Washington D.C. This delay has cost some five years of time during which the airport could have been constructed and placed into use.

Because the complaint filed by the Grand Canyon Trust with the Court of Appeals complained that sufficient consideration had not been given to the impact of the proposed airport on Zion National Park, some 20 miles distant from the airport, we would like to comment somewhat regarding that complaint.

We have been impressed by the thoroughness of the current consultant, Labrum and Brown, and we commend them for their detailed and complete study of this issue, along with all other aspects of the report that they have taken into consideration. It is not a normal requirement to spend this quantity of time and effort relative to the noise effects of an airport location or expansion. The various studies that they have completed and the resulting favorable results from their tests is admirable.

We recognize that it is the stated goal of various environmental organizations to eliminate any airplane flight over any National Park at any altitude. The St. George airport proposal simply provided the environmental groups an opportunity to see if they could realize this goal. St. George nor Washington County has any control over trans-continental flights across the United States at high altitudes. They do have influence over flights originating out of or into the replacement airport. The City has proposed to provide pilot training relative to approach and departure from this airport. Because the primary commercial use of this facility is anticipated to be Sky West Airlines, headquartered in St. George, the ability to train and inform pilots relative to accepted flight paths is certainly achievable. The majority of commercial flights originating from the current airport are passenger flights (see Table 7.1 of the EIS). The next highest use is for business flights (Table 7.1). The pilots of those business flights coming to the airport may likewise be instructed.

The only overflight of airplanes originating from the St. George replacement airport might be adjacent to the area of the National Park known as the Kolob Canyon area located immediately adjacent to the Interstate 15 Freeway. Many Sky West flights heading to or from Salt Lake City follow the Interstate Freeway around the Pine Valley Mountain area. This small part of Zion National Park is open for vehicular access from the Freeway and is not intended as an area of solitude or seclusion in the Park. According to exhibits 7.10 through 7.14 of the EIS, the number of projected events over the Park in the dBA range where sound might create a disturbance to nature, is relatively non-existent.

Mr. David Field - page three

Keep in mind that one of the most quiet commercial airplanes now in existence, according to information from Sky West Airlines, is the Canada Air Regional Jet of which Sky West flies the RJ50 and RJ70. These planes cannot presently carry passengers to and from the St. George airport because of the limitation of the current airport. Once completed, these planes will replace the Brazillia Turbo-prop planes presently using the airport. Actual sound levels from the RJ planes will be less than the current level of the Brazillia's.

As a County Commission, may we once again emphasize the need for the airport to serve all of rapidly growing Washington County. Also a careful study of the EIS will certainly provide sufficient information to determine that there will be no significant environmental impact from the replacement airport. The safety of passengers and citizens living here will be increased greatly by moving the airport from the central part of the City. Through the use of newer aircraft it is anticipated that the sound level in the valleys of Washington County will be decreased, and that Zion National Park will only remotely be affected by this proposal.

The County Commission strongly supports the construction of the replacement airport to serve all of Washington County. We appreciate your prompt attention to, and favorable approval of, the EIS that is currently being submitted for review. We are confident that it will result in the approval and subsequent construction of this badly needed airport facility.

Sincerely,


James J. Eardley, Chairman Alan D. Gardner, Commissioner Jay Ence, Commissioner

The Washington County Commission

▲
1

- Submitted Via E-mail -

From: "Larry Gardner", St. George City Council <jmilarry@infowest.com>
Sent: 11/08/2005 11:15 AM
To: David Field
Subject: St. George City Airport

To Whom It May Concern:

I was appointed to the St. George City Council in 1993 and have been involved in the airport project since that time. City staff and elected officials have worked in earnest since 1996 to accomplish this task. It has almost been unbelievable to me to watch the ridiculous hoops that we have been forced to go through as a city trying to move this project forward. Frivolous lawsuits, endless studies, impractical and unnecessary requirements have caused years of delay and astronomical cost increases. Its too bad that the horrendous cost of the bureaucracy and red tape eventually comes back to the local tax payer who already is taxed beyond the breaking point when we could have expeditiously moved forward to the blessing of all.

We have studied environmental and noise issues ad nauseum. The I's have been dotted and the T's have been crossed and the studies continue to validate what we knew nine years ago. It's time to move forward.

Recent statistics now show that St. George is the second fastest growing community in the nation. The immediate county is @125,000 strong and growing at over 1000 per month. Projections take us to over 600,000 in the future. It is indeed time to get our replacement airport approved and built. Our citizens deserve to have the appropriate air transportation available to them. With Sky West phasing out the Brazilia, in favor of the Canadian jet that cannot fly out of the exiting airport because of length, the citizens of Washington County are left at a tremendous disadvantage.

I urge you to approve this study that has found favor with the FAA and the Park Service. It's time to lock arms and go forward.

Sincerely,

Larry H. Gardner
St. George City Council
753 S. Lexington Dr.
St. George, Utah 84770

1. Your comments have been noted.

1

From: Gerald Schiefer <gschief@earthlink.net>
Sent: October 19, 2005, 12:03 PM
To: David Field
Subject: St. George Utah Proposed Airport

David, I am writing in strong support for the new St. George Airport. It is an absolute necessity. We should not let a few emotional isolationists prevent what is needed for the masses. We are suffering from that with our current gasoline prices. The possible increase in noise and some possible additional particles in the sky does not counter the need.

The present airport was fine when St. George and Washington County had a population of under 10,000. But it cannot handle present requirements let alone those in the future. Population increase for the County goes anywhere from 200,000 to 300,000. We must have this new airport. It is in a very favorable location.

I have backpacked in the Sierras for much of my life. The military used much of the sky (R2508 and the MOAs) for testing and training. There was some noise and there was some particulate matter but it did not bother my enjoyment at all. I think we have let a verbose few unduly affect our decisions and we have made bad decisions as a result. It is time we do the right thing regardless of the emotional outcry from a few.

I was born and raised in Zion National Park. My father was a National Park Ranger there for 38 years. I worked there on a fire tower for three seasons. We know and love the Park and its environs. However, even though I am an environmentalist by nature, I am a scientist and a practical one. I do not have respect for environmental emotion and those who run around crying the "sky is falling" like Chicken Little did. I think this Zion Park Environmental outcry is a red herring and really should have no pre-eminent place in our decision making. Don't let the radical group undermine your EIS.

My father would say "we protect our heritage where possible but we balance it with other needs." I agree with his position. I was born where the Park Administration / Museum now stands. I was raised where the major campgrounds and the visitor center are. I have more of Zion National park in me than any other involved with this. I plead with you to press forward and build this proposed airport at St. George and let us bring proper transportation to this beautiful area.

Gerald R. Schiefer
45 South 100 West
Pine Valley, Utah 84781
435 574-3751

1. Thank you for your interest in this project. Your comment has been noted.

1

October 24, 2005

Daniel E. Smith
1410 Hopi Circle
St. George, UT 84790
(435) 229 3975

Mr. David Field, Manager, Planning/Programming Branch, Airports Division,
Federal Aviation Administration, Northwest Mountain Region,
1601 Lind Avenue, S.W., Suite 315, Renton, WA 98055-4056
Telephone: (425) 227-2600,

Fax: (425) 227-1600

Email: David.Field@faa.gov

Dear David:

As part of the Public Comment section of the St. George Municipal Airport Relocation, I am voicing some concerns which I have publicly stated at the first two meetings at the St. George City Building and subsequent monthly airport meetings.

Who am I:

President - USA Flightnet, Inc. - Tenant St. George Municipal Airport
Former Director of Flight Training & Faculty member - Dixie State College of Utah
Utilizing St. George Municipal Airport
F.A.A. Designated Pilot Examiner based at St. George Municipal airport NM07 Salt Lake
F.S.D.O.
F.A.A. Aviation Safety Counselor NM07 Salt Lake F.S.D.O.
F.A.A. Part 145 Repair Station owner
Former Flight Systems Specialist for Pacific Southwest Airlines - San Diego B727, MD-80,
BAe 146 aircraft.
Certificates & Ratings: ATP, CFII MEI, A&P mechanic, IA, AGI, IGI

Our main concern is to see that the airport is properly built for all intended operations.

A major problem with the existing airport is that it is not economically feasible to operate with afternoon prevailing winds at 250 degrees at 20 to 45 knots perpendicular to the runway. With thousands of hours of training experience in this area I know that the prevailing wind also is the same at the proposed new airport site as we have used that site for emergency landing approach practice. I voiced these concerns again last year at the public airport meetings and was assured by Larry Bullock and David Ulano that the new runway would be situated 4-22. Recently it was announced after the September meeting that it was back to 1-19. This presents a safety issue which needs to be addressed prior to the start of construction.

1. Thank you for your comments. As stated in **Chapter 3, Section 3.2.3.3, Runway Orientation Deficiencies**, in the Draft EIS, the typical design objective for a runway system is to be able to provide wind coverage for conditions that would apply at least 95 percent of the time. A range of acceptable runway orientations were identified in the *1998 Master Plan* to satisfy the recommended 95 percent wind coverage requirements for the crosswind component at the proposed replacement airport, utilizing the existing wind data for St. George Municipal Airport. Through an analysis of wind data, collected by the Utah Department of Transportation (UDOT) at the proposed replacement airport site, it was determined that a Runway 01/19 alignment (oriented to magnetic headings of approximately 10 degrees and 190 degrees, which was erroneously shown on early airport layout drawings as 04/22) would provide 94.1 percent wind coverage for the 10.5-knot crosswind component and 96.7 percent wind coverage for the 13-knot crosswind component. It would further provide 99 percent wind coverage for the 16-knot crosswind component. The orientation of the runway at the proposed replacement airport would thereby provide improved crosswind availability as compared to the existing airport.

Furthermore, due to the topography of the area surrounding the proposed replacement airport site, the alignment of 01/19 was determined to be the best alignment to minimize obstructions to approach and departure surfaces, in particular, potential obstructions created by the proximity of Warner Ridge which lies approximately 10,000 feet to the east of the proposed replacement airport site and runs generally in a north-south orientation. Runway orientations which would align the runway in a more east-west orientation (i.e., 04/22 or 07/25) would have a greater potential for having obstructions to approach and departure surfaces due to Warner Ridge to the east and an un-named ridge immediately west of the proposed replacement airport site. Therefore, the runway orientation of 01/19 was determined to best meet the topographic challenges while meeting the objective of improving the crosswind availability as compared to the existing airport.

It is recognized that terrain is an issue with the west side of the site and the northeast side of the airport. Construction of runway 7-25 from the center of the proposed runway eastward should be considered with alteration of the terrain west of the airport. This would also direct straight-in traffic away from the Zion National Park. East traffic would be completely over unpopulated areas.

▲
1

My position with PSA airline included qualifying airports as suitable for airline use including noise abatement at John Wayne Orange County airport, Yakima Washington, Arcata California, Buchanan Field Walnut Creek California and others. Considerations such as engine failure after takeoff/circle to land capability were major factors. The new site would not qualify with economic payload capability.

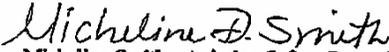
Many accidents and incidents over several decades are directly attributable to the crosswind situation at the present site. This problem can be completely eliminated at the new site.

My verbal appeals, along with other qualified spokesman, at public meetings have been shrugged off, possibly due to City of St George personal agendas with property ownership issues. I hope that this formal written statement will get serious attention.

Respectfully,



Daniel E. Smith



Micheline Smith - Aviation Safety Counselor - Flight School Dispatcher

Tuesday, November 01, 2005

David Filed
Planning/Programming Branch
Airports Division
Federal Aviation Administration
Northwest Mountain Region
1601 Lind Avenue S. W. Suite 315
Renton, Washington 98055-4056

Dear Mr. Filed:

I wish to express my support for the approval of the new and expanded airport on the drawing board for St. George, Utah. As a frequent flier, I know the importance of this endeavor to the traveling public. The expanded runway will also allow larger aircraft and more frequent service that will greatly enhance the viability of industry in this rapidly-growing area.

Please know of the strong support the expanded airport has among the communities in Washington County.

Thank you,



Mark Ahrenholz
466 Homestead Drive West
Dammeron Valley, Utah 84783
435-574-2661

1. Thank you for your interest in air travel. Your comment has been noted.

1

Voin R. Campbell
708 Picturesque Dr
St. George, UT 84770

November 1, 2005

David Field
Manager, Planning/Programming Branch
Airports Division
FAA, Northwest Mountain Division
1601 Lind Avenue, S.W., Suite 315
Renton, WA 98055-4036

Re: Replacement Airport - St George, Utah

Dear Mr. Field:

On October 19, 2005, I attended and participated in a public hearing as part of the process of completing the Environmental Impact Statement for the proposed St. George, Utah Replacement Airport. As per the instructions at that hearing, I submit for your records the following comments.

The current airport, located on top of a small mesa in the heart of the city, operated by the City of St. George for many years, is now inadequate for the city's current needs. Because of its location, any further upgrades to the airport are impossible. In view of the steady population and economic growth in the immediate area and the obvious limitations of the current site, there is a major concern by almost everyone involved in planning for the city's immediate and future transportation needs.

There are three conclusions that are generally accepted by those best qualified to draw such conclusions. One, the need for a replacement airport at a more suitable location is critical. Two, construction must begin now, without delay. Three, to maximize the passenger service and economic benefits, the location of the replacement airport must be near the center of the current and anticipated concentrations of population and economic activity.

For over ten years, the staff and city council of City of St. George and the staff and county commissioners of Washington County have carefully studied all of the reasonable possibilities pertaining to the best location of such an airport. Almost all who participated have concluded that the location now proposed by the City of St. George was the only sensible choice.

As a long time resident of St. George, I have followed with interest the efforts of the City of St. George and Washington County to upgrade the airport facilities of the City. I have never ceased to be amazed by the city's relentless determination to obtain the necessary approvals and funding necessary to effect this desperately needed improvement to the areas transportation system, in the face of seemingly endless and generally unreasonable obstacles thrown up by small groups, with narrow environmental interests. All of these issues have now been satisfactorily addressed. There has been more than enough time, attention and resources devoted to all of the issues raised. It is long past the time to complete the approval of this process.

I strongly urge you to move forward as quickly as possible and to actively assist the City of St. George in constructing its well conceived replacement airport. Your efforts to that end will be appreciated. If I can be of assistance in that effort, I would be pleased to do so.

Respectfully,
Voin R. Campbell



1. Thank you for your interest in this project. Your comment has been noted.

1

November 2, 2005

David Field, Project Manager
For St. George Replacement Airport
EIS/FAA, Northwest Mountain Region
1601 Lind Avenue, SW/Ste 315
Renton WA 98055-4056

Dear Mr. Field:

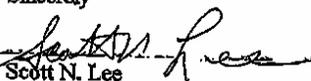
~~I hope the St. George, Utah replacement airport can be approved with as little delay as possible. This airport is critical to our rather unique situation of no railroad and an excessive number of multi articulate trucks doing commerce in and through this fast growing area. The planning should have started much earlier to construct this new airport.~~

I spent 20 years as a supervisory research physical scientist managing the field accident studies for both injury assessment and accident causation at the National Highway Traffic Administration. We supported the National Transportation Board regarding the mechanisms of injury in airplane accidents. Prior to that, I was a Utah State Trooper and then Director of Field Accident Studies at Cornell University's Aeronautical Laboratory. I also served as Deputy Highway Safety Coordinator for the State of Arizona. Subsequent to my retirement I served as a Federal consultant to the San Diego Police Department on injury analyses and reconstructed accidents for CALTRAN.

All of this is to say that between 1950 and 1992 I have had some experience in transportation issues.

The attached letter to you signed by Paul and Geniel Thompson clearly expresses my concerns as well. We ask for your support to move this project forward.

Sincerely


Scott N. Lee

Scott N. & Joyce J. Lee
2847 Calle Las Casitas
St. George, UT 84790

1. Thank you for your interest in this project. Your comment has been noted.

- Submitted Via E-mail -

From: George Linden <gnlinden@allvantage.com>
Sent: 11/01/2005, 05:42 PM
To: David Field
Subject: airport

David,

When will we know if we get a new airport? Very sorry to see that it has taken so long for such a necessary project. | 1

George Linden
831c E. Vermillion Ave.
St George, UT
435-652-8141

1. Thank you for your interest in this project. Your comment has been noted.

November 1, 2005

David Filed
Federal Aviation Administration
1601 Lind Avenue, S.W.
Suite 315
Renton, WA 98055-4056

Re: Proposed St. George Utah Airport

Dear David,

I would like to express my support for the new airport that may be built soon near St. George, Utah. I've always kept up to date in local airport matters, as my father recently retired after 36 years with the FAA. Washington county out grew its existing airport location probably 10 or 15 years ago. There are several reasons the new airport should be built in its proposed location. Some of these are:

- The location will give Las Vegas and other cross country flights an improved emergency diversion field. It will be closer to Vegas and could eventually be larger than the regional airport in Cedar City, Utah.
- It is about the only suitable place in the county to build a large airport, and the land should be utilized for that purpose instead of lost to something less economically valuable.
- There seems to be nothing stopping the incredible growth in this area. A better airport will ensure the benefit of keeping a healthy diversity in future economic growth.

Sincerely,



Kenneth Mackay
441 E. Sunland Dr. #11
St. George, UT 84790

1. Thank you for your interest in local aviation. Your comment has been noted.

1

Paul W Martin/UT/USB
11/01/2005 09:32 AM

To: David.Field@faa.gov/
cc
bcc
Subject: St. George, Utah Replacement Airport

Dear Mr. Field,

I would like to take a moment to express my feelings that we need to go forward with the proposed airport here in St. George, Utah.

I have been a Commercial Loan Supervisor in the St. George area since the fall of 1996. I have witnessed the extensive growth of the City, area and County. I do not stand alone in my frustration that I cannot obtain access to flights that would assist me on both a business and personal basis. I have also witnessed first hand what the lack of a quality airport has done to the business growth of the area.

Please accept my letter in SUPPORT of the proposed airport site.

Sincerely,

Paul "West" Martin
3176 Canyon View Dr.
Santa Clara, UT 84765
Ph: 435-986-5620
Fx: 435-628-3398

1

1. Thank you for your interest in local aviation. Your comment has been noted.

- Submitted Via E-mail -

From: Bill Hudson <bhud@infowest.com>

Sent: 11/04/2005 11:57 AM

To: David Field

Subject: Proposed St. George Airport

I am writing in regard to the St. George replacement airport.

I am speaking out in favor for the area being considered for the new airport. I am a resident of nearby Washington City and have lived here for more than 12 years. The need for a larger airport, that will allow our community to grow and offer affordable air travel options, is extremely high. I feel like the area that is being considered is the best option available and should be accepted.

Thanks you for allowing me to voice my opinion on this matter.

Bill Hudson
PO Box 98
344 N. 100 W.
Washington, UT 84780
435-656-9228

1

1. Thank you for your interest in this project. Your comment has been noted.

- Submitted Via E-mail -

From: LaVerna B. Johnson [bwt@infowest.com]
Sent: 11/04/2005, 07:50 PM
To: David Field
Subject: St. George UT Airport

Dear Mr. Field,

This is a letter of support and an affirmation of the facts as reported by Mr. Paul Thompson who is highly credible. The proposed regional airport for the St. George area is badly needed and we hope that the process of finalization will move forward with speed. Thanks for your good work on this vital project.

1

1. Thank you for your interest in this project. Your comments have been noted.

Sincerely,

Dr. Sheldon & Mrs. LaVerna B. Johnson
259 South 2020 East Circle
St. George, UT 84790

David Field, Project Manager
For St. George Replacement Airport
EIS FAA, Northwest Mountain Region
1601 Lind Ave., SW/ Ste 315
Renton, WA 98055-4056

We are very concerned citizens of the St. George Metropolitan Area. We fully support the approval of the Proposed Replacement Airport for St. George, Utah. We feel it critical that recognition be fully given to the environmental assessment and approval from the Federal Aviation Administration in January 2001, and the following four years and \$3 million expended by the city to support that approval. We feel it is critical and urgent that full approval be now granted for the construction of the replacement airport for the following reasons:

1. The St. George Metropolitan Area was ranked by the U.S. Census Bureau, September 22, 2005, as the second fastest growing metropolitan area in the nation. Its current population exceeds 100,000 with an expected increase to 200,000 within a five-ten year period. It is critical that safe and suitable air transportation be established to meet the needs of this citizenry, relieving them from the hazards of the present unsafe and limited airstrip airport.
2. The St. George Metropolitan Area does not have railroad facilities. It is almost entirely dependant upon trucking services for meeting the food, furniture, and other needs of the citizens. The area is also largely dependant upon trucking services for shipment of supplies to maintain the financially successful production of business and industrial products. Improved air transportation services must be added to supplement the presently over-taxed trucking services.
3. The St. George Metropolitan Area has a responsibility to improve the availability and safety of tourists wishing to experience the magnificence and beauty of our national treasures: Zion's National Park and the Grand Canyon. Having the safe and suitable provisions of the proposed replacement airport will help the citizens of this city share the beauties of this area with more of the nation's worthy citizens.

We have been residents over the past 40 years in the St. Louis, Tacoma, Seattle, New York City, and Washington DC areas where both heavy concentrations of people and industrial developments exist and where national monuments, historical sites and natural settings of grandeur and beauty exist unimpaired ALONG WITH THE ADVANTAGES of significant, regulated air transportation services. As a family, we have never felt an infringement upon our personal needs or family rights by the occasional passing overhead of others.

Sincerely,

R. Paul and Geniel P. Thompson
750 W. Mariposa Dr.
Washington, UT 84780

1. Thank you for your interest in this project. Your comments have been noted.

1

- Submitted Via E-mail -

From: "Troy Bowler" <t_bowler@msn.com>
Sent: 11/06/2005, 09:49 PM
To: David Field
Subject: Public comment on St. George replacement airport

Mr. Field,

I have seen a copy of the DEIS for the St. George Replacement Airport and am glad to see that the conclusion states that there will not be a negative impact on the environment if the new airport is built. My husband, Troy and I are very much in favor of having a new airport as are a majority of the people we have talked to about it. There is a great need in this area for a bigger, more modern, and safer airport. Southern Utah is rapidly growing and this need is actually overdue, so we ask that you help expedite this decision and get our airport built as soon as possible. Thank you for your time.

Sincerely,

Troy and Kerrie Bowler
1312 North 1280 West
St. George, Utah 84770
(435) 673-5718

1

1. Thank you for your interest in this project. Your comment has been noted.

- Submitted Via E-mail -

From: Gilbert Jennings [jmigilbert@infowest.com]
Sent: Monday, November 07, 2005, 10:53 AM
To: David Field
Subject: New Airport, St. George, Utah

Dear Mr. Field:

I am manager of the Ft. Pierce Industrial Park located in the southeast part of St. George, Utah. we [sic] have been working on the economic development of the area for many years now, and the development of this new airport is critical to the viability of our Economic Development Program.

Every time that we meet with representatives of larger "National" companies, they ask for and make a priority, the transportation capabilities of our area. Without exception, the requirement named is for access to a Regional airport with the capacity to handle larger jet aircraft.

Our ability to respond to the need to create job opportunities with companies that will pay appropriate wages and offer opportunities for our area to grow in the manufacturing sector, hinges on the "New Airport"! We must have this added capability to improve and extend our air services to attract the companies that will enhance our community.

Please accept my recommendation that the airport plan be approved. We need this project as soon as possible. the [sic] site is close to the Business Park and will enhance [sic] our ability to service the existing businesses that are now located in the Park as well.

Thanks for receiving these comments relative to the proposed airport.

Sincerely,

Gilbert M. Jennings, Manager
Fort Pierce Business Park
(1200 acre Industrial park located just to the west of the proposed airport site.)

Gilbert M. Jennings, P.E.
Manager, Fort Pierce Business Park
335 E. St. George Blvd. #301
St. George, Utah 84770
Office (435) 688-9740
Fax (435) 688-9741
email: jmigilbert@infowest.com

1. Thank you for your interest in this project. Your comment has been noted.

1

- Submitted Via E-mail -

From: Royce Jones <royce_derea@yahoo.com>
Sent: 11/08/2005 04:11 PM
To: David Field
Subject: St. George Replacement Airport

I am fully supportive of the replacement airport as presented.

I do not believe there will be negative impacts felt by neighboring communities or federally controlled land that outweigh the enormous benefits of an expanded airport, one that is more able to adequately handle the transportation needs of residents and visitors alike.

Royce Jones
2923 Jacob Hamblin Drive
St. George, UT 84790
435-673-6070

1

1. Thank you for your interest in this project. Your comment has been noted.

- Submitted Via E-mail -

From: Royce Jones <royce_derea@yahoo.com>
Sent: 11/08/2005 04:11 PM
To: David Field
Subject: St. George Replacement Airport

I am fully supportive of the replacement airport as presented.

I do not believe there will be negative impacts felt by neighboring communities or federally controlled land that outweigh the enormous benefits of an expanded airport, one that is more able to adequately handle the transportation needs of residents and visitors alike.

Royce Jones
2923 Jacob Hamblin Drive
St. George, UT 84790
435-673-6070

1

1. Thank you for your interest in this project. Your comment has been noted.

- Submitted Via E-mail -

From: "Shelline Advertising" <shelline@infowest.com>
Sent: 11/08/2005 11:02 AM
To: David Field
Subject: St. George Replacement Airport

Dear Mr. Field,

I just wanted to write & express my support for the plan to put a new, larger airport here in Washington County.

I have lived here for about 15 years. My family and I have loved this area and have seen it grow tremendously since we moved here in the early 90's. We also love our trips to area National Parks & recreation areas. So I can understand the desire to proceed with caution as we consider possible noise issues with larger aircraft coming into the area.

At the same time, I own a business here and I depend upon the continued vitality of our area for my livelihood. I also do some travel and have clients travel to St. George, and I am concerned that our existing little airport with its rather uncomfortable small twin prop airplanes can't handle the demands that our growing business economy will place on them.

So please do what you can to expedite the approval and construction of this replacement airport.

Thank you for your time.

Sincerely,

Don Shelline
Owner, Shelline Studios
557 S. Woodsvie Circle
St. George, UT 84770
p - 435.652.1801 f - 435.652.0655
shelline@infowest.com

Shelline Studios
We Help You Tell Your Story

Shel·line
STUDIOS LLC

1. Thank you for your interest in this project. Your comment has been noted.

1

David Field, Project Manager
For St. George Replacement Airport
EIS FAA, Northwest Mountain Region
1601 Lind Ave. SW Ste 315
Renton, WA. 98055-4056

RE: ST. GEORGE UTAH, REPLACEMENT
AIRPORT

Dear Sir:

Please be advised that I fully support the approval of the Proposed Replacement Airport for St. George, Utah. It is WAY PAST TIME for such an improvement!

My city has expended \$3 million to support the approval of the Federal Aviation Administration, and the environmental assessment of January 2001.

I propose that there be no further "hang-ups"!

The St. George metropolitan area was recently rated as the second fastest-growing metropolitan area in the nation. Our present air facilities are not keeping up with this growth, nor will it take care of the projected future growth of 200,000...within a five-ten year period.

The over-taxed trucking industry does not meet the needs of our city, nor will it as the city continues to grow and expand, and as we encourage further industry.

Our tourist industry, which brings much revenue into our community, would be further enhanced if we had an upgraded air service to and from our area, and the beauty of this area could, and could be enjoyed by so many more.

Sincerely,



63 E. 200; Apt. 5
St. George, UT 84770-
2315

- 1. Thank you for your interest in this project. Your comment has been noted.

1834 E. 680 S. Cir.
St. George, Utah 84790

David Field, Project Manager, St. George Airport
EIS FAA
Northwest Mountain Region
1601 Lind Ave. SW Ste. 315
Renton, Wa. 98055-4056

Dear Mr. Field:

I am writing regarding the draft environmental impact statement for the proposed airport for St. George, Utah. The impact statement has been completed, so now it is time to move forward with the project.

The Grand Canyon Trust has had an additional 4 years plus required the government to spend \$3 million on this impact study. It is time that they except the study and quit there stall tactics. However, being such diehard environmentalist, they will never give up the fight. They need to join their co-hearts that want to drain Lake Powell, and take up residency in the Nevada desert, and live off the land not enjoying the benefits of electricity, clean water, airplane and car travel.

They claim that we need to preserve the tranquility of the Zion National Park, which I agree. However, an airplane flying over the park is not damaging to the park or it's guests. It will not affect the visitors to the park. They will hardly even know that an aircraft is flying over the park. Most aircraft can be routed around the park if need be.

St. George is one of the fastest growing communities in the nation and we need a much larger airport that will handle the larger aircrafts. The existing airport is dangerous and too small for the future. Being a former pilot, I am very much aware of the cross winds at the existing airport that make landing an aircraft sometimes very difficult.

Let's get moving forward and build this airport. It is needed today.

Sincerely,



Royden L. Wittwer

1. Thank you for your interest in this project. Your comments have been noted.

1



November 7, 2005

David Field, Project Manager St. George Replacement Airport EIS
FAA Northwest Mountain Region
1601 Line Ave., SW, Ste. 315
Renton, WA 98055-4056

Dear Mr. Field,

In April of 2001, the Towns of Springdale and Rockville passed a resolution (see attached) recognizing their dependence on the long-term protection of the natural features in Zion National Park. This resolution was written in support of the position taken by the Grand Canyon Trust regarding noise impacts on the Park. This position, among others, has led to the development of the draft EIS currently being considered by the FAA.

We would like to first say that the Town of Springdale does not question the need for the replacement airport. The replacement airport offers great opportunities for St. George and the other communities in the region, including Springdale and Zion National Park. The citizens of Springdale and visitors to Springdale and the Park stand to gain from the advantages of an improved, modern air transportation system. However, we do not believe that these advantages should overshadow the need to protect in perpetuity the natural quiet of Zion National Park.

We are concerned that the draft EIS does not adequately recognize or mitigate the impacts of noise from all aircraft from all airports over Zion National Park. The Draft EIS does not appear to analyze future impacts to the Park with larger planes or more flights in and out of the replacement airport. Mitigation of all aircraft noise over the Park, from whatever origin, should be analyzed in the EIS.

We are concerned that flights directly over the Park will greatly diminish the experience of the millions of people who come to the Park seeking to experience natural sounds in an unimpaired condition. In order to protect the natural quiet of the Park, the FAA should revise the proposed flight route to Denver from the replacement airport to an area north of the Park. We understand that rerouting of flight paths is a common practice for dealing with military special use areas. The northern route could follow the route now being used by SkyWest for flights between St. George and Salt Lake City.

1. Please see **Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park**, and **Appendix X, Monitored Noise Abatement Initiatives**, in the Final EIS.

1

118 Lion Boulevard
P.O. Box 187

Springdale, UT 84767-0187
www.springdaletown.com

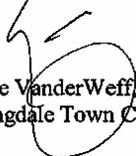
(435) 772-3434
(435) 772-3952 fax

Protecting the natural quiet of the Park benefits all parties, the citizens of Springdale and Rockville, the residents of the region who will utilize the new airport, the visitors to Zion National Park and the FAA.

1

Thank you for the opportunity to comment on the draft EIS. We hope that this process will facilitate the completion of a final EIS that addresses the issues of all concerned parties.

Sincerely,



Bruce VanderWeff, Mayor
Springdale Town Council

Resolution # 01-0416

The Towns of Rockville and Springdale, Utah recognizing their dependence upon the long-term protection of natural features in Zion National Park hereby resolve as follows:

WHEREAS: Natural quiet and solitude are important resources of Zion National Park and it's neighboring communities and tourists to the area, especially visitors to backcountry wilderness areas, should be able to experience natural quiet, undisturbed by the sound of man-made noise, including that made by aircraft,

WHEREAS: Zion National Park is a critical natural feature that contributes significantly to the economic welfare of the Towns of Rockville, Springdale and Washington County,

WHEREAS: The citizens of St. George and Washington County have a recognized need to replace the current airport in order to accommodate jet aircraft while meeting federally mandated safety standards and the Towns of Springdale and Rockville support their efforts to build the new airport,

WHEREAS: A new airport with a longer runway is also anticipated to create an opportunity for additional air traffic and that the take-off and landing patterns of these routes may adversely affect the natural quiet resource of Zion National Park and the neighboring communities,

WHEREAS: The Environmental Assessment completed by the Federal Aviation Administration does not satisfy our concerns about the potential of a new airport to negatively impact the natural quiet resource of Zion National Park and the neighboring communities,

WHEREAS: The Towns of Rockville and Springdale hereby support the position taken by the Grand Canyon Trust in asking the FAA to address, in a satisfactory manner, in its environmental assessment, the issue of the potential impact of the proposed new airport on the natural quiet resource of Zion National Park and the neighboring communities,

THEREFORE, BE IT RESOLVED that; the Towns of Rockville and Springdale strongly urge the Federal Aviation Administration to collaborate with the affected parties, especially the National Park Service and Zion National Park.

BE IT FURTHER RESOLVED that, the Towns of Rockville and Springdale call upon all responsible and affected federal, state, county and local governments to work together for a beneficial resolution of these issues.

BE IT FURTHER RESOLVED that, the Towns of Rockville and Springdale ask the FAA along with all responsible agencies to work to fully and accurately assesses the potential impact of the proposed airport on the natural quiet resource of Zion National Park and to develop a mutually satisfactory solution that allows the airport to advance while assuring the protection of the natural quiet resource in Zion National Park in perpetuity.

Approved this 16th day of April, 2001

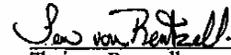
Town of Springdale


Phillip K. Bimsted
Mayor

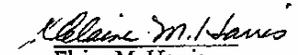
Town of Rockville


David M. Hatfield
Mayor

Attest:


Teri vonRenzell
Town Clerk

Attest:


Elaine M. Harris
Town Clerk

From: Donald Falvey <donfalvey@yahoo.com>
Sent: 10/31/2005, 08:59 AM
To: David Field
Subject: Comments on the Draft Environmental Impact Statement (DEIS) for the St. George, Utah Replacement Airport

Attached are my comments on the Draft Environmental Impact Statement (DEIS) for the replacement airport at St. George, Utah. I have also attached a copy of an article dated April 20, 2001 from The Spectrum reporting on a joint resolution from the Towns of Springdale and Rockville in which they express their concern of the impacts of aircraft flying over the park and their communities and their desire to reroute air traffic around the park.

I request this resolution be included as part of your review process.

I served as the superintendent of Zion National Park from 1991 -2000 and provided oversight in preparation of the park's general management plan.

That plan provides a framework for the preservation of the park's resources and identifies the desired experiences for visitors of the park - among them the ability of visitors to experience natural quiet.

I hope you will seriously consider the impacts of aircraft noise on the ability of the park to provide this experience for visitors. Providing this type of visitor experience is key to many of the other programs and management activities within the park. Thank you for the opportunity to comment.

Copies of my comments are being provided to:

Senator Robert F. Bennett

Senator Orrin G. Hatch

Representative James D. Matheson

Zion National Park

The Grand Canyon Trust

Mayors of Springdale and Rockville

The Coalition of National Park Service Retirees

The Salt Lake Tribune

The Spectrum

Donald A. Falvey
P. O. Box 55
Marysvale, UT 84750
(435) 326-4268

(See attached file: Comments on the St George Airport - 10.29.05.doc)

Comments on the Draft EIS for the replacement St George Airport
Submitted by Donald A. Falvey
P.O. Box 55
Marysvale UT 84750
(Superintendent, Zion National Park, 1991-2000)

Construction of a replacement airport in St. George offers great opportunities – for St George and the nearby communities within the region, for Zion National Park and for the Federal Aviation Administration (FAA).

The citizens of St. George and the local communities gain from the advantages of an improved, modern air transportation system. Zion National Park and the FAA gain by having the opportunity of achieving their responsibilities as defined by the United States Congress.

The park was established to preserve and protect within its boundaries the unique geologic resources, the dynamic process of canyon formation, the resulting scenic beauty of vegetation and the brilliantly colored strata, and the archaeological features pertaining to ancestral Indian tribes while providing a range of experiences - from solitude to high use - to assist visitors in learning about and enjoying these resources.

The park's general management plan includes a provision that visitors have the opportunity to experience natural sounds in an unimpaired condition with the sounds of civilization generally confined to developed areas.

The concept of natural quiet was defined in the *1995 Report on Effects of Aircraft Overflights on the National Park System*:
What is natural quiet? Parks and wilderness areas offer a variety of unique, pristine sounds not found in most urban or suburban environments. They also offer a complete absence of such sounds that are found in such environments. Together, these two conditions provide a very special dimension to a park experience – quiet itself. In the absence of any discernible source of sound (especially manmade), quiet is an important element of feeling solitude. ...the ability to clearly hear the delicate and quieter intermittent sounds of nature, the ability to experience interludes of extreme quiet their own sake, and the opportunity to do so for extended periods of time is what natural quiet is all about.

1



1. The effect of aircraft activity associated with the proposed replacement airport on natural quiet has been addressed through the analysis of L50 natural ambient noise levels and a supplemental audibility analysis in **Appendix T** in this Final EIS. Regarding natural quiet, the identification of the best metric for evaluating aircraft overflight noise over quiet settings in national parks and the prospects for assigning a numerical threshold of significance are topics currently under consideration within the FAA and National Park Service. These are complex issues on which there are divergent opinions and very limited studies, and they will not be resolved before this EIS is completed. For the L50 natural ambient noise levels, both time and number of events have been computed for areas within Zion National Park. Additionally, the audibility of aircraft above ambient noise levels has been assessed and is presented in **Appendix T** in the Final EIS. The results for both analyses reflect minimal impacts from St. George. A detailed assessment of L50 for natural ambient conditions is presented in **Chapter 6, Section 6.6.1**, and **Chapter 7, Section 7.2.3** in the Draft EIS. Additionally, a supplemental assessment of the time aircraft noise is audible within Zion National Park has been conducted and its results are presented in **Appendix T** in the Final EIS.

The FAA conducts a variety of activities relating to air transportation including: regulating civil aviation, developing and operating a system of air traffic control for civil and military aircraft, and developing and carrying out programs to control noise and other environmental effects of civil aviation (see FAA Home Page, Summary of Activities). As noted in the Draft Environmental Impact Statement for the replacement airport, the National Environmental Policy Act (NEPA) requires the FAA "to identify possible conflicts between the replacement airport and the objectives of Federal, regional, state, tribal, and local land use plans, policies and controls for the area concerned and the extent to which the FAA would reconcile its proposed action with the plan or law".

1

In assessing the noise impacts of additional aircraft, soon to include jets, flying over the park, the emphasis in the DEIS is on determining how loud and how long aircraft noise will be heard. The point that is missed is that the park's objective of providing visitors the ability to experience natural quiet as described in the park's general management plan (its local use plan) has not been addressed. Imagine attending a symphony orchestra performance and hearing someone's cell phone ringing. The experience of enjoying the music would be destroyed even though the measureable sound levels may not be great.

The FAA can meet its obligation of reconciling the negative effects on the park caused by airplanes using the relocated airport by revising the air routes, rerouting that traffic around the park. For example the northern route could follow that now being used by SkyWest for flights between St George and Salt Lake City. This would also allow the FAA to accommodate the concerns of the park's neighbors – the towns of Springdale and Rockville – who have passed resolutions (as reported in the April 20, 2001 edition of *The Spectrum*) expressing their concerns with protection of their communities from the noise of low flying aircraft.

2

Now is the time for FAA to fulfill its responsibilities of helping Zion National Park fulfill its obligations to manage the park's resources as defined by the U.S. Congress and identified in its general management plan. By protecting the soundscape of the park, everyone gains – the citizens of St George, the local communities, the visitors to Zion National Park, and the FAA, too.

2. The issue of mitigation is addressed in **Appendix W, *Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park***, in the Final EIS. Please also see **Appendix X, *Monitored Noise Abatement Initiatives*** in the Final EIS.

From: "Lin Alder" <alder@infowest.com>
Sent: 11/08/2005 11:04 PM
To: David Field
Subject: St. George airport EIS comments

Hi David,

As a resident of southern Utah--and Zion Canyon--I am deeply grateful to live in a place where it is possible to escape from the noise of our fast-paced society. I also appreciate having close access to the conveniences of our fast paced world that the new St. George airport will provide. Ultimately, I feel that future generations of southern Utahans will be better served by preserving the characteristics that caused my pioneer ancestors to name this place Zion--a place of refuge.

The EIS needs to be corrected in a few key ways in order to keep Zion quiet. These corrections include...

- 1) mitigation of future impacts caused by increased number of flights over Zion whether they originate in St. George or not | 1
- 2) the noise analysis needs to focus on peak days and hours, not day averages | 2
- 3) ensuring the flight path to/from Denver stay well north of Zion National Park | 3
- 4) reporting "Current Conditions" for noise over Zion, based on 2000 or 2003 baseline year. | 4
- 5) reporting "Audibility" data that was promised in the Scope of Work. | 5

I recognize the challenge we all face in balancing the many conflicting values in our modern society. I applaud your efforts to address this issue. With a few key changes, I believe the EIS can be an even better tool for decision makers as we move forward.

Best wishes,

Lin Alder
Alder Photo & Writing
140 Juniper Lane
Springdale, Utah 84767
435-772-4279
www.alderphoto.com
lin@alderphoto.com

1. Please see **Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park**, in the Final EIS.
2. The FAA's Integrated Noise Model, INM, is unable to compute the peak characteristics requested by the commenter. In addition, the underlying input data required for such an analysis is unavailable.
3. Please see **Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park**, and **Appendix X, Monitored Noise Abatement Initiatives**, in the Final EIS.
4. **Appendix S, Noise Levels for 2003 Conditions**, of the Final EIS, provides current noise level information for all noise metrics, except audibility, at all identified 4(f)/303(c) locations (including Zion National Park) within the study area.
5. As of the completion date of the Draft EIS, a version of the INM capable of producing audibility information had not been released for public use. In the Final EIS, the FAA used the new INM model, INM v6.2b, (which has not been released for public use at this time) to calculate the requested audibility information. The results of this additional analysis are presented in the Final EIS in **Appendix T, Audibility Evaluation for Zion National Park**.

From: "Wayne Staab" <WSTAAB@aol.com>
Sent: 10/28/2005 08:38 PM
To: David Field
Subject: St. George, Utah EIS on Proposed Airport

Dear Mr. Field:

I am fairly new to the St. George area and have not been involved with the new airport proposal for this area. However, an article in the local newspaper this week indicated that after what seems forever, the deadline is approaching for airport comments.

I realize there is probably a formal way to make comments and I am not following them, but my dial-up Internet service would take forever (assuming that it does not crash) to download the information from the website.

I am an audiologist/hearing scientist. As a result, I noticed that much concern and effort seems to have been expended at looking at ambient noise levels. What I am most concerned is how this information will be used - in other words, the use and interpretation of it. My concern is that there may, and most likely have been, attempts to suggest that in some way the noise produced by such an airport is in some way damaging to the environment, or at least to the esthetic sensitivity of certain individuals who look for whatever way they can to make assumptions about how severe the impact will be.

From a hearing point of view, the airplane sounds will be heard with varying degrees of loudness, depending on at least (actually many more) three different issues: 1) the distance from the source, including the factoring in of wind direction (which according to my neighbor's weather station is mostly from the southeast in our area). 2) The second issue relates to the hearing sensitivity of individuals within the area. There are many who would have a difficult time hearing airplanes even if they were fairly close to them. This is especially true with those of advancing age (over about 35 years of age from a hearing point of view) or with those who spend much of the early or current life listening to very loud sounds via their music listening devices. I would hope that these issues have been factored into consideration, but doubt that they have been. They may be too logical and practical, and support realistic experiences and expectations.

3) Another issue relates to noise sensitivity - I am referring to both physical and psychological sensitivity. The levels heard will be less than what individuals experience in their own homes when their homes are quiet - and I doubt that most would call home sounds in quiet as being overly excessive. In other words, individuals are unwilling to tolerate sounds related to the airport that they tolerate daily in their homes, even when their homes are quiet.

1. The FAA agrees with the commenter that sound levels are indeed a function of the distance between the source and the receiver. For point sources such as an aircraft engine, noise will be reduced by about 6 decibels (dB) per doubling of the distance between the source and the receiver. For example, if the noise source is 65 dB at 1,000 feet from a jet, then someone standing 2,000 feet from the same source would be exposed to a sound level of approximately 59 dB.

Sound is measured using the logarithmic dB scale. This is because the range of sound pressures detectable by the human ear can vary from *1 to 100 trillion units*. A logarithmic scale allows us to discuss and analyze noise using more manageable numbers. The range of audible sound ranges from approximately 1 to 140 dB, although everyday sounds rarely rise above about 120 dB.

A logarithmic scale requires different mathematics than used with linear scales. The sound pressures of two separate sounds, expressed in dB, are not arithmetically additive. For example, if a sound of 80 dB is added to another sound of 74 dB, the total is a 1 dB increase in the louder sound (81 dB), not the arithmetic sum of 154 dB. If two equally loud noise events occur simultaneously, the sound pressure level from the combined events is 3 dB higher than the level produced by either event alone.

Human perceptions of changes in sound pressure are less sensitive than a sound level meter. People typically perceive a tenfold increase in sound pressure, a 10 dB increase, as a doubling of loudness. Conversely, a 10 dB decrease in sound pressure is normally perceived as half as loud. In community settings most people perceive a 3 dB increase in sound pressure (a doubling of the sound pressure or energy) as just noticeable. (In laboratory settings, people with good hearing are able to detect changes in sounds of as little as 1 dB.)

Please refer to **Appendix T** in the Final EIS, ***Audibility Evaluations For Zion National Park***, for details regarding the additional noise analysis done for this project since the Draft EIS.

1

Again, my concern relates to who will interpret these noise levels and under what agenda. I suspect that the FAA has appropriate counsel on the issues related to noise and does not follow unsupported and irrational expectations.

Sincerely,

Wayne J. Staab, Ph.D.
Dr. Wayne J. Staab & Associates
352 Sundial Ridge Circle
Dammeron Valley, UT 84783-5196
435-574-0061 - Phone
435-574-0063 - FAX
wstaab@aol.com
www.waynestaab.com
Google: Wayne Staab



project manager David Field

Sent : 10/26/2005 at 8:07:34 AM

Subject : St George Replacement Airport Formal Comment

From : Thomas Bailey

Pages : 1 (including Cover)

Mr. Field, Ladies and Gentlemen:

I am a 16 year resident of St George, Utah and I heartily support construction of the new, replacement airport as promptly as possible. My single, deeply felt comment is one I urge you to include as a formal issue. It involves the current airport which will be replaced. Having resided in several areas which built new airports, including Sacramento, CA, I feel there must be early and definite requirements placed on utilization of the current St George airport upon completion of the replacement airport. In the absence of enforceable requirements, local takeoffs and landings will subside briefly and then begin increasing steadily until they present serious problems of many types for local residents and taxpayers. Surely there must be a responsible and effective way to make this issue an embedded part of the new, replacement airport plan.

Thank-you for this opportunity to comment.

Thomas F Bailey
1460 Geronimo Rd.
St George, UT 84790
USA

1

1. Upon obtaining approval of the replacement airport project from the FAA, the City of St. George plans to redevelop the existing St. George airport property into a mix of residential, commercial, administrative and professional, light industry, and/or campus land uses. The existing airport would remain intact and active until the replacement airport site is completed and the runway is operational. At that time, the City would initiate redevelopement of the existing airport site. The existing runway and taxiway would then be removed; therefore, no aviation activity would occur from the existing airport site after the replacement airport is completed and in operation.

Washington City

Terrill Clove
MAYOR

Roger Carter
CITY MANAGER

Sydney Wasden
CITY TREASURER

November 8, 2005

111 North 100 East
Washington, Utah 84790

Office: (435) 656-6900
FAX: (435) 656-6370

Mr. David Field, Manager
Planning/Programming Branch, Airports Division,
Federal Aviation Administration, Northwest Mountain Region
1601 Lind Avenue, S. W., Suite 315
Renton, WA 98055-4056

RE: St. George Municipal Airport Draft Environmental Impact Statement

Dear Mr. Field:

Listed below are the comments from Washington City regarding the Draft Environmental Impact Statement for the St. George Replacement Airport.

1. Exhibit 1.2 and similar exhibits depicting the replacement airport property show that the southeastern entrance to the airport, from and including the interchange from the Southern Corridor, is proposed to be part of the airport property. This is the first time Washington City became aware of this proposal, and becoming aware was by reading the document and not by any other verbal or written information received from St. George City or its representatives. In both the Record of Decision for the environmental document prepared for the Southern Corridor under the jurisdiction of the Utah Department of Transportation (UDOT) and the Airport Vicinity Land Use Plan drafted by a task force that included representatives of Washington City, it was clearly stated that the locations of the interchanges had not been determined. Section 6.4 of the Draft Airport Vicinity Land Use Plan states that "Washington City, St. George and Utah Department of Transportation will meet to coordinate final decisions regarding exact alignments and interchanges prior to approval of the Airport Vicinity Land Use Plan." This statement was requested to be included by Washington City because the interchange location and partial road alignment are within a major wash area (Ft. Pierce Wash); a difficult area for developing the required access infrastructure. There are properties further to the north that have much flatter terrain, are out of the wash area, and would prove much easier to develop the required access infrastructure and would not impact the sensitive nature of a major wash. I do not see where the Draft EIS adequately addresses the

1. The location of the airport access road and the intersection with the Southern Corridor was coordinated by the City of St. George throughout the continuous planning efforts conducted for both the airport and the Southern Corridor, which involved the Dixie Metropolitan Planning Organization (MPO), Washington County, Washington City, the Five County Association of Governments, the Utah Department of Transportation (UDOT), and the Federal Highway Administration (FHWA). The corridor for the airport access road and the proposed location of the intersection and future interchange with the Southern Corridor are consistent with the airport development and transportation plan components of the St. George General Plan. Much of the area to the north of the proposed airport access road is located within the corporate limits of Washington City, making the development and management of access to the replacement airport by the City of St. George difficult. According to the Washington City General Plan, approved and published on March 9, 2005, Washington City recognizes the influence of the proposed replacement airport location on future development and has planned development patterns that appear compatible with the recommendations in the Draft Airport Vicinity Land Use Plan. Continued coordination between the City of St. George and Washington City will be essential to providing access to the development area between the airport and the Southern Corridor.

The impacts associated with the airport access road corridor depicted in the EIS and on the proposed Airport Layout Plan (ALP) (**Exhibit 4.3**, in the Draft EIS) were evaluated in this EIS. The proposed alignment of the airport access road crosses one tributary of the Fort Pearce Wash. As described within the Draft EIS in **Chapter 6, Section 6.8 Impacts to Wetlands and Water Resources, Section 6.9 Floodplains and Floodways, and Appendix P** (in the Draft EIS), this crossing will have minimal impact on this tributary and will have no impacts to the main channel of the Fort Pearce Wash, the floodplain, or habitat immediately adjacent to the Wash. Although areas of rough terrain exist near the proposed intersection of the airport access road and the Southern Corridor, the location of the access road provides for a larger, more contiguous land area north of the access road, east of the airport, and west of the Southern Corridor for future compatible development.
[continued ▼]

▲
1.

[▲continued] As stated previously, the interconnection of the airport access road and the Southern Corridor will be achieved through the construction of an at-grade intersection. As described in the Record Decision (ROD) issued by the FHWA for the Southern Corridor on October 17, 2005, (Federal) funding has been identified for the first phase of construction only, which includes the Atkinville interchange at I-15. The Southern Corridor would be initially constructed as a limited-access facility with at-grade intersections and, when increased traffic volumes and decreased roadway capacity warrant, upgraded to a four-lane divided highway with grade-separated interchanges. The UDOT has reserved the right to modify the location of intersections / interchanges along the Southern Corridor as development occurs. The City of St. George will continue coordination with the UDOT as design plans for the airport access road and Southern Corridor are completed. The final precise location of the access road and other future intersections and interchanges proposed by other developments along the Southern Corridor will be determined through continued coordination among the City of St. George, Washington City, Washington County, the Dixie MPO, the UDOT, and the FHWA.

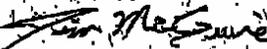
In the event that location of the intersection/interchange connecting the airport access road and Southern Corridor is moved from what is depicted in either the Southern Corridor EIS or the airport EIS, a separate environmental analysis would be conducted by either the Federal Highway Administration (FHWA) or the FAA to obtain the necessary approvals for the improvement. The appropriate permits and approvals will be obtained from the state and Federal agencies having jurisdiction prior to the construction of the airport access road and intersection/interchange with the Southern Corridor, regardless of the final location.

impacts to the Ft. Pierce Wash area in relation to fewer impacts that could be realized with alternative locations further to the north. The Final EIS should include statements that alternative access locations have been considered and included in the scope of the EIS since the specific locations have not been determined by UDOT. That way the plans for the airport can move forward and not be questioned when access ends up being different than that depicted on Exhibit 1.2 and other similar exhibits. If the depicted access is ultimately chosen, there should be clear justification why that access is preferred over the flatter terrain alternatives further to the north.

2. Exhibit 5.9 should reflect the agreed upon land uses in the Draft Airport Vicinity Land Use Plan for the Special Study Area of the Washington City General Plan.
3. During the scoping phase of the Draft EIS, I requested that an analysis of the impacts to properties within Washington City be performed since clearly Washington City will be impacted more than any other jurisdiction. The exhibits in Chapter 6 depicting the proposed flight tracks and minutes per average day where noise exceeds 65 dBA, and the noise assessment located in Appendix B, Section B.2, show that the analysis was performed and Washington City is appreciative of the documentation. Although Washington City will experience additional noise and visual impacts, the impacts are not significant according to federal standards. We will now be able to show this documentation to our citizens.

Thank you for your time in addressing our concerns.

Sincerely,



Jim McGuire
Community Development Director

cc: Roger Carter, City Manager

▲
1
2
3

2. Land use designations were not available for the whole area surrounding the proposed replacement airport when the Draft EIS was released to the public in August 2005. Therefore, **Exhibit 5.9, Future Land Use Designations from Existing General Plans** (from the Draft EIS), denotes certain land areas around the proposed replacement airport as "No Designation." **Exhibit 5.9** is revised in the Final EIS to include the future land use recommendations that were agreed upon by the Airport Vicinity Land Use Planning committee.
3. Your comment regarding impacts to properties within Washington City is noted.

*Desert Canyons Group
c/o Quality Development
113 East 200 North #3
St. George, UT 84770*

November 7, 2005

Mr. David Field
Manager
Planning/Programming Branch, Airports Division
Federal Aviation Administration
Northwest Mountain Region
1601 Lind Avenue, SW, Suite 315
Renton, WA 98055-4056

Via Email

Dear Mr. Feld:

This letter is sent in response to your request for public comments on the Draft Environmental Impact Statement ("DEIS") for the St. George Replacement Airport. We are Ed Burgess and Richard Pratt and we represent all the owners of the property previously known as the Leucadia property. For identification purposes we have designated the property as "Desert Canyons."

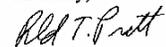
We have reviewed the proposed replacement airport and its effect on our adjacent property. We support the general plan that has been previously approved by the St. George City Council both in airport hearings and in a general plan update approval process. Exhibit 5.9 referenced in this DEIS reflects our understanding of the proposed land use of our property. We recognize that there will be refined changes as development occurs in the future, but for the purpose of our response to the approval of this replacement airport as presented, we approve. We do feel that the restrictions suggested on safety and noise are at best very conservative, and we reserve the right to demonstrate this issue as our property is developed in future years.

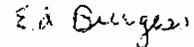
While we approve of the broad concepts and conclusions drawn in the draft EIS, the document provides only a high level view of the effects of the airport, and the decisions which are yet to be made by the numerous governmental entities having jurisdiction. Land owners have varied interests and expectations as to the detail of zoning and land use allocations. As major land owners adjoining the airport we expect to provide input as this process continues.

The access to the airport located on our property was a part of the consideration with St. George City in making the exchange for our eventual ownership of this property. The easements for the Southern Corridor were given as consideration for the airport entrance road to be located in the approximate location as shown on every exhibit and land plan in the EIS approval process for both the airport and the Southern Corridor. Additional exits will need to be studied as the road design for the Southern Corridor is finalized.

We expect to be a positive and constructive force in the further planning of the St. George Replacement Airport and the Southern Corridor and look forward to working with the FAA and other public authorities as the airport development proceeds.

Sincerely,


Richard T. Pratt


Ed Burgess

1. As documented in the Federal Highway Administration's (FHWA) Record of Decision (ROD) for the Southern Corridor on October 17, 2005, the EIS prepared for the Southern Corridor was a 'planning-level' study. The location of the airport access road and the intersection with the Southern Corridor was coordinated by the City of St. George throughout the continuous planning efforts conducted for both the airport and the Southern Corridor, which involved the Dixie Metropolitan Planning Organization (MPO), Washington County, Washington City, the Five County Association of Governments, the Utah Department of Transportation (UDOT), and the FHWA. The corridor for the airport access road and the proposed location of the intersection and future interchange with the Southern Corridor are consistent with the airport development and transportation plan components of the St. George General Plan. Much of the area to the north of the proposed airport access road is located within the corporate limits of Washington City, making the development and management of access to the replacement airport by the City of St. George difficult. According to the Washington City General Plan, approved and published on March 9, 2005, Washington City recognizes the influence of the proposed replacement airport location on future development and has planned development patterns that appear compatible with the Airport Vicinity Land Use Plan. Continued coordination between the City of St. George and Washington City will be essential to providing access to the development area between the airport and the Southern Corridor.

The impacts associated with the airport access road corridor depicted in the EIS and on the proposed Airport Layout Plan (ALP) (**Exhibit 4.3**, in the Draft EIS) were evaluated in this EIS. The proposed alignment of the airport access road crosses one tributary of the Fort Pearce Wash. As described within the Draft EIS in **Chapter 6, Section 6.8 Impacts to Wetlands and Water Resources, Section 6.9 Floodplains and Floodways, and Appendix P** (in the Draft EIS), this crossing will have minimal impact on this tributary and will have no impacts to the main channel of the Fort Pearce Wash, the floodplain, or habitat immediately adjacent to the Wash. Although areas of rough terrain exist near the proposed intersection of the airport access road and the Southern Corridor, the location of the access road provides for a larger, more contiguous land area north of the access road, east of the airport, and west of the Southern Corridor for future compatible development.
[continued ▼]

1

2

- ▲
1. [▲continued] As stated previously, the interconnection of the airport access road and the Southern Corridor will be achieved through the construction of an at-grade intersection. As described in the ROD issued by the FHWA for the Southern Corridor on October 17, 2005, (Federal) funding has been identified for the first phase of construction only, which includes the Atkinville interchange at I-15. The Southern Corridor would be initially constructed as a limited-access facility with at-grade intersections and, when increased traffic volumes and decreased roadway capacity warrant, upgraded to a four-lane divided highway with grade-separated interchanges. The UDOT has reserved the right to modify the location of intersections/interchanges along the Southern Corridor as development occurs. The City of St. George will continue coordination with the UDOT as design plans for the airport access road and Southern Corridor are completed. The final precise location of the access road and other future intersections and interchanges proposed by other developments along the Southern Corridor will be determined through continued coordination among the City of St. George, Washington City, Washington County, the Dixie MPO, the UDOT, and the FHWA.

In the event that location of the intersection/interchange connecting the airport access road and Southern Corridor is moved from what is depicted in either the Southern Corridor EIS or the airport EIS, a separate environmental analysis would be conducted by either the FHWA or the FAA to obtain the necessary approvals for the improvement. The appropriate permits and approvals will be obtained from the state and Federal agencies having jurisdiction prior to the construction of the airport access road and intersection/interchange with the Southern Corridor, regardless of the final location.

2. Your comment regarding planning involvement has been noted.

P.O. BOX 1268
ST. GEORGE, UTAH 84771
Phone: 435.574.2627
Fax: 435.574.3948

November 8, 2005

Sent Via Email: david.field@faa.gov

MR. DAVID FIELD
FEDERAL AVIATION ADMINISTRATION
1601 LIND AVENUE, S.W., SUITE 315
RENTON, WA 98055-4056

Re: Draft Environmental Impact Statement St. George Replacement Airport Public Comments for the following entities owning property in the replacement airport vicinity: Calneva L.L.C., Grand Circle Enterprises L.L.C., Organic Farms L.C., Southwest Airways L.C.

Dear Mr. Field:

On behalf of the before listed companies, we would like to express our appreciation and gratitude for the numerous hours of hard work, analysis, and conclusions provided in Landrum & Browns professional and comprehensive EIS.

Our main issue of concern that warrants serious comment relates to the airport's access from the proposed Southern Corridor. It is our understanding that the EIS takes into consideration the social, economic, and environmental impacts of the proposed airport.

Approvals for the property located directly south of the replacement airport (commonly referred to as the Leucadia parcel) primarily supports a master planned residential golf course community. It is further noted that the location of the proposed corridor exit in this area is situated on adulating or topographically challenged property not suitable for commercial development.

This is strongly evidenced in Exhibit ES.2 of the Executive Summary. Attached is the Exhibit with an overlay highlighting the two topographical and geographical locations. The area surrounded in Red depicts St. George City's desired location for the airport access from the Southern Corridor. This area is inclusive of the region's most

1. The location of the airport access road and the intersection with the Southern Corridor was coordinated by the City of St. George throughout the continuous planning efforts conducted for both the airport and the Southern Corridor, which involved the Dixie Metropolitan Planning Organization (MPO), Washington County, Washington City, the Five County Association of Governments, the Utah Department of Transportation (UDOT), and the Federal Highway Administration (FHWA). The corridor for the airport access road and the proposed location of the intersection and future interchange with the Southern Corridor are consistent with the airport development and transportation plan components of the St. George General Plan. Much of the area to the north of the proposed airport access road is located within the corporate limits of Washington City, making the development and management of access to the replacement airport by the City of St. George difficult. According to the Washington City General Plan, approved and published on March 9, 2005, Washington City recognizes the influence of the proposed replacement airport location on future development and has planned development patterns that appear compatible with the Airport Vicinity Land Use Plan. Continued coordination between the City of St. George and Washington City will be essential to providing access to the development area between the airport and the Southern Corridor.

The impacts associated with the airport access road corridor depicted in the EIS and on the proposed Airport Layout Plan (ALP) (**Exhibit 4.3**, in the Draft EIS) were evaluated in this EIS. The proposed alignment of the airport access road crosses one tributary of the Fort Pearce Wash. As described within the Draft EIS in **Chapter 6, Section 6.8 Impacts to Wetlands and Water Resources, Section 6.9 Floodplains and Floodways, and Appendix P** (in the Draft EIS), this crossing will have minimal impact on this tributary and will have no impacts to the main channel of the Fort Pearce Wash, the floodplain, or habitat immediately adjacent to the Wash. Although areas of rough terrain exist near the proposed intersection of the airport access road and the Southern Corridor, the location of the access road provides for a larger, more contiguous land area north of the access road, east of the airport, and west of the Southern Corridor for future compatible development.
[continued ▼]

David Field
November 8, 2005
Page Two of Two

extreme grades and drainages of the Fort Pierce Wash. Poorly, located on these intense grades is the airport's future interchange access, which is situated on the most undesirable site possible with respect to the airport's future economic development (see green topographic contour lines depicted in Exhibit ES.2).

In contrast the area shown in Green embodies the airports most flat prime developable acreages. Attached is Landrum & Brown's map titled Study Area and Safety Zones taken from the recently published Airport Vicinity Land Use Plan for the proposed St. George City replacement airport. As you can see in Landrum & Brown's attached Land Use Plan, this area has clearly received designation as Mixed Use Commercial and Airport Supporting Business Park Lands. These are the airport's most prime flat developable acreages.

It is further noted that the Utah Department of Transportation (UDOT) will determine the access from the Southern Corridor. The Southern Corridor's Record of Decision clearly indicates that no decision has been made with regards to this or any other access.

We kindly ask that the proposed accesses be omitted from the final EIS, so not to imply or prejudice the eventual location as determined by UDOT. This will insure an objective and fair approach for maximizing economic benefits to the community derived from the airport and surrounding lands.

Again, on behalf of the before listed companies, we appreciate the FAA's and Landrum & Brown's fair and equitable approach to this crucial project.

Sincerely,



Jeff Klein
Managing Member of listed Entities

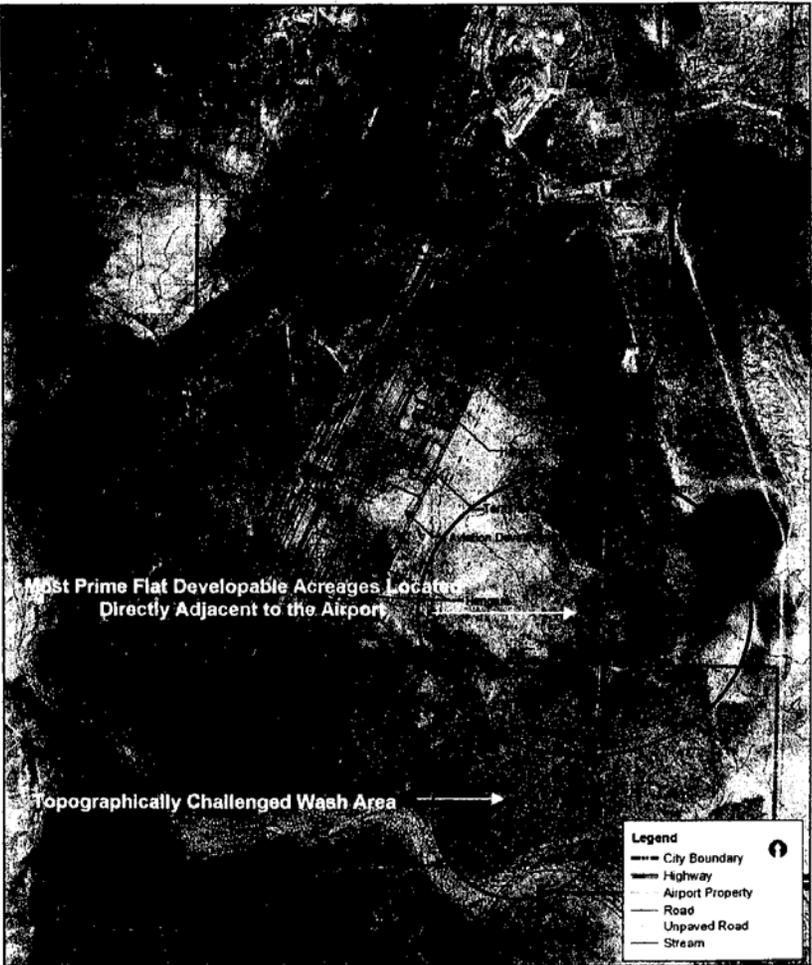
Enclosure

▲
1

▲
1.

[▲continued] As stated previously, the interconnection of the airport access road and the Southern Corridor will be achieved through the construction of an at-grade intersection. As described in the Record Decision (ROD) issued by the FHWA for the Southern Corridor on October 17, 2005, (Federal) funding has been identified for the first phase of construction only, which includes the Atkinville interchange at I-15. The Southern Corridor would be initially constructed as a limited-access facility with at-grade intersections and, when increased traffic volumes and decreased roadway capacity warrant, upgraded to a four-lane divided highway with grade-separated interchanges. The UDOT has reserved the right to modify the location of intersections / interchanges along the Southern Corridor as development occurs. The City of St. George will continue coordination with the UDOT as design plans for the airport access road and Southern Corridor are completed. The final precise location of the access road and other future intersections and interchanges proposed by other developments along the Southern Corridor will be determined through continued coordination among the City of St. George, Washington City, Washington County, the Dixie MPO, the UDOT, and the FHWA.

In the event that location of the intersection/interchange connecting the airport access road and Southern Corridor is moved from what is depicted in either the Southern Corridor EIS or the airport EIS, a separate environmental analysis would be conducted by either the FHWA or the FAA to obtain the necessary approvals for the improvement. The appropriate permits and approvals will be obtained from the state and Federal agencies having jurisdiction prior to the construction of the airport access road and intersection/interchange with the Southern Corridor, regardless of the final location.

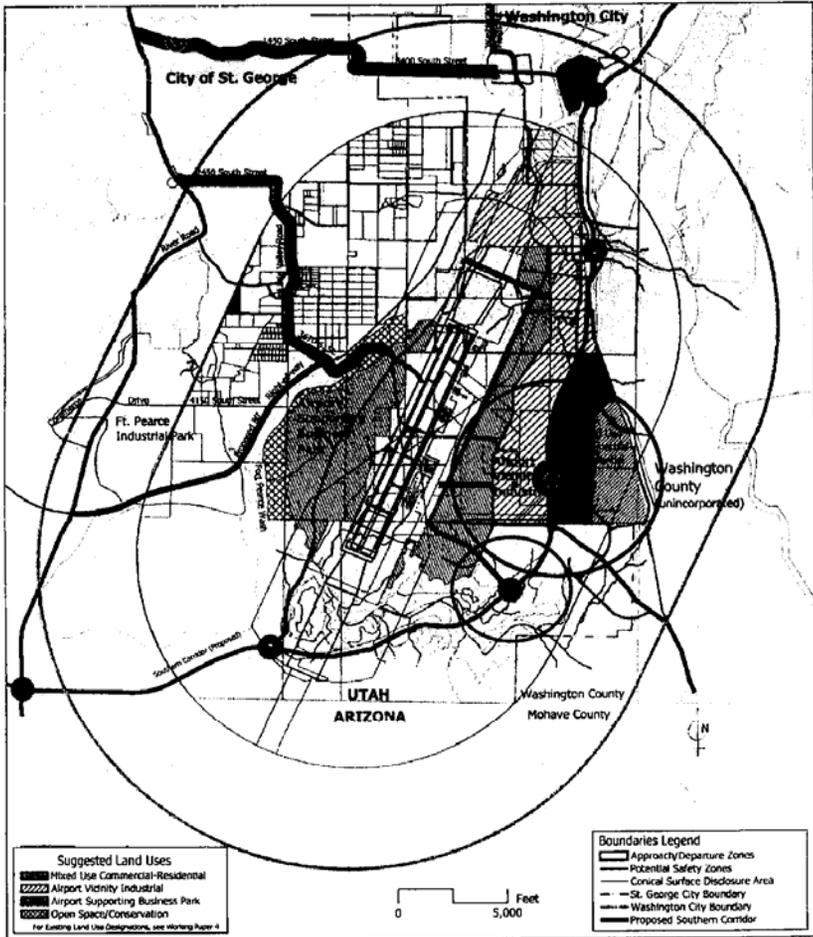


*St. George Municipal Airport
Environmental
Impact
Statement*

**Airport Facilities at
Proposed Site (ALP)**

**EXHIBIT
ES.2**

1/06/2004
Prepared by: Lottman & Brown
Drawing: ES.2-212.mxd



City of St. George
Airport Vicinity Land Use Plan

**Airport Vicinity Land Use Plan
 Study Area and Safety Zones**

EXHIBIT
6.1

November 8, 2005

VIA FACSIMILE, EMAIL AND
FIRST CLASS MAIL

Mr. David Field
Manager, Planning/Programming Branch, Airports Division,
Federal Aviation Administration, Northwest Mountain Region
1601 Lind Avenue, S.W., Suite 315
Renton, WA 98055-4056
Telephone: (425) 227-2600
Fax: (425) 227-1600
Email: David.Field@faa.gov

Re: *Comments to Draft Environmental Impact Statement St. George Replacement Airport*

Dear Mr. Field:

This firm represents the following entities and/or persons who own property in the immediate vicinity of the proposed St. George Replacement Airport: Pinnacle Investment Properties, L.L.C., Cohen Holdings, LLC, Global Jet Holdings, Utah 40, L.L.C., Scott Peterson, S&A Peterson 1997 Trust Dated 10-21-97, S&A Peterson 1987 Trust, Peterson 1981 Trust, Mohler 1973 Trust, Robert Bickel, Patricia Bickel, Lisa Ann-Miller Ferguson, Joan L. Miller 1993 Trust Dated January 22, 1993, Paula Boardman Irrevocable Trust, Cooper Family Trust dated December 29, 1995, Alan Zellhoefer, Terega Zellhoefer, Kravetz Family U/A/D 11/24/86, Gifford 1973 Trust, Penelope L. Stirling, Byron and Dale Todd Living Trust dated Oct. 21, 2004, Tracy G. Hoyt, Landing Zone, L.L.C., Richard W. and Lynn R. Oehmann Family Trust Dated April 2, 1996, Pleasant Grove, L.L.C., Mesquite Investment Irrevocable Trust Dated 11/14/91, Rebecca R. Bunker and R. Christopher Bunker (collectively "Adjacent Property Owners"). On behalf of the Adjacent Property Owners, the following are comments and/or objections to the Draft Environmental Impact Statement ("Draft EIS") for the St. George Replacement Airport ("Replacement Airport").

In general, the Adjacent Property Owners support the Replacement Airport and the findings contained in the Draft EIS. However, it is not clear whether the Draft EIS considers the environmental impacts of the proposed southeastern access from the Southern Corridor Highway for the Replacement Airport. For example, exhibit 1.2 of Chapter 1 of the Draft EIS shows that the currently-depicted southeastern access location and road will be airport property. This could lead to the conclusion that the findings contained in the Draft EIS are dependant on the access road being located in the approximate location as shown on exhibit 1.2.

1. The location of the airport access road and the intersection with the Southern Corridor was coordinated by the City of St. George throughout the continuous planning efforts conducted for both the airport and the Southern Corridor, which involved the Dixie Metropolitan Planning Organization (MPO), Washington County, Washington City, the Five County Association of Governments, the Utah Department of Transportation (UDOT), and the Federal Highway Administration (FHWA). The corridor for the airport access road and the proposed location of the intersection and future interchange with the Southern Corridor are consistent with the airport development and transportation plan components of the St. George General Plan. Much of the area to the north of the proposed airport access road is located within the corporate limits of Washington City, making the development and management of access to the replacement airport by the City of St. George difficult. According to the Washington City General Plan, approved and published on March 9, 2005, Washington City recognizes the influence of the proposed replacement airport location on future development and has planned development patterns that appear compatible with the Airport Vicinity Land Use Plan. Continued coordination between the City of St. George and Washington City will be essential to providing access to the development area between the airport and the Southern Corridor. [continued ▼]

As you are likely aware, the location of access to and from the Southern Corridor for the Replacement Airport is controlled by the Utah Department of Transportation ("UDOT"). In the Record of Decision for the Southern Corridor, UDOT specifically stated that the location of the interchange that would serve as access to and from the Replacement Airport and the Southern Corridor has not yet been determined. See Southern Corridor Record of Decision, October 17, 2005, at page 20, Comment Number P-006-01, stating: "The final decision regarding access locations on the Southern Corridor will be made during final design of each phase of the project as funding is identified."

In addition, the City of St. George, Washington City, Washington County, Mohave County and UDOT are still in the process of finalizing the Airport Vicinity Land Use Plan prepared by Landrun & Brown ("Plan") for the areas surrounding the Replacement Airport, and no final decision has been made regarding Replacement Airport access from the Southern Corridor. The Plan specifically says that: "Washington City, St. George and the Utah Department of Transportation will meet to coordinate final decisions regarding the exact alignments and interchanges prior to approval of the Airport Vicinity Land Use Plan."¹ Based upon this uncertainty as to the exact location of the Replacement Airport access on the Southern Corridor, the Adjacent Property Owners request that the EIS specifically state that the alignment and location of the Replacement Airport access from the Southern Corridor has not been finalized and could be altered without affecting the findings contained in the EIS.²

In the alternative, if the alignment of the Replacement Airport access on the South Corridor is part of the EIS, the Adjacent Property Owners object to the Draft EIS on the basis that the Draft EIS fails to consider whether the environmental impacts of the airport entrance road could be mitigated by moving the interchange and alignment of the road to the North, as shown on the maps attached hereto as Exhibit "A" and Exhibit "B" (the "Alternative Alignment"). The current depiction of the proposed southeastern access shows the access to be located on a tract of land commonly referred to as the Leucadia parcel. This portion of the Leucadia parcel is not ideal for access from the Southern Corridor due to the topography and uneven nature of the surrounding property.³ The development of the type of commercial property which would be ideally located around an interchange may also adversely impact

¹ See Airport Vicinity and Land Use Plan for the Proposed Replacement Airport at St. George, Utah – Working Paper 6 Revised Draft Land Use Plan, Section 6.4, page 14.

² For instance, a sentence could be added after the second sentence of Section I.3.2. Airport Facilities at Proposed Site, which would state: "Though depicted on certain maps, the location of Replacement Airport access on the Southern Corridor has not yet been determined."

³ The location of the depicted southeast interchange was apparently chosen based upon a 1998 agreement between Leucadia and the City of St. George whereby St. George agreed to place the access road intersection at its depicted location. Annotating the EIS to clarify that the depicted southeast entrance is not a mandatory alignment would allow numerous other concerns to be considered by UDOT in its analysis of the most beneficial placement of the interchange.

1. [▲continued] The impacts associated with the airport access road corridor depicted in the EIS and on the proposed Airport Layout Plan (ALP) (**Exhibit 4.3**, in the Draft EIS) were evaluated in this EIS. The proposed alignment of the airport access road crosses one tributary of the Fort Pearce Wash. As described within the Draft EIS in **Chapter 6, Section 6.8 Impacts to Wetlands and Water Resources, Section 6.9 Floodplains and Floodways, and Appendix P** (in the Draft EIS), this crossing will have minimal impact on this tributary and will have no impacts to the main channel of the Fort Pearce Wash, the floodplain, or habitat immediately adjacent to the Wash. Although areas of rough terrain exist near the proposed intersection of the airport access road and the Southern Corridor, the location of the access road provides for a larger, more contiguous land area north of the access road, east of the airport, and west of the Southern Corridor for future compatible development.

As stated previously, the interconnection of the airport access road and the Southern Corridor will be achieved through the construction of an at-grade intersection. As described in the Record Decision (ROD) issued by the FHWA for the Southern Corridor on October 17, 2005, (Federal) funding has been identified for the first phase of construction only, which includes the Atkinville interchange at I-15. The Southern Corridor would be initially constructed as a limited-access facility with at-grade intersections and, when increased traffic volumes and decreased roadway capacity warrant, upgraded to a four-lane divided highway with grade-separated interchanges. The UDOT has reserved the right to modify the location of intersections/interchanges along the Southern Corridor as development occurs. The City of St. George will continue coordination with the UDOT as design plans for the airport access road and Southern Corridor are completed. The final precise location of the access road and other future intersections and interchanges proposed by other developments along the Southern Corridor will be determined through continued coordination among the City of St. George, Washington City, Washington County, the Dixie MPO, the UDOT, and the FHWA.

In the event that location of the intersection/interchange connecting the airport access road and Southern Corridor is moved from what is depicted in either the Southern Corridor EIS or the airport EIS, a separate environmental analysis would be conducted by either the FHWA or the FAA to obtain the necessary approvals for the improvement. The appropriate permits and approvals will be obtained from the state and Federal agencies having jurisdiction prior to the construction of the airport access road and intersection/interchange with the Southern Corridor, regardless of the final location.

the Fort Pierce Wash and the Little Black Mountain Petroglyph Site. In contrast, the placement of access at the Alternative Alignment would be an ideal location for development of businesses that are dependent on traffic volume. The Plan recognizes that the areas surrounding the Alternative Alignment are conducive to the following land uses: airport supporting business park, airport vicinity industrial, and mixed use commercial-residential – which includes hotels and motels.

In conclusion, the Adjacent Property Owners request that the final EIS note that the alignment of the proposed southeast entrance road has not been determined and alterations in such alignment will not impact the viability of the EIS or the Record of Decision. In the alternative, the Adjacent Property Owners object to the Draft EIS to the extent that it fails to adequately consider whether an alternative alignment of the access road would mitigate the environmental impacts of the Replacement Airport, and request that the EIS consider whether, based upon the comparative merits of each road alignment and interchange location, the interchange and access road for the southeast entrance, as detailed on Exhibit "A" and Exhibit "B," would be the preferred alternative to the interchange and alignment depicted in the Draft EIS.

Very truly yours,

PARSONS KINGHORN HARRIS, P.C.

John N. Brems

Exhibit A

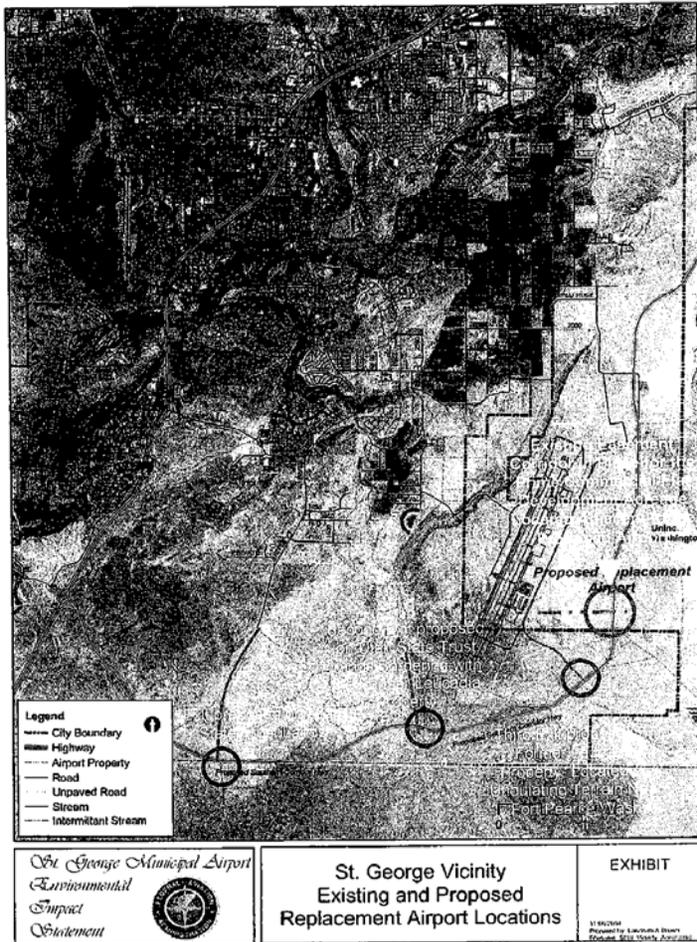
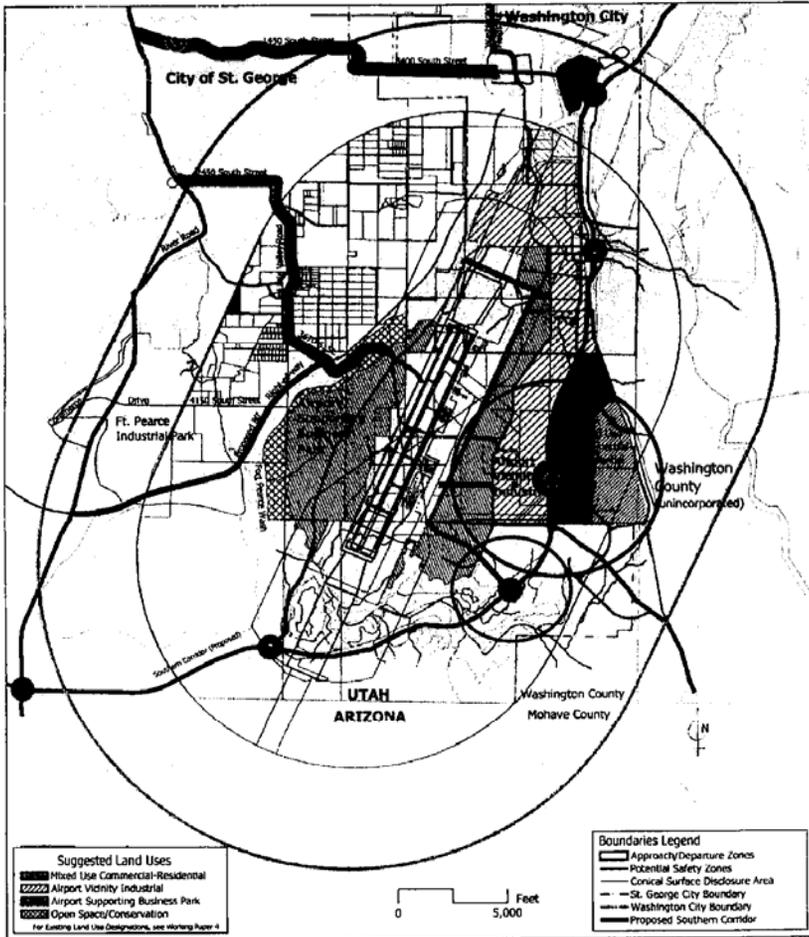


Exhibit B



City of St. George
Airport Vicinity Land Use Plan

**Airport Vicinity Land Use Plan
 Study Area and Safety Zones**

EXHIBIT
6.1

From: Bill Black [wtblack@sunrivertoday.com]
Sent: 10/27/2005 12:14 PM
To: David Field
Subject: St. George, UT Replacement Airport

My question is concerning the freeway interchange. About 3 miles north of the projected interchange is a round-a-bout exit and entry on either side of the freeway. We have had many accidents and problems with drivers not knowing how to use the round-a-bouts.

Recently a freeway interchange was completed in Washington, Utah, which everyone seems to negotiate without problems. This newer type of freeway exit-entry was also used for the winter olympics in Salt Lake City.

Since there is an airport and much traffic, is this also being used for the new interchange? Hopefully, it is not a round-a-bout technology.

Thank you,

William T. Black, M.D.
4583 S. Sandcastle Dr.
St. George, UT 84790

1

1. At this time, no final interchange design has been selected. The alignment of the airport access road and location of the proposed intersection/interchange with the Southern Corridor were provided by the City of St. George. This location is also consistent with the St. George General Plan. The impacts resulting from construction of the airport access road with an at-grade intersection at the Southern Corridor were evaluated in the replacement airport EIS. Based on the findings included in the Record of Decision (ROD) for the Southern Corridor, the Utah Department of Transportation (UDOT) may reserve the right to modify the location of the intersection/interchange of the airport access road and the Southern Corridor. The final location of this and other future interchanges along the Southern Corridor will be determined through continued coordination among the City of St. George, Washington City, Washington County, the UDOT, and the Federal Highway Administration (FHWA). If the location of the airport access road and/or the intersection/interchange is modified, additional environmental studies may be prepared by either the FHWA or the FAA to obtain the necessary approvals for construction of the roadway and the future interchange.

November 1, 2005

Telephone response to the Draft Environmental Statement in the Federal Register

LOIS GRAHAM
2231 Engelmann Place
St. George, UT 84790

Telephone Number: 435-674-0721

COMMENTS: As to the proposed new airport, I prefer that it never be built. But, if the project is going forward, at least have it far away from Bloomington Hills, Bloomington, and other already established residential areas, so no impact of flight patterns and noise would impact these existing residential areas.

Statement taken by Nancy J. Royak
November 1, 2005
12:30 pm

1

1. Thank you for your interest in this project. Specifically, please note that the proposed replacement airport is located approximately 2.1 miles southeast of the area known as Bloomington Hills, which is outside the 65 DNL contours.



southern
utah
wilderness
alliance

November 8, 2005

David Field
Manager, Planning/Programming Branch, Airports Division, Federal Aviation Administration,
Northwest Mountain Region, 1601 Lind Avenue, S.W., Suite 315,
Renton, WA 98055-4056

E-mailed to David.Field@faa.gov and Faxed (425) 227-1600

RE: Draft Environmental Impact Statement and DOT Section 4(f)/303(c) Evaluation for a
Proposed Replacement Airport for the City of St. George, Utah

Dear Mr. Field,

The Southern Utah Wilderness Alliance (SUWA) appreciates the opportunity to submit comments on the Draft Environmental Impact Statement and DOT Section 4(f)/303(c) Evaluation for a Proposed Replacement Airport for the City of ST. George, Utah (hereinafter, "DEIS"). SUWA's comments do not address issues regarding Zion National Park, but rather focus on the surrounding wilderness study areas and proposed wilderness areas managed by the Bureau of Land Management (BLM). The Grand Canyon Trust (GCT) has submitted extensive comments addressing the implications of the proposed project on Zion National Park. SUWA has read these comments and hereby incorporates the GCT comments in addition to submitting the following comments. We look forward to having our concerns addressed in the final EIS and the Record of Decision.

A. Failure to Assess Impacts to Wilderness Resources on Public Lands

As you may know, several areas near Zion National Park have been proposed for wilderness designation by the Utah Wilderness Coalition (UWC). See Citizen's Proposal for Wilderness In Utah – Greater Zion/Hot Desert Regional Summary available at <http://www.uwcoalition.org/proposal/index.html> (last visited Nov. 2, 2005). A bill is currently pending in both houses of Congress that would designate all the areas in the UWC proposal as wilderness.

394 S. State Street #2
La Verkin, UT. 84745
435.635.3901 (P)
435.635.5524 (F)
www.suwa.org

1. FAA National Environmental Policy Act (NEPA) policies normally define the parameters of a noise analysis study area based upon the location of noise-sensitive areas incompatible with airport operations (as likely to experience significant noise impacts). Following this general policy, these areas are generally located within or adjacent to 65 DNL (day-night average sound level) contours. For this EIS, those areas so impacted are all in the immediate vicinity of the proposed replacement airport, and all such areas received a traditional NEPA noise analysis in this EIS.

FAA NEPA policy also recognizes, however, that special consideration of supplemental noise compatibility criteria may be needed to evaluate the impacts of aircraft overflights on properties of unique significance, such as national parks and other areas protected by Section 4(f)/303(c). For this reason, in this EIS, the FAA defined a greatly expanded noise study area, using a noise screening analysis to identify the location of all Section 4(f)/303(c) properties which had any reasonable potential to be significantly impacted by the replacement airport project. This expanded study area, centered on the proposed replacement airport site, ultimately encompassed some 9,200 square miles. With this expanded study area, properties protected by Section 4(f)/303(c) received an enhanced noise analysis using both NEPA and Section 4(f)/303(c) noise criteria. Other properties, not so protected, were not subject to a similar enhanced noise analysis.

Section 4(f) allows the approval of a *transportation program or project requiring the use of publicly owned land of a public park, recreation areas, or wildlife and waterfowl refuge, or land of an historic site of national, State, or local significance* only if there is no prudent or feasible alternative or all possible planning for minimization of harm is included. The land *must be 'designated or administered, formally or informally'* for one of these purposes identified under Section 4(f). Mullin v. Skinner, 756 F. Supp. 904, 924 (E.D.N.C. 1990)(quoting National Wildlife Federation v. Coleman, 529 F.2d 359, 370 (5th Cir. 1976)). [continued ▼]

America's Redrock Wilderness Act in the 109th Congress, available at http://www.suwa.org/page.php?page_name=arwa_home#107 (last visited Nov. 2, 2005). The UWC proposal includes all of the Wilderness Study Areas (WSA) in the Zion Mojave region, and also includes areas outside of the WSA boundaries. The UWC proposed wilderness areas possess wilderness resources that provide significant opportunities for scenic enjoyment, solitude, recreation, and contain important cultural resources. Keeping these areas free of noise pollution is particularly important because they are remote, and people who visit them often do so with the specific intent of experiencing solitude, quiet, and other values associated with wilderness.

The DEIS completely fails to disclose that these wilderness quality areas outside of the WSAs will be impacted, or to discuss what the impacts of the proposed project will be on these areas. "Under NEPA, when a federal agency undertakes a major Federal action[] significantly affecting the quality of the human environment," it must prepare an environmental impact statement ("EIS") that details, among other things, the environmental impacts of the proposed action, any adverse environmental effects that would occur as a result, and alternatives to the proposed action." *Greater Yellowstone Coalition v. Flowers*, 259 F.3d 1257, 1274 (10th Cir. 2004) (emphasis added); 42 U.S.C. 4332(2)(C). The agency has failed to evaluate or disclose the adverse impacts to UWC proposed wilderness areas.

Preparation of an impact statement serves two primary purposes: (1) "to inject environmental considerations into the federal agency's decisionmaking process," and (2) "to inform the public that the agency has considered environmental concerns in its decisionmaking process." *Weinberger v. Catholic Action of Hawaii*, 454 U.S. 139, 143 (1981); see also *Sierra Club v. Hodel*, 848 F.2d 1068, 1088 (10th Cir. 1988). The failure to adequately assess and disclose the impacts of the proposed project on proposed wilderness areas violates these dual purposes of NEPA. As a result of this omission, both the general public and decision makers are left with an incomplete assessment of the full impacts of the project. In reality, the proposed project is likely to impact more resource areas used for recreation and solitude than reflected in the DEIS. SUWA urges the agency to assess the impacts of the proposed project on proposed wilderness. In addition to NEPA the agency may have an obligation under 49 U.S.C. § 303 to evaluate the impact of the proposed project on UWC proposed wilderness areas. Under 49 U.S.C. § 303 the agency must determine whether the development of the airport would require the use of publicly owned land of a public park, recreational area, wildlife or waterfowl refuge, or land of an historic site of national state, or local significance. It is likely the UWC proposed wilderness areas fall within one or more of these categories. In the final FEIS the agency must address whether proposed wilderness is a 4(f) 303 property, and provide an explanation if the agency determines it is not.

B. The Modeling Data Relies on Averages and Therefore does not Provide Information about the Concentration of Environmental Impacts.

SUWA is concerned about the use of averaging to assess noise impacts in the EIS. Specifically, SUWA is concerned about the use of averaging to calculate Time Above (TA). TA refers to the number of minutes or percentage of time of the average 24-hour day of operation

1. [▲ continued] FAA Order 1050.1E states that *[n]ational wilderness areas may serve similar [4(f)] purposes and shall be considered subject to Section 4(f) unless the controlling agency specifically determines that for Section 4(f) purposes the lands are not being used*" Appendix A, *Analysis of Environmental Impact Categories*, pp. A19-20. No specific reference is made to Wilderness Study Areas. However, in light of the fact that Wilderness Study Areas are areas designated by a Federal land-management agency as having wilderness characteristics and that such agencies must manage these areas as though they are wilderness until Congress makes a determination as to whether this designation should be official, the FAA has included Wilderness Study Areas into its official Study Area. There is no guidance or law that dictates the inclusion of any other lands not officially designated a Wilderness Area or Wilderness Study Area.

With the exception of Little Black Mountain Petroglyph Site, for which mitigation is addressed in the EIS, **Appendix B** (in the Draft EIS), Page B-155, **Cumulative Results**, the flight routes and aircraft altitudes over the many designated wilderness areas within the initial area of investigation change little between the existing conditions at the current airport and the baseline conditions at the replacement airport site. The designated 4(f) areas west of St. George (Gunlock State Park, Snow Canyon State Park, Joshua Tree Instant Study Area, and Cougar Canyon Wilderness Study Area) are generally exposed to less aircraft noise while areas to the southeast (Canaan Mountain, Cottonwood Point and The Watchman Wilderness Study Areas, and Coral Pink Sand Dunes State Park) may be exposed to slightly increased noise levels.

2. ▼ Most aircraft flights occur during daytime hours as described in the EIS, **Chapter 6, Environmental Consequences, Table 6.2, Day/Night Traffic Distribution – 2003 Conditions** (in the Draft EIS). **Table 6.1, Average Day and Annual Operations – 2003 Current** (in the Draft EIS), discloses the 24-hour average noise levels. The metrics used in the noise analysis are described in **Appendix A** in the Draft EIS. The computation of standard deviation assumes the use of a range of values. Data for individual days is not available to provide such a range for analysis. The average day is computed by dividing the annual total activity by 365. [continued ▼]

that a location will be exposed to aircraft noise above a threshold selected by the evaluator. DEIS, at Appendix A-5 (emphasis added). This reliance on averages is misleading and creates an inaccurate understanding of the impacts of the project. When measuring environmental impacts, a key concern is concentration of impacts. Averages result in measurements that disperse impacts and make it impossible to assess whether impacts are concentrated. As an example, assume that during a 24 hour period there was absolute silence for 20 hours and for 4 hours there was a continuous noise of 100 db. If you reflect this information as a percentage or number of minutes you would find that there would be 240 minutes TA or 1/6th of the time. However, what is not reflected is the concentrated nature of this impact and the fact that the actual impact took place for 4 continuous hours, as opposed to dispersed minutes. Information about concentration of impacts is vitally important to understand how the noise will actually impact the average visitor's experience in WSAs and other areas with wilderness characteristics. At least one court has expressed similar concerns about the scientific appropriateness of averaging. Oregon Natural Resources Council v. Brong, 2004 WL 255474 (D. Or Nov. 8, 2004) (Court found no scientific justification for Forest Service averaging cut units with uncut units to meet standards for retaining standing dead trees).

Adding to SUWA's concerns about the use of averages is the fact that the agency's own data indicate that the vast majority of the flights would take place during daytime hours. DEIS, at 6-12. Further, there are many visitors to WSAs and other areas with wilderness character who do not camp overnight, but rather use these areas only during the daytime hours. Landscape contemplation is the predominant activity engaged in by wilderness users and is a unique daytime activity. Averaging does not accurately reflect the impact of the proposed project on landscape contemplation.

Finally both TA and Events Above Ambient are expressed in terms of the "average day". This raises significant questions.

- For purposes of TA and Events Above Ambient what is the average 24 hour day?
- What is the standard deviation? The agency should list the standard deviation for the TA calculations and Events Above Ambient calculations for each WSA and proposed wilderness area.
- What was the process used to establish the noise level for the average 24 hour day for WSAs?
- Is the average 24 hour day specific to each WSA or is it one constant? If so, how was the constant calculated?
- Will non average days be concentrated during times of high travel such as July and August? If so, how many non average days are expected during this heavy travel time?
- Finally, to properly assess whether the impacts will be concentrated, the agency should provide data about TA and events above ambient for each hour during daytime hours for each month. This is the only way that the public and decision makers can assess whether impacts will be concentrated.

For the above stated reasons, twenty-four hour averaging and use of the "average day" is unacceptable.

2. [▲ continued] Unlike vehicular traffic, aircraft traffic does not experience the degree of concentration based on seasons. Throughout the year, the distribution of the great majority of the air traffic over the initial area of investigation is dependent upon national travel demand trends and varies little from month to month. Non-average days were not individually assessed as part of the EIS analysis. The noise analysis for Zion National Park used the average measured (L50) existing and natural ambient levels for the park. The seasonal ambient measurements for Zion National Park were relatively consistent year-round.

FAA Order 1050.1E, Appendix A, outlines the FAA's policy requirement of averaging to assess noise impacts. The extensive noise analysis in the EIS, which includes the addition of an audibility analysis in the Final EIS in **Appendix T, Audibility Evaluations for Zion National Park**, and a **15-Hour Sensitivity Study (Appendix U)**, is sufficient to constitute the "hard look" required under NEPA.

C. The EIS Fails to Adequately Assess the Cumulative Impacts of the Proposed Project on Wilderness Study Areas and Other Proposed Wilderness Areas.

The EIS fails to adequately assess the cumulative impacts of the proposed project on WSAs and other 404(F)(3) areas. Essentially, the agency has provided hundreds of sheets of data with no analysis. A mere listing of cumulative impacts is not sufficient to inform the public and decision makers, nor does it constitute the “hard look” required by NEPA. The EIS “must include a ‘useful analysis of the cumulative impacts of past, present and future projects.’” *Muckleshoot Indian Tribe v. U.S. Forest Service*, 177 F. 3d 800, 810 (9th Cir. 1999). This means a discussion and an analysis in sufficient detail to assist “the decisionmaker in deciding whether, or how, to alter the program to lessen cumulative impacts.” *Id.* The agency cannot put the burden of analyzing the metrics data on the public or decision makers. Rather, in the Final EIS the agency itself must analyze the cumulative impacts in some type of narrative form. While the metric data is useful and necessary, it simply is not a substitute for analysis.

3

D. The Agency Fails to Analyze a Reasonably Foreseeable Future Action.

The EIS states that the southern portion of the proposed site would be reserved for future runway lengthening, as necessary. DEIS 1-5. The St. George City Council considered it imperative to acquire sufficient property to allow expansion of the proposed runway to the south for an ultimate length of 11,500 feet, if that should ever become necessary. *Id.* The EIS only evaluates the impacts of development of a 9,300- foot runway. *Id.* NEPA requires cumulative impacts be analyzed in an EIS. 40 C.F.R. § 1508.25. Specifically, the agency must evaluate past, present, and reasonably foreseeable impacts. 40 C.F.R. 1508.8. In this case, the city has insisted on purchasing space with the potential to develop an 11,500 foot runway. The City Council’s insistence on purchasing sufficient property to allow development of an 11,500 foot runway is strong evidence that the runway will be developed in the future. The development of the southern section is a reasonably foreseeable future impact, which NEPA requires the agency to evaluate. The agency should evaluate both the direct impacts from development, and the impacts resulting from the increased air activity of the 11,500 foot runway.

4

F. The DEIS Fails to Provide Information About Existing Conditions.

Both FAA direction and NEPA require that the EIS assess existing conditions. FAA Order 1050.1(E), Sec. 14.4 (e) specifically requires that existing conditions be assessed as part of the noise analysis. 69 Fed. Reg. 33819 (June 16, 2004) further clarifies that current conditions should reasonably portray the existing environment that may be impacted by the proposed project. Additionally, NEPA requires the analysis of cumulative impacts which are defined as the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions. 40 CFR § 1508.7 (emphasis add). BLM is required to “succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration.” 40 C.F.R. § 1502.15. Although the establishment of baseline conditions is not an independent legal requirement of NEPA, the establishment of the baseline conditions of the affected environment is a practical and necessary requirement of the NEPA process. “The concept of a baseline against which to compare predictions of the effects of the proposed action and reasonable alternatives is critical to the NEPA process.” Council on Environmental Quality, “Considering Cumulative Effects under the National Environmental Policy Act” (May 11, 1999).

5

3. Narrative, tabular, and graphic descriptions of the noise-related effects of the project and the cumulative noise with and without the project are provided in **Chapter 6, Chapter 7, and Chapter 8**, as well as **Appendices B and T** of the EIS. There are currently no specific quantitative criteria for assessing the significance of aircraft noise impacts on park-like or wilderness-like resources. The FAA, however, has utilized qualitative guidance in its analysis of noise. The Counsel of Environmental Quality, in its regulations implementing NEPA, defines the term “significantly” both in terms of context and intensity (40 C.F.R. § 1508.27). For this project, context required consideration of both short and long-term effects on the resource’s values while intensity required consideration of the severity of impacts on those values. This consideration can be seen in the afore-mentioned chapters and appendices.
4. The proposed land envelope for the replacement airport will be able to accommodate a future extension of the runway to a length of 11,500 feet. The additional runway length is not reasonably foreseeable, but is shown on the Airport Layout Plan (ALP) for future planning purposes only. Since the future extension is not reasonably foreseeable, the impacts of that extension were not evaluated within the EIS. If, in the future, an extension is warranted and then proposed, a separate environmental study would be conducted to disclose and evaluate the impacts. A need must be demonstrated based on demand for a longer runway. We do not know if that would occur or not in the future.
5. Existing condition information was provided in the Draft EIS for the area surrounding the replacement airport within the area of significant impact as defined by FAA standards. Existing condition information was not provided in the Draft EIS for areas beyond the immediate environs of the replacement airport. Under NEPA, information must be provided to compare conditions with and without the proposed action – this was accomplished by providing projected noise level information for 2010 and 2020 for the airport in its existing and replacement location, both independently and combined (cumulatively) with other aviation noise sources throughout the region.

In addition, the terms “baseline” and “current conditions” are not equivalent for NEPA purposes. “Baseline” refers to a no-action alternative (the existing airport in a future year), while “current conditions” refers to conditions (including activity at the existing airport) in a present or recent year. [continued ▼]

The EIS fails to provide any information about the current noise levels in WSAs or other areas with wilderness characteristics. This is particularly troubling because it also seems to point to a serious flaw in the EIS analysis of cumulative effects. Without any data about the existing noise conditions, how can the agency adequately assess the cumulative impacts? It seems unlikely that the agency can adequately assess the cumulative impacts of the proposed project without assessing the existing level of noise pollution in WSAs and other areas with wilderness characteristics. This is particularly true given that the agency used data from Zion's to garner the current ambient levels.

G. The DEIS Inappropriately Assessed Time Above Ambient for 4(f) 303(c) locations outside of Zion.

To compute the TAA for 4(f) 303(c) locations outside of Zion the agency used the L50 (existing) average noise measured at sites in Zion National Park and used this as an estimated ambient level for other areas. DEIS 7-75. The agency has an obligation to insure the professional integrity, including scientific integrity, of the discussions and analyses in environmental impact statements. 40 C.F.R. § 1502.24 The agency has failed to provide any scientific or mathematic data to indicate that measurements from Zion National Park may appropriately be used for calculations of ambient noise in WSAs. It seems inappropriate to use data from Zion National Park to establish the ambient noise level for WSAs or other areas that receive far less use, and are thus, much quieter places. The agency's own data indicate that there can be a significant difference in ambient noise between areas in Zion National Park and areas outside. The average ambient noise in Little Black Mountain was 20 dba in comparison to 29 dba in Zion National Park. DEIS 7-75. The agency needs to explain and support its use of the Zion National Park ambient noise data for WSAs. For purposes of calculating ambient noise levels in WSAs and proposed wilderness areas it would be more appropriate for the agency to measure the ambient noise level in an actual WSA, or at the very least use the 20 dba figure from Little Black Mountain. Failure to justify the use of the Zion data or make one of the suggested changes in the FEIS is a violation of the agency's obligation to ensure scientific integrity of the EIS analysis.

H. The Agency has Failed to Seriously Evaluate Mitigation

The agency is mandated by FAA Order 1050.1(E) Sec. 6.4 to discuss mitigation in the EIS, which states the EIS should thoroughly analyze and document prudent and feasible alternatives that would avoid the use of section 4(f) property and provide detailed measures to minimize harm. Additionally, even if mitigation is not mandated under FAA Order 1050.1(E) the agency still has the authority to preserve, protect, and enhance the environment by minimizing, mitigating, and preventing the adverse effects of aircraft overflights on public... lands." P.L. 106-181, Sec. 802(2). Instead of considering mitigation to protect these areas from increasing noise pollution, the agency simply insists that there will be no significant change from the proposed project and uses this as a rationale for not evaluating mitigation. The protection of WSAs and other areas with wilderness characteristics is an issue of national importance. The agency should seriously discuss the possibilities of mitigating impacts to the proposed areas.

- ▲
5. [▲continued] Please see **Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park** (in the Final EIS), which contains a discussion of this issue.
- Nevertheless, the FAA has included additional current condition information for each 4(f)/303(c) property evaluated in the EIS in **Appendix S, Noise Levels for 2003 Conditions**, in the Final EIS.
6. The FAA considers the average of measured ambient L50 levels in Zion National Park at 13 separate locations to be more representative of average ambient noise levels throughout the initial area of investigation because the measurements were recorded over several seasons, cover a longer sampling period, and reflect a variety of topographic and surface cover conditions found throughout the region. The Little Black Mountain Petroglyph Site measurements, which were made in winter during a period of less local overflight activity, were sited to record noise on one property, and consequently reflect limited topographic and surface vegetation conditions specific only to that property. Therefore, the considerably greater quantity of measurement data available from Zion National Park is considered to be more representative of the average conditions in the region. That data has been accepted by the National Park Service (NPS) as representative of conditions throughout Zion National Park and other NPS properties in the area. Owing to the similarity of natural conditions in Zion National Park (weather, vegetation, topography, soils, etc.) to the natural conditions present in other 4(f)/303(c) locations throughout the region, the FAA has concluded that these NPS properties have similar characteristics to those managed by the Bureau of Land Management (BLM). In addition, land use managers of the other 4(f)/303(c) properties were provided with several opportunities in the early stages of the Draft EIS to comment or object to the FAA's use of the Zion ambient for their properties. Despite receiving comments from some on various issues, none objected to the use of the Zion ambient data. There is currently no need to change the analytical approach taken.
7. Please see **Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park, Appendix X, Monitored Noise Abatement Initiatives**, and **Table 6.334** in the Final EIS. Please note that the FAA considers BLM lands in this area to be similar in characteristics to NPS lands in this area.

I. Use of the L50 Standard

SUWA has serious reservations about whether the L50 standard is appropriate for the measuring the ambient noise level in WSAs and other areas with wilderness characteristics. In these areas quite is one of the single most important resources. It therefore seems particularly appropriate to use the L90 standard for analysis of impacts in these areas. SUWA would be very interested in seeing the differences in the impacts of the proposed project using the L90 standard as compared to the L50 standard, and sincerely hopes that this information will be made available in the final EIS.

Once again thank you for the opportunity to comment. SUWA looks forward to reviewing the final EIS. Should you have any questions about the actual boundaries of the UWC proposal please contact our field inventory specialist, Ray Bloxham, at (801) 428-3982. Please send me a hard copy of the final EIS.

Sincerely,

Chaitna Sinha
Southwest Representative

8

8. As discussed in the EIS, the FAA has found and the NPS has concurred that the L50 noise descriptor is appropriate for use in this analysis. A comparative analysis of the L50 and L90 noise descriptors was conducted to see how well each descriptor matched ambient noise levels in the wilderness environments. The analysis showed that the L50 median represented a better average of natural ambient noise levels than the L90 because most of the noise in backcountry areas is from natural sources. Therefore, L90 was not computed for the various locations within the initial area of investigation. Please also see the paper in **Appendix N, Attachment N-4, Explanation for Not using L₉₀ in the St. George EIS Noise Analysis**, in the Final EIS, which discusses this issue.

- Submitted Via E-mail -

From: Tom Thompson <tomt@ramcompany.com>
(Forwarded to David Field by Ralph Thompson, FAA)
Sent: 11/03/2005, 10:12 AM
To: David Field
Subject: St. George, Utah airport

From: Ralph Thompson, FAA
Sent: 11/03/2005 08:30 AM
To: Tom Thompson <tomt@ramcompany.com>
Cc: David Field, FAA
Subject: Re: St. George, Utah airport (Document link: David Field)

Mr. Thompson,

Thank you for your comment. Your communication is being forwarded to Mr. David Field, Manager, Planning/Programming Branch, Airports Division, Northwest Mountain Region, FAA. Mr. Field is the FAA official responsible for the preparation and management of the environmental impact statement for the proposed St. George project.

Ralph C. Thompson, Manager
FAA, Community & Environmental Needs Division (APP-600)
800 Independence Avenue, SW
Washington, DC 20591
Phone: 202-267-8772
Fax: 202-267-8821
ralph.thompson@faa.gov

From: Tom Thompson <tomt@ramcompany.com>
Sent: 11/03/2005, 10:12 AM
To: Ralph Thompson, FAA
Subject: St. George, Utah airport

Ralph,

I'm writing you to let you know that I'm opposed to building a new airport in Southern Utah. In my line of work I fly out to customers facilities nearly every month, and I would rather drive to Las Vegas than see the beautiful area that I live in impacted by an Airport. With three National parks surrounding the area, I believe an airport is the last thing we need.

1

1. Thank you for interest in this project. Your comment has been noted.

If this email should be directed to another individual or department, please forward it to the appropriate person or let me know so that I can redirect this correspondence.

Thanks,

Tom P. Thompson
Chief Engineer
RAM Company
"Your Design Solution"
3172 East Deseret Drive South
St. George, UT 84790
Ph: 435-673-4603
Fx: 435-673-8239

Thomas Paul Thompson
489 North 2140 East Circle
St. George, UT. 84790

"PLEASE NOTE: The preceding information may be confidential or privileged. It only should be used or disseminated for the purpose of conducting business with RAM Company. If you are not an intended recipient, please notify the sender by replying to this message and then delete the information from your system. Thank you for your cooperation."

- Submitted Via E-mail -

From: "Richard Spotts" <spotts@infowest.com>
Sent: 11/07/2005, 08:11 PM
To: David Field
Subject: My comment letter on St. George Replacement Airport DEIS

November 7, 2005

Mr. David Field, Manager
Planning/Programming Branch
Airports Division
Federal Aviation Administration
Northwest Mountain Region
1601 Lind Avenue, S.W., Suite 315
Renton, WA 98055-4056

RE: Draft Environmental Impact Statement and DOT Section 4(f)/303(c)
Evaluation for a Proposed Replacement Airport for the City of St. George, Utah

Dear Mr. Field:

Please accept this letter with my comments on the Draft Environmental Impact Statement (DEIS) and DOT Section 4(f)/303(c) evaluation for the proposed St. George replacement airport.

I appreciate the detailed information and analysis provided in these documents. Indeed, I believe that these documents are generally very thorough and professional.

As a concerned Utah citizen and resident of Washington County, I am concerned about the protection of Section 4(f)/303 noise sensitive areas as identified in the DEIS. I believe that maintaining solitude and natural soundscapes in these areas is very important to the environmental, economic, social, and recreational health of this region. This region is undergoing explosive human population and development growth. The irony is that most of these new residents come here to escape problems associated with growth elsewhere. Besides new residents, the other major growth in the economy is from tourism. A significant part of this tourism is people who live in urban areas coming here to escape and enjoy solitude and nature. As such, it is clear that the beautiful scenery, high quality of life, and opportunities to find and enjoy solitude are big factors in what makes this region attractive, and what increasingly sustains its economic growth.

With this background in mind, I believe that the FAA improperly, even if inadvertently, segmented its cumulative impacts analysis in this DEIS with respect to how reasonably foreseeable changes in commercial air tours may affect both

1

2

1. Thank you for your interest in this project. Your comments regarding the protection of Section 4(f)/303 noise-sensitive areas have been noted for the record.
2. Extensive evaluations have been provided in **Chapter 7** and **Appendices B and T** regarding the cumulative noise levels that would be present within Zion National Park. [continued ▼]



National Park Service (NPS) units and Bureau of Land Management (BLM) units (especially national monuments and statutorily designated wilderness areas).

The DEIS admittedly provides data and analysis based on the current commercial air tours over some NPS units. It also makes projections for future use based on interviews with the commercial air tour operators. However, while acknowledging the Air Tour Management Act that will lead to interim and then final limits on commercial air tours over specific NPS units (and a related law for Grand Canyon National Park), it does not address how these limits – combined with a likely continuing increase in demand – may shift commercial air tour patterns. These shifts or changes could mean more tours over both NPS and BLM noise sensitive areas.

This is the obvious equation of adding up all of the proposed new and expanded airports in this region, the projected exponential increase in human population in this region, the commensurate increase in aviation uses, and, specifically, the likely continued growth in demand for commercial air tours over beautiful scenery and natural landmarks. As limits are properly placed over more NPS units (such as the Grand Canyon, Zion, and Bryce Canyon National Parks) to restore their natural soundscapes, and if the market demand remains the same or increases, other noise sensitive areas may suffer.

The existing commercial air tour routes shown in the DEIS do not reflect these foreseeable changes. And the air tour operator interviews would not reflect these changes because operators may resist these changes, and they do not know the outcome on these future limits over NPS units.

If the FAA response is that this DEIS is not the appropriate or ripe tool to analyze this issue, then the FAA should at least identify in the FEIS what future NEPA analysis will be done which will address it. NEPA requires an adequate cumulative effects analysis, and Section 4(f)/303 protects all noise sensitive areas, regardless of whether they are administered by NPS or BLM. No one should accept the risk that as natural soundscapes are restored in some NPS units, other NPS or BLM units will suffer increased soundscape degradation.

Another concern is the DEIS methods for assessing how the proposed replacement airport may affect the existing soundscapes in these noise sensitive areas. For example, it uses some 24-hour assessments that may be misleading because most of the overflights occur during about a 15 hour period of daylight. This approach may then skew the results, by relatively underestimating the frequency of noise events.

In addition, the noise measurements are difficult to understand in the abstract, because sounds that are normal in more urban settings may stand out in remote, primitive settings. Indeed, I don't mind hearing or seeing airplanes where they are normally expected to occur. But I do mind them, especially lower-elevation flights, if they occur in noise sensitive areas where I have a reasonable, and legally protected, expectation of solitude and natural quiet.



2

3

4



2.

[▲continued] The changes in future commercial air tours alleged by the commenter are not reasonably foreseeable. It is difficult to reliably predict the location of future air tour traffic because air tour operators have not identified future routes and it is not yet known where air tour traffic may be permitted to fly. Regarding the relationship between population growth in St. George and the future demand for air tour operations, the interviews conducted during this study indicate very little relationship between population growth and demand for air tour operations. St. George is used primarily as a refueling or lunch stop for air tours and is not currently, nor expected to be, an originating location of much air tour activity. The EIS takes into account the forecast air tour operations for the initial area of investigation, however it is not possible to predict where additional flights might occur if the areas currently open to air tours are prohibited to air tours in the future.

3.

Information regarding noise effects during the 15-hour day (Leq-day) is presented in **Table 6.24A, Table 6.24B, Table 6.27, and Table 6.28** of the EIS for average annual conditions for Zion National Park. Please see **Appendix U, 15-Hour Sensitivity Analysis**, in the Final EIS.

4.

The commenter points out the crux of the difficulty in conducting noise analyses in low-level sound environments where there are sensitive land uses. There are no currently-accepted standards to help define an “impact” or various levels of adverse impact. The FAA and National Park Service (NPS) are working cooperatively on a national basis to perform needed scientific research and development for improving assessment methodology and for building appropriate noise criteria for park-related evaluations. Noise evaluations are not an easy topic for many people to understand because they use high order mathematics and integrated calculus in developing the results. Adequate information is provided in **Appendices A, B, and T**, as well as **Chapter 6 and Chapter 7**, to allow an interested reader to better understand the content of the study process and the import of the various reported levels of noise information for the study.

b

In this regard, the DEIS concludes that the potential increase in aviation noise is minimal in most of these noise sensitive areas based on the analysis, but does not address at what point a noise increase would result in a substantial enough degradation to constitute an impermissible constructive use. In other words, the DEIS tells us what is not enough noise to worry about, but not what would or could be enough noise to worry about in these noise sensitive areas.

I respectfully request that the FAA address the preceding concerns in the FEIS, and strive in good faith to effectively mitigate aviation noises –especially from lower-elevation commercial air tours – in all noise sensitive areas subject to Section 4(f)/303(c) protection.

Please send me a copy of the FEIS (on CD would be sufficient) when it is released.

Thank you very much for your consideration.

Sincerely,

Richard Spotts
1125 W. Emerald Drive
St. George UT 84770-6026
spotts@infowest.com

▲

4

5

5. Please see **Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park, Appendix X, Monitored Noise Abatement Initiatives**, and **Chapter 8** in the Final EIS. The FAA considers 4(f) lands managed by Bureau of Land Management (BLM) as similar in characteristics to 4(f) lands managed by NPS.

From: Scott M [scottm@ramcompany.com]
Sent: Monday, November 07, 2005 5:26 PM
To: Sara Hassert
Cc: zz David Field
Subject: Written Comments regarding St. George, UT proposed replacement airport

Dear Ms. Hassert,

I'm writing you to let you know that I'm opposed to building a new airport in Southern Utah. In my position I travel by air frequently to customer facilities. In fact, the business I've worked in for the past 25 years directly supports the aerospace industry. With that noted; I gladly drive to Las Vegas or use the connection services currently offered by the existing airport. I would much rather do this than see the beautiful area that I live in impacted by a larger airport. One of the reasons I moved to St. George was to enjoy the three National Parks surrounding the area, as well as to be free of the noise, traffic and congestion of the "big city". Sometimes the drive from a major airport or the slight inconvenience of a connecting flight is a small price to pay for the quality of life that brought me to this area. I am the local air traveler and I ask you to not spoil one of the most magnificent areas in this great nation.

I appreciate your time.

Sincerely,

Scott J. Marshall
2176 Panorama Parkway
St. George, Utah 84790

AKA
Scott J. Marshall
Manager, Sales / Marketing / Contracts
RAM Company
"Your Design Solution"
3172 East Deseret Dr. South
St. George, Utah 84790
Ph:435-673-4603
Fx:435-673-8239

1

1. Thank you for your interest in this project. Your comments have been noted.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8
999 18TH STREET - SUITE 300
DENVER, CO 80202-2466
Phone 800-227-8917
<http://www.epa.gov/region08>

NOV 7 2005

Ref: SEPR-N

Mr. David Field
Manager, Planning/Programming Branch
Federal Aviation Administration
Northwest Mountain Region
1601 Lind Avenue, S.W., Suite 315
Renton, WA 98055-4056

Re: Comments on DEIS
Proposed St. George Airport, St. George, UT
CEQ # 20055037

Dear Mr. Field:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Environmental Protection Agency (EPA) Region 8 office is providing comments on the Draft Environmental Impact Statement (EIS) for the proposed replacement airport in St. George, Utah.

Background

The Federal Aviation Administration (FAA) released an Environmental Assessment and Finding of No Significant Impacts on this project on January 30, 2001. The Grand Canyon Trust filed suit against FAA in December, 2001 on the basis of insufficient analysis of several issues, particularly the noise impacts of the proposed airport on Zion National Park. On May 24, 2002, the court issued its decision, remanding the case to the FAA. The court stated that the record was insufficient to determine whether an EIS is required. The FAA published an EIS for the proposed airport in August, 2005.



Printed on Recycled Paper
Printed on Recycled Paper

EPA Rating

Based on EPA's procedures for evaluating potential environmental impacts of proposed actions and the adequacy of information presented, EPA is rating the preferred alternative EC-2. The "EC" (environmental concerns) portion of the rating means that EPA's review has identified environmental impacts that should be avoided in order to fully protect the environment. In this case, air quality, specifically particulate matter from construction, and reasonably foreseeable cumulative impacts are of concern. The "2" portion of this rating means that the DEIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment. In this case, air toxics and particulate matter were not sufficiently addressed. A summary of our ratings definitions is enclosed.

Our detailed comments on the environmental impacts of future development and cumulative impacts in this area, as well as comments on air and water quality, follow. Thank you for your consideration of our comments on this project in the past. The analysis provided in this EIS is much improved from the original EA. Please contact Deborah Lebow of my staff at 303 312-6223 if you have any questions on these comments. We look forward to working with you on any of these or other issues in which EPA may have expertise.

Sincerely,



Larry Svoboda, Director
NEPA Program
Office of Ecosystem Protection and Remediation

Enclosures (2)

EPA's Detailed Comments
St. George Airport DEIS

Air Quality

Section 6.4: The section lacks analysis of air toxics. It also lacks analysis of particulate matter less than 2.5 microns (PM 2.5). These pollutants have been identified by EPA as having significant public health and environmental issues. The emissions of these pollutants may be minimal for this project, but they have to be addressed and analyzed in the EIS.

In addition, further discussion and analysis should be included that considers the reasonably foreseeable growth emissions in the air shed surrounding St. George. While St. George is currently small and the air quality is currently good, the growth that is expected in the next 15 years will have an impact on air quality. The emissions from the airport in addition to the rapid urban growth could have a significant impact on the local and regional air quality and on the visibility within the nearby Class 1 designated Zion National Park.

Section 6.4.2.9: Emissions Dispersion Modeling System (EDMS) Modeling Parameters: This section discusses the use of EDMS for estimating the air quality impacts of the St. George Airport project. This section also discusses "temperature inversions." Only the total emissions are presented in the document; no concentrations are presented or analyzed. It is unclear from the material presented whether the St. George area is subject to frequent temperature inversions or what impact this type of meteorology has on the air quality in the project area. Please include information in the FEIS on the impact of the EDMS modeling on future air quality in the region.

Section 6.4 and 7.5: Construction Emissions: Construction emissions from this project in combination with the Southern Corridor and other nearby development are likely to cause significant particulate matter pollution given the dry conditions prevalent in the St. George area. EPA suggests that mitigation of dust during the temporary but relatively long (likely several years) construction period be a top priority. While the DEIS does list the standard state-requirements noted in section 6.4.2.1, EPA recommends that all of the dust control practices listed be required to the maximum extent possible and additional measures be employed to reduce particulate emissions from the diesel equipment such as the use of particulate trap exhaust filters, B20 biodiesel fuel, on-road highway grade ultra low sulfur diesel, and oxidation catalysts as well as requirements for reducing the idling of diesel engines.

Section 7.5 Cumulative Impacts on Air Quality: The Prevention of Significant Deterioration (PSD) provisions of the CAA require measures "to preserve, protect, and enhance the air quality in national parks, national wilderness areas, national monuments, national seashores, and other areas of special national or regional natural, recreation, scenic, or historic value." Zion National Park (ZNP) is considered a Class 1 area requiring stringent protection of the air quality. This issue is briefly noted in a qualitative sense in section 7.5. The DEIS notes that the State of Utah is or has developed a Regional Haze Rule. The DEIS should assess whether the airport and associated emissions have been accounted for in the haze rule. In addition, it is noted that some monitoring of air quality has been done or is ongoing within ZNP. Any monitoring data that is

1. An analysis of particulate matter (PM_{2.5}) was not included in the Draft EIS air quality assessment for SGU because at the time the analysis was prepared, insufficient data was available to evaluate PM_{2.5} emissions. In the intervening time, the computer model used to evaluate emissions from airport-specific sources, the FAA Emissions and Dispersion Modeling System (EDMS), has been updated to include PM_{2.5} emissions factors for aircraft and other emission sources. Therefore, a PM_{2.5} analysis has been included in **Section 6.4** of the Final EIS.

The scope of an air quality assessment for a proposed airport project is driven by the provisions of NEPA, the Clean Air Act, including the 1990 Amendments (CAA), and any state regulations relevant to air quality assessments of Federal actions at airports. The methodology and procedure for assessing impacts to air quality due to FAA actions are provided in the guidelines published by the FAA and U.S. Environmental Protection Agency (USEPA), and are influenced by comments received during public scoping meetings.

An air toxics analysis, or a hazardous air pollutants (HAPs) evaluation, was not included in the air quality assessment in the Draft EIS for several reasons, including the fact that the St. George area is in complete attainment with the National Ambient Air Quality Standards (NAAQS) for criteria pollutants. This is a clear indicator that HAPs, like the criteria pollutants, would not be potential issues. Other pertinent factors are the relative lack of urban density and industrialization that would contribute to higher background levels and population exposure.

In addition, due to the lack of comments on HAPs during the scoping period from either the public or government agencies, a HAPs evaluation was not conducted for this EIS. Furthermore, the FAA is not aware of any state or local regulations that require a HAPs analysis as part of an airport EIS.

2. The text has been revised to elaborate on the status of Zion National Park as a Class 1 area. As the air quality analysis shows, the proposed replacement airport would not adversely affect air quality in Zion National Park and its status as a Class I Federal Area under the Prevention of Significant Deterioration (PSD) provisions of the CAA.

While an increase in urban growth in the St. George area may be reasonably foreseeable, it is outside the control of the FAA to direct or manage local land use and transportation planning policy. Furthermore, a local-area air quality assessment such as the one conducted as part of this EIS, limits the evaluation of indirect emissions to those that are defined as both reasonably foreseeable and caused by the construction, implementation, and operation of the Federal action. [continued ▼]

▲
2. [▲continued] Therefore, it is neither reasonable nor feasible for the FAA to conduct the requested level of long-term regional air quality analysis. However, specific project-related direct and indirect emissions associated with the anticipated growth of the St. George metropolitan area have been accounted for in the 2010 and 2020 Final EIS air quality analysis. The analysis considered the anticipated increase in the number of annual aircraft operations at St. George and other reasonably foreseeable emission sources relating to the airport project that could also be adequately identified and quantified. The air quality assessment demonstrated that there will be no adverse air quality impacts from the construction, implementation, or construction of the proposed replacement airport. St. George is currently in attainment for all criteria pollutants regulated under the CAA and none of the Federal air quality standards are being exceeded at the time of the preparation of this Final EIS. Notably, the Utah State Implementation Plan (SIP) does not indicate any past exceedance or future anticipated significant deterioration of the air quality in Washington County.

3. The methodology and assumptions used to perform the aircraft emissions inventory are considered conservative and reflective of worst-case conditions. The results of the analysis show that there would be no impact on the future air quality of the local area. The air quality assessment for an EIS is prepared for the evaluation of local conditions not for regional modeling and evaluation.

A dispersion analysis is not needed because the region is in attainment for all criteria pollutants and the air quality analysis shows that project emissions are de minimis. General conformity de minimis thresholds are conservative and well-below levels that would cause an issue with the NAAQS. Therefore, the combination of low regional background levels and low project levels indicate virtually no possibility that project emissions would cause or contribute to new violations of the NAAQS. Regional air quality monitoring data was not included in the air quality assessment because the assessment did not include dispersion modeling.

The discussion of temperature inversions was included in the discussion of air quality impacts only to fully and thoroughly explain and describe how aircraft emissions are calculated. A temperature inversion implies the existence of a mixing layer. The identification of the base of the mixing layer (the mixing height) is important to the calculation of aircraft emissions. [continued▼]



- ▲
3. [▲continued] The higher the mixing height the longer an aircraft is considered to contribute to the local emissions on approach and climbout. For this reason a conservative mixing height was calculated based on upper-air data assumed to reasonably reflect the meteorological conditions at SGU. Notably, the analysis assumed a conservative temperature inversion existed for every aircraft arrival and departure, every hour of every day of the year – an extremely unlikely occurrence.
 4. FAA Order 1050.1E requires the FAA to consider construction emissions to the extent that they are reasonably foreseeable. A construction emissions inventory was prepared and the results are reported in **Chapter 6, Section 6.4.3, Table 6.19** of the Final EIS. Your recommendation for additional measures to be employed to reduce particulate emissions has been incorporated in **Section 6.4.2.1** of the Final EIS. The methodology used to prepare the inventory, including the assumptions, are described further in **Section 6.4.2.1** and all the calculations are given in **Appendix H, Air Quality, Attachment H-1** of the Final EIS.
 5. Zion National Park is located more than 20 miles from the site of the proposed airport. The air quality assessment showed no significant air quality impacts at the site of the proposed replacement airport; therefore, it is unlikely the same sources would cause significant air quality impacts more than 20 miles away. Consequently, it can be concluded that the lack of air emissions impacts resulting from the construction and implementation of the proposed replacement airport would not adversely affect regional haze conditions.

While air quality monitoring data are available through the USEPA from monitors within Zion National Park, the primary issue with air quality monitoring is the difficulty in differentiating contributions from multiple sources. No effective method exists for identifying the specific portions of measured emissions that are attributable to the numerous individual sources detected by the monitors, both natural and human including aviation as a whole or specific SGU flights.

available for the park should be included. The Southern Corridor FEIS includes some visibility and monitoring data and notes an ongoing monitoring program in ZNP. This data, and any other available data, should also be included in this DEIS. Further assessment of how the PSD requirements are being met should be added to the FEIS.

We recognize that the proposed St. George airport is not a large airport by industry standards, and at a project level this is a difficult issue to address. However, the impacts of air travel to climate change should be disclosed in this document. An analysis of CO2 emission trends associated with this project would be appropriate. FAA may have some language already developed that can be placed in this document on this issue.

As noted in the Future Land Use and Zoning section this letter, the development of the existing airport property is a connected action associated with the construction of the replacement airport. The emissions associated with this new development should be included in the EIS. Use of the Smart Growth principles seen in the Southern Corridor FEIS will help reduce the air emissions associated with the new development.

Water Quality

Run-off from the new replacement airport washes into the Virgin River, which has TDS (total dissolved solids) issues, through the Fort Pearce Wash. We have the following comments designed to reduce water quality impacts to the Virgin River from this project, and to ensure high quality ground water.

- Given that ground water will be the primary source of drinking water for the airport and surrounding areas, secondary containment should be employed at all bulk fueling and storage areas. In order to ensure adequate containment at the airport's fuel storage areas, it is recommended that stormwater flows from impervious surfaces up-gradient of the airport's fuel farms be diverted.
- Ethylene glycol from deicing operations have the potential to contribute to the TDS impairment in the Fort Pearce Wash and the Virgin River. The stormwater pollution prevention plan for the operation of the facility should contain measures which address how and where deicing operations may occur to prevent transport of ethylene glycol off site. Please refer to this plan in the Final EIS.
- Detention and/or retention of stormwater should be employed both during the construction process and during the post-construction operation of the airport in an effort to mimic pre-development hydrologic conditions. This is of particular importance at the site given the erosive nature of soils and steep slopes present at the site as erosion has been noted as the primary source of dissolved and suspended solids in the Fort Pearce Wash and Virgin River.
- During the construction process, upland flows should be diverted around exposed soils, vegetation buffers should be retained and phasing the construction process should be

- 4 -

6

7

8

9

6. New stationary sources of emissions that exceed major source thresholds (usually 100 to 250 tons per year) in attainment counties require a PSD permit review. Emissions from stationary sources at the proposed airport were around 2.5 tons per year, which would be 0.25 ton per year more than under the existing airport conditions. As such, the PSD regulations would not apply to the airport. Furthermore, as shown, the combined direct and indirect emissions from stationary sources related to the airport project were estimated to be far below the threshold that the USEPA considers potentially harmful in an area designated as Class I under the PSD program. Therefore, the proposed replacement airport will not adversely affect air quality in Zion National Park, as defined under the PSD requirements for a Class I area, and a PSD permit is not required. The text has been revised to include a detailed explanation of the PSD permit requirements in **Section 6.4.4** in the Final EIS.

7. Research on the potential climate effects of aircraft emissions is currently underway through the FAA Center of Excellence, which is co-sponsored by the National Aeronautics and Space Administration (NASA) and Transport Canada. University participants in this research include Stanford and MIT. This research at the national and international level is designed to assess the state of knowledge on contrail formation and the possible atmospheric impacts of commercial and other aircraft operating at cruise altitudes. The effort includes methods for characterizing particles and condensable gases and how these and other factors can be represented in global models used to evaluate global impacts.

On a project level basis, an evaluation of the impact of airport operations on CO₂, a greenhouse gas, or climate change would be meaningless without an inventory of the total contribution of the varied emission sources across a large area, possibly larger than the regional level. It is not reasonable or within the requirements of NEPA for a project-specific EIS of this nature to undertake such an analysis of climate change as a result of air travel.

8. **Appendix D** in the Final EIS contains the City's proposed Airport Redevelopment Plan for the existing airport site. Appendix A of this report contains the Plan's environmental analysis. It is the most detailed environmental analysis that can be performed at this time because the Plan is a generalized concept plan that was developed for the purposes of determining the potential land value, for which implementation would be dependent on independent developers and market forces as they exist several years in the future. The Plan states that 240 of the site's 280 acres would be developable for [continued ▼]

- ▲
8. [▲continued] residential and commercial uses depending upon which development alternative is chosen. The residential development would be divided into planned unit development, condominiums, and apartments. The commercial uses would be typical urban uses, such as “hotels, a shopping center, quality restaurants, gas stations, general offices, medical offices, a business park and specialty retail buildings.”

The site is already substantially disturbed by development as a result of more than 75 years of use as an airport. The Plan includes the necessary infrastructure to insure that environmental impacts would be managed in accordance with applicable environmental protection laws.

The Plan notes that the site is in a rapidly developing area, and also notes that “many of the surrounding open land areas of St. George are environmentally sensitive to growth and development, forcing continued growth and escalating land values within this particular area of St. George City for some time to come.” In the absence of this site, however, it is likely that some or all of this development would in fact occur on or near available environmentally sensitive areas. Market forces would cause this activity to occur in the St. George area. It is environmentally preferable to contain it within this already developed area in the region. Additionally, the Plan embodies the principles of smart growth and greyfield reuse to ensure project sustainability.

At this point in time, any definitive redevelopment of the existing airport site remains speculative in nature. In order for an analysis of any redevelopment to occur, specific construction and planning details would be needed. An emissions inventory can only be prepared when assessing a “known” project that can be sufficiently defined. At this time, redevelopment plans for the existing airport site have not been defined in the sufficient detail required for further air quality analysis.

Additionally, because the existing airport is subject to grant assurances as a result of the City receiving Federal grant-in-aid funding and that a portion of the original airport site was previously Federal land, any land release of the existing airport site for other non-aviation development by the City would be subject to a formal Federal land release process and further analysis under NEPA. Since these additional Federal actions / decisions are not likely to take place until the replacement airport is operational (beyond the 2010 timeframe), it is likely that the redevelopment plans will be much more refined by that time, permitting a much more detailed NEPA analysis than is currently permitted based on the somewhat speculative plan that has currently been developed by the City. In any case, a land release process and NEPA analysis would be conducted at the appropriate time once sufficient detail is available and prior to any release of the land.”

considered to meet the MEP (Maximum Extent Practicable) standard for preventing erosion associated with the Utah DEQ construction stormwater permit.

Future Land Use Plans and Zoning

Section 5.6.1 states that “If the proposed replacement airport is approved, the City of St. George plans to redevelop the existing airport site for a mix of residential, commercial, administrative and professional, light industry, and/or campus land uses after the proposed replacement airport becomes fully operational.” Section 6.18.2 also discusses the potential for the development of other land uses that would support the airport around the replacement airport, as well as redevelopment of the existing airport property with a planned multi-use development. These developments will occur because the replacement airport is being developed, and are therefore connected actions or indirect impacts due to the airport. Appendix D does discuss some of the environmental issues associated with the planning of these two areas, but it does not do so in detail. The largest impacts we can assume from the development around the replacement airport are habitat fragmentation and stormwater runoff. The environmental impacts of both these developments should be analyzed in this document. Some of the analysis in the Southern Corridor EIS may be referenced here. Please refer to Chapter 6 if the Southern Corridor EIS on Smart Growth, and in particular, Table 6.5-1 on the difference in impacts between a sustainable development scenario and a growth as usual scenario on land use/land area consumed; water consumption, infrastructure costs, residential energy consumed and vehicle miles traveled.

These developments should be planned to minimize environmental impacts and take advantage of sustainable development principles, such as reducing driving distances; addressing stormwater runoff and optimizing infrastructure, open space, and habitat conservation. As done on the Southern Corridor EIS, EPA is interested in assisting in any such planning efforts to reduce impacts to air and water quality, habitat and other resources at these early stages of planning.

Sustainable Design and Development

Section 6.22 states that all federal agencies have been directed by Executive Order 12873 to develop and adopt principles of Sustainable Design and Development. Principles include pollution prevention, waste minimization, and resource conservation during project planning and implementation. Section 6.22.2 states that the construction and operation of the proposed replacement airport would not have a significant effect on the availability of natural resources and energy and explains why. This, in our opinion, does not appear responsive to the requirements of Executive Order 12873.

The Clean Airport Partnership is a non-profit organization, to our knowledge the only one in the nation, devoted to working with airports to improve environmental quality. The Clean Airport Partnership has developed The Green Airport Initiative that identifies near-term strategies for improving environmental quality and energy efficiency while simultaneously reducing operating costs. Working with this organization or some similar entity, would be

▲
9

9. The suggested methods to reduce water quality impacts on the Virgin River have been considered by the FAA and included in **Section 6.7.4** as deemed appropriate, in the EIS. Additional details regarding mitigation of potential water quality impacts will be considered and incorporated into the design of the airport as the project moves into those stages of development.

10

10. The direct impacts resulting from construction of the replacement airport on natural habitat and stormwater runoff are relatively small compared to overall availability of habitat and water resources within the study area. At this time, appropriate detail on the specific type, size, location, and timeframe of development related to the airport but not included in this proposal is unknown, and therefore, cannot be effectively analyzed in conjunction with the direct and indirect effects of the replacement airport. Future land use planning will need to take into consideration the cumulative effect of the airport on habitat and water quality with the direct effects of that development.

11

Although specific development plans are not available for the area on and near the new airport, the FAA is familiar with development typical of airports similar in size and use to the St. George airport. Such development normally includes services for travelers and other airport users, and may include motels, automobile service facilities, package delivery, etc. To the extent that these activities relate to operations and passengers at the new airport, their impact is already included in the environmental analysis in this EIS. The forecasts are unconstrained and reflect the market demand for air services. Facilities on or near the airport would service that activity, but in the FAA’s judgment would not stimulate activity that is not already accounted for in the unconstrained forecasts. Furthermore, the forecast of passengers at SGU are not sufficient to be the driving force in the development of resorts or other similar major urban projects. [See response to Comment #9 above for further detail regarding the redevelopment of existing airport.]

12

13

11. Your comment regarding planning strategy has been noted and provided to local planning and zoning authorities for consideration in future land use plans.

▼

12. FAA Order 1050.1E, *Environmental Impacts: Policies and Procedures* (June 8, 2004) and FAA Order 5050.4A, *Airport Environmental Handbook* (October 8, 1985), do not require that an EIS be responsive to Executive Order 12873, *Federal Acquisition, Recycling, and Waste Prevention*. Instead, the two FAA Orders require an EIS to address potential impacts of a proposed action in the categories of hazardous materials, pollution prevention, solid waste, energy supply and natural resources, and construction impacts; impact categories that are in line with those required by Executive Order 12873. Please refer to **Chapter 6, *Environmental Consequences***, of the EIS where we provide full disclosure of the potential impacts of the no action and proposed replacement airport alternatives for impact categories of hazardous materials, pollution prevention, solid waste, energy supply and natural resources, and construction impacts.
13. Your comment regarding the Clean Airport Partnership has been noted.

appropriate to at least determine what measures can be adopted to comply with the Executive Order. The contact for The Clean Airport Partnership is Steven Howards at www.cleanairports.com or 303 462-1647.

Cumulative Impacts

Except for the noise analysis, the Cumulative Impacts Section of this EIS is extremely qualitative. For example, section 7.7 on cumulative impacts on water quality suggests that with the growth expected in the St. George area, impervious surface will increase which may have an impact on water quality. No numbers or estimates of impacts are given. Area of impervious surface could be estimated based on average housing and retail trends in the area, and that number could be added to the present amount of impervious surface to determine whether local governments should be addressing impervious surface cover in planning development to avoid future water quality issues. Section 7.9 on cumulative impacts of biological resources and threatened and endangered species states that the constant struggle to balance development and transportation needs will most likely cause long-term cumulative impacts on natural habitats and the species they support. No information is given on amount of habitat impacted and what can be done about it.

While we recognize that construction of the replacement airport and Southern Corridor highway represent less than 1% of the loss of habitat in this area, that is not insignificant and is perhaps an irrelevant number given the total loss of habitat and habitat fragmentation. If the total loss is significant, any additional loss is significant. We suggest the local governments form an entity that addresses these cumulative environmental impacts before development of the replacement airport is approved. Again, EPA would be happy to lend assistance in the form of information, and perhaps grant monies in the future for this type of activity.

▲
13

14

14. The magnitude of direct impact of the project when added to the reasonable and foreseeable impacts of the Southern Corridor and other projects is relatively small compared to the availability of resources within the study area and the region. Development proposals for areas near the proposed replacement airport have not been developed in sufficient detail to allow for a realistic and reasonable determination of impacts to be considered.

As described in Chapter 6, Smart Growth, of the Final EIS for the Southern Corridor, issued in April 2005 by the Utah Department of Transportation and the Federal Highway Administration, the City of St. George and Washington County have adopted city and county land use planning initiatives being adopted in Southern Utah to protect the environment while accommodating growth. St. George's land use plan is being updated to implement growth strategies over the next five years that include smart growth principles and land use controls which include mixed-use zoning, encouraging compact development, development of interspersed open space, and xeriscape principles. Implementation of these measures, along with the adoption of sustainable design principles, would ensure that available land is used efficiently and that cumulative impacts to natural habitats, water quality and supply, and air quality are minimized. Implementation of the replacement airport would include many of these same development principles to further minimize impacts to the surrounding environment.

As discussed in **Section 6.7, Water Quality**, of the Draft EIS, construction of the replacement airport will be conducted in accordance with the procedures outlined in FAA AC 150/5370-10, *Standards for Specifying Construction of Airports*, to ensure that there are no long-term impacts to surface and groundwater systems. Although construction of the airport involves the clearing and recontouring of most of the 1,306 acres of undeveloped land within its proposed perimeter, the proposed impervious surface area created should occupy less than 12 percent of the total site. The FAA and the City recognize the importance of water quality to the area and the construction and operational practices of the airport would be designed to address stormwater management and runoff issues. [continued ▼]

▼

- ▲
14. [continued▲] Determining the accumulation of impervious surface areas within the study areas evaluated for this project would be extremely difficult. As described in **Section 5.1 Study Areas**, there were three study areas established for evaluation – an initial area of investigation covering 9,200 square miles (an area three times the size of Washington County), the existing airport site, and the proposed replacement airport site. Quantifying the change in impervious area or the change in natural cover for the two airport sites could be accomplished fairly reasonably, but determining the percent impervious area or change in natural cover over 9,200 square miles would be difficult and inaccurate.

The information included in this response has been included in **Chapter 7, Cumulative Impacts**, of the Final EIS.

U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements

Definitions and Follow-Up Action*

Environmental Impact of the Action

LO - - Lack of Objections: The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC - - Environmental Concerns: The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO - - Environmental Objections: The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU - - Environmentally Unsatisfactory: The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 - - Adequate: EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 - - Insufficient Information: The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 - - Inadequate: EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

From: Hal Hilburn <hilburn@infowest.com>
Sent: 11/08/2005, 08:57 PM
To: David Field
Subject: over looked safety concerns

Sirs;

The proposed site for the new St George Airport has a few over looked safety concerns that will result in dangerous conditions.

Leading the list is the runway alignment. As proposed it is 01/19. The cross wind studies conducted by the state of Utah may have not been in accord with the Cross Wind Component limits placed on General Aviation Aircraft. Most light Aircraft manufacturers limit the demonstrated cross components to 13 knots. My experience reflects that the prevailing south west winds exceeding 15 kts cross winds are from 220 to 260 degrees. The fact that the difference of 30 degrees in wind direction and runway alignment represents 50% of the total cross wind component.

Such as a wind from 240 degrees at 20 kts in reference to a runway alignment of 190 degrees, only 50 degrees difference, would yield a cross wind component of more than 15 kts. Furthermore if wind direction continues to swing further to the west, additional crosswind component become larger. In personal experience I note that the local prevailing winds come from the southwest, along with other collaborating flight instructors in the St George area.

The winds above the demonstrated components is the issue of aviation safety concerns that over shadows the present alignment. The total number of general aviation operations far exceed and will continue to exceed the aircraft falling in the larger commercial category that the proposed airport is striving to support.

The air movement over the surface is also affected by the bluffs to the east and west of the proposed runway. Again causing a vortex effect, similar to the current St George Airport.

The proposed location and alignment offer no possible crosswind airstrip, such as the old crosswind strip previously located at the proposed new site previously called the CAA site. The new site will not be using a crosswind runway.

The proposed location is aligned with a geological fault line, overlaying a sediments of expansive clay soil.

The issues listed above represent grave safety concerns, that should be reviewed before any further development is continued.

1. As stated in **Chapter 3, Section 3.2.3.3, Runway Orientation Deficiencies**, in the Draft EIS, the typical design objective for a runway system is to provide wind coverage for conditions that would apply at least 95 percent of the time. A range of acceptable runway orientations were identified in the *1998 Master Plan* to satisfy the recommended 95 percent wind coverage requirements for the crosswind component at the proposed replacement airport, utilizing the existing wind data for St. George Municipal Airport. Through analysis of wind data collected by the UDOT at the proposed replacement airport site, it was determined that a Runway 01/19 alignment (oriented to magnetic headings of approximately 10 degrees and 190 degrees) would provide 94.1 percent wind coverage for the 10.5-knot crosswind component and 96.7 percent wind coverage for the 13-knot crosswind component. It would further provide 99 percent wind coverage for the 16-knot crosswind component. The new runway orientation at the proposed replacement airport would thereby provide improved crosswind availability as compared to the existing airport. Thus, there is no need for a crosswind runway at the proposed replacement airport.
2. Your comments regarding the fault line and clay soil have been noted. Soil borings and appropriate materials testing will be conducted as part of the construction process. The City of St. George and the FAA will work with the contractor to develop and implement the most effective methods to deal with less than desirable conditions, if they are identified. Based on review of the Interim Geologic Map of the St. George Quadrangle, St. George, Utah; dated 1995, the proposed replacement airport site lies approximately two miles southeast of and parallel to the Bloomington Dome/Virgin Anticline and approximately three miles southeast of the southern end of the St. George Fault. The soil deposits on the site, described in **Section 5.2.2 Topography in Proposed Replacement Airport Study**, in the Final EIS, are underlain by Older Eolian and Alluvial Deposits clay, silt, sand, and gravel and may be up to 15 feet thick.

Hal Hilburn

Background

FAA Safety Councilor

Certified Flight Instructor

Commercial Pilot

St George Airport Board Member

Hal Hilburn

P. O. Box 172

St George, UT 84771

435-632-2808

Jack Russell
1374 W 450N
St. George, Utah 84770
10-27-2005

David Field, Project Manager for
St. George Replacement Airport EIS
FAA, Northwest Mountain Region
1601 Lind Ave. S.W. Ste 315
Renton, WA. 98055-4056.

Dear Mr. Field:

Put me down as one opposed to the proposed
new airport for St. George, Utah.

I believe surveys showed people, most of them,
were opposed to it from the "Get go". That
of course didn't stop the City Council.

Why do I oppose it?

We don't need the influx of people it will
bring, no doubt a good share of them illegally.
With many of the major air lines in financial
trouble, mostly of their own making, who is
going to fly in to St. George? Airlines with
small passenger planes - the air port we
have is adequate.

We don't need the noise here or over
Zion Park, & our streets can't handle
much more traffic.

If our City Council or Congressman make the
decision I know how the vote will go. If
some group with a little spare cash can
manage it won't be a problem. I Hope the

Regards,
Jack Russell

1. While the facilities at the existing airport can support smaller aircraft, it cannot safely accommodate larger regional jet and propeller aircraft that are in the commercial air carrier fleet projected for future use at St. George.
2. The majority of the traffic to and from the airport will be accommodated on the Southern Corridor and the Airport Access Roadway that have not yet been constructed. Local roadways within the City of St. George should not see an influx of traffic from the replacement airport; but actually a small decrease in congestion could occur along roadways that currently carry traffic to the existing airport once the existing airport is closed.

- Submitted Via E-mail -

From: "Wanda Magleby" <wmagleby@infowest.com>
Sent: 10/30/2005 09:25 PM
To: David Field
Subject: St. George Replacement Airport

It is my personal opinion that St. George does not need a larger airport. We are only 120 miles from Las Vegas. The St. George Airport on the Black Hill is part of what makes St. George a charming place to visit and to live. I have never had a problem getting to any destination by flying out of the St. George Airport.

Airfares have gotten so high in the past year that even flying out of Las Vegas is expensive. If airfares continue to climb, I doubt very many people can afford to travel very often.

Currently it costs \$10 to take a taxi from downtown St. George (less than 1/2 mile) up the Black Hill to the Airport. If the Airport is relocated 5 miles out of town, it will probably cost \$25 or more to take a taxi to the Airport. The shuttle to Las Vegas is only \$55 round-trip.

Please do not approve the St. George Replacement Airport. I live in downtown St. George and I very much enjoy watching the airplanes fly in and out.

Thank you for the opportunity to share my opinion.

Wanda Magleby
550 South 200 East #9
Saint George, UT 84770-3976
435-673-3803

1. Thank you for your interest in this project. Your comment has been noted.

1



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Arizona Strip Field Office
345 East Riverside Drive
St. George, Utah 84790
www.az.blm.gov



In Reply Refer To:
1790

November 8, 2005

Mr. David Field, Manager
Planning/Programming Branch
Airports Division
Federal Aviation Administration
Northwest Mountain Region
1601 Lind Avenue, S.W., Suite 315
Renton, Washington 98055-4056
Fax: (425) 227-1600

VIA FAX AND FIRST CLASS MAIL

RE: Draft Environmental Impact Statement and DOT Section 4(f)/303(c) Evaluation for
a Proposed Replacement Airport for the City of St. George, Utah

Dear Mr. Field:

The Arizona Strip District Office (ASDO) of the U.S. Bureau of Land Management (BLM) appreciates this opportunity to provide comments on the above-referenced Draft Environmental Impact Statement (DEIS) and DOT Section 4(f)/303(c) Evaluation for the proposed St. George replacement airport.

At the outset, we wish to commend the Federal Aviation Administration (FAA), Landrum & Brown, and National Park Service (NPS) staff who worked so diligently to prepare this DEIS and DOT Section 4(f)/303(c) Evaluation. Indeed, this is one of the most thorough and comprehensive environmental analyses that we have reviewed. We also recognize the obvious constraints posed by the current St. George airport, and we support the need for this replacement airport.

On the specific matters of interest to the ASDO, we appreciate the detailed information and analysis provided with respect to the noise sensitive areas that we identified as part of the DOT Section 4(f)/303(c) Evaluation. We generally concur with this information and analysis. We also support the "Fly Friendly" practice described on DEIS page 8-18 whereby airport signage and notices to airmen would discourage direct over-flights of the Little Black Mountain Petroglyph Site.

Of course, in matters of such overall complexity, there may be a few inadvertent errors or omissions that should be addressed to improve the analysis provided in the final EIS. With this constructive purpose in mind, we wish to offer the following five suggestions.

First, in our December 6, 2002, scoping letter on preparation of this DEIS, we stated: "The EIS should . . . address the effects of existing and projected increased air tour traffic." We went on to explain that, while we were not generally concerned about higher-elevation commercial flights, we were very concerned about the future potential for lower-elevation commercial air tours over BLM ASDO noise sensitive areas. We pointed out that virtually all of the airports in this region were proposed for replacement or expansion. The DEIS provides data and analysis based on the current tours over some NPS units, and makes projections for future use based on interviews with the commercial air tour operators. We appreciate this data and analysis, but we remain somewhat concerned because one reasonably foreseeable scenario was apparently not addressed.

This scenario is the combination of overall increases in regional populations and aviation uses, greater market demand for scenic commercial air tours, combined with potential new limits or restrictions on commercial air tours over NPS units, especially Grand Canyon, Zion, and Bryce Canyon National Parks. We believe that the market demand for commercial air tours may continue to grow and that as limits go into effect over NPS units they may generate new or increased air tours over some BLM noise sensitive areas. Some of these areas have scenic qualities comparable to those found in the NPS units. The existing tour routes would not reflect these changes, nor would the projected future uses of these existing routes. In addition, the operator interviews would not because they do not yet know what any future limits would be, where they would occur, and when they would take effect.

We also do not know what level of NEPA analysis will be done in connection with these future commercial air tour decisions, nor what role the BLM ASDO may play in that analysis. While we recognize that this may be a very difficult scenario to analyze, we nevertheless request that the FAA do so to the best of its ability in the final EIS. For example, a key question to be addressed would be: How could regional population and aviation use increases, new or expanded regional airports, greater market demand for commercial air tours, and future limits on commercial air tours over NPS units potentially cause indirect or cumulative effects on BLM noise sensitive areas subject to Section 4(f)/303(c)? A related question would be: To the extent that such indirect or cumulative effects are possible, how could the FAA mitigate these effects?

As you know, implementation of Section 4(f)/303(c) occurs through a relationship between the Secretaries of Transportation and Interior, and the statute does not distinguish between NPS or BLM managed areas. Natural soundscapes in noise sensitive areas subject to Section 4(f)/303(c) should be treated the same regardless of which Interior department agency administers them. In summary, we request that the FAA include in the final EIS an analysis of whether future limits on commercial air tours over these NPS areas may affect these BLM areas, and, if so, how the FAA may mitigate those effects. The final EIS should also explain what objective, scientific standard would be used to determine when commercial air tour noise over noise sensitive areas becomes loud or disruptive enough to warrant limits and what ongoing monitoring would occur to determine when that standard may be reached or exceeded and limits are necessary.

1. The changes in future commercial air tours mentioned by the commenter are not reasonably foreseeable. It is difficult to reliably predict the location of future air tour traffic because air tour operators have not identified future routes and it is not yet known where air tour traffic may be permitted to fly. Regarding the relationship between population growth in St. George and the future demand for air tour operations, the interviews conducted during this study indicate very little relationship between population growth and demand for air tour operations. St. George is used primarily as a refueling or lunch stop for air tours and is not currently, nor expected to be, an originating location of much air tour activity. The EIS takes into account the forecast air tour operations for the initial area of investigation, however, the future location of air tours is too speculative to allow the FAA to predict where additional flights might occur if the areas currently open to air tours are prohibited to air tours in the future.

There is some difficulty in conducting noise analyses in low-level sound environments where there are sensitive land uses. There are no currently accepted standards to help define an "impact" or various levels of adverse impact. The FAA and National Park Service (NPS) are working cooperatively on a national basis to perform needed scientific research and development for improving assessment methodology and for building appropriate noise criteria for park-related evaluations. The FAA recognizes the similarity between NPS and the Bureau of Land Management (BLM) noise-sensitive areas subject to Section 4(f)/303(c).

Second, on DEIS page 5-12, in Table 5.2, we note the error where the NPS Pipe Spring National Monument is listed across from the "State Parks" heading. This reference should be moved to the National Monuments section of the table.

2

2. Your comment has been noted. The text has been revised.

Third, on DEIS page 5-19, under the Paiute Wilderness heading, the section says that this area "... was designated as a wilderness area by the BLM in 1984." The BLM cannot designate wilderness areas; only Congress can pass such designation legislation that the President may then sign into law. To correct this error, we suggest deleting the phrase "by the BLM."

3

3. Your comment has been noted. The text has been revised.

Fourth, on DEIS page 5-29, in Table 5.3, we note the references to some BLM WSAs in Nevada, such as Clover Mountains WSA and Mormon Mountains WSA. We also know that there are many other references to these Nevada BLM WSAs in the DEIS. While we are not familiar with the details, we understand that Congress passed and the President signed into law about a year ago comprehensive public lands legislation for Lincoln County, Nevada. Based on news reports, we understand that this new law changed some of these WSAs into designated wilderness areas. For example, we understand that some or all of the Clover Mountains WSA and Mormon Mountains WSA were so designated. We recommend that you contact Nevada BLM officials to ensure that appropriate changes are made in the final EIS vis-à-vis the titles or descriptions of these areas in Lincoln County.

4

4. As noted by the Arizona Strip Field Office of the BLM, three of the lands listed in **Table 5.3, Wilderness Study Areas and Instant Study Areas in the Initial Area of Investigation** (in the Draft EIS), were designated Wilderness Areas by the Lincoln County Conservation, Recreation, and Development Act of 2004. These three lands are the Clover Mountains Wilderness, Mormon Mountains Wilderness, and Tunnel Spring Wilderness. In the Final EIS these three lands are removed from **Table 5.3** and are added to the "Wilderness Areas" section of **Table 5.2, Public Lands in Initial Area of Investigation**. The designations of these three lands have also been updated on **Exhibit 5.1, Initial Area of Investigation**, in the Final EIS. These former *Wilderness Study Areas* - the Clover Mountains Wilderness, the Mormon Mountains Wilderness, and the Tunnel Spring Wilderness - were evaluated in the same manner as designated wilderness areas in the Draft EIS. To simplify production of this Final EIS, the names of these areas have not been changed from "Wilderness Study Area" to "Wilderness" in the remainder of the document because the change in name does not change the level of analysis conducted for this project.

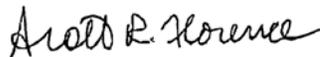
5

5. Your comment has been noted. Please see the response to #4 above.

Fifth, on DEIS page 5-38, under the 5.4.4.2 Wild and Scenic Rivers heading, the discussion talks about the Verde River in central Arizona well outside this region, but omits the Virgin River within the FAA's study area for this DEIS. Arizona BLM completed a Legislative EIS (LEIS) on river segments entitled: Final Arizona Statewide Wild and Scenic Rivers Legislative Environmental Impact Statement. The Record of Decision (ROD) for the LEIS included determinations that portions of the Virgin River were eligible and suitable for consideration under the National Wild and Scenic Rivers Act. Based on these determinations, Arizona BLM has recommended to Congress that these segments of the Virgin River be designated as study segments to receive interim protection and further consideration. We recommend that this DEIS section be revised to reflect this information.

We hope that these comments are helpful, and we look forward to receiving the final EIS when it becomes available. Please let us know if we can provide any further information or assistance.

Sincerely,



Scott R. Florence
District Manager



United States Department of the Interior

NATIONAL PARK SERVICE
Zion National Park
Springdale, Utah 84767



L7617 (ZION-RM&R)

November 8, 2005

Lowell H. Johnson, Manager
Airports Division
Federal Aviation Administration
Northwest Mountain Region
1601 Lind Avenue, SW
Renton, Washington 98055-4056

Dear Mr. Johnson:

Pursuant to the FAA's request for comments on the Draft Environmental Impact Statement (DEIS) for the St. George Replacement Airport, the National Park Service (NPS) respectfully offers the following comments in our capacity as cooperating agency for the EIS. We appreciate the opportunity to provide information within our area of agency expertise that might be useful to or assist the Federal Aviation Administration (FAA) in its examination of the environmental effects, if any, of the proposed replacement airport. Appreciating that every federal agency conducts National Environmental Policy Act (NEPA) analyses differently, the NPS defers to the FAA's role as lead agency as well as the FAA's sole jurisdiction over airspace and air safety issues and consequently, limit our comments to those relative to and within our area of agency expertise. Please note that this letter and attachment are provided on behalf of the various NPS units within the Initial Area of Investigation (IAI).

The NPS continues to recognize the need for a replacement airport facility for St. George and Washington County, Utah. Our aim in participating as a cooperating agency is to support and facilitate that end, while working diligently to protect the resources of the relevant units of the NPS for present and future generations.

Percent Time Audible

The DEIS uses Integrated Noise Model (INM) version 6.1 to model aircraft noise impacts associated with the St. George Replacement Airport which does not have the ability to calculate Percent Time Audible. "Audibility" is the ability of animals, and humans, with normal hearing to hear a given sound. This ability is affected by both frequency content (different species of animals and humans hear some frequencies better than others) and amplitude (species differ in their sensitivity to amplitude). It is important to note that humans and wildlife both can hear a wide range of frequencies, which means that several sounds can be heard at the same time. For example, a motorcycle producing sound at a low frequency, a coyote howl at a mid-range frequency, and a bird call at a high frequency can all be heard simultaneously. Audibility analyses are considered to more closely represent how humans distinguish sound in their environment. Given that humans hear many sounds at one time, it is important to collect frequency data when conducting acoustic measurements in parks. Frequency data is collected for the 31 one-third octave bands between 20 and 20,000 Hz which is the audible frequency range for humans and most animal species. While Time Above Ambient and other metrics are important to characterizing

1
▼



1

1. As of the completion date of the Draft EIS, a version of the Integrated Noise Model (INM) capable of producing audibility information had not been released for public use. The Federal Aviation Administration (FAA) agreed to use the new version of the INM model, V6.2b to calculate the requested audibility information. The results of this additional analysis are presented in **Appendix T, Audibility Evaluations for Zion National Park**, in the Final EIS.

In brief, the audibility analysis indicates that at all points within Zion National Park (Zion), the cumulative condition with the replacement airport resulted in a decrease in the minutes of audibility over a 24-hour day.

When the differences in contributions to audibility were compared for the existing and replacement airports alone, the replacement airport resulted in a decrease in the minutes audible at every point within Zion. The percent time audible was calculated to decrease at all points within the park except one, where the analysis shows no change. The percent time audible for airport only conditions ranged from 0.5 percent to 12.5 percent of the day across the airport only cases, with average exposures ranging from 3.5 percent to 6.1 percent of the day among the three separate years that were evaluated.

For a full discussion of the audibility results, please see **Appendix T, Audibility Evaluations for Zion National Park**, in the Final EIS.

the soundscape, audibility is important to park service management objectives because it can show how people hear noise at decibel levels relative to the ambient sound environment and can discern sounds at varying decibel levels (loudness) at different frequencies

Cumulative Analysis and Baseline Conditions

Although examination of the incremental change analyses presented in the DEIS suggests it is unlikely that the subject NPS units will be significantly adversely impacted from the direct operation of the replacement airport itself, changes in the aircraft noise environment from a baseline year or present conditions carried through the forecasted years will be needed in order for the NPS to accurately assess potential cumulative impacts to park resources or visitor use and enjoyment. The information relevant to any changes from the baseline conditions is needed because based on the growth rate information provided, the park units will in fact experience increasing impacts from aircraft operations over the forecast period presented in the DEIS and, however, the determination of whether there are significant adverse impacts on the park units will be based on the cumulative impacts of that increased noise that is associated with the construction of the proposed airport. The NPS would like to assist the FAA in ascertaining whether or not such cumulative impacts can be mitigated through the routing of aircraft operations to and from the proposed airport, through the utilization of quieter aircraft, or through reduced frequency of operation in and out of the proposed airport by employing larger aircraft.

Given the proximity of Zion National Park (ZION) to the proposed airport, coupled with the specific flight track information presented in the DEIS, the NPS would like to work with the FAA to resolve remaining questions about potential impacts that might result from the addition of cumulative noise. Information presented in Tables 7.11A and B helps characterize noise impacts in ZION management zones. However without first establishing baseline conditions it is difficult to assess the cumulative change in noise over time and the relative significance of impacts to resources and visitor enjoyment.

In light of the above, in order to provide meaningful input to the FAA with respect to potential impacts to park resources or visitor use, it would be most useful to NPS to see a cumulative effects comparison, accounting for all overflight activity beginning with baseline conditions (including existing airport) and extending to 2010 and 2020 (including replacement airport) for the following metrics, detailed further in our attached comments:

- Percent Time Above Ambient (Natural) for both a 24- and 15-hour day
- Cumulative Number of Events per 24- and 15-hour Day Above L_{max} Thresholds
- Hourly Time Above selected noise thresholds

Management Actions

In Section 6.6.1.5, the DEIS identifies specific actions that the St. George Airport owner can take to reduce noise effects over ZION and other noise-sensitive areas. The NPS appreciates the efforts by the City of St. George and FAA to develop these concepts for the DEIS. These actions would be voluntary for both the airport owner and pilots. In the final EIS, it would be helpful in terms of informing the public to provide more details about the proposed mitigation strategy to help reduce impacts from the St. George airport.

In 1987, Congress passed the National Parks Overflights Act (Public Law 100-91) which mandated several studies and a report on the impacts of overflights and remediation needed to solve these problems. As reported to Congress in Report on Effects of Aircraft Overflights on the National Park System (1995), ZION was identified specifically as "an immediate priority for maintaining or restoring natural quiet". The NPS has taken numerous steps to reduce noise in ZION park operations, including development of a \$27-million shuttle-bus system, but NPS is unable to deal with aircraft overflight noise without assistance from FAA and others.



- ▲
- 1
- 2
- 3
- ▼
2. An extensive evaluation of the cumulative impact of noise within Zion as well as other public lands (4(f)/303(c) properties) within the initial area of investigation is described in **Chapter 7** and **Appendices B and T** of the EIS. The EIS discloses that the noise levels contributed by operations associated with the proposed replacement airport will not differ significantly from those contributed by the existing airport. Moreover as explained in **Appendix T** in the Final EIS, the proposed replacement airport would result in a decrease in the minutes of audible aircraft noise.

Existing condition information was provided in the Draft EIS for the area surrounding the replacement airport within the area of significant impact as defined by FAA standards (i.e., within the 65 DNL contour). Existing condition information was not provided in the Draft EIS for areas beyond the immediate environs of the replacement airport. Under National Environmental Policy Act of 1969 (NEPA), information must be provided to compare conditions with and without the proposed action – this was accomplished by providing projected noise level information for 2010 and 2020 for the airport in its existing and replacement location, both independently and combined (cumulatively) with other aviation noise sources throughout the region.

The terms “baseline” and “current conditions” are not equivalent for NEPA purposes. “Baseline” refers to a no-action alternative (the existing airport in a future year), while “current conditions” refers to conditions (including activity at the existing airport) in a present or recent year.

Please see **Appendix W** (in the Final EIS), **Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park**, which contains a discussion of this issue.

Nevertheless, the FAA has included additional current condition information for each 4(f)/303(c) property evaluated in the EIS in **Appendix S, Noise Levels for 2003 Conditions**, in the Final EIS.

3. Please see **Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park, and Appendix X, Monitored Noise Abatement Initiatives**, in the Final EIS. The City of St. George intends to work with the commercial carriers at SGU to mitigate aircraft noise generated from the replacement airport through the development of voluntary agreements to fly to the north or to the south of Zion. [continued ▼]

Should you have any questions regarding our comments, please contact me or Jeff Bradybaugh, Chief of Resource Management and Research, at 435-772-0208 or jeff_bradybaugh@ups.gov. Again, we appreciate the opportunity to work through these important issues with you and your staff.

Sincerely,

/s/ Jock F. Whitworth

Jock F. Whitworth
Superintendent

Enclosure

cc:
Regional Director, IMRO
Manager, Natural Sounds Program Office, WASO
Environmental Compliance Officer, IMRO
GIS Team Leader/Overflights Coordinator, IMRO
Superintendent, BRCA
Superintendent, CEER
Superintendent, GRCA
Superintendent, LAME
Superintendent, PARA
Superintendent, PISP

▲
3.

[▲continued] In addition, the FAA would establish an approach procedure for the replacement airport designed to keep aircraft as high as possible and west of Zion without negatively affecting final approach minimums. This approach procedure is shown in **Exhibit 1.3** in the Draft EIS and reproduced as an attachment to **Appendix X** in the Final EIS. Finally, **Appendix X, Monitored Noise Abatement Initiatives**, in the Final EIS, provides more detail on voluntary measures for reducing aircraft noise impacts on Zion and the Little Black Mountain Petroglyph site.

In accordance with the National Parks Air Tour Management Act of 2000 (NPATMA), the FAA, in cooperation with the National Park Services (NPS), will establish an Air Tour Management Plan for Zion that will include acceptable and effective measures to mitigate or prevent the significant adverse impacts, if any, of commercial air tours on the natural and cultural resources and visitor experiences at the park.



NATIONAL PARK SERVICE
DETAILED COMMENTS
DRAFT ENVIRONMENTAL IMPACT STATEMENT
PROPOSED REPLACEMENT AIRPORT ST. GEORGE, UTAH

The National Park Service (NPS) appreciates the Federal Aviation Administration's (FAA) thorough information gathering for the Draft Environmental Impact Statement (DEIS). The information provides a window into the growth of aviation overflights to be expected over the Initial Area of Investigation (IAI) from the year 2010 through 2020. Information relating to these trends serve as a preface to NPS comments.

Combining the data presented in DEIS Tables 7.1, 7.2 and 7.3 to examine the total air traffic load across the study area illustrates significant cumulative increases.

YEAR	ANNUAL OVERFLIGHTS	Increase in # from 2003	% Increase from 2003	DAILY OVERFLIGHTS	Increase in # from 2003	% Increase from 2003
2003	525,243			1,450		
2010	621,252	96,009	18.3	1,702	252	17.4
2020	845,898	320,655	61.0	2,317	867	59.8

Examining the current and projected flight tracks presented in the DEIS, it is clear that increased overflights will yield increased noise events in Zion National Park (ZION) and other 4(f) areas in the IAI. Flight tracks indicate a further concentration of noise impacts as opposed to a uniform or random distribution. Further, as pointed out on DEIS page 7-21, only 3.8% of overflights occur between 10:00pm and 7:00am, again concentrating the noise effects into a 15-hour day. This growth will mean that a greater percentage of the day will be noise impacted, resulting in reduced noise-free intervals in NPS and other 4(f) properties.

IMPORTANCE OF PERSISTENT EVENTS AND 15-HOUR VERSUS 24-HOUR DAY

The information presented in DEIS Table 7.4 is helpful regarding the noise effects on the 4(f) locations sampled. Recognizing that this data does not include St. George airport contributions, it does present the number of events above 25dBA for most other air traffic contributions (less itinerant from local airports and military overflights). Twenty-five dBA is a reasonable approximation of ambient sound conditions (natural soundscape) in these 4(f) areas. This is, then, a more explicit documentation of the effects of the growth in overflights up to 2020, though no baseline data for 2003 is provided. It is also a conservative estimate, as the St. George airport contribution is not included.

To make this information more representative to aircraft activity during the day, we took the number of events over 25dBA, which are presented for a 24-hour period in DEIS Table 7.4, and adjusted these events to a 15-hour day in accordance with the information presented in Section 7.2.1.3, that only 3.8% of aircraft operations occur in the night-time hours. This allows for display of the temporally-compressed aircraft activity occurring between 7am and 10pm on the "average" day.

Site	Number of Events above 25dBA (24-hr)/day	Number of Events above 25dBA (15-hr)/day	Average Number of Events per hour
Zion-Chimle Trail	346	333	22.2
Zion-Crazy Quilt	325	313	20.9
Zion-East Rim Mesa	301	289	19.3
Zion-Hop Valley	244	235	15.7
Zion-Parunuweap	356	342	22.8
Zion-Lava Point	231	222	14.8



4. Your comments regarding aviation overflights have been noted.

5. The Draft EIS presented the standard average annual day analysis and the Final EIS also includes a sensitivity analysis for daytime hours to provide additional reference and comparison of daytime and nighttime levels. For a full discussion regarding this analysis, please see **Appendix U, 15-Hour Sensitivity Analysis**, in the Final EIS.

The data regarding noise effects during a 15-hour day (Leq-day) are presented in **Chapter 6, Tables 6.24A, 6.24B, 6.27, and 6.28** of the Draft EIS for average annual conditions for Zion. In response to the NPS' comment, the FAA prepared **Appendix U, 15-Hour Sensitivity Analysis**, for inclusion in the Final EIS. **Appendix U** (in the Final EIS) discloses the relationship between 24-hour and 15-hour noise levels and event data and concludes that the two periods do not significantly differ in their noise characteristics. Therefore, the FAA has determined that additional analysis of 15-hour operational characteristics is not justified.

TABLE B			
Site	Number of Events above 25dBA (24-hr)/day	Number of Events above 25dBA (15-hr)/day	Average Number of Events per hour
Cedar Breaks NM	379	365	24.3
Little Black Mtn	315	303	20.3
Paiute Wilderness	207	199	13.3
Pine Valley Wilderness	252	242	16.1
Pipe Spring NM	309	297	19.8

The above table uses only a subset of sites selected from DEIS Table 7.4, representing sites most, least and moderately impacted in terms of number of events above 25dBA in 2020 in ZION, and includes the other 4(f) sites depicted in DEIS Table 7.4. From the above table it is apparent that aircraft noise impacts, independent of the proposed airport project, occur at significant rates during the day. Assumption in the table: Events are averaged on an hourly basis throughout the 15-hour day.

This assumption normalizes the overflight activity through averaging. In actuality, there are peak hours, peak periods and varying lengths of exposure to aircraft overflight noise, which might make simple averaging seem dubious. However, while peak periods are very important, Foch (2002) found that persistent events (average number of events per hour) constituted the most minutes of noise impact throughout the day. This information, recorded for jet aircraft over ZION, supports the concept that event averaging may be useful, in the absence of more specific data, for demonstrating the impact of aircraft noise to the natural quiet. Also, data from ZION (Wyle 2001) shows that overflights do occur throughout the 15-hour day at their various sampling sites, with activity most hours, not only at peak periods during the day.

Observations of overflights while hiking trails in ZION were conducted as part of the Wyle study. Results show that overflights were recorded at rates from 6 to 14 per hour, depending on the specific trail hiked, in 2000-2001. Given the air traffic growth predicted by 2020, and using these observations from the Wyle study, events per hour demonstrated in the Table B above are probable.

IMPORTANCE OF PEAK PERIODS

A number of attended logging sessions by technicians were conducted during the Wyle (2001) study to specifically note audible aircraft overflights. During three 30-minute periods at the ZION-Crazy Quilt sampling site, a subset of manual observations (selected for a related analysis) showed that during 2 of the sample periods, 6 and 9 overflights were recorded in the 30-minute period and during the third sample, overflights dominated the natural soundscape leaving only 5 seconds where natural sound could be observed. For this example, the third sample could be considered a peak period for overflights, while the other two periods were representative of persistent or average numbers of hourly events.

No peak period analysis is provided in the DEIS, though the information likely exists from the extensive FAA data collection effort. The table above, however, provides insight to the issue, in that peak hours would therefore have reduced noise-free minutes each hour and shortened noise free intervals when compared to "averaged" conditions. On average during the day in 2020, these sites may have approximately half to a third of each hour free of discernible aircraft noise.

All this serves to demonstrate that aircraft noise is substantial and will be increasing at ZION with or without the proposed airport replacement project at St. George.

5

ANALYSES IMPORTANT TO A CUMULATIVE EFFECTS DETERMINATION IN THE FINAL EIS

The final EIS would benefit from a cumulative effects comparison using data from a baseline year, to allow managers to determine the significance, if any, of cumulative effects. Ideally, this analyses would account for all overflight activity beginning with baseline conditions (including existing airport) and extending to 2010 and 2020 (including replacement airport) for the following metrics:

- Percent Time Above Ambient (Natural) for both a 24- and 15-hour day
 - Display data in tabular format for each grid point, for each of the 3 year-points, side by side, using similar format and color coding as DEIS Table 7.11A
 - Using grid point maps, display points where >25% of the 24- and 15-hour days exceed Natural Ambient and provide the percentage in the grid point circle.
- Cumulative Number of Events per 24- and 15-hour Day Above LAmx Thresholds
 - Display data in tabular format for each grid point, for each of the year-points, side by side
 - Using grid point maps, display average number of events per hour for both "days", using the same grid points from results above for Percent Time Above Ambient (TAA).
- Hourly Time Above – defined as the average number of minutes in each hour of the average 24-hour day that aircraft overflights exceed 25, 35 and 45 dBA for each of the year-points at the same grid points from results above for Percent Time Above Ambient. For the same grid points above or a representative subset distributed geographically and by Percent Time Audible, display the data in a histogram of the 24-hour day or similar technique.

ADDITIONAL COMMENTS

CHAPTER 5

Page 5-19, section 5.3.4, paragraph 2

The NPS Organic Act is misquoted: "...and historic objects and the wildlife therein..." is incorrect. Wild life is two words in the Act.

Section 5.6 Future Land Use Plans and Zoning

CEQ regulations and FAA's NEPA guidelines [§500a(1)] require an identification of "possible conflicts between the proposed action and the objectives of Federal, regional, State, Tribal and local land use plans, policies, and controls for the area concerned [40 CFR §1502.16(c)], and the extent to which the agency would reconcile its proposed action with the plan or law [40 CFR §1506.2(d)]. Currently, there is no mention of National Park Service plans and whether or not this project is consistent with the goals identified in those plans in the DEIS. On September 16, 2004, NPS provided FAA with detailed information for each affected NPS unit's goals from appropriate plans. This information, the potential conflicts, and the extent to which FAA will reconcile these conflicts should be addressed in the final EIS in terms of section 4(f)/303(c) determinations, as well as a basis for potential aircraft management in relation to these areas.

CHAPTER 6

Page 6-95, section 6.6.1, last sentence

The DEIS states that "Time Above the natural ambient level (L50_{natural}) is considered comparable to Time Audible, a metric which is in development by the FAA and the NPS, but unavailable for this study." We suggest this sentence be removed from the document. NPS acoustic experts do not consider Time Above and Time Audible as "comparable" metrics, and have communicated this opinion to FAA. The Time Above metric is simply presented as a best technology available for the DEIS development.

6. As noted in response to comment #2 above, existing condition information was provided in the Draft EIS for the area surrounding the replacement airport within the area of significant impact as defined by FAA standards (i.e., within the 65 DNL contour). Existing condition information was not provided in the Draft EIS for areas beyond the immediate environs of the replacement airport. Under NEPA, information must be provided to compare conditions with and without the proposed action – this was accomplished by providing projected noise level information for 2010 and 2020 for the airport in its existing and replacement location, both independently and combined (cumulatively) with other aviation noise sources throughout the region.

The terms "baseline" and "current conditions" are not equivalent for NEPA purposes. "Baseline" refers to a no-action alternative (the existing airport in a future year), while "current conditions" refers to conditions (including activity at the existing airport) in a present or recent year.

Please see **Appendix W** (in the Final EIS), *Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park*, which contains a discussion of this issue.

Nevertheless, the FAA has included additional current condition information for each 4(f)/303(c) property evaluated in the EIS in **Appendix S, Noise Levels for 2003 Conditions**, in the Final EIS.

- 7. The text has been changed to address the comment in the Final EIS.
- 8. The descriptions of the NPS units located within the Initial Area of Investigation, located in **Section 5.3, Public Lands, Sub-Section 5.3.4 National Parks, Monuments, and Recreation Areas** in the Final EIS, are revised in the Final EIS to reflect the management goals outlined in your correspondence of September 16, 2004. A reference to consistency of the proposed action with the management goals of the NPS areas within the initial area of investigation has been added to **Section 6.3** in the Final EIS. The 4(f)/303(c) determination coordinated between the FAA and the NPS for Zion is included in **Chapter 8** in the Final EIS.
- 9. The text has been changed to address the comment in the Final EIS.



CHAPTER 7

Page 7-8, 7-9

As pointed out on pages 7-8 and 7-9, noise impacts were not modeled for military aircraft and itinerant operations from other airports in the study area, because of lack of adequate data. However, it should be noted that this lack of data leads to a conservative estimate of noise impacts throughout the DEIS analyses.

Page 7-61, last line

It appears that maybe the "Percent Time Above Ambient-Weighted" actually be Percent Time Above Ambient-Unweighted? The following sentence goes on to discuss %TAA-Unweighted so it follows logically that it may have been a typographical error.

CHAPTER 8

Comments on Chapter 5, Section 5.6, apply to this Chapter as well.

Page 8-3, paragraph 1

The TAA metric is considered comparable to time audible, a metric which is in development by FAA and NPS, but unavailable for this study." We suggest FAA remove this sentence from the document. See comments on Chapter 6.

Page 8-6, paragraph 2

As noted in the text, Cedar Breaks National Monument "...is noted as one of the top ten locations in the U.S. for viewing the night sky. Part of its attraction is the natural quiet which is generally free from low altitude aircraft." In addition, 78% of the land area (4,830 acres) is recommended for wilderness designation. Reviewing data presented in Appendix B the cumulative TAA, using an ambient of 29dBA, ranges from 34 minutes per day in 2010 to 48.3 minutes in 2020, a modeled increase of approximately 13 minutes per day over the period. While this is a relatively minor increase, no current year or baseline conditions data is presented from which to gauge the relative effect from the present to the modeled out-years.

Page 8-6, paragraph 3

Likewise, as noted in the text for Pipe Spring National Monument, maintenance of the isolation and serenity of this setting, in light of the historical context of the park is of prime importance to the NPS. Reviewing data presented in Appendix B, the cumulative TAA using an ambient of 29dBA, ranges from 121.9 minutes per day in 2010 to 173.8 minutes in 2020, a modeled increase of approximately 48 minutes per day over the period. This represents an increase from 8% in 2010 to 12% of the average 24-hour day when noise conditions will be above the existing ambient sound levels (natural quiet) in 2020. The incremental increase due specifically to the proposed St. George replacement airport between 2010 and 2020 is approximately .1 minute. While the incremental increase is insignificant, the cumulative effect of aircraft noise ranging up to 12% of the average day impacted at a site which depends on conditions reflecting the historic setting, may be construed by some as a moderate impact. With no current year or baseline year data presented from which to gauge the growth in noise levels and consequent effect from the present to the modeled out-years, we cannot determine the relative impact to the sound environment at PISP between now and 2020 associated with the proposed project.

Section 8.5, Zion National Park Noise Effects Analysis

Table 8.1 presents the trend of increasing aircraft noise impacts to ZION. The summary presented for TAA, Replacement Airport shows a cumulative increase of up to 110 minutes per day between 2010 and 2020 or nearly 2 additional hours of the 24-hour day impacted by noise above the park ambient level already affected. From data presented in Appendix B for an NPS measurement site where the 110 additional TAA minutes was calculated between 2010 and 2020, the site will experience noise levels above the ambient natural sounds level for greater than 28% of the average 24-hour day. Again, no baseline for the present situation is reported, so it is impossible to determine the increase from existing conditions associated with the proposed project.



10. As noted in the EIS, military aircraft operating in the enroute environment and aircraft operating between St. George and other study area airports were included in the noise analyses. A few other military flights (training exercises) operate within the study area, but at many different altitudes and across numerous routes of Visual Flight Rules free flight. Location and altitude data are not available for these operations that occur less than once per average day. They approach no closer than three miles from Zion. Consequently it is not possible to estimate the contribution of these flights to the noise environment within the study area.

While estimates are made of the number of operations that occur at various other general aviation airports within the study area, the destinations or origins of these flights are not recorded. Only in the Las Vegas vicinity is information available that allows an estimation of the direction of flight and mix of aircraft that fly over study area locations. Consequently it is not possible to determine the locations of flights or the type of aircraft (other than to be nearly certain that they are smaller propeller aircraft) that operate to or from other general aviation airports in the study area.

The net effect of these few military operations and undocumented general aviation flights is believed to be inconsequential to the cumulative noise levels to which sensitive locations throughout the study area are exposed.

Based on experience at numerous other airports throughout the U.S., it is likely that the noise energy associated with these "unmodeled" aircraft will be inconsequential on the cumulative noise level. However, the infrequent single event by these aircraft may have temporary effects on underlying land uses that are noticeable to those on the ground that are not reflected in cumulative noise levels.

11. The commenter is correct. The text has been changed in the Final EIS.

12. The sentence has been removed from the Final EIS. Audibility evaluations for Zion are presented in the Final EIS in **Appendix T**.

13. Information regarding noise at Cedar Breaks National Monument in 2003 for all noise metrics except audibility is presented in **Appendix S, Noise Levels for 2003 Conditions**, in the Final EIS.

14. Information regarding noise at Pipe Springs National Monument in 2003 for all noise metrics except audibility is presented in **Appendix S, Noise Levels for 2003 Conditions**, in the Final EIS. Growth of the cumulative TAA noise condition associated with the project action is 0.1 minute between 2010 and 2020. There is no project related effect in 2003.

- ▲
18. [▲continued] As noted in response to comment #2 above, the FAA has included current noise level information for all noise metrics, except audibility, at all identified 4(f)/303(c) locations within the initial area of investigation. This information is found in **Appendix S, Noise Levels for 2003 Conditions**, in the Final EIS
 19. The text has been revised with the inclusion of the average L50 measured noise level in Zion in the Final EIS.

November 7, 2005

David Field, Manager
Planning/Program Branch
FAA Northwest Mountain Region, Airports Division
1601 Lind Avenue, SW, Ste. 615
Renton, WA 98-55-4056

Re: Comments re St. George Replacement Airport EIS

Dear Mr. Field:

The Grand Canyon Trust and National Parks and Conservation Association appreciate this opportunity to respond to the Draft EIS for the construction of a replacement airport in St. George, Utah (please see attached comments).

The Grand Canyon Trust challenged the initial EA because of concern about the potential noise impacts such a replacement airport could generate upon the natural soundscape of Zion National Park.

Resulting from the subsequent court decision, the present DEIS was generated. We immediately would state, again, that we do not, and have not, been opposed to the idea of replacing St. George's existing airport. Our sole concern has been, and continues to be, the rapidly growing, cumulative noise impacts of commercial aviation on Zion National Park, which the National Park Service has identified as a high priority park for the protection of its natural soundscape. The St. George airport is an essential part of the national aviation transportation system, which is our main focus in these comments.

In our scoping letter of November 27, 2002, we asked for a number of cumulative noise analyses and considerations regarding Zion. Some of these have been thoroughly accomplished, others in a rushed or "masked" way, and some not at all. We do respect the precedent-setting nature of this extraordinary depth of analysis, and the detailed work that went into it.

We are still not convinced, after examining this document, that the noise analysis has met certain, qualitative preciseness required to protect natural quiet in Zion National Park. This lack of analysis standard masks the enormity of the cumulative aviation noise burden on Zion National Park. We see from the cumulative noise analysis, however, enough unsettling documentation to cause us to renew our expectation: that FAA immediately proceed further, in cooperative concert with the NPS. This work would be to (1) flesh out certain underdeveloped portions of the Zion noise analysis, for the FEIS; and (2) to develop in the FEIS more substantially significant mitigation measures for Zion.



Thank you for your ongoing interest in this project. Your comments regarding the Zion National Park (Zion) noise analysis and mitigation measures are addressed later in response to your attached comments.

We appreciate your careful attention, and anticipate responsiveness as to our requests. Please don't hesitate to contact us if you have questions. Herewith follow our detailed concerns.

We would like to be included in any "Route Design Workshop" which could be developed in the near future, to begin the much-needed mitigation. Please don't hesitate to contact us with any questions.

Sincerely yours,

Dick Hingson
Overflights Specialist
Grand Canyon Trust

Steve Bosak
National Parks Legacy Program Director
National Parks Conservation Association
Washington, D.C.

Cc: Jock Whitworth, National Park Service, Superintendent, Zion National Park
Jeff Bradybaugh, National Park Service (Resources), Zion National Park
Karen Trevino, NPS Natural Sounds Program

**Comments to the St. George Airport Draft Environmental Impact Statement
Submitted by the Grand Canyon Trust and National Parks and Conservation
Association
November 8, 2005**

Noise impacts on Zion: The DEIS Summary Page contains a brief and inadequate cumulative impact acknowledgement in its final Summary Table 6.28, "Summary of Environmental Impacts and Benefits Associated with the Proposed Replacement Airport." (Page 6-523).

.....
*"Overflights of . . . Section 4(f)/303(c) propert(ies) . . . including Zion National Park . . .
 "will continue to occur with relocation of the airport."*

The FAA has presented no significant noise mitigation for Zion, within this DEIS, that can be reliably assured, in spite of an extensive, and regionally unsettling, cumulative DOT Sec. 4(f)/303c noise impacts analysis. We therefore re-emphasize the urgent need for *significant* mitigation for noise.

1. **Rapidly growing numbers of noisy en route overflights above Zion, regardless of source, are increasingly creating substantial impairment on the Park, a Section 4(f) 303(c) property of national significance.**

The hard reality, confirmed by the cumulative noise impacts analysis, is this: Over the last several decades, the FAA has allowed and facilitated ever more noise-producing, en route aircraft traffic over Zion, as with many surrounding, noise-sensitive parts of the West. The impetus for a sufficient capacity, and efficient national air transportation system is understandable. However, this has resulted in an exponentially growing number of intrusive noise events, substantially impacting large portions of even prime, historic national park units such as Zion. Its fragile soundscape daily becomes significantly fragmented, heading towards its imminent obliteration in the Park's quietest backcountry.

The Park Service, within this DEIS, had noted the current noise burden there quite simply: "At Chinle and Kolob, human-caused sounds" (here meaning aircraft) "are audible 25 to 30 per cent of time (mean for all hours); some hours exceed 55%." (emphasis supplied)



1

1. The comment discusses the "rapidly growing numbers of noisy en route overflights above Zion, regardless of source, [which] are increasingly creating substantial impairment on the Park." This "substantial impairment" language relates to constructive use under Section 4(f). Under Federal Aviation Administration (FAA) environmental procedures, the FAA uses as guidance the regulation defining "constructive use" at 23 CFR §771.135(p). Under this regulation, a pre-existing substantial impairment is not relevant in determining whether a proposed action would itself result in substantial impairment. See Federal Register, Volume 55, page 3600 (1990). Moreover, the extensive analysis of cumulative noise in the EIS does not indicate that the additional noise from the proposed replacement airport would cause significant impacts on Zion or would be the "straw that breaks the back of the environmental camel." See **Chapters 6, 7, and 8 and Appendices B and T**. Indeed, the audibility analysis in **Appendix T** of the Final EIS shows that the audibility of aircraft noise in Zion would decrease with the proposed replacement airport.

For greater discussion regarding mitigation, please see **Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park**, in the Final EIS.

Exhibits 7.23 and 7.25, and Tables 7.11A and 7.11B in the DEIS plainly concur. The audibility trend is that for the same sites (and at most others within the Park), intrusive sound will be heard between 50 and 80 percent of peak daylight hours quite regularly, by the year 2020.

A particularly revealing way to comprehend the longstanding, growing degree of soundscape impairment is seen in the analysis of the NA35 (“Number of Events Above 35 dBA”) data. NA35 is a good measure of the “on/off”, “motor-revving” ground effects from the parade of endless overflights impacting the core of the Park. The Park, in turn, is at the core of the controversy. Any given one of these noise events – if considered in isolation, or if widely spaced – might not interfere much with wilderness character, or with backcountry visitor experience. But it is the *cumulative effect over time*, especially for repeat visitors, which undeniably and unacceptably interferes with the very reasons the backcountry visitor seeks out those zones, or other special settings, within the Park. These more noticeable noise events, i.e., 10-15 decibels – at minimum, to as much as *50 decibels above* the natural ambient, are compellingly captured by the NA35 noise metric.

“A ‘Ringling’ that Never Stops”

As former Zion Superintendent Don Falvey has pointed out, in his most recent comment¹ on this DEIS, “Imagine attending a symphony orchestra performance, and hearing someone’s cell phone ringing. The experience of enjoying the music would be destroyed even though the measurable sound levels may not be great.”

Unfortunately, the DEIS confirms that, *on average*, there will occur in Zion, at each grid-point, between *five* and *nine* aviation noise events -- each likewise noticeable and extended -- during each daytime hour, in 2010. Ten years later, the DEIS discloses that this same figure -- *on average* -- will have risen to between *seven* and *thirteen*. Such numbers will become doubly worse on peak days and peak hours, with noticeable noise events --each lasting about two minutes --becoming as frequent as yet “another one” every three minutes (i.e., 20 per hour.)

In our view, such noise impacts increasingly approach and/or exceed both FAA substantial impairment and NPS major adverse impact thresholds for Zion National Park’s backcountry.

2. **Substantial aircraft noise mitigation², therefore, is immediately required for Zion, beginning with this decision, and with similar decisions for regional airports in the future.**

¹ See also the NPCA Scoping Letter (#21, at page 3, dated 12/9/02) for a similar conceptualization.

² From National Park Service Scoping Letter (#12, at page 3, dated 12/3/02), “. . . for alternatives in the EIS that demonstrate potential adverse impacts on (Zion), FAA will need to consider how and to what extent



1

2. As the FAA understands this comment, it is the commenter’s position that Section 4(f)/303(c) and FAA Order 1050.1E, App. A, Sec. 6.4, require the FAA to mitigate the “substantial impairment” to Zion alleged in Comment #1 above. As explained in **Chapter 8** of the Final EIS, the proposed replacement airport at St. George would not result in a “use” of Zion. Therefore, no mitigation is required under Section 4(f)/303(c). For additional information regarding mitigation, please see **Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park**, in the Final EIS.

2



Nonetheless, measures to minimize impacts from this project are described in **Appendix X, Monitored Noise Abatement Initiatives**, in the Final EIS.

This mitigation is suggested by not only DOT Section 4(f)/303(c). It is also mandated by FAA Order 10150.1E, Sec. 6.4: "The EIS should . . . provide detailed measures to minimize harm." Equivalent context is also evident in the Wilderness Act of 1964 and the National Parks Organic Act of 1916, as amended in 1978 and subsequently interpreted by the National Park Service's management and other policies. FAA's authority to respond appears implicit in DEIS Sec. 5.14 (page 5-95) on "Airspace Structure": "The categories and types of airspace are dictated by the complexity or density of aircraft movements, the nature of the operations conducted within the airspace, the level of safety required, and *national or public interest*." (emphasis supplied)

The national or public interest includes environmental protection for premier national parks, which was reasserted as one of the FAA's foundational authorities by the National Parks Air Tour Management of 2000 (as a Congressional Finding³.)

It is "national or public interest" that, for example, recently has enabled the FAA to temporarily, intermittently, or permanently, clear or alter airspace over relatively circumscribed areas, such as Disney theme parks, sporting venues, or certain vulnerable urban areas. The "national or public interest" should likewise encourage a similar-scale effort regarding Zion National Park – being a monumental, national landmark⁴, where the quiet natural soundscape is designated as worthy of extraordinary respect.

- 3. The NPS "Desired Conditions" noise thresholds⁵ by Zion management zone should, correspondingly, be presented succinctly, consistently, and coherently in the main body of the FEIS. They should also appear within its Executive Summary.

the impacts can be mitigated. The clearest and most obvious mitigation would consist of an alternative routing of all flights into areas that do not contain national parks or monuments, while providing sufficient horizontal buffers around those units in closest proximity. Mitigation in other alternatives could consist of limiting the number of flights over such areas, scheduling flights so they do not occur over the park during critical times of day, and prescribing a flight path . . . which can be judged as having an acceptable impact"

³ P.L. 106-181, Sec. 802(2): "the FAA has the authority to preserve, protect, and enhance the environment by minimizing, mitigating, and preventing the adverse effects of aircraft overflights on public . . . lands."

⁴ Spatial route mitigation could be referenced to a renowned Park "special landmark" as the focus for noise abatement. In this regard, we again suggest Zion's "Great White Throne", rising above the heart of the Park, as a symbolic, defining Park feature for centering this effort.

⁵ These important noise standards have evidently been set forth obscurely and inconsistently, scattered, or virtually unlocatable (i.e., left out!) deep within the Consultations Appendix.

▲
2
3
▼
3

- 3. Information is provided in **Chapter 7** of the EIS and **Appendix T, Audibility Evaluation for Zion National Park**, in the Final EIS, regarding the noise levels associated with the National Park Services (NPS) desired conditions within its various soundscape management zones. The NPS letters detailing these desired conditions are available in **Appendix N, Coordination with the National Park Service**, in the Final EIS.

The marked, increasing disparity between these Desired Conditions and the Existing Condition and (especially) Forecast Condition, underscores the increasing NPS concern regarding Zion National Park. The Grand Canyon Trust and other environmental organizations have continually commented to FAA on this issue.

4. **NPS-determined “Desired Conditions” incorporating NA35 (“Number of Events above 35 dBA per unit time”) are critical for the various Zion National Park Management Zones. This means adding NA35 as a fourth sound metric for pivotal “Desired Conditions” noise thresholds.**

“Noticeability-Free Intervals” (which correspond to the selected NA35 thresholds) should be correspondingly determined. The “Noise-Free Intervals” (which correspond closely to NA20 impact thresholds) should likewise be computed.

KEY POINT: For purposes of “substantial impairment” discussion, related to FAA Order 1050.1E, Sec. 6.2e-f, one might reasonably (for Zion) consider NA35 thresholds for noise impact assessment⁶ in backcountry primitive, pristine, or research zones, as accelerating along the following, illustrative scale:

“NA35” (“Number of Events Above 35 dBA”), for any given hour

Minor Adverse:	> 1.0
Moderate Adverse:	> 2.0
Major Adverse:	> 4.0

Substantial Impairment⁷: > 8.0

(The above scale is illustrative only. Corresponding scales would be appropriate for longer intervals than an hour. The thresholds might be appropriately modified to account for the fact that a proportion of the visitors are experiencing several or many hours (even days) in these backcountry zones. The thresholds might be modified also for the more developed Park management zones.)

⁶ The level of a minimal, audibility-based “Noise-Free Interval” of 60 minutes has been suggested as a “desired conditions” ceiling for non-adverse, Zion backcountry noise impacts; see NPCA’s Scoping letter of Dec. 9, 2002. The Park Service, in any event, may advise the FAA as to its thresholds in this regard.

⁷ See DOT Sec. 4f/303c, as interpreted in FAA Order 1050.1E, Sec. 6.2e-f

3

4. The FAA cannot accept this suggestion to use number of events above 35 dBA (“NA35”) as a noise threshold of significance for purposes of determining “substantial impairment” under Section 4(f)/303(c). First, NA35 does not represent Department of Transportation or Department of Interior policy, or the policy of any Federal agency, for a National Environmental Policy of 1969 (NEPA) standard of significance in evaluating aircraft overflight noise for NPS units. Second, the FAA is not aware of any scientific studies or empirical research suggesting that this type of threshold is appropriate for adoption by the FAA in making its determinations of constructive use under Section 4(f)/303(c) or significance under NEPA. The extensive noise analysis in the Final EIS, which includes an audibility analysis using Integrated Noise Model (INM) v6.2b is sufficient to demonstrate that the proposed replacement airport would not result in significant noise impacts or a substantial impairment of Zion.

4

Adverse noise impacts, especially in the pristine or primitive (wilderness managed) portions of Zion, increasingly disrupt at NA35 frequencies exceeding one or two per given hour, where they cause increasing *dissipation of aesthetic value*.

Recent laboratory and field research findings confirm this point, as reported to the FAA in Scoping Comment #13, from Britton L. Mace, Ph.D., dated Dec. 6, 2002: "My colleagues and I have found statistically significant effects (in national parks) on aesthetic, affective, and cognitive scale ratings when helicopter noise is present at 40 A-weighted decibels . . ." "Results suggest that (such) noise, even at a relatively quiet 40 dB(A), interferes with many attributes considered to be important to the visitor experience, and even affects the perceived aesthetic quality of landscapes." (emphases added)

NA35 data particularly well conveys such cumulative impacts (better than Lmax or even Per Cent Time Audible) because the frequency of noticeable events, incessantly coming back into consciousness, has more impact than either many very low or very sporadic, very high magnitude events. That is why NA35 data and thresholds appear singularly appropriate for the Zion noise and DOT 4(f)/303(c) analysis.

5. (a) **Audibility Data** needs to be presented in the FEIS (and actually mapped) for all Zion National Park grid-points, modeled with INM 6.2
- (b) Observer-attended **Audibility Data** should be presented for all Zion sites where recently obtained, (i.e., the 1995 – 2003 studies.)

INM 6.2 modeling data is required in order to allow the NPS the ability to apply its selected quantitative impacts criteria re noise to its management goals (i.e., "Desired Conditions") as set forth by Park management zones.

The DEIS has not, however, produced INM 6.2 data modeling results, as promised by its original Statement of Work. As per FICAN's January 27, 2005 meeting, "INM 6.2 is the best practices modeling methodology currently available to evaluate aircraft noise in national parks." Its omission in this instance is strongly noted, now almost a year later.

Therefore, (1) Will the FEIS show INM 6.2 modeling results, at least for each grid point and observer-based site in Zion National Park? (2) Will the FEIS present previously obtained audibility data, from 1995, 1998, and 2002? (3) Will such data be adequately presented, for each of the observer-attended noise-modeling sites within Zion National Park?

Re Lmax: This, of NPS' "desired conditions" three criteria, is the only one that has been quantitatively assessed by the FAA. In that regard, we ask, are

▲

4

5. As of the completion date of the Draft EIS, a version of the INM capable of producing audibility information had not been released for public use. The FAA agreed to use the new version of the INM model, v6.2b, to calculate the requested audibility information. The results of this additional analysis are presented in **Appendix T, Audibility Evaluations for Zion National Park**, in the Final EIS.

The data reported in the 1995-2003 measurement studies at Zion is the basis of the audibility analysis presented in the Final EIS. These data were used to develop 1/3 octave band characteristics for multiple locations within Zion and then processed using the INM to produce Percent Time Audible maps of aircraft noise in Zion.

In brief, the audibility analysis indicates that at all points within Zion, the cumulative condition with the replacement airport resulted in a decrease in the minutes of audibility over a 24-hour day.

When the differences in contributions to audibility were compared for the existing and replacement airports alone, the replacement airport resulted in a decrease in the minutes audible at every point within Zion. The percent audibility for airport-only conditions ranged from 0.5 percent to 12.5 percent of the day across the airport-only cases, with average exposures ranging from 3.5 percent to 6.1 percent of the day among the three separate years that were evaluated.

5

For a full discussion of the audibility results, please see **Appendix T, Audibility Evaluations for Zion National Park**, in the Final EIS.

Regarding your comment on Lmax, the EIS provides Lmax information on each grid point in Zion, regardless of its level. Further, **Appendix B** presents information regarding the amount of time the 45 dBA level is exceeded at each grid point within Zion.

▼

5

Lmax “desired limits” now somehow set at 60 dBA, in the three most protected park zones, rather than 45 dBA, as shown in the DEIS? (See NPS Letter to Lowell Johnson, dated 2/4/05, from Jock Whitworth.) Without adequate rationale, any elevation of limits from 45 dBA to 60 dBA (not even reported, let alone explained, in this DEIS) could be viewed as arbitrary and capricious.

In our view, the published Lmax threshold of 45 dBA for non-human noise, (being more than 20 dBA above typical back-country Zion natural ambient), remains more appropriate.

6. **The indiscriminate, repeated reliance on only the broadest of averaging parameters for Zion National Park noise analysis is not sufficient, and in some cases, simply not appropriate.**

The concern for Zion National Park’s special natural quiet is at the heart of this multi-million dollar environmental impact analysis. Its noise analysis thus has to be appropriate to the needs of various classes of Zion park visitor, by zone, by time, by time of day.

Critical aspects of noise assessment, focusing on more precise periods (“daytime hours”, “12-hour day”, “15 hour day”, “peak day”, “peak hour”, particular “segments” of days, the “night” etc.) have all been unreasonably ignored. This is especially true for “Time Above” and “Number of Events Above Analyses.

The typical backcountry user is not necessarily there for 24 full hours, or even as an overnight camper. Some do camp there one or more nights. The typical park visitor may not camp, or, only in established, vehicular campgrounds. Yet both classes of visitors do use the backcountry zones. Both classes seek out contemplative time or solitude there during a particular hour they may have available, or period of any given day, or particularly upon reaching certain special settings/vistas.⁸

In general, the quality of visitor experience in Zion – oriented as it is toward landscape appreciation – is most impacted or affected by *daytime* noise intrusions, in contrast to much more sporadic night-time, noise events. Night hours coincide mainly with sleeping, social, eating, or otherwise less attentive activities, and landscape contemplation is less central (except perhaps during certain portions of moonlit periods.) Twenty-four hour *averaging* for NA, and Time Above, or for Time Audible, is therefore unacceptable, if not augmented with analysis for more precise periods, like “Peak Hour”, and “Peak Day.”

⁸ See DEIS, at page B-284: “The majority of the Park visitor activity takes place in the morning, afternoon, and early evening hours.”

5

6

6. The Draft EIS presented the standard average annual day analysis and the Final EIS also includes a sensitivity analysis for daytime hours to provide additional reference and comparison of daytime and nighttime levels. For a full discussion regarding this analysis, please see **Appendix U, 15-Hour Sensitivity Analysis**, in the Final EIS.

Most aircraft flights occur during daytime hours as described in the EIS **Chapter 6, Table 6.2, Day/Night Traffic Distribution – 2003 Conditions**, which may be compared to the 24-hour average noise levels disclosed in **Table 6.1, Average Day and Annual Operations – 2003 Current**. The metrics used in the noise analysis are described in **Appendix A** of the EIS. An average day value is computed by dividing the annual total activity by 365. The process used to establish the noise level for the 24-hour day involves noise modeling of average daytime activity coupled with an assumed average ambient level representative of the average measured L50 existing ambient level within Zion.

Unlike vehicular traffic, aircraft traffic does not experience the degree of concentration based on seasons. Throughout the year, the distribution of the great majority of the air traffic over the initial area of investigation is dependent upon national travel demand trends and varies little from month to month. Non-average days were not individually assessed as part of the EIS analysis. Hourly data is not currently available. The extensive noise analysis in the EIS, which includes the addition of an audibility analysis in **Appendix T, Audibility Evaluation for Zion National Park**, in the Final EIS, is sufficient to constitute the “hard look” required under NEPA.

"Peak Hour" was used for certain noise analyses (TA35, TA45) in the original EA's supplemental noise analysis and should be included in the DEIS.

7. **Broad Regional Context, particularly regarding aircraft flight routes, is key to understanding potential mitigations for Zion.**

We request that a wider-scope selection of Regional "Flight Density" and/or cumulative, typical-day "Flight Tracks" maps be also provided in the FEIS. Even for the limited Potential Area of Effect, the DEIS maps tended to be smaller-scope, segmented, to show type of aircraft or route track. They were not cumulative operations density depictions. (The types of wider-scope maps we suggest can be seen in the two final graphics presentations⁹ of "What Is A Natural Soundscape", a January, 2005 technical paper, at <http://www.hmmh.com> - see at "Publications".)

What we particularly request are examples of cumulative flight density, graphically mapped for a typical day (or representative parts of days), out to 500 miles, perhaps 750 miles, from Zion and the St. George Airport. These should be presented and discussed, particularly with reference to the most major airports of origin and destination, and with emphasis on consistently uneven patterns of daily density. We are interested in how any patterns may typically fluctuate by time of day, or by days of the week, or by seasons of the year, or how they could be modified to better treat Zion.

Quantified contour maps of daily, or hourly, flight density would additionally be helpful in the analysis and understanding of the broad regional sound environment, traffic patterns, and options for long distance traffic routing/mitigation. FAA and interested parties could then be able to commence the "Route Design Workshop", called for in NPCA's Scoping Letter of December 9, 2002.

Without mapped Flight Density and/or Flight Tracks – on widened regional scales – it is nearly impossible for the interested public to conceptualize what ultimate mitigation, for long distance routes, could or could not be accomplished for Zion.

8. **"Existing Conditions" (2003 or 2000 baseline data) needs to be presented, assessing current aircraft noise over Zion.**

We note the presence of 2003 operations data, as supplementing similar data presented in the original EA. This is the type of data which would underlie a "base line" year" or "present conditions" analysis, yet there does not appear to

⁹ Referring to this HMMH study's two maps, titled "Issues to Resolve", sub-titled "Jet Departures over Grand Canyon National Park, Arizona: October 17, 2000". One covers 180 x 120 miles; the other 800 x 520 miles.

6

7

8

7. The initial area of investigation surrounding the St. George airport vicinity is based on the area of potential effect at the existing or replacement airport at St. George. The cumulative effects of aviation noise within the area affected by St. George airport activity was then added to the initial area of investigation to demonstrate the cumulative condition. The study area for the St. George EIS now extends approximately 100 miles by 120 miles, covering over approximately 12,000 square miles. The noise analysis conducted in this EIS indicates that the replacement airport at St. George would not have significant impacts within the selected study area and therefore expanding the study area would not further contribute to the understanding of impacts associated with the proposed project.

The issue of mitigation for "long distance routes" is addressed in **Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park**, in the Final EIS.

8. Existing condition information was provided in the Draft EIS for the area surrounding the replacement airport within the area of significant impact as defined by FAA standards (i.e., within the 65 DNL contour). Existing condition information was not provided in the Draft EIS for areas beyond the immediate environs of the replacement airport. Under NEPA, information must be provided to compare conditions with and without the proposed action – this was accomplished by providing projected noise level information for 2010 and 2020 for the airport in its existing and replacement location, both independently and combined (cumulatively) with other aviation noise sources throughout the region.

The terms "baseline" and "current conditions" are not equivalent for NEPA purposes. "Baseline" refers to a no-action alternative (the existing airport in a future year), while "current conditions" refers to conditions (including activity at the existing airport) in a present or recent year.

Please see **Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park**, which contains a discussion of this issue.

Nevertheless, the FAA has included additional current condition information for each 4(f)/303(c) property evaluated in the EIS in **Appendix S, Noise Levels for 2003 Conditions**, in the Final EIS.

be an "Existing Conditions" Noise Analysis, produced from this data, for Zion. We also note the July 27, 2005 Consultation Letter from the Park Service at Zion to Lowell H. Johnson, asserting that "baseline year" or "present conditions" noise data should be included as part of the prerequisite cumulative impact assessment.

Without such data, we conclude that a complete cumulative impact analysis is lacking, one that takes into account the "contributions past and present, as well as reasonably foreseeable future actions, even if not directly attributable to the proposed project, but when related and taken together, may constitute a potential impact to sensitive resources." Existing Conditions Noise Analysis is explicitly called for by FAA Order 1050.1E, Sec. 14.4 (e). This responsibility is further clarified by the FAA direction concerning Sec. 14.4 (e), in *Federal Register* 69 (115) 33819.

We look forward to seeing comprehensive "Existing Conditions" Noise Data (particularly as to Zion National Park) being presented in the Final EIS, with application of the additionally precise metrics and assessment thresholds cited in the above sections.

9. **Jet Contrails over Zion are a major aesthetic, visual impact from cumulatively growing aviation over the Park. This impact needs to be assessed.**

Organizational (NPCA), Agency (EPA), and individual (Comment #17) scoping letters -- the latter even presenting representative photographs -- pointed, directly or implicitly, to the need for a visual impacts or other analysis for jet aircraft contrails over Zion National Park. Visual and aesthetic impacts are part of customary NEPA analysis and we look forward to the FEIS assessment addressing the impacts of jet contrails over Zion National Park.

10. **RE: FAA L90 "White Paper" re Zion Noise Assessment: We do not support the FAA "Explanation for Not Using L90 in the St. George EIS Noise Analysis."**

Our original position remains constant; and respects the bedrock constancy of L90. The L90 is the most appropriate indicator of the natural ambient sound levels in national parks, particularly parks such as Zion.

We here simply recite from the James D. Foch, Ph.D. Affidavit to the U.S. Court of Appeals, D.C. Circuit in our 2002 case briefs, for *Grand Canyon Trust vs. FAA*. Dr. Foch's credentials are presented there, and are well known to NPS and FAA. The second cite is from the National Park Service itself.

.....

9. The assertion in the comment that jet contrails are a major visual impact is not supported by evidence. Contrails are line-shaped "condensation trails" that are sometimes produced by aircraft engine exhaust, typically at aircraft cruise altitudes several miles above the Earth's surface. Contrails have been a normal effect of jet aviation since its earliest days. They are composed primarily of water (in the form of ice crystals) and do not pose health risks to humans. For a contrail to form, suitable conditions must occur immediately behind a jet engine in the expanding engine exhaust plume. Depending on the temperature and amount of moisture in the air at the aircraft altitude, contrails evaporate quickly (if the humidity is low) or persist (if the humidity is high). Atmospheric temperature and humidity at any given location undergo natural daily and seasonal variations and hence, are not always suitable for the formation of contrails.¹

FAA Order 1050.1E addresses visual impacts in Appendix A, Section 12. It instructs that the visual sight of aircraft, aircraft contrails, or aircraft lights at night, particularly at a distance that is not normally intrusive, should not be assumed to constitute an adverse impact. Information gathered by NPS and the U.S. Forest Service (USFS) has indicated that visual effects of aircraft or aircraft contrails are minor. Visitor survey information compiled by NPS from 39 different units of the national park system reported that 18.8 percent of visitors reported seeing aircraft and that three percent of visitors were annoyed by seeing aircraft.² The USFS study on *Potential Impacts of Aircraft Overflights of National Forest System Wilderness* (1992) found that annoyance of wilderness visitors was associated more strongly with noise exposure than with the visibility of aircraft or the condensation trail, and that aircraft were rarely noticed for visual effects alone.

¹ *Aircraft Contrails Factsheet*, U.S. Environmental Protection Agency, EPA430-F-00-005, September 2000, www.epa.gov

² *Report on Effects of Aircraft Overflights on the National Park System*, U.S. Department of the Interior/National Park Service, July 1995.

- 10 As discussed in the EIS and in **Appendix N, Attachment N-4, Explanation for Not Using L90 in the St. George EIS Noise Analysis** (in the Final EIS), the FAA and the NPS have agreed that the L50 metric is appropriate for use in this analysis. Further, an assessment of the appropriateness of L50 and L90 as representative of ambient noise levels in wilderness environments was conducted with the conclusion that the L50 median represented a better average ambient noise level because virtually all noise in such environments is from ambient sources. Therefore, L90 was not computed for the various locations within the initial area of investigation.

(I)

"The significance of L90 is simple: it is the approximately constant sound level, a resultant of many distant natural sounds, upon which nearby natural sounds (and intruding human noise) are superposed.

L90 is the most appropriate indicator for gauging noise impact to the natural soundscape. Noise levels appreciably greater than L90 will obliterate or destroy the natural soundscape." – James L. Foch, Ph.D.

.....
Our organizations believe that merely recognizing the abstract median, or the mean, of the natural sound level is not the same as appropriately embracing also the particularly striking, phenomenal low-end of the natural ambient. The L90 addresses the most critical "lulls", "interludes", or "intervals" needing protection; as the National Park Service states in its 1994 Report to Congress, with emphases added:

(II)

"Lulls in the wind or interludes between animal sounds create intervals where the quiet of a sylvan setting is quite striking. In considering natural quiet as a resource, the ability to hear clearly the delicate and quieter intermittent sounds of nature, the ability to experience interludes of extreme quiet for their own sake, and the opportunity to do so for extended periods of time is what natural quiet is all about."

-- Sec. 3.2.1 "Qualitative Assessment of Natural Quiet", from the **National Park Service** 1994 Report to Congress, "Effects of Overflights on Units of the National Park System"

.....
Therefore, we respectfully disagree with the selection of the L50 natural ambient as somehow agreed earlier this year between the FAA and the NPS, in lieu of L90. The "lulls", "interludes," "intervals", and "(striking) or (extreme) quiet" -- as in fine music -- are entirely depending upon maintaining L90 as their fundamental baseline of ambient preservation.

Our disagreement with L50 becomes all the sharper for a particular, small number, of national park units where a phenomenal degree of extended quiet (what is essentially "silent") is recognized as being an essential part of their aura, their "power of place." Zion is certifiably among that small number of

10

national parks which have been thus recognized, and deserves L90 as the recognized and protected natural ambient, wherever possible. The difference between these two exceedence levels at Zion is apparently near 4-5 dB. To some that is only a number. These numbers, however, are among the most important decibels of value in Zion. To devalue them, with any version of L50, is to unduly devalue one of the Park's most defining characteristics.

11. **Request for "User-Friendly" Graphics and Certain Cumulative Noise Analyses**

We appreciate the many elaborate, user-friendly graphic depictions and colored tabular information presented in comparing Zion noise and other area impacts. These mainly focus on the present St. George airport versus the proposed St. George replacement airport. At this point, we seek likewise "user-friendly" graphics and detail in the FEIS for facilitating analysis of other, equally important acoustic measurements and overall cumulative impact analyses for en route overflights, affecting Zion National Park.

Here are examples we request, to improve the FEIS:

- Contextual Exhibits: As context for interpreting the above, the FEIS should provide certain temporal data about aircraft operations:
 - ** Illustrate the typical, *daily*, and *nightly*, cycle—by hour—of en route Zion flyovers from all aircraft, irrespective of airport of origin. Histograms by hour would cogently and simply present the number of overflights typical, throughout the typical 24-hour day.
 - ** Illustrate, similarly, *seasonal* and *day-of-the week* fluctuations in overflights of Zion.
- Exhibit 7.7: Each grid-point for Zion should show its own, unique column and row number, within its own circle, on such templates. The reader should not have to laboriously decipher and transfer the information from elaborate tables, while depending on a "bare bones" introductory scheme such as that shown in Exhibit B.55.
- Exhibit B.55: The above principle applies here also.
- Requested Exhibit: The L50 Natural Ambient (plotted to the nearest decimal) should appear on each one of the 95 mapped grid-points for Zion.
- Requested Exhibit: The NA35 should be plotted similarly onto each Zion grid-point and observing site, for the 24 hour-day, *but also after* being serially corrected for particular more active and/or precise "per unit time" intervals, such as specified under Point "6." above. These should be also done, to the nearest decimal, for
 - ** Baseline Year (2003)
 - ** Y2010
 - ** Y2020

▲
10

11. The extensive noise analysis in the EIS is complex in nature but the agency believes that the existing documentation, including additions made to the Final EIS, are reasonable and accessible. Graphics of information not available (peaking characteristics and hourly data) are not provided. Audibility mapping is provided in **Appendix T, Audibility Evaluation for Zion National Park**, in the Final EIS.

FAA policy requires the preparation of the DNL assessment in environmental documents.

11

▲
10

- Exhibit 7.23, and Exhibit 7.25: The cumulative “Per Cent of Time Above Natural Ambient” with the Replacement Airport should likewise be comprehensively plotted (for 24-hour day, for also for 15-hour day, for 9-hour night, and for other useful, precise time parameters we have requested, and as NPS may also deem appropriate.
- Requested Exhibits: *Mapped* exhibits similar to the above, but according to the following specifications.
 1. INM 6.2 audibility data, with similar time parameters as requested above
 2. Observer-attended audibility data from the Wyle and HMMH work.
 3. “Peak Hour” and “Peak Day” modeled audibility data in addition to “Average Hour” and “Average Day” data.
 4. An Exhibit comparing INM 6.2 audibility data for at least selected Zion National Park grid points, versus:
 - (a) observer-attended audibility-logged data from the Park;
 - (b) TA20 and NA20; and TA25 and NA25 data, as derived from INM 6.1

These data and grid-points could be somewhat selective, but should cover enough data points to adequately validate the DEIS’ application of INM 6.1 over DOT 4(f) and neighboring areas, since INM 6.2 analysis for them might seem infeasible at this point. (If feasible, it should be done.)

- Requested Exhibits:
 1. “*Noise-Free Interval*” in minutes, mapped onto the 95 Zion grid points (derived from INM 6.2, or else TA20, for units of *daytime* hours or segments)
 2. *Noticeability-Free Intervals*” in minutes, mapped likewise (these to be derived from TA35 and NA35 data)
- Requested Exhibits
 1. A “template” Zion topographical map, which more clearly shows underlying trails, roads, creeks, named points of interest, and with grid-point (or encircled grid-point) overlays which do not obscure these features, useful for persons knowledgeable/interested in Zion Park land features (this would better allow relating data numbers from tables to specific landscapes and topography).
 2. Show representative “time-sound histories”, to illustrate the succession of typical single event aircraft noise events. The Wyle and HMMH studies are replete with them as raw data.

3. Show representative “single-event” instantaneous noise contours from selected types of commercial aircraft, for individual overflight of Zion.
4. Show “Indicative NA35, Average 15-Hour Day or “Per Hour” color contour graphic illustration for Zion, in years 2010 and 2020 (analogous with the NA70 plot in Fig. 4.3 in “Discussion Paper: Expanding Ways to Describe and Assess Aircraft Noise” (Australian Commonwealth Department of Transport and Regional Services, March 2000; available at <http://www.dotrs.gov.au>, or through david.southgate@dotrs.gov.au.)

For this exercise, useful color categories would roughly correspond to the “number of events” intervals keyed on the Australian graphic.

- If FEIS space becomes at issue, we suggest the FAA consider adding the above-requested exhibits, while simultaneously deleting the DNL data analysis for DOT Sec 4(f)/303c properties currently shown.

FAA Order 1050.1E, Sec. 14.3, informs that “The DNL 65 dB threshold does not adequately address the effects of noise on visitors to areas *within a national park*. . . where other noise is very low and a quiet setting is a generally recognized purpose and attribute. The Park Service itself has repeatedly explained the DNL is not especially helpful or appropriate in national park noise assessment, though it may be for other purposes. The NPCA Scoping Letter of 12/9/02, at Page 5, explains much the same point, and requested FAA to not include or rely on DNL data as an useful metric for national park noise analysis.

Unless FAA has some demonstrably useful, or appropriate, need for the DNL analysis for DOT 4(f)/303c properties, re Zion in particular, DNL could reasonably be discarded for the FEIS. By improving focus, the FEIS would thus become a much more user-friendly document..

12. Forecasting

The predicted St. George Airport operations numbers, and Zion cumulative “overflights” numbers from all airports, seem very high for 2010 and 2020. This is based on current conditions and world events, especially regarding current oil prices and recent trends in air travel, and airline route restructuring and solvency. FAA’s 2005 Aerospace Forecasts (March, 2005), for example,

11

12. The past history of fuel fluctuations (i.e., oil embargo, economic downturns, bankruptcies, etc.) does not indicate any significant reduction in the rate of growth in passenger demand or aviation activity except in the general aviation sector. What general aviation activity remains is largely non-discretionary and takes place in support of business activities. Airlines are, as a group, generally unaffected by these factors because they pass the additional costs through to the passenger. The forecasts, as developed for the St. George evaluation are developed from the bottom up with the participation of the users of the facility, the air carriers and the general aviation operators, and consequently, are likely to be more accurately representative of future conditions than forecasts drawn from national totals down to local conditions.

In early 2006, the FAA published their annual Terminal Area Forecast (TAF) of aviation activity for airports throughout the U.S. Upon review of the 2006 TAF and the forecast used for this EIS, the FAA has determined that the EIS forecast remains consistent with and within the criteria of acceptability (10 percent for the 5-year time horizon and 15 percent for the 10-year time horizon) with the newly published TAF. Furthermore, the EIS forecast of operations and the 2006 TAF operations numbers are within one percent of one another.

12

derive from its contained, faulty economic assumption that the price of jet fuel would be at 75-80 cents per gallon, between 2005 and 2010. Presently, these prices remain sustained in the \$2.50 to \$2.80 range (at least triple the forecast assumption.) Experienced observers do not expect significant long-term reductions to anywhere near the originally forecast fuel price levels.

Request: Even if not incorporated into the detailed noise analyses, please update the best available forecast data, from the soon-to-be released 2006 FAA Aerospace Forecast, in Cumulative Analysis Table 7.1, "Current and Forecast Operations" (Page 7-7). (One might prudently anticipate at least a possible acknowledgement at that point, by the FAA, that it no longer anticipates so high a sustained (3.6%) annual growth rate in U.S. operations.) Any revised, cumulative growth rate percentage should be presented as new information, in the FEIS.

13. Psychological Impacts Assessment

Please list and qualify actual or potential psychological impacts on Zion backcountry users exposed to hours and/or days of unmitigated, protracted, cumulative frequencies of overflight noise events, particularly at highly noticeable Lmax levels near or exceeding 40 dBA.

This request is consistent with comments and references provided in the 12/9/02 NPCA Scoping letter, at Page 5, also with scoping comments simultaneously received from Britton L. Mace, Ph.D, cited in the NPCA letter.

14. Air Tour Data

The air tour data in Appendix C (re: Zion, Bryce, and Cedar Breaks) should be reconciled with approved air tour "Interim Operating Authority" numbers for those Parks, as reported in the FAA's Federal Register Notice of October 7, 2005, "Supplement to Notice of Interim Operating Authority Granted to Commercial Air Tour Operators Over National Parks and Tribal Lands Within or Abutting National Parks."

15. Desired Conditions: (NPS, Zion)

A simple summary comparison, of the likely quantitative correlation between unweighted and weighted audibility, at various dB levels, as per NPS "Desired Conditions" for Zion, should be provided, to aid the general public and decision-makers.

16. Unwarranted Use of "Existing Ambient" instead of Natural Ambient for DOT 4(f)/303c Properties other than Zion National Park

▲
12
13
14
15
16
▲

13. No health or welfare impacts are known to occur at the low levels of aircraft noise currently occurring in or predicted for Zion. A maximum sound level of 40 dBA is not loud, and most of the aircraft over Zion have lower maximum levels than 40 dBA. Average aircraft sound levels are in the 30's dBA.

To put this sound level into context, below is an excerpt of examples of average sound levels in national parks from a poster used by FAA and NPS at NEPA scoping meetings for Grand Canyon overflights and some common noise equivalencies.

dBA	National Park Average Sound	Indoor Equivalent Sound	Outdoor Equivalent Sound
20's	Canyonlands National Park, leaves rustling	Recording studio / Concert Hall background noise	Quiet rural nighttime
30's	Grand Canyon, High altitude airline overflight	Library	Quiet suburban nighttime
40's	Zion National Park, Crickets (5 m)	Small theatre background noise	Quiet urban nighttime
60's	Whitman Mission, Speech (3 m)	Normal speech at three feet	Commercial area

Studies that have been done on effects of aircraft noise on visitors to national parks or wilderness areas have focused on annoyance and interference with enjoyment. The *Report on Effects of Aircraft Overflights on the National Park System* (NPS 1995) and the *Potential Impacts of Aircraft Overflights of National Forest System Wilderness* (U.S. Forest Service 1992) are large-scale studies in which a concerted effort was made to apply quantitative methods to outdoor recreationists' reactions to aircraft noise exposure in wilderness-type environments.

The NPS study reported that about a fifth of all park visitors recalled hearing airplane noise (including visitors to parks with frequent low-altitude air tour flights). Two to three percent of visitors thought aircraft noise had an impact on them, and less than two percent of visitors believed that aircraft noise interfered with enjoyment of their visits or was annoying. Among park visitors who expressed annoyance of any degree, most reported they were slightly or moderately annoyed. NPS surmised that negative reactions to aircraft noise would be stronger among people who spent more time in isolated areas and may have different expectations about solitude. When questioned by mail after their park visits, about a third of wilderness permit holders recalled some annoyance or intrusion from aircraft noise during their outdoor recreation experiences. [continued ▼]

▲
13

[▲continued] The major emphasis of the USFS study was to determine the effects of aircraft overflights on visitor enjoyment in remote wilderness areas. Wilderness visitors were interviewed during and shortly after their wilderness visits to assess the impact from exposure to aircraft overflights. Key findings of this study included:

- Aircraft noise intrusions did not appreciably impair the surveyed wilderness users' overall enjoyment of their visits or reduce their reported likelihood of repeat visits.

The majority of wilderness visitors interviewed were not annoyed by overflights. The visitors, in general, did not notice aircraft even when they were present. This was especially true for high altitude aircraft. Low-altitude, high-speed aircraft were reported as the most annoying type of aircraft.

14. The most recent Interim Operating Authority (IOA) data was used in the preparation of the EIS.

15. Information is provided in **Chapter 7** and **Appendix T, Audibility Evaluations for Zion National Park**, in the Final EIS regarding the noise levels associated with the NPS desired conditions within its various soundscape management zones. The NPS letter detailing these desired conditions is available in **Appendix N, Coordination with the National Park Service**, in the Final EIS.

As noted by the NPS in its comments to the FAA regarding noise evaluations within Zion, the analysis of unweighted noise levels is not possible using INM version 6.1. The audibility analysis prepared for the Final EIS provides an assessment of the time aircraft are audible at various locations within Zion using unweighted 1/3 octave band data and INM v6.2b. Please see **Appendix T, Audibility Evaluation for Zion National Park**, in the Final EIS.

The use of “existing ambient” as baseline for the other DOT 4(f)/303c properties does not seem scientifically supported. The DOT 4(f)/303c ambient threshold of 29 dBA throughout appears, 5-10 dBA high. Recent Grand Canyon natural ambient data charts show such levels typical only of Ponderosa-type forest, and near rapidly running water. We request correction by substituting the natural ambient levels used for the Black Mountain Petroglyph special noise analysis, which appeared to be 20 dBA; and, better still, use/develop available L90 data for other such properties. A “reasonableness test” could be prudently developed, by simply measuring the natural ambient L90 for a representative sample of other DOT 4(f)/303c properties.

17. **Leq Increases During Forecast Period**

We note Zion grid-point Leq increases, averaging about 1.5 dBA, during the 2010-2020 forecasting interval alone. This is a cause of considerable concern. As per the NPA/Grand Canyon Trust Letter of 3/30/01, commenting on the EA’s Record of Decision, we repeat that a few-decibel rise in Leq over x number of years is by no means “de minimus”, for national park areas, Zion in particular. We, and many commentators have observed this. Since no “Existing Conditions” Noise Data (2003) appeared in the DEIS, we don’t know what further increase FAA predicts for Leq between 2003 and 2020, in Zion.

Request: Please calculate the 2003 to 2020 increases in daily and daytime Leq, and for “Peak Hour”, and show for all grid-points in Zion. This can be irrespective of which St. George airport, and could be either with the airport omitted or included.

▲
16
17

16. The average of measured ambient L50 levels in Zion at thirteen separate locations is considered to be more representative of average ambient noise levels throughout the initial area of investigation because they were measured over several seasons, cover a longer sampling period, and reflect a variety of topographic and surface cover conditions found throughout the region. The Little Black Mountain Petroglyph Site measurements were made in winter during a period of less local overflight activity, were sited to record noise on one property, and consequently reflect limited topographic and surface vegetation conditions specific only to that property. Therefore, the considerably greater quantity of measurement data available from Zion is considered to be more representative of the average conditions in the region. That data has been accepted by the NPS as representative of conditions throughout Zion and other NPS properties in the area. Owing to the similarity of natural conditions in Zion (weather, vegetation, topography, soils, etc.) to the natural conditions present in other noise-sensitive locations throughout the region, the FAA has concluded that the noise levels measured in Zion will adequately represent ambient noise conditions in other 4(f)/303(c) locations as well.

17. As noted in Comment #8, the FAA is providing current noise level information for all noise metrics, except audibility, at all identified 4(f)/303(c) locations within the initial area of investigation. That information is disclosed in the Final EIS in **Appendix S, Noise Levels for 2003 Conditions**.

As noted in Comment #6, a discussion of 15-hour vs. 24-hour day can be found in **Appendix U, 15-Hour Sensitivity Analysis**, in the Final EIS. Peak hour information is not available and will not be computed for existing or future conditions.



TOWN OF ROCKVILLE

PO Box 680206
Rockville, UT 84762
Phone/Fax (435) 772-0992

Founded 1862
Incorporated June 30, 1987

November 4, 2005

David Fields, Project Manager
St. George Replacement Airport EIS FAA
Northwest Mountain Region
1601 Lind Ave., NW, Ste 315
Renton, WA 98055-4056

Dear Mr. Fields:

I am writing on behalf of the Town of Rockville with concerns about the St. George Replacement Airport and its potential for excessive aircraft noise over Zion National Park.

The Draft Environmental Impact Statement (EIS) does not recognize or mitigate the impacts of the noise from all aircraft from all airports that may overfly Zion National Park. You may not fully realize the noise level generated by even small aircraft and helicopters that currently fly over the Park on rescue or fire suppression missions, but the canyon amplifies the sound.

Proposed routes should be located north of Zion National Park and not over the Park. Please be realistic and do all you can to protect the solitude of this great park. With the crush of "progress" all around us, we all need Zion National Park for the refuge that it offers humans as well as the varied wildlife.

I urge you, again on behalf of the citizens of Rockville, to do all you can to reconcile proposed actions by revising air traffic routes around Zion National Park and not over it.

Sincerely,
Dan McGuire, Mayor
Town of Rockville

cc: Town Council
Planning Commission

1. Through the analysis of cumulative noise effects presented in Chapter 7 and detailed in Appendix B, the EIS discloses the noise effects of aircraft from airports other than St. George Municipal Airport. Aircraft and helicopters conducting rescue or fire suppression missions within the initial area of investigation are among those general aviation operations that cannot be forecast and for which no records are available. Therefore, adequate information is not available to model the potential noise effects. The effects of these operations however are believed to be inconsequential to the average annual conditions, although single flights by such aircraft may be considered intrusive by an observer on the ground. Nevertheless, it is expected that these operations will continue throughout the planning horizon and the location of the municipal airport in St. George will have no effect on noise levels or frequency of flights.

Regarding mitigation, please see the Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park, in the Final EIS.

2. Theoretically, canyons may amplify noise levels by up to three decibels; however, the Integrated Noise Model does not capture echoes (the refraction and reflection of the sound) associated with great variations of surface topography.

3. Regarding air traffic routes, please see Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park and Appendix X, Monitored Noise Abatement Initiatives, in the Final EIS.

1
2
3

**COMMENT FORM
PUBLIC MEETING AND PUBLIC HEARING
DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE
PROPOSED REPLACEMENT AIRPORT
ST. GEORGE, UTAH
OCTOBER 19, 2005**

Welcome to the Public Meeting and Public Hearing for the Draft Environmental Impact Statement (EIS) for the proposed replacement airport at St. George, Utah. Public comments are an integral part of the environmental assessment process. This comment form is provided to receive your input and ensure that your concerns are considered during the preparation of the Final EIS. Please use this form to submit written comments, attaching additional pages if necessary. Either leave the form with a staff member here at the meeting, or mail or fax it to the address below, **postmarked by November 8, 2005**. Comments can also be e-mailed to the address below and must also be received by November 8, 2005. Comments received via fax or e-mail will only be accepted with the full name and address of the sender. The FAA's response to comments will be included in the Final Environmental Impact Statement. Please note that this form is pre-addressed on the reverse side if you wish to fold and mail this sheet with your comments.

I am particularly concerned about commercial airline flights over Zion N.P. Not only do they present a noise problem but ^{they} also present a visual problem, i.e., contrails. As a photographer, I get very annoyed when a contrail appears in a beautiful photograph in an otherwise pristine sky. Given modern navigation capabilities (GPS, etc), it should not be difficult to route commercial aircraft around Zion N.P. (as well as other National Parks).

1. Please see Appendix W, *Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park*, in the Final EIS.

Submit comments postmarked by November 8, 2005 to:

David Field
Manager, Planning/Programming Branch
Airports Division
FAA, Northwest Mountain Region
1601 Lind Avenue, S.W., Suite 315
Renton, WA 98055-4056
Telephone: (425) 227-2610 or 2600
Fax: (425) 227-1600
Email: David.Field@faa.gov

FROM (Please Print):

Name: Jim Case
Address: 95 S. Columbia Way
Cedar City UT 84720-2854
jimcase@netutah.com

From: "John Singleton" <jsandjs@sunrivertoday.com>
Sent: 10/28/2005 12:42 PM
To: David Field
Subject: EIS St. George Airport

Dear Mr. Field:

As a resident of the newly established community of Sun River, St. George, Utah, I am deeply concerned regarding the impacts of the landing and take off patterns, over-flights and noise that will be generated by aircraft arriving and departing from the proposed new airport. Have abatement studies been performed to mitigate these foreseeable problems for this area?

1

Zion Park seems to get all the attention regarding these problems. Sun River is much closer, approximately four to five miles distance from the proposed airport. With this close proximity I am certain the above mentioned problems could occur.

2

If deemed necessary, a committee can quickly be formed by this community to oppose the EIS if it appears that our life style will be adversely impacted by this airport location.

Your rapid response is appreciated.

Respectfully yours,

John Singleton
1805 Wide River Drive
St. George, Utah 84790
Phone/fax 435-773-4888
jsandjs@sunrivertoday.com

1. Thank you for your interest in this project. Please see **Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park**, and **Appendix X, Monitored Noise Abatement Initiatives**, in the Final EIS.
2. SunRiver is located approximately four miles southwest of the existing airport and approximately five miles west of the proposed replacement airport. SunRiver is currently overflowed by arriving and departing aircraft at the existing airport. With implementation of the proposed action, the SunRiver community will still be overflowed by aircraft arriving or departing the replacement airport. Due to the location of the airport east of the community and the arrival and departure corridors oriented in a primarily north-south direction, the overflights generated by the replacement airport should be fewer than what is experienced now and those overflights should be at higher altitudes (see **Exhibit 6.21 and Exhibit 6.24** in the Draft EIS). The high altitude overflights generated by airports outside of the Initial Area of Investigation (i.e., Las Vegas, Salt Lake City, Los Angeles, Denver, etc.) will not change with development of the replacement airport.

- Submitted Via E-mail -

From: "Lisa Zumpft" <zumpft@aol.com>
Sent: 10/31/2005, 08:59 PM
To: David Field
Subject: Draft EIS of the new proposed St. George Airport - Protect Zion National Park's Quiet Solitude

I am writing in regards to the Draft EIS of the new proposed St. George Airport. It doesn't protect Zion National Park from noise impacts of flight paths. The Draft EIS says there will be no impact to the Park from the new proposed airport. I disagree. The new proposed flight route to Denver from the new proposed St George Airport should be located north of Zion National Park and not over the park.

The Draft EIS doesn't recognize or mitigate the impacts of noise from all aircraft from all airports over Zion National Park.

The Final EIS needs to Report "Audibility" data, both from already conducted observer-attended logging sites in Zion, and using the new FAA noise model INM 6.2, which FAA promised in the Scope of Work, and then didn't model from. Without audibility data, the NPS does not have the ability to apply its selected quantitative impacts criteria re noise to its management goals (i.e., Desired Conditions") as set forth by Park Management Zones.

The Draft EIS didn't analyze the future impacts to the Park as planes get bigger and there are more flights.

Mitigation of all aircraft noise over Zion, from whichever origin, should be analyzed in the EIS. The cumulative impacts as seen from this study are already unacceptable, and rising steadily.

The Draft EIS indiscriminately, repeats reliance on only the broadest averaging parameters for Zion Park noise analysis and is not acceptable.

The Draft EIS noise assessment should be sharpened to focus on "Peak Days", "Peak Hour(s)", etc. Not just 24-hour days, as they do. At minimum the EIS should compare "Day" and "Night" noise impacts, in terms of their "Number of Events Above" assessments, NA35 being perhaps the most useful, also in terms of Per Cent Time Audible. FAA in the EIS should apply the same principle to all its "Per Cent Time Audible" calculations for Zion, as well.

The EIS should have more precise cumulative impacts assessments (irrespective of originating/departing, old or new St. George airport) and should be plainly plotted for each grid-point on the Zion map. Using Time Above, and Number of Events Above. Especially TA 20 and NA35

1

1. Please see **Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park**, in the Final EIS.

2

2. Please see **Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park**, in the Final EIS.

3

3. As of the completion date of the Draft EIS, a version of the Integrated Noise Model (INM) capable of producing audibility information had not been released for public use. The FAA agreed to use the new version of the INM model, v6.2b, to calculate the requested audibility information. The results of this additional analysis are presented in **Appendix T, Audibility Evaluations for Zion National Park**, in the Final EIS.

4

4. Please see **Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park** and **Appendix X, Monitored Noise Abatement Initiatives**, in the Final EIS.

5

5. The Draft EIS presented the standard average annual day analysis and the Final EIS also includes a sensitivity analysis for daytime hours to provide additional reference and comparison of daytime and nighttime levels. Please also see **Appendix U, 15-Hour Sensitivity Analysis**, in the Final EIS.

6

6. The evaluation of the cumulative noise levels within Zion National Park (Zion) with and without the proposed replacement airport is presented in **Chapter 7** and **Appendices B and T** of the EIS. The EIS discloses that the cumulative noise effects of the proposed airport would not substantially differ from those of the existing airport and that the proposed airport would reduce the time audible of aircraft over Zion.

[continued ▼]

Also, the EIS should similarly report "Current Conditions" for noise, based on 2000 or 2003 baseline year. (The Draft only has the years for 2010 and 2020, omitting the baseline altogether.)

Lisa Zumpft
PO Box 413
Springdale, UT 84767
435-772-0435

▲
6

▲
6.

[▲continued] The FAA has added to the Final EIS, current noise level information for all noise metrics, except audibility, at all identified 4(f)/303(c) locations within the initial area of investigation. See **Appendix S, Noise Levels for 2003 Conditions**, in the Final EIS.

Nov. 1, 2005

Dear Sir,

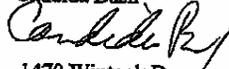
I am a resident of St George, Utah, and am writing to urge you to please do all you can to mitigate the noise that will be caused by the new airport in Zion National Park. The peace and serenity of that area is one of our most precious resources. The impact that overflying jets will have will be enormous. Surely, flights can be diverted around it?

I have recently been greatly saddened by the new helicopter concession overflying Bryce. What a very bad idea that was. A few people make a lot of money, a handful of (usually wealthy) people get to overfly the park in a chopper, and the rest of us are just plain screwed. The noise is incredible.

Please don't let that same kind of racket drown out the pleasure of Zion. Soon there will be nothing left.

Sincerely,

Candida Bush



1470 Wintook Dr.

Ivins, UT 84738

1

1. Thank you for your interest in this project. Your comments have been noted. Specifically, please see **Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park, and Appendix X, Monitored Noise Abatement Initiatives**, in the Final EIS.

- Submitted Via E-mail -

From: Megan and Bob Orton
<ReduceReuseRecycle@zionbunkhousebedandbreakfast.com>
Sent: 11/02/2005, 07:23 PM
To: David Field
Subject: St. George Airport

We have already written to express our concerns in general terms. Here they are in terms specific to the EIS.

The new proposed flight route to Denver from the new proposed St George Airport should be located north of Zion National Park and not over the park.

The Draft EIS doesn't recognize or mitigate the impacts of noise from all aircraft from all airports over Zion National Park.

FAA used a flawed Model to analyze impacts in the Draft EIS. The Final EIS needs to Report "Audibility" data, both from already conducted observer-attended logging sites in Zion, and using the new FAA noise model INM 6.2, which FAA promised in the Scope of Work, and then didn't model from.

Without audibility data, The NPS does not have the ability to apply its selected quantitative impacts criteria re noise to its management goals (i.e., Desired Conditions") as set forth by Park Management Zones.

The Draft EIS didn't analyze the future impacts to the Park as planes get bigger and there are more flights.

Mitigation of all aircraft noise over Zion, from whichever origin, should be analyzed in the EIS. The cumulative impacts as seen from this study are already unacceptable, and rising steadily.

The Draft EIS indiscriminately, repeats reliance on only the broadest averaging parameters for Zion Park noise analysis and is not acceptable.

The Draft EIS noise assessment should be sharpened to focus on "Peak Days", "Peak Hour(s)", etc. Not just 24-hour days, as they do.

At minimum the EIS should compare "Day" and "Night" noise impacts, in terms of their "Number of Events Above" assessments, NA35 being perhaps the most useful, also in terms of Per Cent Time Audible.

FAA in the EIS should apply the same principle to all its "Per Cent Time Audible" calculations for Zion, as well.

1

1. Thank you for your interest in this project. Please see **Appendix W, issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park**, in the Final EIS, in response to your comment on the new Denver flight.

2

2. Through the analysis of cumulative noise effects presented in **Chapter 7** and detailed in **Appendix B** and **Appendix T, Audibility Evaluations for Zion National Park** (in the Final EIS), the EIS discloses the noise effects of aircraft from airports other than St. George Municipal Airport. This topic is also discussed in **Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park**, in the Final EIS.

3

3. As of the completion date of the Draft EIS, a version of the Integrated Noise Model (INM) capable of producing audibility information had not been released for public use. The Federal Aviation Administration agreed to use the new INM model v6.2b to calculate the requested audibility information. The results of this additional analysis are presented in **Appendix T, Audibility Evaluations for Zion National Park**, in the Final EIS.

4

4. Through the analysis of cumulative noise effects presented in **Chapter 7** and detailed in **Appendices B and T**, the EIS discloses the noise effects of aircraft from airports other than St. George Municipal Airport. This topic is also discussed in **Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park**, in the Final EIS.

5

5. The Draft EIS presented the standard average annual day analysis and the Final EIS also includes a sensitivity analysis for daytime hours to provide additional reference and comparison of daytime and nighttime levels. Please also see **Appendix U, 15-Hour Sensitivity Analysis**, in the Final EIS.

The EIS should have more precise cumulative impacts assessments(irrespective of originating/departing, old or new St.George airport) and should be plainly plotted for each grid-point on the Zion map. Using Time Above, and Number of Events Above. Especially TA 20 and NA35

6

Also, the EIS should similarly report "Current Conditions" for noise, based on 2000 or 2003 baseline year. (The Draft only has the years for 2010 and 2020, omitting the baseline altogether.)

7

We moved here to escape the noise and pollution of city living. We want the quiet and clean air preserved.

Megan & Bob Orton
P.O. Box 630146
Rockville, Utah 84763

"There is no revenge so complete as forgiveness."
Josh Billings
1815-1885, Humorist and Lecturer

From: Megan and Bob Orton
<ReduceReuseRecycle@zionbunkhousebedandbreakfast.com>
Sent: 10/30/2005, 05:48 PM
To: David Field
Subject: St.George, Utah airport

Dear Mr. Field,

We are residents of Rockville Utah near Zion National Park. We are extremely concerned that no flight patterns be permitted within earshot of Zion National Park. We know first hand what has happened to Toroweap on the North Rim of the Grand Canyon where aircraft are allowed to destroy the powerful quiet and natural splendor of the area by the constant buzz buzz of tour aircraft. We do not want that to happen to our area. We want the flight patterns to be limited to areas that will not be impacted as severely as would ours.

8

Megan & Bob Orton
P.O. Box 630146
Rockville, Utah 84763

"There is no revenge so complete as forgiveness."
Josh Billings
1815-1885, Humorist and Lecturer

6. The evaluation of the cumulative noise levels within Zion National Park (Zion) with and without the proposed replacement airport is presented in **Chapter 7** and **Appendices B and T** of the EIS. The EIS discloses that the cumulative noise effects of the proposed airport would not substantially differ from those of the existing airport and that the proposed airport would reduce the time audible of aircraft over Zion.
7. The FAA has added to the Final EIS current noise level information for all noise metrics, except audibility, at all identified 4(f)/303(c) locations within the initial area of investigation. Please see **Appendix S, Noise Levels for 2003 Conditions**, in the Final EIS.

8. Please see **Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park, and Appendix X, Monitored Noise Abatement Initiatives**, in the Final EIS.

1797 Wide River Drive
St. George, UT 84790
November 2, 2005

David Field
St George replacement airport EIS FAA
Northwest Mountain Region
1601 Lind Ave., SW Ste. 316
~~Renton, WA 98056-4056~~

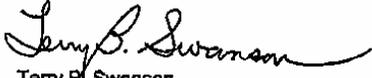
Dear Mr. Field:

I am a resident of St. George, UT and an avid hiker. Much of my hiking is done in Zion National Park where not only is the beauty outstanding but the solitude only adds to the experience. I am also a private pilot and love flying and all its joys.

I urge you, consistent with safety, to make every attempt to keep traffic above and near Zion to the absolute minimum.

Certainly St. George needs this new airport but we must also protect Zion, a true national treasure!

Regards,


Terry B. Swanson
TBS:mjh

1

1. Thank you for your interest in this project. Please see **Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park**, and **Appendix X, Monitored Noise Abatement Initiatives**, in the Final EIS.

- Submitted Via E-mail -

From: Kathleen Kavarra Corr <kavarra@yahoo.com>
Sent: 11/03/2005 04:15 PM
To: David Field
Subject: Zion National Park Protection from noise

* the new proposed flight route to Denver from the new proposed St George Airport should be located north of Zion National Park and not over the park.

*The Draft EIS doesn't recognize or mitigate the impacts of noise from all aircraft from all airports over Zion National Park.

*FAA used a flawed Model to analyze impacts in the Draft EIS. The Final EIS needs to Report "Audibility" data, both from already conducted observer-attended logging sites in Zion, and using the new FAA noise model INM 6.2, which FAA promised in the Scope of Work, and then didn't model from.

Without audibility data, The NPS does not have the ability to apply its selected quantitative impacts criteria re noise to its management goals (i.e., Desired Conditions") as set forth by Park Management Zones.

* The Draft EIS didn't analyze the future impacts to the Park as planes get bigger and there are more flights.

*Mitigation of all aircraft noise over Zion, from whichever origin, should be analyzed in the EIS. The cumulative impacts as seen from this study are already unacceptable, and rising steadily.

***The Draft EIS indiscriminately [sic], repeats reliance on only the broadest averaging parameters for Zion Park noise analysis and is not acceptable.

**The Draft EIS noise assessment should be sharpened to focus on "Peak Days", "Peak Hour(s)", etc. Not just 24-hour days, as they do.

At minimum the EIS should compare "Day" and "Night" noise impacts, in terms of their "Number of Events Above" assessments, NA35 being perhaps the most useful, also in terms of Per Cent Time Audible.

FAA in the EIS should apply the same principle to all its "Per Cent Time Audible" calculations for Zion, as well.

Dear Mr. Field,

Have you ever spent some time in Zion national park? Please do. The quiet and darkness and peace seep into the soul. Not many places left like it....

1

2

3

4

5

6

1. Thank you for your interest in this project. Please see **Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park**, and **Appendix X, Monitored Noise Abatement Initiatives**, in the Final EIS.
2. Through the analysis of cumulative noise effects presented in **Chapter 7** and detailed in **Appendices B and T**, the EIS discloses the noise effects of aircraft from airports other than St. George Municipal Airport. Please also see **Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park**, and **Appendix X, Monitored Noise Abatement Initiatives**, in the Final EIS.
3. As of the completion date of the Draft EIS, a version of the Integrated Noise Model (INM) capable of producing audibility information had not been released for public use. The FAA agreed to use the new INM model v6.2b to calculate the requested audibility information. The results of this additional analysis are presented in **Appendix T, Audibility Evaluations for Zion National Park**, in the Final EIS.
4. Please see **Appendix W, issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park**, and **Appendix X, Monitored Noise Abatement Initiatives**, in the Final EIS.
5. The Draft EIS presented the standard average annual day analysis and the Final EIS also includes a sensitivity analysis for daytime hours to provide additional reference and comparison of daytime and nighttime levels. Please see **Appendix U, 15-Hour Sensitivity Analysis**, in the Final EIS.

So please issue a review of the noise impacts from the new St. George/Washington [sic] County airport.

The impacts of increased airport noise on Zion National Park has not been properly assessed in relation to the new and massively expanded airport in St. George, UT.

I would appreciate a new and more honest and accurate assessment of the additional noise levels in the National Park as mandated.

I am a former Park ranger, US Citizen, and Ph.D. candidate doing research in relation to the Virgin River. If you need a rationale for doing so read on, If you realize the power, and Godlike presence of silence and natural sounds then you will do the right thing and read on anyway...

Thank you for your time and consideration,

Kathleen Corr
PO Box 613
Springdale, Utah 84767

The EIS should have more precise cumulative impacts assessments (irrespective of originating/departing, old or new St. George airport) and should be plainly plotted for each grid-point on the Zion map. Using Time Above, and Number of Events Above. Especially TA 20 and NA35

Also, the EIS should similarly report "Current Conditions" for noise, based on 2000 or 2003 baseline year. (The Draft only has the years for 2010 and 2020, omitting the baseline altogether.)



6



6

7

6. The evaluation of the cumulative noise levels within Zion National Park (Zion) with and without the proposed replacement airport is presented in **Chapter 7** and **Appendices B and T** of the EIS. The EIS discloses that the cumulative noise effects of the proposed airport would not substantially differ from those of the existing airport and that the proposed airport would reduce the time audible of aircraft over Zion.

7. The FAA has added to the Final EIS current noise level information for all noise metrics, except audibility, at all identified 4(f)/303(c) locations within the initial area of investigation. Please see **Appendix S, Noise Levels for 2003 Conditions**, in the Final EIS.

From: Barry <rubrpoet@infowest.com>
Sent: 11/06/2005, 10:18 AM
To: David Field
Subject: formal comments on FAA Draft EIS

Dear Mr. David Field,

Please Include the below comments in your formal process as part of the final EIS for the St George [sic] Airport proposal.

* the new proposed flight route to Denver from the new proposed St George Airport should be located north of Zion National Park and not over the park.

1

1. Thank you for your interest in this project. Please see **Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park**, in the Final EIS, in response to your comment on the new Denver flight.

*The Draft EIS doesn't recognize or mitigate the impacts of noise from all aircraft from all airports over Zion National Park.

2

2. Through the analysis of cumulative noise effects presented in **Chapter 7** and detailed in **Appendix B** and **Appendix T, Audibility Evaluations for Zion National Park** (in the Final EIS), the EIS discloses the noise effects of aircraft from airports other than St. George Municipal Airport.

*FAA used a flawed Model to analyze impacts in the Draft EIS. The Final EIS needs to Report "Audibility" data, both from already conducted observer-attended logging sites in Zion, and using the new FAA noise model INM 6.2, which FAA promised in the Scope of Work, and then didn't model from. Without audibility data, The NPS does not have the ability to apply its selected quantitative impacts criteria re noise to its management goals (i.e., Desired Conditions") as set forth by Park Management Zones.

3

3. As of the completion date of the Draft EIS, a version of the Integrated Noise Model (INM) capable of producing audibility information had not been released for public use. The Federal Aviation Administration (FAA) agreed to use the new INM model v6.2b to calculate the requested audibility information. The results of this additional analysis are presented in **Appendix T, Audibility Evaluations for Zion National Park**, in the Final EIS.

* The Draft EIS didn't analyze the future impacts to the Park as planes get bigger and there are more flights.

4

*Mitigation of all aircraft noise over Zion, from whichever origin, should be analyzed in the EIS. The cumulative impacts as seen from this study are already unacceptable, and rising steadily.

***The Draft EIS indiscriminately, repeats reliance on only the broadest averaging parameters for Zion Park noise analysis and is not acceptable.

**The Draft EIS noise assessment should be sharpened to focus on "Peak Days", "Peak Hour(s)", etc. Not just 24-hour days, as they do.

At minimum the EIS should compare "Day" and "Night" noise impacts, in terms of their "Number of Events Above" assessments, NA35 being perhaps the most useful, also in terms of Per Cent Time Audible.

5

4. Through the analysis of cumulative noise effects presented in **Chapter 7** and detailed in **Appendix B**, the EIS discloses the noise effects of aircraft from airports other than St. George Municipal Airport. Please also **Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park**, and **Appendix X, Monitored Noise Abatement Initiatives**, in the Final EIS.

FAA in the EIS should apply the same principle to all its "Per Cent Time Audible" calculations for Zion, as well.

5. The Draft EIS presented the standard average annual day analysis and the Final EIS also includes a sensitivity analysis for daytime hours to provide additional reference and comparison of daytime and nighttime levels. Please also see **Appendix U, 15-Hour Sensitivity Analysis**, in the Final EIS.

The EIS should have more precise cumulative impacts assessments (irrespective of originating/departing, old or new St. George airport) and should be plainly plotted for each grid-point on the Zion map. Using Time Above, and Number of Events Above. Especially TA 20 and NA35

6

Also, the EIS should similarly report "Current Conditions" for noise, based on 2000 or 2003 baseline year. (The Draft only has the years for 2010 and 2020, omitting the baseline altogether.)

7

Thanks you for your time & consideration.

Sincerely,

Barry Sochat
218 River Road
Rockville, Utah 84763
(435) 772-3441

6. The evaluation of the cumulative noise levels within Zion National Park (Zion) with and without the proposed replacement airport is presented in **Chapter 7** and **Appendices B and T** of the EIS. The EIS discloses that the cumulative noise effects of the proposed airport would not substantially differ from those of the existing airport and that the proposed airport would reduce the time audible of aircraft over Zion.
7. The FAA has added to the Final EIS current noise level information for all noise metrics, except audibility, at all identified 4(f)/303(c) locations within the initial area of investigation. Please see **Appendix S, Noise Levels for 2003 Conditions**, in the Final EIS.

- Submitted Via E-mail -

From: lcgallia@att.net
Sent: 11/06/2005, 10:33 AM
To: David Field
Subject: Draft EIS St George Airport

Dear Mr. Field,

I am a home owner in Springdale, UT. My land borders on Zion National Park. I also am a former general aviation pilot. I am concerned that the noise from the increased regional jet traffic from the proposed new airport in St. George will disturb the serenity of the Park. I request that the FAA encourage SkyWest and other regional air carriers to have all SGU jet traffic diverted around the Park. I looked over the Draft EIS and I appreciate the responses from the air tour operators in the appendices. I hope that there will be no increase in air tours over the Park secondary to the new facility as their replies indicate. I also request that the FAA and the airport operator commit to a strong [sic] education program that makes transient aviators (including the military) aware of the flight limits over the Park and Springdale.

Sincerely,

Leonard (Leo) Gallia
107 Parunuweap Cr.
P O Box 58
Springdale, UT 84767

1

1. Thank you for your interest in this project. Please see **Appendix X, *Monitored Noise Abatement Initiatives***, in the Final EIS, which deals with voluntary routing around the park.

November 7, 2005

David Field
Project Mger/St George Airport
NW Mountain Region
1601 Lind Ave SW Ste 315
Renton, WA 98055-4056

Dear Mr Field:

I am a Professor of Public Policy specializing in public lands, and I am writing to express my concerns regarding the St George Airport DEIS. It is quite clear to me that the finding of "no impact" on the park is unsubstantiated. Public policy decision making must rely on quantifiable information and the document presents no real audibility data. Given this fact the park will have no way to know whether mgmt goals are being met in its different zones. One of these is a Research Natural Area and several others are zoned as "Primitive." Without adequate data there is no way that informed management can take place.

Similarly, it seems impossible that the predicted 6-fold increase in population for the area will do anything other than degrade the air shed and its tranquility.

The document is defective.


Steven Parker
Professor of Public Policy
UNLV
Stone Mountain Condos
Springdale, UT

1. As of the completion date of the Draft EIS, a version of the Integrated Noise Model (INM) capable of producing audibility information had not been released for public use. The FAA agreed to use the new INM model v6.2b to calculate the requested audibility information. The results of this additional analysis are presented in **Appendix T, Audibility Evaluations for Zion National Park** of the Final EIS.
2. Your comment regarding population growth has been noted. Based on information received from the Five County Association of Governments in November 2005, the population of Washington County is forecast to grow from 125,010 persons in 2005 to 301,459 persons in 2020, which is a 2.4-fold increase. A two-fold increase in the population of St. George is forecast over the same time frame, with the 2005 population at 65,968 persons growing to 132,497 persons in 2020.

Jane Whalen
PO 182
Hurricane, Utah 84737

November 7, 2005

David Field, Planning, Airports Division
Federal Aviation Administration
Northwest Mountain Region
1601 Lind Ave., SW, Ste. 315
Renton, WA 98055-4056

Subject: Comments on the Draft Environmental Impact Statement for the proposed St. George Replacement Airport.

Dear Mr. Field:

I appreciate the opportunity to submit comments on the Draft Environmental Impact Statement (EIS) for the proposed St. George Replacement Airport (Airport). However, in reviewing the Draft EIS I was unable to concur that the airport flight paths would not affect the noise levels in Zion National Park (Park). The data and modeling used by Federal Aviation Administration (FAA) in the Cumulative Impact Analysis wasn't understandable or as precise as it should have been.

The "Natural Quiet" is a significant value to protect in the Park. Currently the Park is effected by the noise of over flights. More airplane noise would diminish and degrade the experience of a Park visitor. It's well documented that airplane noise negatively impacts National Parks across the country and visitors complain about it. Why do we have to create a airplane noise problem in Zion National Park too? In the Draft EIS the FAA assumes the proposed airport flight paths would not create noise in the Park. What makes these flight paths different? Concluding there would be a minimal impact to the Park because there would be fewer flights is not an adequate scope of analysis. Can the FAA guarantee there would be fewer flights in the future?

In the Draft EIS there is no serious mitigation plan. The Draft EIS fails to mitigate the adverse impacts of proposed flight paths and should mitigate the impact by moving the flights north of the Park. An obvious way to mitigate the noise in the Park is to route air traffic around all or some of the Park. There is no effort is made by the FAA in the EIS to minimize the noise of aircraft in the Park. Not every flight across the country is in a straight line and other airports across the county have constraints on flight paths.

1

2

1. St. George and the FAA have forecasted the potential future flights to the extent that they are reasonably foreseeable. These forecasts were then used to run the noise analysis. SkyWest was consulted in the preparation of the forecasts for the future development at the airport. The airline has indicated no interest in moving to aircraft larger than those indicated in the forecasts (regional jets and large passenger turboprop aircraft). Other airlines were considered for their potential to add service to St. George. The growth rate in the county and southwestern Utah region is not considered to be adequate to support the incorporation of aircraft larger than the regional jet (50 or 70 passenger) into the forecast mix through 2020.

The analysis of noise impacts from the proposed replacement airport is presented in **Sections 6.2 and 7.1**, and **Appendix B** of the Draft EIS and **Appendix T** of the Final EIS. Because of the distance between the replacement airport and Zion, the flight paths for the replacement airport and the existing airport and the altitudes of aircraft along those flight paths are generally the same. See also **Appendix X, Monitored Noise Abatement Initiatives**, in the Final EIS.

2. Please see **Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park**, in the Final EIS.

1



The Draft EIS doesn't recognize or mitigate the impacts of noise from all aircraft from all airports over the Park. Mitigation of all aircraft noise over the Park, from whichever origin, should be analyzed in the EIS. The cumulative impacts as seen from this Draft EIS are already unacceptable, and is rising steadily.

2

The FAA should explain in the EIS why flight paths couldn't be moved away from the Park. In particular why the flight route to Denver that goes over the Park can't be moved north.

3

The EIS conclusion that there will be only a few more flights over the Park and that its impact is minimal is in error. The new airport will grow larger with bigger airplanes and more flights. Skywest Airlines a local company is growing and buying other airlines with future routes yet unknown. With Washington County being one of the fastest growing counties in the country we know air traffic over the Park is going to increase airplane noise in the Park.

4

The Cumulative Impact analysis was hard to understand and determine the methods used to analyze the cumulative effects that conclude flight paths don't impact the Park. The route maps were hard to read, therefore, the information was incomplete. The EIS should be more precise in the Cumulative Impacts assessments irrespective of originating or departing, old or new St. George airport and should be clearly plotted for each grid-point on the Park map. Using Time Above, and Number of Events Above, especially TA 20 and NA35. This information is relevant and essential to determine the adverse impacts of the flight paths on the Park. The FAA needs to apply the best forecasting techniques to assess the potential for adverse impacts by using the Park's data and modeling.

5

In the Draft EIS the FAA used a flawed Model to address accumulative impacts and the model to be clarified. The Final EIS needs to Report "Audibility" data, both from already conducted observer-attended logging sites in the Park, and use the new FAA noise model INM 6.2.

6

The EIS lacks audibility data and without audibility data, the NPS doesn't have the ability to apply its selected quantitative impacts criteria on noise in its management goals (i.e., Desired Conditions") as set forth by Park Management Zones in their General Management Plan.

3. Please see **Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park**, and **Appendix X, Monitored Noise Abatement Initiatives**, in the Final EIS.

4. See Response #1.

5. The evaluation of the cumulative noise levels within Zion National Park with and without the proposed replacement airport is presented in **Chapter 7** and **Appendices B and T** of the EIS. The nature of this unprecedented noise analysis is complex and includes an extensive amount of existing graphics. This documentation ultimately discloses that the cumulative noise effects of the proposed airport would not substantially differ from those of the existing airport and that the proposed airport would reduce the time audible of aircraft over Zion National Park.

6. As of the completion date of the Draft EIS, a version of the Integrated Noise model (INM) capable of producing audibility information had not been released for public use. The FAA agreed to use the new INM model v6.2b to calculate the requested audibility information. The results of this additional analysis are presented in **Appendix T, Audibility Evaluations for Zion National Park**, of the Final EIS. Please also see **Appendix V, Use of INM Versions 6.1 and 6.2 in the St. George Replacement Airport EIS**, in the Final EIS.

The Draft EIS indiscriminately, repeats reliance on only the broadest averaging parameters for the Park's noise analysis and isn't acceptable.

The EIS noise assessment should be sharpened to focus on "Peak Days", "Peak Hour(s)", etc. Not just 24-hour days, as they do.

At minimum the EIS should compare "Day" and "Night" noise impacts, in terms of their "Number of Events Above" assessments, NA35 being perhaps the most useful, also in terms of Per Cent Time Audible.

FAA in the EIS should apply the same principle to all its "Per Cent Time Audible" calculations for the Park, as well.

Also, the EIS should similarly report "Current Conditions" for noise, based on 2000 or 2003 baseline year. The Draft only has the years for 2010 and 2020, omitting the baseline altogether.

In conclusion, the FAA should strive for a proposal where the airport flight paths and the Park can co-exist. The current proposal conflicts with the mandate of the Zion National Park to protect the natural quiet of the Park for the visitor. The FAA should move the flight paths away from the Park. The unique feature of natural quiet in Zion National Park is a resource that's too important to lose especially in today's modern times where solitude is getting harder to find. The Park was established over 100 years ago and the FAA's actions shouldn't degrade the visitor experience in the Park; it means too much to the nation.

Sincerely,



Jane Whalen

7

8

9

7. The Draft EIS presented the standard average annual day analysis and the Final EIS also includes a sensitivity analysis for daytime hours to provide additional reference and comparison of daytime and nighttime levels. Please also see **Appendix U, 15-Hour Sensitivity Analysis**, in the Final EIS.
8. The FAA has added to the Final EIS current noise level information for all noise metrics, except audibility, at all identified 4(f)/303(c) locations within the initial area of investigation. Please see **Appendix S, Noise Levels for 2003 Conditions**, in the Final EIS.
9. As noted above and in the afore-mentioned appendices, the analysis in the Draft EIS showed relatively small increases in cumulative aircraft noise levels in Zion National Park with the replacement airport. In addition, the new audibility analysis found in **Appendix T, Audibility Evaluation for Zion National Park**, in the Final EIS, shows that audibility of aircraft noise in Zion will actually decrease with the replacement airport.

- Submitted Via E-mail -

From: "Marcel Rodriguez" <marcelr@infowest.com>
Sent: 11/08/2005 07:52 PM
To: David Field
Subject: Aircraft noise at Zion National Park

Dear Mr. Fields;

Please don't allow the flight patterns for the new St. George International Airport to obtrude on Zion National Park's quiet. There are very few places on the planet free of this century's roar. Zion is one of those unique places, free of the rage that afflicts our highways. I'm a ranger at the park and I can assure you that the silence in Zion is a thing that I hear mentioned every day by appreciative visitors from all over the world.

I know that this note fails to address the technical aspects of what noise pollution factors have or have not been considered thus far in the process but let me assure you that it is valid nonetheless. Ultimately the decisions handed down by the FAA will either allow Zion to continue as a place of refuge from this century's noisy excesses or go, sadly, the way of the Grand Canyon.

Sincerely,

Marcel Rodriguez
P.O. Box 465
Springdale, UT 84767

1

1. Thank you for your interest in this project. In response to your comments, please refer to **Appendix W, *Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park***, and **Appendix X, *Monitored Noise Abatement Initiatives***, in the Final EIS.

- Submitted Via E-mail -

From: "Lisa & Alan" <her-n-me@appleaccess.com>
Sent: 01/02/2006 03:13 PM
To: TJ Stetz/ANM/FAA@FAA
Subject: St. George Airport Expansion

January 2, 2006

Lisa and Alan Rutherford
173 N. Painted Hills Drive
Ivins, Utah 84737

Dear TJ Stetz,

As residents of the St. George, Utah area, we and others with whom we've spoken on many occasions are not all thrilled with the idea of an expanded airport in St. George.

We hope that Utah's glorious national parks -- its scenic wonders that draw people here yearly -- are high on your list of significant issues to our area. They are to us. As we sat at the Zion National Park Museum viewing area taking in the beauty and grandeur of this national treasure, a plane flew overhead - its noise disturbing the beauty and serenity of the experience, and we realized what a disgrace it would be to have the new St. George Airport built only to have planes flying even lower over Zion on their descent into St. George. What a sad and sorry thing that would be to take one of this state's and this nation's greatest treasures and reduce it to just another noisy airplane thoroughfare so that St. George can develop into another over-developed western city with pollution problems spilling over into this gem of a national park. Please work to protect this magnificent area for future generations to enjoy. Perhaps routing planes from flying directly over the park would help, but frankly, St. George's current pollution (we see it often already!) doesn't bode well for future uncontrolled growth.

Please, let us know what we as citizens can do to stop the progress on a new St. George airport. Mesquite, Nevada and Cedar City, Utah are also planning expanded airports. Frankly, we don't mind driving to Mesquite or Cedar City to catch a plane. Both are closer than Las Vegas, which we currently use for travel, so that would be more convenient and keep the larger planes from damaging our area in several ways: noise, pollution and visual distraction. We don't want our skies filled with planes as are seen in larger cities already. There has to be some way to keep our skies from being overloaded. You are the people who have the control; please exercise it.

We appreciate anything you can do to stop the St. George Airport expansion.

Sincerely,

Lisa and Alan Rutherford

1. Thank you for your comments. They have been noted. Specifically, the National Environmental Policy Act (NEPA) requires Federal agencies to analyze their Federal actions for potential environmental impacts. The EIS noise analysis done pursuant to this law for the proposed replacement airport in St. George indicates that operations to and from the replacement airport will continue to contribute very little to the general aircraft noise levels over Zion National Park. Moreover, the new audibility analysis found in **Appendix T, Audibility Evaluation for Zion National Park**, in the Final EIS, shows that audibility of aircraft noise in Zion will actually decrease with the replacement airport.

▲
4. Relocation of the airport to the proposed replacement site would add development where there currently is none, altering the existing visual character of the area from open and undeveloped to a developed and diverse setting and would introduce air traffic into areas and at altitudes where aircraft don't currently occur, while removing aircraft arrivals, departures, and overflights from other areas in closer proximity to the existing airport. Aircraft arrivals, departures, and local overflights at the proposed replacement airport would be visible to nearby developments, but to no greater extent than current operations are at the existing airport site. High altitude overflights of the proposed replacement airport that originate and end at airports other than St. George would not change from existing conditions because such flights are beyond the realm of this proposed replacement airport.

5 The City of St. George, Washington City, and Washington County have cooperatively participated in the development of an Airport Vicinity Land Use Plan (AVLUP) for the proposed replacement airport. The AVLUP and its associated process is an effort to gauge the successes and failures regarding the quality of development around the airport and the ability to protect the airport's surrounding area through zoning and compatible land use planning.

As a condition of the Federal grant process funding construction of the replacement airport, the City of St. George, the future owner and operator of the proposed replacement airport, has provided assurance that it is and would continue to be in compliance with Section 49 USC 47107(a) of the Federal Reauthorization Act of 1996. This land use assurance relates to existing and planned land uses and adoption of zoning laws and other measures to the extent reasonable, to restrict the use of land adjacent to or in the immediate vicinity of the airport, to activities and purposes compatible with normal airport operations.

How to build a safe, '1st-Class', un-restricted, 12,000' airport; located within 20 square miles of vacant desert land, only 8 miles South of downtown St. George City, and connected by I-15

1. The North-South St. George, Utah valley is 25 miles wide, is bisected by the Utah-Arizona border, and has more than 20 square miles of Arizona vacant desert land available for lease or purchase at very low prices. There are no inhabitants, buildings, and little water.
2. A 12,000' East-West un-restricted runway can be built on a level site 3 miles long and a mile wide, located two miles South of the Utah-Arizona line and 5 miles S/West of the proposed dangerous St. George Red Hawk Airport. The site is near and contiguous to the Fort Pierce Industrial Zone and has ample room for large-scale industrial and commercial projects. This ideal location will enable a better airport to be built at a much lower capital investment.
3. The proposed airport site is adjacent to the Black Rock Interchange of Interstate 15 and has a direct 8 mile Interstate 15 connection to downtown St. George and 12 miles to Washington City. The East end of the runway site is connected to the North-South 4-lane River Road into the East side of St. George City and to the 'front-door' of Skywest Airline headquarters.
4. All approach and landing patterns would be over the un-inhabited Arizona side of the border and would eliminate any flights over the St. George, Washington, Santa Clara, and Ivins communities. This ideal location would eliminate any flights over Zion National Park.
5. This Black Rock, Arizona airport site meets the 93% prevailing wind criteria. Analysis of the future income value of this airport location shows that it would double the profit projections of the St. George Red Hawk Airport, of which 90% would go to the Utah cities and county.. The EIS for the Red Hawk replacement airport applies to this ideal Black Rock Airport site.

The Black Rock Airport site has FAA Airspace approval

FAA representatives who attended any of the St. George City Council airport public hearings are well aware of the limits, restrictions, and deficiencies of the Red Hawk Airport proposal for the present time and for 25-50 years into the future. These same Northwest Mountain Region FAA employees are also aware of the advantages of the ideal Black Rock Airport site but only seem concerned about plants, animals, burial sites, petroglyphs, and noise in Zion National Park. It is doubtful that any of these FAA officials will even be working for the FAA in 25 years, and so what do they care if another new replacement airport will be needed in the future?

The enclosed maps will portray, better than any words, the safety aspects and locations of the dangerous St. George Red Hawk replacement airport and the ideal Black Rock airport site.

Paul K. Bevan
 Paul K. Bevan
 2430 South 450 West Circle
 Washington, Utah 84780
 USA, the Americas

*Is there any top-level FAA administrator
 'That-Gives-a-Damn'
 about the safety of families living under an airport?
 If there is one, have her/him give me a call!*

E: zacor@infowest.com Tel: 435-627-8555 Fax: 435-627-8388
 Airport 3

6. A number of alternative sites were reviewed for location of the St. George replacement airport as part of the 1998 Site Selection and Master Plan Study (1998 Master Plan) conducted by the City of St. George. The 1998 Master Plan initially identified 15 potential sites within the area surrounding St. George, with six possible sites selected for initial analysis. Five of the initial sites were located in Arizona (see Exhibit 4.1 in the Draft EIS). Based on the initial site review, which included review of natural land penetrations and prevailing wind considerations, three potential development sites were identified that would accommodate the specified development criteria for a proposed replacement airport for St. George. There is a lengthy discussion and analysis of alternative sites and the selection of the preferred alternative site included in Chapter 4, Alternatives, in the EIS. Based on the information contained within the 1998 Master Plan, the "Black Rock Airport" site was not reviewed as an alternative location for the St. George Municipal Airport. However, According to the City of St. George, the "Black Rock Airport" site was one of the three sites in Arizona looked at during the site selection study conducted for the proposed replacement airport in 1998. The site was eliminated from further consideration during the site selection study and development of the Environmental Assessment due to the location of the site in Arizona, and issues associated with the planned approaches to the airport that could not be resolved.

Based on the information presented on the "Black Rock Airport's" website (http://www.burningman.com/on_the_playa/airport/airport.html), the physical layout of the site is very similar to the proposed replacement airport site described in this EIS. Similar to the "Black Rock Airport," the proposed replacement airport site is relatively flat and lies within a valley area. No persons, homes, or businesses would be displaced with development at either the Black Rock location or the proposed replacement airport site. The "Black Rock Airport" has a dirt runway and limited tie down area. At the proposed replacement airport site in St. George, a 9,300 foot long runway would be constructed initially, with the ability to extend the runway to 11,500 feet in the future as aviation demand requires. The replacement airport would be easily accessed from the city of St. George and the surrounding area via the Southern Connector. Approach and departure procedures would be designed to minimize impacts to areas dominated by sensitive land uses, including Zion National Park, as feasible, without compromising aviation safety. The orientation of the proposed runway at the replacement airport attains 94.1 percent wind coverage (see Table 3.1 in the Draft EIS). With the "Black Rock Airport's" location in Arizona, it would not be feasible for the City of St. George to manage that airport.

Probe into crash could take a year

Slid off end of runway: The Southwest 737 had passed a routine brake inspection the day before

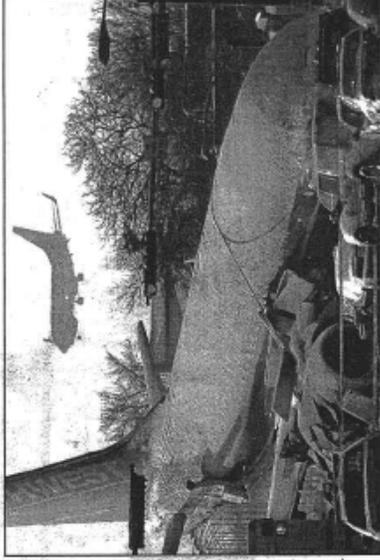
By P.J. HERRINGTON
AND LYNN MARSHALL
Los Angeles Times

CHICAGO — Tucked in the middle of a southwest Chicago neighborhood, a busy runway is the site of a tragedy that has struck a family of brick business and family-owned businesses such as Dorland's Dance Center. Holiday lights are strung across the rooftops, and manager scenes grace newly returned lawns.

Friday morning, amid the snow-covered porches and the airplane belly shells, sit the

As aviation experts began examining the listing hull of the Southwest Airlines 737-700 that slid off the end of a runway during a snowstorm Thursday night and crashed into two cars, federal officials said that it could take a year to complete their investigation.

The crash at Midway killed Joshua Woods, 6, and injured his parents and two siblings. The family had been on their way to visit the children's grandparents when they stopped at a red light on Central Avenue, at the south-west corner of the airport terminal. "Joshua and the other kids were looking out the windows, watching the planes," Stensney said. "They could hear a loud roaring. They thought it was a plane sliding off, but it kept getting louder and louder. The noise was deafening at the impact."



CRASH SITE AT MIDWAY AIRPORT
A Southwest Airlines 737 rests on its nose in an intersection outside Midway Airport on Friday after skidding off the end of the runway, skidding through a barrier fence, careening across a sidewalk and crashing into the two cars, which killed Joshua Woods, 6, and injured his parents and two siblings Thursday night.

Six other people — four on the

ground and two in the airplane — suffered injuries that ranged from serious lacerations, according to Southwest officials and the Federal Transportation Safety Board. Curious neighbors gathered at the crash site Friday afternoon, braving biting winds and freezing temperatures to peer past police barricades and catch a glimpse of the snow-covered wreckage and blue jet.

"I don't know everybody here," said a woman, 21, a dance instructor at Daniel's who has lived in the

neighborhood all of her life. Before being observed for landing on the airport's 4,500-foot runway, Southwest Flight 1544, which came from Baltimore, was scheduled to land at the airport, about a half-hour, Southwest chief executive Gary Kelly told reporters. The delay was caused by the weather and the flight traffic.

When the plane touched down at 7:14 p.m., CST there was an estimated 1.5 inches of snow on the ground across the city. Out on the runway, there was one sixteenth of an inch of snow.

300 U.S. airports lack runway safety feature

By LESLIE MILLAR
The Associated Press

WASHINGTON — Nearly 300 U.S. commercial airports, including Chicago's Midway, lack the EMAS for Runway Material Arresting System, a feature that the federal government considers adequate for

runway barrier spaces, people and found that a certain light curable concrete will cause airplanes to decelerate quickly. The soft concrete bed, called EMAS for Runway Material Arresting System, extends about 600 feet from the runway edge.

Places that overruns are unusable after the 1980 crash. In New York, the beds have stopped being used. They are now used only in runways that are less than 1,000 feet long, such as John F. Kennedy International Airport, including a Boeing 747 in January, according to the FAA.

A bill recently passed federal law seeks to encourage non-airports to build EMAS systems. The bill also encourages airports to build EMAS systems by the end of 2015. There are 21

each airport, according to the FAA.

Many are older airports squeezed next to dense city neighborhoods, bodies of water or steep drop-offs that don't have the available space.

Runway overruns can be extremely dangerous. In June 1999, an American Airlines jetliner crashed into a residential area in Little Rock, Ark., killing 11 passengers and injuring 88. And it was only the remarkable speed of the passengers' evocation — that less than two minutes — that prevented serious injury or death when an Air France Airbus A330-300 burst into flames in Toronto and burst into flames in

The federal Aviation Administration in the 1980s began researching solutions to the

cc: The Administrator, Federal Aviation Administration
FAA, Office of Airport Planning, Washington, DC
FAA, Northwest Mountain Region, Renton, Wash.
Utah Department of Transportation, SILC, Utah
'Neighbors' of the proposed Red Hawk Airport
The Associated Press 12-28-05

December 28, 2005

Ms. Leslie Miller
Associated Press
2021 K Street NW, 6th Floor
Washington, DC 20006

Fax: 202-776-9570 Tel: 202-776-9400

Re: Failure of the FAA to enforce the safe design and construction of old and new airports.

Ms. Miller,

I read with great interest your AP story, printed in the 12-10-05 Edition of the Salt Lake Tribune, concerning the death of a 6 year-old boy, when a Southwest Airline plane crashed through a fence and into a neighborhood near the end of the runway at Chicago's Midway Airport. What riveted my attention were the 3 hazards, near many airports, that you listed in your story:

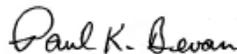
1. Nearby neighborhoods.
2. Steep drop-offs.
3. Lack of 1,000' safety end-zones.

Incredibly, these 3 hazards and others are being incorporated into the design of a new airport in St. George, Utah. I have attempted for more than 5 years to point out the 'insanity' of building this new and dangerous airport to city, county, state, and FAA officials. The Midway Airport tragedy, and your story, could be the 'precipitating-event' that could reverse the dangerous plans that St. George City and the FAA have for placing our families "In harm's way". I mailed the enclosed letter, your Midway story, and maps to the Administrator of the FAA (Maybe too late).

Has there ever been any investigative research to determine if the FAA enforces their own rules and procedures of airport design-construction-operation, in a fair and timely manner? It appears that the only time the FAA calls for the rules to be followed is when there is another air disaster. What is especially alarming in our local St. George airport controversy is that the FAA is not only approving this hazardous project but is supporting and encouraging this airport fiasco!

American newspapers have always been a leader in exposing incompetence and the corruption of laws, rules, regulations; and issues of public safety and welfare. But our local newspaper, The Spectrum (owned by USA Today), seems to only print airport news releases prepared by the city, and has never done any apparent research or printed any of the hazards or negative aspects of this critical issue.

Thank you for your time and interest in reviewing these documents and maps. And thank you for your timely Midway Airport story, which will be a big help in focusing neighborhood, city, county, state, and Federal Aviation Administration attention on the foolhardy effort to build a restricted-use and dangerous airport inside a city, and surrounded by residential neighborhoods.

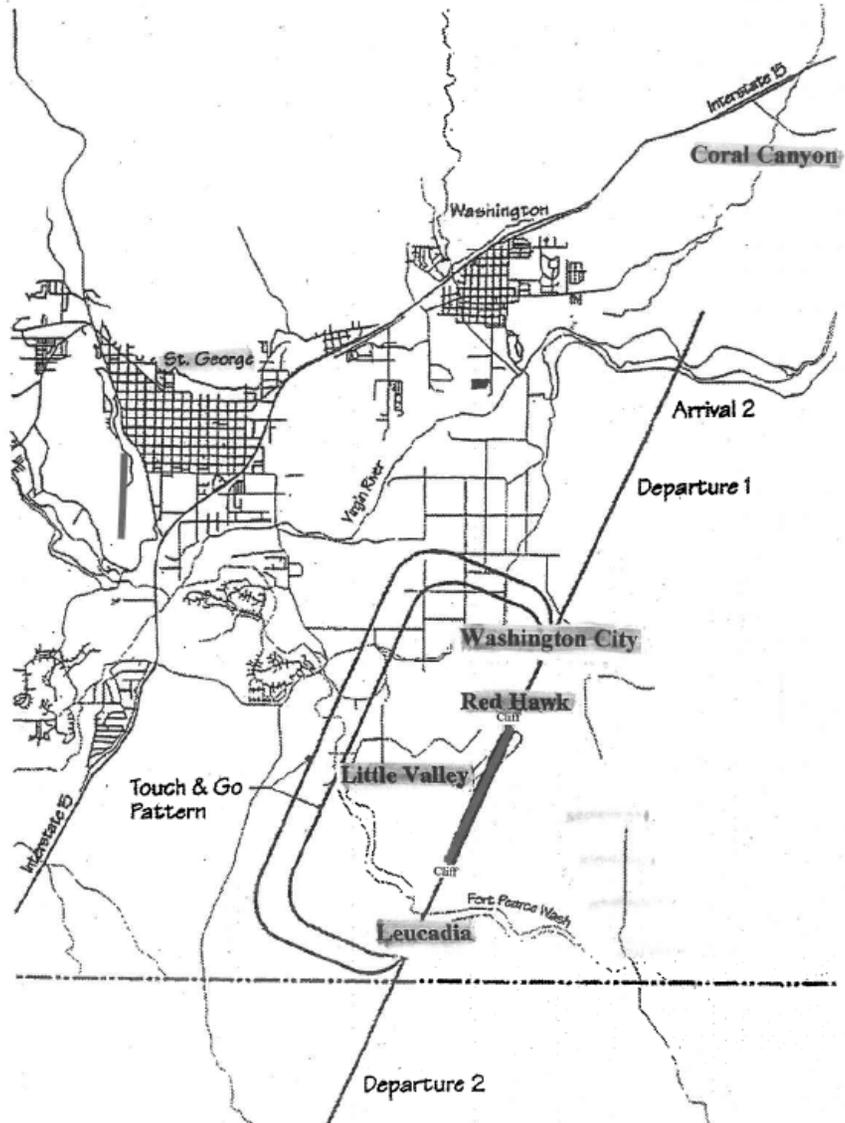


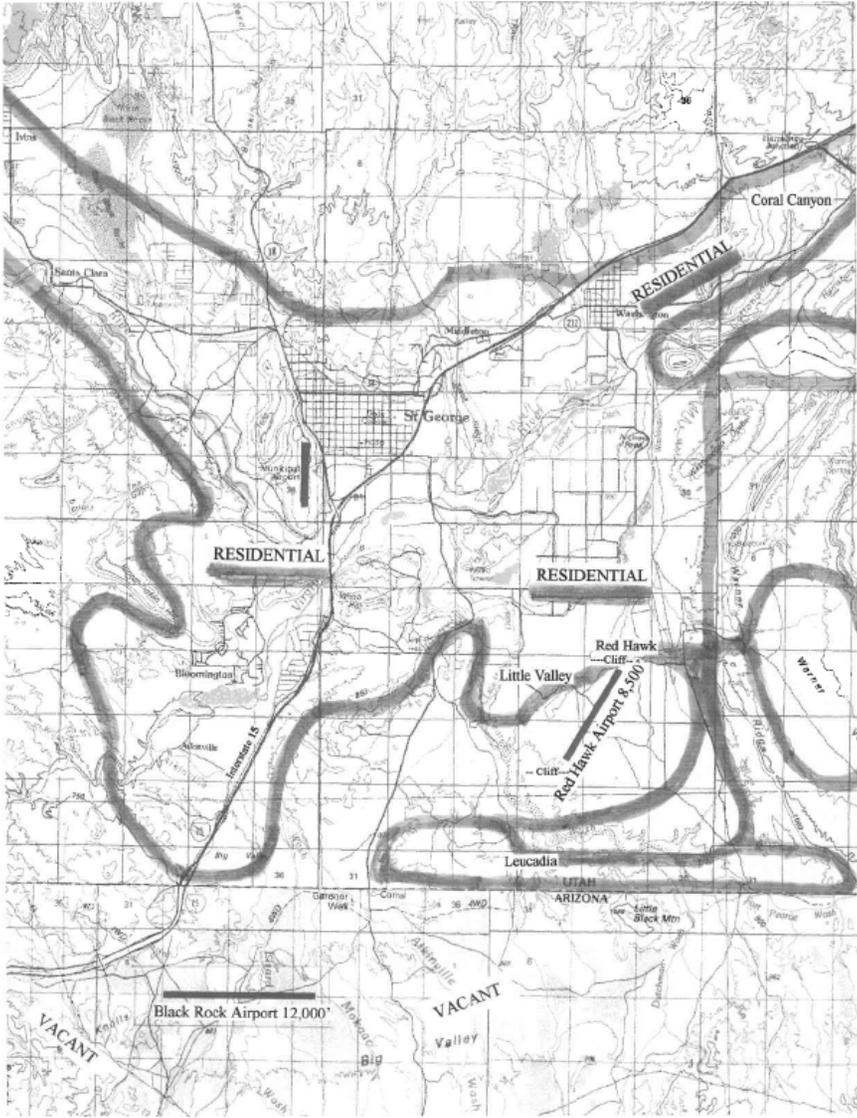
Paul K. Bevan
2430 South 450 West Circle
Washington, Utah 84780
USA, the Americas

Airport5

E: zacor@infowest.com Tel: 435-627-8555 Fax: 435-627-8388

Preferred New St. George Airport Site





- Submitted Via E-mail -

From: Cornelia Kallerud [cktahoe@hotmail.com]
Sent: 11/01/2005, 08:45 AM
To: David Field
Subject: St George-Denver flight route

Please, please, keep the route north of the park, above and along Hwy 70.

In the park we are enjoying the piece and quiet and beauty of our natural world. When we drive along hwy 70 to Denver we are in the car and the outside noise wouldn't make much difference.

Since my daughter and family live in Rockville and other relatives live in Denver, we spend much time in the park and also drive the route to Denver frequently.

How much time do you really spend in Zion National Park??

Cornelia Kallerud
314 Talvista Drive, PO Box 969
Tahoe City, CA 96145-0969

1

1. Thank you for your interest in this project. Please see **Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park, and Appendix X, Monitored Noise Abatement Initiatives**, in the Final EIS.

From: jayrich@infowest.com
Sent: 11/01/2005, 05:59 AM
To: David Field
Subject: St. George airport

Please save the quiet that is so important to a visit to Zion National Park. I agree with the following solution as printed in our local paper: An obvious mitigation of noise in Zion is to route air traffic around some or all of the park. Hingson said this would not take much effort because it is done all the time for military special use areas. Not every flight across the country is in a straight line and every type of transportation has some kind of constraint, he said. "There's room for creative route design there," he said.

1

1. Thank you for your interest in this project. Please see **Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park, and Appendix X, Monitored Noise Abatement Initiatives**, in the Final EIS.

ORIGINAL

PUBLIC HEARING
IN THE MATTER OF THE
PROPOSED REPLACEMENT AIRPORT
AT ST. GEORGE, UTAH

---oooOooo---

Date: Wednesday, October 19, 2005
Time: 3:00 p.m. to 7:00 p.m.
Place: Dixie Center
1835 South Convention Center Drive
St. George, Utah

Reported by Jennifer Sullivan, RPR

PUBLIC HEARING 10/19/05

1 APPEARANCES:

2 MARK A. PERRYMAN
3 President
4 Landrum & Brown
5 11279 Cornell Park Drive
6 Cincinnati, Ohio 45242
7 513-530-1235

8 JEFFREY N. THOMAS
9 Chief Executive Officer
10 Hearing Officer
11 Landrum & Brown
12 9841 Airport Boulevard
13 Suite 1516
14 Los Angeles, California 90045
15 (l) 310-838-9448

16 INDEX

17 <u>SPEAKER</u>	18 <u>PAGE</u>
19 Mike McClure	20 14
21 Roxie Sherwin	22 16
23 Voin R. Campbell	24 20
25 Eric DeVita	26 21
Scott Hirschi	27 34
Roene B. Wilkinson	28 39

PUBLIC HEARING 10/19/05

PUBLIC HEARING

1
2
3 MARK A. PERRYMAN: My name is Mark
4 Perryman. I'm with the firm of Landrum & Brown. We
5 were the consultants selected to assist the FAA in
6 preparation of the Environmental Impact Statement.
7 What I'm going to do at this time is just give a
8 very brief overview, highlighting a couple of the
9 facets of the Environmental Impact Statement. If
10 you heard me at the introductory boards, you're
11 going to hear a lot of the same material.

12 Basically, the project, the Proposed
13 Replacement Airport for St. George, has been thought
14 about roughly for the last 15 years, since the late
15 '80's, early '90's. There was a site selection
16 study that concluded in 1998 that recommended the
17 site that we are assessing. And an environmental
18 assessment, which is a notch below the Environmental
19 Impact Statement level, was prepared and issued, and
20 the FAA issued a finding of no significant impact
21 or, jargon, you're going to see a lot of that
22 tonight, FONSI, was issued in 2001.

23 Subsequent to that, there was a challenge
24 by the Grand Canyon Trust. The FAA was asked by the
25 Court to go back and take a more comprehensive look

PUBLIC HEARING 10/19/05

1 at some of the noise analysis especially relative to
2 Zion National Park. In doing so, the FAA decided to
3 prepare an Environmental Impact Statement and
4 include all additional analysis that the court
5 requested. That's what we're here about tonight.

6 Where we are in the process, our little
7 snake diagram, as we call it. The EA is up here to
8 the upper left. We've gone through a series of
9 scoping processes. The draft document has been
10 prepared. It was released last month, roughly 30
11 days ago. Today we're at our public hearing. The
12 comment period is a 60-day window that will conclude
13 on November 8th. All comments need to be into the
14 FAA by November 8th.

15 From here, we will take a look at those
16 comments. The document will be changed as
17 necessary, additional review and analysis, if
18 necessary, and then the FAA will issue a final
19 Environmental Impact Statement, followed by a record
20 of decision as to what the agency's final decision
21 is. At this point, the FAA has not made a decision.
22 This is merely a disclosure document as to what it
23 is considering in its decision-making process. Then
24 once the FAA makes a decision, the City of
25 St. George can then go forward with design and

PUBLIC HEARING 10/19/05

1 construction.

2 A little bit about why -- you already have
3 an airport here in St. George, why do you need
4 another one. This is truly a replacement airport to
5 accommodate the future demand here in St. George and
6 the region around St. George. Currently the airport
7 can only accommodate smaller turboprop aircraft,
8 32-seat or less. There is a great demand. All
9 planes coming in today, for instance, have been sold
10 out. People are wanting to come to St. George;
11 you're wanting to go to other locations. There is
12 definitely a need for additional capacity, a larger
13 aircraft to be able to fly into and out of
14 St. George.

15 The project of building a replacement
16 airport will accommodate that need. That's what it
17 basically comes down to. It doesn't mean that the
18 existing airport is unsafe. It just means that it
19 is restricted to smaller aircraft. That is the
20 bottom line. And larger aircraft are necessary to
21 accommodate the demand.

22 This slide shows the existing airport
23 site. Relative to the proposed airport site, we're
24 about halfway in between, a little bit south of the
25 existing. A little closer view of the proposed site

PUBLIC HEARING 10/19/05

1 development. It's a little bit hard to read here.
2 If you want to get up close and personal, there are
3 boards out in the other room where you can look at
4 all the various facilities. It will be a
5 fully-instrumented, fully-developed airport. It
6 will have all the facilities that you have today at
7 the existing airport.

8 Again, coming back to the why, the
9 aircraft on the right is what flies in and out of
10 St. George today. The aircraft on the left here,
11 the regional jet, the 50- and 70-seat regional jet
12 is what is proposed to be flying into the proposed
13 replacement airport in the future.

14 The key to this, and I shouldn't have gone
15 so quick, is relative to noise effects, the new
16 aircraft, the jet, is just as quiet as the
17 turboprop. So there is really little difference.
18 As you can see these little strips of noise contours
19 on either side of the aircraft, there's really
20 little difference relative to noise impacts when you
21 change from one aircraft to the other.

22 You'll hear a lot about noise in this
23 project because of the proximity to a lot of natural
24 resources, most notably Zion National Park, and
25 others, Little Black Mountain to the south, and a

PUBLIC HEARING 10/19/05

1 whole host of other parks and recreational
2 facilities. We didn't just look at noise. We
3 looked at all the various aspects. This gives you
4 an idea of some of those that we took a look at in
5 the Environmental Impact Statement process, from
6 land use to solid and hazardous waste issues,
7 construction, how is it going to be constructed.
8 Those are all documented in that three-volume
9 document that sits out on the table in the other
10 room.

11 But to focus a little bit on the noise and
12 just give you an overview of what Scott has on his
13 presentation, if you want to go through it with him,
14 the noise analysis that was conducted as part of the
15 EIS used the latest model available to us, uses the
16 latest methodology. In fact, we worked very closely
17 with the National Park Service at developing
18 protocols and methodologies to meet their needs and
19 demands as we moved forward. I can stand here today
20 and say it's probably the most exhaustive noise
21 analysis, bar none, in the country, especially for
22 an airport this size. There was more noise analysis
23 put into this EIS than there was for the runways
24 at O'Hare in Chicago, for instance. This is very
25 comprehensive.

PUBLIC HEARING 10/19/05

1 We started with taking a look at the local
2 area and worked our way out, so the close-in
3 proximity effects of noise. And we looked at the
4 standard that we use for that is day/night average
5 sound level, the DNL. We looked to see how many
6 homes or people were impacted within the 65, which
7 is the federal level of significance. There are no
8 homes within the 65 of the existing airport, and
9 there would be no homes in the 65 of the future
10 airport. So there was no change in total impacts
11 from that perspective.

12 Just to give you an example, these -- turn
13 down these lights a little. The spanning network
14 that we have here is the flight tracks into and out
15 of the existing airport. And they would be very
16 similar for the proposed replacement airport. This
17 is a little zoomed in. That was a wide-angle view.
18 This is a little bit more zoomed in. The existing
19 airport over to the left and the replacement airport
20 over to the right. And showing the relative change
21 in flight tracks and overflight areas.

22 The resulting noise contours, as I
23 described earlier, this is the existing airport and
24 the effects of noise. The yellow band all the way
25 around is 60 DNL, is actually 5 DB less than -- or

PUBLIC HEARING 10/19/05

1 greater than what we were required to look at versus
2 the 60 DNL for the proposed replacement airport.
3 Again, those footprints are relatively compact and
4 stay within the confines of the airport.

5 We then took a broader look at the noise
6 effects, started taking a look at what we call the
7 4F303C areas. These are parks and recreation areas,
8 is fundamentally what they are or sites of natural
9 or historic significance. We used the same
10 methodology for these types of properties as we did
11 for Zion National Park.

12 I'll go into that a little bit more. This
13 was the total area of investigation, the initial
14 area of investigation, as we call it. Is that a
15 little better? Just to give you some relative size,
16 this constitutes 9200 square miles that we took a
17 look at in this assessment. It's about 80 by 88
18 miles, 88 miles across and 80 miles north to south.
19 So very broad area that we took a look at and
20 accounted for all the noise effects. Zion is up in
21 the -- toward the upper right-hand corner there.

22 We did some very specific analysis
23 relative to the noise at Zion. We took a look at
24 what's called their natural ambient. The whole
25 purpose here was to make sure that we covered the

PUBLIC HEARING 10/19/05

1 cumulative activity, not just the activity from
2 St. George as it is today and as it might be in the
3 future, but we also looked at all the airports in
4 the area, all the high-altitude overflights, all of
5 the air tour operators that transition this area
6 going from Grand Canyon to Zion to Bryce throughout
7 the entire region. All of that was accounted for in
8 our noise analysis in this Environmental Impact
9 Statement. So it's very, very comprehensive.

10 Just to give you some indication, these
11 are the high-altitude flights only that overfly that
12 initial area of investigation that we talked about.
13 And this is a snapshot from one day of high-altitude
14 flights in the area. A little harder to read, but
15 these are the air tour operators that transition.
16 Typically, most of them are coming out of Vegas up
17 through the Grand Canyon, up to Zion or to Bryce.
18 Very few air tour operators actually originate out
19 of St. George.

20 Basically, the bottom line is what's next?
21 We keep hearing that. This has been a very long
22 process, we know. The comment period, as I
23 indicated, will close on November 8th. We intend to
24 have a final document prepared over the winter, rest
25 of this year through winter of '06, and the FAA

PUBLIC HEARING 10/19/05

1 anticipates a decision in the spring of next year,
2 spring of '06.

3 That's it for my overview and
4 introduction. If you have more detailed questions,
5 we have a whole host of consultants and FAA
6 personnel out at the boards. Feel free to discuss
7 anything with them, any questions you might have.

8 At this point, because of the process, we
9 will open this up for a formal public hearing.
10 Mr. Thomas will be the hearing officer this evening.
11 His whole purpose here is to help regulate, make
12 sure everyone has the opportunity that wants to
13 speak that can speak.

14 Your comments, whether written or whether
15 given orally, are treated equally. I want to
16 underscore that so that everyone understands that if
17 you don't want to speak you can go out to the table.
18 There's a self-addressed comment form that all you
19 have to do is fold it, either drop it in the box on
20 your way out or take it home and you can write your
21 comment out and mail it in. With that, I'll turn it
22 over.

23 JEFFREY N. THOMAS: Thank you, Mark. Good
24 afternoon. My name is Jeff Thomas. I'd like to
25 welcome you all in the audience to the public

PUBLIC HEARING 10/19/05

1 hearing on the Draft Environmental Impact Statement
2 for the Proposed Replacement Airport at St. George.
3 I am the hearing officer for today's hearing,
4 responsible for maintaining order for these
5 proceedings. Looks like a pretty orderly crowd.

6 In compliance with the National
7 Environmental Policy Act (NEPA), the FAA is
8 providing the public with an opportunity to comment
9 on the analysis of potential environmental impacts,
10 the adequacy of the proposed action and/or the
11 merits of alternatives as presented in the Draft
12 Environmental Impact Statement for the proposed
13 replacement airport. The FAA's response to comments
14 will be included in the Final Environmental Impact
15 Statement. All of the comments, along with prepared
16 responses, will be included in the official public
17 record of the final document.

18 No questions will be answered in the
19 public hearing setting. A public information
20 meeting is going on outside the door in the next
21 room concurrently with this hearing, and your
22 questions can be answered in that area.

23 In addition to making oral comments at the
24 hearing tonight, written comments will also be
25 accepted through Tuesday, November 8th, 2005, when

PUBLIC HEARING 10/19/05

1 the official comment period will be closed. Comment
2 forms are located in the meeting room next door. If
3 you wish to complete the form at home, mail or fax
4 it in, the form is pre-printed, and the mailing
5 address is on the form. Comments can also be
6 e-mailed to the e-mail address on the form.

7 The process for making oral comments at
8 this hearing will be as follows: We'll listen to
9 each and every person who wishes to provide oral
10 comments, and the hearing will remain open until
11 everyone who has registered to speak has had the
12 opportunity to do so. If you have not already done
13 so, you may register to speak at the table near the
14 entrance to the outer room. Registration enables
15 the record of your comments to be correctly
16 attributed to you.

17 In keeping with the hearing protocol, each
18 speaker will be allocated up to three minutes.
19 Those wishing to speak will only be allowed to sign
20 up once to provide oral comments. If you have
21 additional comments that exceed your allotted time,
22 please mail, fax or e-mail them as indicated on the
23 comment forms.

24 The order of the people that will speak
25 will be the order in which they signed up on the

PUBLIC HEARING 10/19/05

1 sign-up sheet with special consideration given to
2 elected public officials who will be given priority.

3 To be respectful of everyone's time, I
4 will be enforcing the three-minute limit to ensure
5 that everyone who wishes to speak gets the
6 opportunity to speak and has an equal opportunity.
7 When your name is called, please come forward and
8 make your comments. Begin by confirming your name
9 for the record. We will now officially open the
10 public hearing.

11 The first speaker, Mike McClure.

12 MIKE McCLORE: Thank you. Mike McClure,
13 representing The Paladin Group. The following
14 comments are to correct inaccurate statements
15 contained in the Draft EIS in Chapter Four, page 4,
16 under the title "Cedar City Regional Airport (CDC)."

17 Comment 1. Paragraph 1; lines 5 and 6.
18 The correction should indicate that the new
19 \$6,000,000 passenger terminal complex at CDC has
20 been completed.

21 Comment 2. Paragraph 2; lines 2 and 3.
22 The correction should indicate that the driving time
23 between St. George Boulevard and Main Street in
24 Cedar City on Interstate Highway 15 is 42 minutes at
25 the legal speed limit.

1

2

1. Thank you for your interest in this project. Your comments have been noted. The information you provided will be verified and corrected in the Final EIS, as appropriate.
2. Your comment has been noted.

PUBLIC HEARING 10/19/05

1 Note: The drive time to many major
2 airports in the United States from surrounding areas
3 is in excess of 42 minutes.

4 Comment 3. Paragraph 2; line 5. The
5 correction should indicate that CDC provides 3 daily
6 flights, not one, to Salt Lake City.

7 Comment 4. Paragraph 2; line 8. The
8 comment related to "market preference" does not
9 consider that at the halfway point between the two
10 cities the drive time actually favors CDC, as street
11 traffic in St. George is considerably heavier.

12 Comment 5. Paragraph 3; line 3. The
13 correction should indicate that should SGU continue
14 to operate from its current location, it would have
15 to do so with the present aircraft whereas CDC could
16 operate today servicing regional jets and other
17 large aircraft. The correction should indicate that
18 SGU would not be able to provide its current level
19 of commercial service if the FAA were to withdraw
20 the current safety exemption allowance.

21 Final Comment: Spending \$100,000,000 to
22 \$200,000,000 for a new airport in St. George, when
23 the Cedar City Regional Airport currently has a far
24 superior capability to service the flying public, is
25 a ridiculous waste of taxpayer dollars. This is

2

3

4

5

6

- 3. Your comment has been noted. The information you provided will be verified and corrected in the Final EIS, as appropriate.
- 4. Your comment has been noted. The information you provided will be verified and corrected in the Final EIS, as appropriate.
- 5. Your comment has been noted. In addition, due to the runway length restrictions at the existing airport, the largest aircraft that can be accommodated is a turboprop with a maximum seating capacity of 30 passengers. The replacement airport and the St. George market would support regional jet operations with a seating capacity of between 50 and 70 passengers. The fleet mix forecast provided in **Appendix E, Aviation Activity Forecast, Table E-6** of the Draft EIS shows that the future class of aircraft will be the same as the existing fleet mix (turboprop, regional jet, business jet, propeller, and helicopter).
- 6. Your comment has been noted.

1 especially true when considering the money needed
 2 for hurricane relief, the continuing war against
 3 terror, and natural catastrophes such as the
 4 earthquake in Pakistan. Is convenience to two or
 5 three thousand people in St. George really worth
 6 that amount of money?

7 JEFFREY N. THOMAS: Thank you.

8 Roxie Sherwin.

9 ROXIE SHERWIN: Hi. I'm Roxie Sherwin
 10 with the St. George Area Convention and Visitors
 11 Bureau. They told me I had five minutes since we're
 12 a government entity; is that correct, or should I
 13 read really fast?

14 JEFFREY N. THOMAS: Read really fast.

15 ROXIE SHERWIN: The St. George Area
 16 Convention and Visitors Bureau is a function of
 17 Washington County government and funded through the
 18 collection of transient room tax. Our mission is to
 19 promote Washington County as a premier convention
 20 and tourist destination; stimulate tourism's
 21 economic impact; and unify partners to maximize the
 22 visitor's experience.

23 The CVB works with other organizations
 24 across the state such as Utah Office of Tourism,
 25 Utah Travel Industry Coalition, Southern Utah

6

7

7. Thank you for your interest in this project. Your comments have been noted.

PUBLIC HEARING 10/19/05

1 National Parks, Zion Natural History Association,
2 Utah Travel Regions, Washington County Museums,
3 local chambers and lodging groups to jointly promote
4 tourism in Southern Utah as well as the entire
5 state.

6 The St. George Area Convention and
7 Visitors Bureau does support the need for the new
8 proposed replacement airport, however has concerns
9 for the potential impact of noise and other
10 distractions that may adversely affect some of the
11 most spectacular scenery and historic sites in the
12 world.

13 Utah is part of a global economy inviting
14 domestic and international business and travel
15 markets to Southern Utah. Since 9/11, we have seen
16 continued growth of the tourism markets into our
17 area. Zion National Park is reporting the highest
18 visitation in the past ten years. 2004 was the
19 busiest year on record with nearly 2.7 million
20 visitors finding safety, variety, hospitality, value
21 and unsurpassed beauty.

22 Sports, adventure, arts and events are all
23 seeing unprecedented interest and growth. The
24 St. George area is listed in "100 Best Art Towns in
25 America" and in the top 10 for retirement

SULLIVAN REPORTING, INC.
(435) 635-0270

PUBLIC HEARING 10/19/05

1 communities, active communities and best unknown
2 golf getaways in the United States.

3 The Canyon Softball Complex has been NSA's
4 facility of the year for the last seven years,
5 hosting 40 softball events annually. St. George
6 Marathon is the 15th largest marathon and was named
7 one of the 10 most scenic.

8 Regarding the dinosaur prints, quoting
9 Gerald Gerlinski from the Polish Geological
10 Institute, "The St. George collection is going to be
11 the most important in the world for research on
12 early Jurassic footprints." Dr. James Kirtland,
13 Utah State Paleontologist, says, "This is the most
14 significant dinosaur track site in western North
15 America."

16 The convention industry is a growing
17 economic engine in the area. Our location is
18 central for western meetings and growing more
19 popular for national meetings and events. In 2004,
20 the Dixie Center, convention hotels and other
21 meeting venues brought in over 150,000 meeting
22 delegates that stayed for an average of 2.5 days.
23 The convention center has seen continued growth in
24 bookings since opening in '98 and is considering
25 doubling our meeting space to coincide with the

SULLIVAN REPORTING, INC.
(435) 635-0270

PUBLIC HEARING 10/19/05

1 opening of the proposed airport.

2 One common concern with many groups is the
3 lack of a major airport in the area. There are only
4 240 seats daily into St. George through the current
5 flight capacity, not enough to handle the needs of
6 groups over 500. This past month, the influx of
7 over 20,000 Senior Games and 12,000 marathon
8 visitors put a heavy load on the airport. Many
9 events and conventions are limited by available
10 venues, hotels and air transportation. With the
11 growth that is occurring, more hotels and venues
12 will be built, thus increasing the need for more air
13 transportation into the city.

14 The convention and tourism industry is
15 changing rapidly with the advent of new technology.
16 The need to continually update venue and elevate
17 marketing goals to accommodate and plan for the
18 future, while preserving our National Parks and
19 Historic Sites is crucial. The great weather, golf,
20 attractions and especially the spectacular beauty of
21 Zion National Park make this area an inviting
22 tourist and business destination worldwide.

23 Consideration for all these factors needs
24 to be carefully reviewed to find the best possible
25 solutions for all. Thank you.

SULLIVAN REPORTING, INC.
(435) 635-0270

7

PUBLIC HEARING 10/19/05

1 JEFFREY N. THOMAS: Voin Campbell.
 2 VOIN CAMPBELL: I appreciate your time and
 3 opportunity to comment. My name is Voin Campbell.
 4 I also am a member of the Action Committee of the
 5 Chamber of Commerce and the chairman of the
 6 Environmental Subcommittee. I will make just some
 7 brief comments today and will follow-up later with
 8 written comment.
 9 The Action Committee of the Chamber of
 10 Commerce strongly endorses and supports the City's
 11 proposed replacement airport. We have looked at the
 12 data that has been made available up to this point
 13 and are satisfied that the City is quite capable of
 14 meeting all of the standards of safety and also can
 15 develop routes that will not be disruptive to the
 16 parks and other areas of particular interest.
 17 This replacement airport is absolutely
 18 fundamental to the continued economic growth and the
 19 future of the area generally. We believe that
 20 St. George is now a staging point for many tourists
 21 who travel through these parts and enjoy them. And
 22 as a replacement airport comes in, it will be an
 23 even greater friend of these parks in providing
 24 staging points for travel to and from these areas of
 25 interest.

8

8. Thank you for your interest in this project. Your comment has been noted.

PUBLIC HEARING 10/19/05

1 We appreciate your efforts to meet the
2 requirements that are necessary for us to get on
3 with the construction of this airport. I thank you
4 for your time.

5 JEFFREY N. THOMAS: Thank you.

6 Eric DeVita.

7 ERIC DeVITA: Good afternoon. Appreciate
8 you taking the time to listen to the folks out here.
9 I missed the first little bit, but sure sounds like
10 most of the folks are going to be in here arguing
11 the value of an airport, a large metropolitan type
12 airport, folks who run businesses who are looking
13 for that growth of 600,000 people in the next 20 to
14 30 years. Same folks that want that large project
15 of pumping the water in here from the lake. Let's
16 watch real estate prices grow another 20 percent
17 every year for the next five to 10 years.

18 I got to tell you, as a guy who lives here
19 and a guy who moved here a couple of years ago to a
20 small community, I look at it from the other side
21 and say I'm not sure that I want the place to be
22 600,000 people. I'm not sure that I want a regional
23 airport here. What I love having is 30 miles away a
24 regional airport in Mesquite. The second largest
25 runway I think in Utah is where? From what I've

9. Thank you for your interest in this project. Your comments have been noted.

9

SULLIVAN REPORTING, INC.
(435) 635-0270

1 read, I think it's up in Cedar City. I think that's
 2 45 miles away. So I would argue that what you have
 3 today available for regional transportation very
 4 close to St. George is very acceptable and is going
 5 to be even better. I'm not sure that we need that
 6 here.

9

7 You guys are the environmental folks, but
 8 I got to tell you that even in the last couple of
 9 years, if you look around here, you've seen,
 10 particularly with the construction going on,
 11 visibility has dropped dramatically just in the last
 12 couple of years. Traffic has gotten tremendous.

13 My property taxes. Always tell everybody
 14 going to be self-sufficient, it will be paid for
 15 with something else. Everyone knows as well as I do
 16 that any time you build a new public infrastructure
 17 like this, whatever the cost is going to be, you
 18 probably need to add another quarter or 50 percent
 19 on top of that. So I worry about what happens when
 20 the property taxes have gone up about 40 percent for
 21 water this year and 20 percent for schools. That's
 22 in one year, let alone with the new assessment that
 23 you're going to get.

10

24 I'm just worried about the cost of it, the
 25 traffic that it's going to bring, and the change

10. Your comment regarding taxes has been noted. The City does not intend to raise taxes to pay for the replacement airport. It is the City's intent to use the proceeds of the sale of the existing airport property to finance the replacement airport (per Mike LaPier 3/7/06) and Federal Grant-In-Aid monies from the Airport Improvement Fund.



PUBLIC HEARING 10/19/05

1 it's going to make to St. George. I would argue
2 that having a nice airport in somebody else's back
3 yard 30 miles away would benefit us greatly with
4 less impact. Thanks.

5 JEFFREY N. THOMAS: Thank you.

6 At this point, we have no one else who has
7 signed up. Are there any others in the audience who
8 wish to make oral comments? We'll close the hearing
9 now and restart it on the top of the hour.

10 (First segment of hearing
11 adjourned at 3:33 p.m.)

12 (4:00 p.m. segment begins.)

13 MARK A. PERRYMAN: My name is Mark
14 Perryman. I'm with the firm of Landrum & Brown. We
15 were the consultants selected to assist the FAA in
16 preparation of the Environmental Impact Statement.
17 What I'm going to do at this time is just give a
18 very brief overview, highlighting a couple of the
19 facets of the Environmental Impact Statement. If
20 you heard me at the introductory boards, you're
21 going to hear a lot of the same material.

22 Basically, the project, the Proposed
23 Replacement Airport for St. George, has been thought
24 about roughly for the last 15 years, since the late
25 '80's, early '90's. There was a site selection

10

SULLIVAN REPORTING, INC.
(435) 635-0270

PUBLIC HEARING 10/19/05

1 study that concluded in 1998 that recommended the
2 site that we are assessing. And an environmental
3 assessment, which is a notch below the Environmental
4 Impact Statement level, was prepared and issued, and
5 the FAA issued a finding of no significant impact
6 or, jargon, you're going to see a lot of that
7 tonight, FONSI, was issued in 2001.

8 Subsequent to that, there was a challenge
9 by the Grand Canyon Trust. The FAA was asked by the
10 court to go back and take a more comprehensive look
11 at some of the noise analysis especially relative to
12 Zion National Park. In doing so, the FAA decided to
13 prepare an Environmental Impact Statement and
14 include all additional analysis that the court
15 requested. That's what we're here about tonight.

16 Where we are in the process, our little
17 snake diagram, as we call it. The EA is up here to
18 the upper left. We've gone through a series of
19 scoping processes. The draft document has been
20 prepared. It was released last month, roughly 30
21 days ago. Today we're at our public hearing. The
22 comment period is a 60-day window that will conclude
23 on November 8th. All comments need to be into the
24 FAA by November 8th.

25 From here, we will take a look at those

PUBLIC HEARING 10/19/05

1 comments. The document will be changed as
2 necessary, additional review and analysis, if
3 necessary, and then the FAA will issue a final
4 Environmental Impact Statement, followed by a record
5 of decision as to what the agency's final decision
6 is. At this point, the FAA has not made a decision.
7 This is merely a disclosure document as to what it
8 is considering in its decision-making process. Then
9 once the FAA makes a decision, the City of
10 St. George can then go forward with design and
11 construction.

12 A little bit about why -- you already have
13 an airport here in St. George, why do you need
14 another one. This is truly a replacement airport to
15 accommodate the future demand here in St. George and
16 the region around St. George. Currently the airport
17 can only accommodate smaller turboprop aircraft,
18 32-seat or less. There is a great demand. All
19 planes coming in today, for instance, have been sold
20 out. People are wanting to come to St. George;
21 you're wanting to go to other locations. There is
22 definitely a need for additional capacity, a larger
23 aircraft to be able to fly into and out of
24 St. George.

25 The project of building a replacement

PUBLIC HEARING 10/19/05

1 airport will accommodate that need. That's what it
2 basically comes down to. It doesn't mean that the
3 existing airport is unsafe. It just means that it
4 is restricted to smaller aircraft. That is the
5 bottom line. And larger aircraft are necessary to
6 accommodate the demand.

7 This slide shows the existing airport
8 site. Relative to the proposed airport site, we're
9 about halfway in between, a little bit south of the
10 existing. A little closer view of the proposed site
11 development. It's a little bit hard to read here.
12 If you want to get up close and personal, there are
13 boards out in the other room where you can look at
14 all the various facilities. It will be a
15 fully-instrumented, fully-developed airport. It
16 will have all the facilities that you have today at
17 the existing airport.

18 Again, coming back to the why, the
19 aircraft on the right is what flies in and out of
20 St. George today. The aircraft on the left here,
21 the regional jet, the 50- and 70-seat regional jet
22 is what is proposed to be flying into the proposed
23 replacement airport in the future.

24 The key to this, and I shouldn't have gone
25 so quick, is relative to noise effects, the new

PUBLIC HEARING 10/19/05

1 aircraft, the jet, is just as quiet as the
2 turboprop. So there is really little difference.
3 As you can see these little strips of noise contours
4 on either side of the aircraft, there's really
5 little difference relative to noise impacts when you
6 change from one aircraft to the other.

7 You'll hear a lot about noise in this
8 project because of the proximity to a lot of natural
9 resources, most notably Zion National Park, and
10 others, Little Black Mountain to the south, and a
11 whole host of other parks and recreational
12 facilities. We didn't just look at noise. We
13 looked at all the various aspects. This gives you
14 an idea of some of those that we took a look at in
15 the Environmental Impact Statement process, from
16 land use to solid and hazardous waste issues,
17 construction, how is it going to be constructed.
18 Those are all documented in that three-volume
19 document that sits out on the table in the other
20 room.

21 But to focus a little bit on the noise and
22 just give you an overview of what Scott has on his
23 presentation, if you want to go through it with him,
24 the noise analysis that was conducted as part of the
25 EIS used the latest model available to us, uses the

PUBLIC HEARING 10/19/05

1 latest methodology. In fact, we worked very closely
2 with the National Park Service at developing
3 protocols and methodologies to meet their needs and
4 demands as we moved forward. I can stand here today
5 and say it's probably the most exhaustive noise
6 analysis, bar none, in the country, especially for
7 an airport this size. There was more noise analysis
8 put into this EIS than there was for the runways
9 at O'Hare in Chicago, for instance. This is very
10 comprehensive.

11 We started with taking a look at the local
12 area and worked our way out, so the close-in
13 proximity effects of noise. And we looked at the
14 standard that we use for that is day/night average
15 sound level, the DNL. We looked to see how many
16 homes or people were impacted within the 65, which
17 is the federal level of significance. There are no
18 homes within the 65 of the existing airport, and
19 there would be no homes in the 65 of the future
20 airport. So there was no change in total impacts
21 from that perspective.

22 Just to give you an example, these -- turn
23 down these lights a little. The spanning network
24 that we have here is the flight tracks into and out
25 of the existing airport. And they would be very

PUBLIC HEARING 10/19/05

1 similar for the proposed replacement airport. This
2 is a little zoomed in. That was a wide-angle view.
3 This is a little bit more zoomed in. The existing
4 airport over to the left and the replacement airport
5 over to the right. And showing the relative change
6 in flight tracks and overflight areas.

7 The resulting noise contours, as I
8 described earlier, this is the existing airport and
9 the effects of noise. The yellow band all the way
10 around is 60 DNL, is actually 5 DB less than -- or
11 greater than what we were required to look at versus
12 the 60 DNL for the proposed replacement airport.
13 Again, those footprints are relatively compact and
14 stay within the confines of the airport.

15 We then took a broader look at the noise
16 effects, started taking a look at what we call the
17 4F303C areas. These are parks and recreation areas,
18 is fundamentally what they are or sites of natural
19 or historic significance. We used the same
20 methodology for these types of properties as we did
21 for Zion National Park.

22 I'll go into that a little bit more. This
23 was the total area of investigation, the initial
24 area of investigation, as we call it. Is that a
25 little better? Just to give you some relative size,

PUBLIC HEARING 10/19/05

1 this constitutes 9200 square miles that we took a
2 look at in this assessment. It's about 80 by 88
3 miles, 88 miles across and 80 miles north to south.
4 So very broad area that we took a look at and
5 accounted for all the noise effects. Zion is up in
6 the -- toward the upper right-hand corner there.

7 We did some very specific analysis
8 relative to the noise at Zion. We took a look at
9 what's called their natural ambient. The whole
10 purpose here was to make sure that we covered the
11 cumulative activity, not just the activity from
12 St. George as it is today and as it might be in the
13 future, but we also looked at all the airports in
14 the area, all the high-altitude overflights, all of
15 the air tour operators that transition this area
16 going from Grand Canyon to Zion to Bryce throughout
17 the entire region. All of that was accounted for in
18 our noise analysis in this Environmental Impact
19 Statement. So it's very, very comprehensive.

20 Just to give you some indication, these
21 are the high-altitude flights only that overfly that
22 initial area of investigation that we talked about.
23 And this is a snapshot from one day of high-altitude
24 flights in the area. A little harder to read, but
25 these are the air tour operators that transition.

PUBLIC HEARING 10/19/05

1 Typically, most of them are coming out of Vegas up
2 through the Grand Canyon, up to Zion or to Bryce.
3 Very few air tour operators actually originate out
4 of St. George.

5 Basically, the bottom line is what's next?
6 We keep hearing that. This has been a very long
7 process, we know. The comment period, as I
8 indicated, will close on November 8th. We intend to
9 have a final document prepared over the winter, rest
10 of this year through winter of '06, and the FAA
11 anticipates a decision in the spring of next year,
12 spring of '06.

13 That's it for my overview and
14 introduction. If you have more detailed questions,
15 we have a whole host of consultants and FAA
16 personnel out at the boards. Feel free to discuss
17 anything with them, any questions you might have.

18 At this point, because of the process, we
19 will open this up for a formal public hearing.
20 Mr. Thomas will be the hearing officer this evening.
21 His whole purpose here is to help regulate, make
22 sure everyone has the opportunity that wants to
23 speak that can speak.

24 Your comments, whether written or whether
25 given orally, are treated equally. I want to

PUBLIC HEARING 10/19/05

1 underscore that so that everyone understands that if
2 you don't want to speak you can go out to the table.
3 There's a self-addressed comment form that all you
4 have to do is fold it, either drop it in the box on
5 your way out or take it home and you can write your
6 comment out and mail it in. With that, I'll turn it
7 over.

8 JEFFREY N. THOMAS: Thank you, Mark. Good
9 afternoon. My name is Jeff Thomas. I'd like to
10 welcome you all in the audience to the public
11 hearing on the Draft Environmental Impact Statement
12 for the proposed replacement airport at St. George.
13 I am the hearing officer for today's hearing
14 responsible for maintaining order for these
15 proceedings. Looks like a pretty orderly crowd.

16 In compliance with the National
17 Environmental Policy Act (NEPA), the FAA is
18 providing the public with an opportunity to comment
19 on the analysis of potential environmental impacts,
20 the adequacy of the proposed action and/or the
21 merits of alternatives as presented in the Draft
22 Environmental Impact Statement for the proposed
23 replacement airport. The FAA's response to comments
24 will be included in the Final Environmental Impact
25 Statement. All of the comments, along with prepared

PUBLIC HEARING 10/19/05

1 responses, will be included in the official public
2 record of the final document.

3 No questions will be answered in the
4 public hearing setting. A public information
5 meeting is going on outside the door in the next
6 room concurrently with this hearing, and your
7 questions can be answered in that area.

8 In addition to making oral comments at the
9 hearing tonight, written comments will also be
10 accepted through Tuesday, November 8th, 2005, when
11 the official comment period will be closed. Comment
12 forms are located in the meeting room next door. If
13 you wish to complete the form at home, mail or fax
14 it in, the form is pre-printed, and the mailing
15 address is on the form. Comments can also be
16 e-mailed to the e-mail address on the form.

17 The process for making oral comments at
18 this hearing will be as follows: We'll listen to
19 each and every person who wishes to provide oral
20 comments, and the hearing will remain open until
21 everyone who has registered to speak has had the
22 opportunity to do so. If you have not already done
23 so, you may register to speak at the table near the
24 entrance to the outer room. Registration enables
25 the record of your comments to be correctly

PUBLIC HEARING 10/19/05

1 attributed to you.

2 In keeping with the hearing protocol, each
3 speaker will be allocated up to three minutes.
4 Those wishing to speak will only be allowed to sign
5 up once to provide oral comments. If you have
6 additional comments that exceed your allotted time,
7 please mail, fax or e-mail them as indicated on the
8 comment forms.

9 The order of the people that will speak
10 will be the order in which they signed up on the
11 sign-up sheet with special consideration given to
12 elected public officials who will be given priority.

13 To be respectful of everyone's time, I
14 will be enforcing the three-minute limit to ensure
15 that everyone who wishes to speak gets the
16 opportunity to speak and has an equal opportunity.
17 When your name is called, please come forward and
18 make your comments. Begin by confirming your name
19 for the record. We will now officially open the
20 public hearing.

21 Scott Hirschi. If I pronounced your name
22 wrong, I apologize.

23 SCOTT HIRSCHI: Good afternoon. My name
24 is Scott Hirschi. I'm the Director of Washington
25 County Economic Development Council. Present the

1 following:

2 The Washington County Economic Development
3 Council (WCEDC) supports St. George City's proposal
4 to replace the existing airport at the site studied
5 in the above-noted Draft Environmental Impact
6 Statement (DEIS). It is the position of the WCEDC
7 that the proposed replacement airport represents an
8 improvement to the health and safety of citizens of
9 the county and the users of aviation services.

10 We have reviewed the DEIS and find the
11 document complete and well done. It is our opinion
12 that the DEIS conscientiously addresses each and all
13 of the environmental issues pertaining to the
14 proposed project. The WCEDC encourages the Federal
15 Aviation Administration (FAA) to issue a Finding of
16 No Significant Impact as quickly as possible and
17 allow the proposed project to move forward in a
18 timely manner.

19 As the DEIS clearly demonstrates, the
20 existing St. George Municipal Airport does not
21 provide an adequate margin of safety and is
22 incapable of being expanded. The ever increasing
23 demand for aviation services in the area require a
24 new airport location that will accommodate a longer,
25 wider runway, and one without the airspace

11 Thank you for your interest in this project. Your comments have been noted.

11

PUBLIC HEARING 10/19/05

1 penetrations associated with the existing facility.

2 For the past four decades the community
3 has seen an annual growth rate of over six percent,
4 taking a county of 10,000 residents in the mid
5 1960's to a population of over 130,000. The State
6 Growth Commission estimates the county will exceed
7 600,000 citizens by the year 2050. I congratulate
8 the City and the FAA for having the foresight to
9 begin the planning process for a replacement airport
10 many years ago. I believe the search for the
11 quintessential site has been comprehensive, and the
12 feasibility studies, including this DEIS,
13 substantiates the suitability of the proposed site.

14 Many of the clients we work with find it
15 necessary to fly into Las Vegas, Nevada, and then
16 drive two hours to arrive in the county. As the
17 local business community has grown, the lack of
18 larger aircraft and more direct routes has become a
19 challenge to retaining existing companies and
20 attracting new businesses.

21 Quoting from the Utah Economic and
22 Business Review, "Acting as catalysts for business
23 expansion, job growth and the development of
24 travel-sensitive industries, state-of-the-art
25 airports are critical to both national and

11

PUBLIC HEARING 10/19/05

1 metropolitan growth. In today's economy, an
2 efficient airport is an essential ingredient for a
3 community to successfully compete for industrial and
4 commercial development." Our experience confirms
5 the validity of that statement. We must replace the
6 existing airport if the area is to continue to enjoy
7 a strong and healthy economy.

8 One of the premier companies of the
9 community is SkyWest Airlines. SkyWest's corporate
10 offices are located in St. George, and because of
11 that the community enjoys excellent connects to both
12 Los Angeles and Salt Lake City. However, SkyWest,
13 like many other carriers, have found it necessary to
14 phase out of 30-passenger aircraft, replacing them
15 with larger, regional jets. The existing airport
16 cannot accommodate the larger aircraft, thereby
17 jeopardizing not only commercial air service for
18 St. George but also the very important economic
19 impact of SkyWest's corporate offices.

20 I participated with the land use planning
21 associated with this DEIS. I appreciate the
22 cooperation of Washington City, St. George City,
23 Mohave County, Arizona, and Washington County in
24 planning land use around the proposed facility that
25 will protect its viability while allowing a great

11

SULLIVAN REPORTING, INC.
(435) 635-0270



PUBLIC HEARING 10/19/05

1 deal of economic development to compliment the new
2 airport.

11

3 Finally, I am an avid hiker. I spend many
4 enjoyable days and nights in the wilderness of the
5 Pine Valley mountains and the back country of Zion
6 National Park. My personal observation is that
7 nearly all aircraft use the Interstate 15 corridor
8 as they proceed north from St. George. It is a rare
9 occurrence to have low-flying aircraft over Zion,
10 but such an occasion is not a major interruption of
11 my otherwise peaceful outings in the natural quiet
12 of the Park or wilderness.

13 I endorse the proposed User Education
14 Program, believing that whatever small amount of
15 overflight activity in noise-sensitive areas that
16 now occurs will be reduced, not increased, by
17 introduction of the new airport and the education
18 program. In addition, the introduction of modern,
19 quieter regional jets will reduce noise levels of
20 commercial flights throughout the area. Sincerely,
21 Scott Hirschi. Appreciate the opportunity to
22 comment.

23 JEFFREY N. THOMAS: We'll pause here and
24 resume. I believe there's another speaker or two
25 lined up.

SULLIVAN REPORTING, INC.
(435) 635-0270

PUBLIC HEARING 10/19/05

1 Roene Wilkinson.

2 ROENE B. WILKINSON: Good afternoon. I'm
3 happy to be here in response to questions asked
4 about the new replacement airport. I speak for
5 myself as an individual and not per se for the
6 St. George area Chamber of Commerce, but I do work
7 for the Chamber of Commerce. We have many
8 comments --

9 JEFFREY N. THOMAS: Would you state your
10 name, please.

11 ROENE B. WILKINSON: Roene B. Wilkinson.

12 JEFFREY N. THOMAS: Thank you.

13 ROENE B. WILKINSON: I just want to make
14 the comment that I have been at the airport. I have
15 used the airport as it stands. It is not large
16 enough. It is not accommodating enough for the
17 amount of traffic that comes into this city. We do
18 need that airport as soon as possible. If not now,
19 when? I understand that this has been going on for
20 15 years trying to get an airport here.

21 I've been here six years. I've used that
22 airport, and it sort of scares me. We need -- as I
23 see business coming into the community, they're not
24 willing to bring business in, large companies,
25 unless they have a facility that accommodates those

12. Thank you for your interest in this project. Your comments have been noted.

12

SULLIVAN REPORTING, INC.
(435) 635-0270

PUBLIC HEARING 10/19/05

1 businesses that want to relocate here. We are a
2 growing community. It is developing rapidly, and
3 this airport is not sufficient. I would like to see
4 that happen as soon as possible.

5 I think the EIS study should come to a
6 halt. I think they've had enough time to do this
7 and that we should get on with what we need to, with
8 business. Thank you.

9 JEFFREY N. THOMAS: Thank you.

10 We probably should wait a few minutes and
11 see if we have other speakers. If not, we'll
12 adjourn until the beginning of the next hour.

13 We'll officially adjourn the hearing and
14 restart the hearing, and we'll restart at the
15 beginning of the next hour.

16 (This segment of the hearing
17 concluded at 4:25 p.m.)

18 (There were no more speakers.)

19 (The hearing concluded at
20 7:00 p.m.)

21
22
23
24
25

12

PUBLIC HEARING 10/19/05

REPORTER'S CERTIFICATE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

STATE OF UTAH)
) ss
COUNTY OF WASHINGTON)

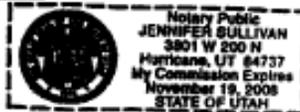
I, Jennifer Sullivan, a duly commissioned
Notary Public, Washington County, State of Utah, do hereby
certify:

That I reported the taking of the Public Hearing
in the matter of the Proposed Replacement Airport at
St. George, Utah, commencing on Wednesday, October 19, 2005,
from 3:00 p.m. to 7:00 p.m.

That I thereafter transcribed my said shorthand
notes into typewriting and that the typewritten transcript
of said public hearing is a complete, true and accurate
transcription of my said shorthand notes taken down at said
time.

IN WITNESS WHEREOF, I have hereunto set my hand
and affixed my official seal in my office in the County of
Washington, State of Utah, this 2nd day of

November, 2005.



Jennifer Sullivan, RPR
Jennifer Sullivan, RPR