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

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<thead>
<tr>
<th>Number</th>
<th>Comment Submitted by Person/Agency</th>
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<tr>
<td>1</td>
<td>Jim Matheson, Congress of the United States House of Representative</td>
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<td>2</td>
<td>Meghan Holbrook, Utah Air Travel Commission</td>
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<td>3</td>
<td>Kirk Nielson, PE; Utah Division of Aeronautics</td>
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<td>4</td>
<td>D. Larry Anderson, P.E.; State of Utah Department of Natural Resources</td>
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<td>5</td>
<td>Lowell Elmer, Dixie Metropolitan Planning Organization</td>
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<td>6</td>
<td>John Williams, Five County Association of Governments</td>
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<td>7</td>
<td>James Eardley, Alan Gardner, Jay Ence; Washington County Commission</td>
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<td>8</td>
<td>Larry Gardner, St. George City Council</td>
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<td>Gerald Schiefer</td>
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<td>Daniel Smith &amp; Micheline Smith</td>
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<td>Mark Ahrenholtz</td>
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<td>Voin Campbell</td>
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<td>Paul &quot;West&quot; Martin</td>
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<td>Bill Hudson</td>
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<td>Dr. Sheldon &amp; Mrs. LaVerna Johnson</td>
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<td>R. Paul &amp; Geniel Thompson</td>
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<td>Gilbert Jennings, P.E.; Fort Pierce Business Park</td>
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<td>Don Shelline, Shelline Studios</td>
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<td>Royden Wittwer</td>
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<td>Bruce VanderWeff, Springdale Town Council</td>
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<td>Lin Alder, Alder Photo &amp; Writing</td>
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<td>29</td>
<td>Wayne Staab, Ph.D.; Dr. Wayne Staab &amp; Associates</td>
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<td>30</td>
<td>Thomas Bailey</td>
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## Table R.1, Continued
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<td>31</td>
<td>Jim McGuire; Washington City Community Development</td>
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<td>Richard Pratt &amp; Ed Burgess; Desert Canyons Group</td>
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<td>John Brems; Parsons Kinghorn Harris, P.C.</td>
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<td>Lois Graham</td>
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<td>Chaitna Sinha, Southern Utah Wilderness Alliance</td>
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<td>38</td>
<td>Tom Thompson</td>
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<td>Hal Hilburn</td>
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<td>Jock Whitworth, National Park Service</td>
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<td>Dick Hingson, Grand Canyon Trust; Steve Bosak, National Parks Conservation Association</td>
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<td>Dan McGuire, Town of Rockville</td>
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<td>Leonard (Leo) Gallia</td>
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<td>Steven Parker, UNLV</td>
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<td>Marcel Rodriguez</td>
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<td>Eric DeVita, transcript</td>
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<td>Scott Hirschi, Washington County Economic Development Council; transcript</td>
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<td>70</td>
<td>Roene Wilkinson, transcript</td>
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Thank you for your interest in this project. Your comment has been noted.
1. Thank you for your interest in this project. Your comment has been noted.
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 approximatively 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
impediment 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,

[Signature]

Meghan Millbrook
UATC Chairwoman

cc:
Dan McArthur, Mayor of St. George
Jerry Atkin, President & CEO, SkyWest Airlines
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 H. Hatch, State Senator
John W. "Bill" Hickman, State Senator
David Cleek, State Representative
Mike Noel, State Representative
Stephen Urquhart, State Representative
Ross "Rocky" Anderson, Mayor of SLC
Thank you for your interest in aviation. Your comment has been noted.

1. 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 cannot 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 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 buses 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 buses 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 Southeaster 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 modeling that are impossible 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
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 distorted 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 aircrafts 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 that serve the entire population of the state. A Commercial Service airport's 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
1. The FAA has noted that your office does not need to see any further documentation on this project.

Thank you,

D. Larry Anderson, P.E.
Director
1. Thank you for your interest in this project. Your comment has been noted.

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 process 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 USA
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 98056-4056

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 the 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 completion 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. Thank you for your interest in this project. Your comments have been noted.
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, Laburn 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 solitudes 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 Brazilian Turbo-prop planes presently using the airport. Actual sound levels from the RJ planes will be less than the current level of the Brazilia's.

As a County Commissioner, 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 being here will be improved 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. Erveld, Chairman  Alan D. Gentry, Commissioner  Jay Erveld, Commissioner

The Washington County Commission
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. It’s 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
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. 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.

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, Bucannon Field Walnut Creek California and others. Considerations such as engine failure after takeoff/rollover 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 B. Smith

Micheline B. Smith

Micheline Smith - Aviation Safety Counselor - Flight School Dispatcher
Thank you for your interest in air travel. Your comment has been noted.
November 1, 2005

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

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 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 area’s 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 in 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.
November 2, 2005

David Field, Project Manager
For St. George Replacement Airport
EISFAA, Northwest Mountain Region
1601 Lind Avenue, SW/Ste 315
Renton WA 98055-4086

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 airplanes 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 Calia Las Casitas
St. George, UT 84790

1. Thank you for your interest in this project. Your comment has been noted.
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 Mackey
441 E. Sunland Dr. #11
St. George, UT 84790

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

Bill Hudson
PO Box 98
344 N. 100 W.
Washington, UT 84780
435-656-9228
1. Thank you for your interest in this project. Your comments have been noted.
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 comment has been noted.

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

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

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
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. Woodsview Circle
St. George, UT 84770
p - 435.652.1801 f - 435.652.0655
shelline@infowest.com

Shelline Studios
We Help You Tell Your Story

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

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
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 lead 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.
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.

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 its 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.

Approved this 16th day of April, 2001

Town of Springdale

[Signature]

Phillip K. Bimstein
Mayor

Town of Rockville

[Signature]

David M. Hathfield
Mayor

Attest:

[Signature]

Tori von Rentzell
Town Clerk

Attest:

[Signature]

Elaine M. Harris
Town Clerk
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 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, 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.

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.

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.
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
2) the noise analysis needs to focus on peak days and hours, not day averages
3) ensuring the flight path to/from Denver stay well north of Zion National Park
4) reporting "Current Conditions" for noise over Zion, based on 2000 or 2003 baseline year.
5) reporting "Audibility" data that was promised in the Scope of Work.

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.
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.
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
Demmeron Valley, UT 84783-5196
435-574-0061 - Phone
435-574-0063 - FAX
wstaab@aol.com
www.waynestaab.com
Google: Wayne Staab
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 redevelopment 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.
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.
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.
1. Impacts to the Ft. Pierce West 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 similar exhibits. If the depicted access is ultimately able, there should be clear justification why this access is preferred over the faster terrain alternative further to the north.

2. Exhibits 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 representative of the documentation. Although Washington City will experience additional noise and visual impacts, the impacts are not significant according to federal standards. We will 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

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.
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. Field:

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 potential 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

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. 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.
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.

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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
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.

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. Sandscape Dr.
St. George, UT 84770
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. 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.
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▼]
1. [continued] FAA Order 1050.1E states that "national 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.

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]
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.
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.

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 representative 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.
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.

Sincerely,

Chaitna Sinha
Southwest Representative
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

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"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."
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.

1. 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▼]
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

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

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
Ref: 8EPR-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
C12Q # 20053037

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.
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 our 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,

[Signature]

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

Enclosures (2)
1. An analysis of particulate matter (PM<sub>2.5</sub>) 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<sub>2.5</sub> 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<sub>2.5</sub> emissions factors for aircraft and other emission sources. Therefore, a PM<sub>2.5</sub> 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.

2. 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.

3. 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 of 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 tanks 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

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."
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.

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.

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.]

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.
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

LI - 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 purpose 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.

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

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
November 8, 2005

Mr. David Field, Manager
Planning/Programming Branch
Airports Division
Federal Aviation Administration
Northwest Mountain Region
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Fax: (425) 227-1690

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.
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.

Third, on DEIS page 5-19, under the Palate 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.”

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.

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 those 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
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.
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.

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 ▼]
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.
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>
<thead>
<tr>
<th>Site</th>
<th>Number of Events above 726RA (24-hr)/day</th>
<th>Number of Events above 726RA (18-hr)/day</th>
<th>Average Number of Events per hour</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cedar Breaks NM</td>
<td>375</td>
<td>365</td>
<td>24.3</td>
</tr>
<tr>
<td>Little Black Mesa</td>
<td>315</td>
<td>303</td>
<td>20.3</td>
</tr>
<tr>
<td>Peake Wilderness</td>
<td>297</td>
<td>299</td>
<td>13.8</td>
</tr>
<tr>
<td>Pine Valley Wilderness</td>
<td>352</td>
<td>342</td>
<td>21.8</td>
</tr>
<tr>
<td>Pipe Spring NM</td>
<td>309</td>
<td>307</td>
<td>19.5</td>
</tr>
</tbody>
</table>

The above table was 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 726RA in 2020 in ZION, and includes the other 47 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 per aircraft over ZION, supports the concept that even 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 extended 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-Canyon Quilt sampling site, a subset of annual 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 collections 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.
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 analysis would account for all overflights activities beginning with baseline conditions (including existing airport) 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 LAmax 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 (2AA).

- 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 DNL for each of the 3 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 Above Ambient, display the data in a histogram of the 24-hour day or similar technique.

ADDITIONAL COMMENTS

CHAPTER 5

Page 6-19, section 5.3.4, paragraph 2

The NPS Organic Act is misspelled: "...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 [40506(3)] 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 1502.2(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 (L,ambient) is considered comparable to Time Audible, a metric which is in development by the FAA and the NPS, but unvaluable 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.
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.

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

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

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.

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.
Noise metric information for the year 2003 at Zion National Park is presented in Appendix S, Noise Levels for 2003 Conditions, in the Final EIS. That information indicates that the noise levels and effects from aircraft not related to the project will increase between 2003 and 2010, similarly to the increase noted between 2010 and 2020.

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. As explained in the response to comment #5 above, the FAA has determined that additional analysis of 15-hour day is not justified.

The text of the Final EIS has been revised to reflect that there is "incrementally small change" rather than "no change" in the noise levels.

The information requested by the commenter is total Time Above Ambient data and differs from the information presented on Exhibit 7.7 and Exhibit 7.8 in the Final EIS, which reflect change in Time Above Ambient levels. Therefore, the change is not appropriate. However, the commenter is directed to Appendix B, Tables B.42 and B.43, which provide the information requested.

FAA NEPA analyses evaluate the degree of change between "no project" or "baseline" conditions and the "with project" condition. Every exhibit and table in the EIS provides this information, as well as the information necessary to determine the degree of change. The inclusion of total Time Above Ambient level mapping could lead to confusion regarding the effects of this project.

The sentence referred to is the FAA's 4(f)/303(c) determination regarding the proposed replacement airport and Zion, a determination that must be made by law prior to a decision to proceed with the project. It is unclear what component of this would be pre-decisional. Please see Appendix B for a thorough description of the relationships between cumulative and project-related noise and the considerations leading to the determination that the project does not create a substantial impairment of the area 4(f)/303(c) sites. This appendix shows the environmental information on the replacement airport project that is available to both public officials and citizens now before any final decisions have been made. In addition, please see Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park, in the Final EIS, which addresses the absence of any necessity to mitigate overflights that are not a part of the project-related action. [continued▼]
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.
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. Hereewith 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
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, as much as 50 decibels above the natural ambient, are compellingly captured by the NA35 noise metric.

"A ‘Ringing’ that Never Stops"

As former Zion Superintendent Don Falvey has pointed out, in his most recent comment 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.

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

See also the NPCA Scoping Letter (#2, at page 3, dated 12/04/02) for a similar conceptualization.

From National Park Service Scoping Letter (#12, at page 3, dated 12/04/02), "... for alternatives in the EIS that demonstrate potential adverse impacts on (Zion), FAA will need to consider how and to what extent

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.

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 Finding). 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 landmark, where the quiet natural soundscape is designated as worthy of extraordinary respect.

3. The NPS “Desired Conditions” noise thresholds 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 cleanest 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.

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.”

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.

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.

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 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. 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 Impairment**: > 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 NFCA’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. 49303c, as interpreted in FAA Order 1050.1E, Sec. 6.2c-f
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 to 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, 1996, 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

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.

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.
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.

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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.  

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.”

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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.
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 graphic presentations” of “What Is A Natural Soundcape”, a January, 2005 technical paper at http://www.hmh.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 2008 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 “baseline” year or “present conditions” analysis, yet there does not appear to

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.
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

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.
"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. Foeh, 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:

"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
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.
• **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(1) 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.
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.
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 acknowledgment at that point, by the FAA, that it no longer anticipates a high 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 L_max 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 scope comments simultaneously received from Brion 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 dBA levels, as per NPS “Desired Conditions” for Zion, should be provided, to aid the general public and decision-makers.

16. Uwarranted Use of “Existing Ambient” instead of Natural Ambient for DOT 400/303e Properties other than Zion National Park

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.

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

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 ▼]
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.

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

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.

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.
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. Please see Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park, 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 overflown by arriving and departing aircraft at the existing airport. With implementation of the proposed action, the SunRiver community will still be overflown 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.
1. Please see Appendix W, Issues Relating to Mitigation of Aircraft Noise Impacts on Zion National Park, 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.

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. 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 also see Appendix U, 15-Hour Sensitivity Analysis, in the Final EIS.

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 Zumpf
PO Box 413
Springdale, UT 84767
435-772-0435

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.
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.

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
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.

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.

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.

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

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.)

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

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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.

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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.
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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.

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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.

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....
So please issue a review of the noise impacts from the new St. George/Washinton
[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
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(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.

1. * 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.

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

3. *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.

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

5. *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.

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.

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.

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 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

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.)

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.
Dear Mr. Field,

I am a homeowner in Springdale, UT. My land borders on Zion National Park. I am also 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 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 education program that makes transient aviators (including the military) aware of the flight limits over the Park and Springdale.

Sincerely,

Leonard (Leo) Gaillia
107 Parunuweap Cr.
P O Box 58
Springdale, UT 84767

---

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.
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.
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.
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.

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.

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.

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 29 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.

In the Draft EIS the FAA used a flawed Model to address cumulative 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.

The EIS lacks audibility data and without auditability 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. 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.

---

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
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

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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.
1. Your comments have been reviewed and noted.

2. The existing airport at St. George is located on top of a mesa; the proposed site for the replacement airport at St. George is situated on a relatively flat plateau, once used as the site of a Civil Aeronautics Administration runway in the 1920s and 1930s. The site is located approximately five miles southeast of the City of St. George.

3. According to the Regional Airline Association (RAA) listing of the Top 50 Regional Airline Individual Carriers in 2004, American Eagle was the largest U.S. regional airline, followed by ExpressJet Airlines; Skywest Airlines was ranked third.

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 in 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). Although the FAA cannot speak for the “Red Hawk Airport,” the replacement airport at St. George is being designed to Airport Reference Code (ARC) Category D-III standards with the critical (i.e., design) aircraft being the Boeing 737-900. Category D-III airports are capable of accommodating, without restrictions, the 737-class aircraft.

4. As shown in Exhibit 5.3, Topography - Proposed Replacement Airport, Study Area (in the Draft EIS), the runway end elevations for the proposed runway are 2,877.25 feet above mean sea level for Runway 19 and 2,837.70 feet above mean sea level for Runway 1. Compared to the existing St. George Airport, which sits atop a mesa surrounded by various densities of residential, commercial, and light highway developments, the proposed replacement airport site is located on a relatively flat plateau of currently undeveloped land. The nearest developed areas are very low density residential and agricultural uses that lie to the north and west; the closest being approximately one mile away and sitting at an elevation 100 feet lower than the average proposed elevation of the replacement airport runway surface (i.e., 2,877 feet mean sea level) (see Section 6.23.2, Visual Impacts). Section 6.16, Construction Impacts, states that materials needed for construction are generally available locally, including clean fill material.
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.
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

By J. JEFFREYSTON
AND LINDA NEAL

CHICAGO—Tucked in the
middle of one of Chicago's
neighborhoods, Midway Inter-
ational Airport is surrounded
by brick buildings and three-
owned businesses such as a
drugstore and a bakery. Build-
ing heights are limited across
the rooftops, and managing noise
problem.

Roughly a month after the crash, aviation experts began
ex­amination of the crash site to determine how the
seven people—four adults and two children—ended up in the
street.

Nearly 300 U.S. airports lack
runway safety feature

WASHINGTON—Nearly 300
U.S. commercial airports, in
cluding Chicago's Midway, lack
the runway safety feature that
the Federal Aviation Adminis-
tration considers adequate for
safety.

Many of the nation's large and
medium-sized airports have run-
way safety features that could
detect an aircraft that takes
off the runway. But other small
airports lack such systems, and
some large airports lack the
safety features.

The lack of runway safety
features is a concern for
aviation advocates, who say
they could prevent accidents.

As of last year, only 12 per-
cent of the nation's airports had
runway safety features, ac-
cording to the Federal Aviation
Administration. The agency said
the lack of features is a concern
for safety.

Among other things, lawyers
for passengers who were injured
in the crash at Midway Airport
in Chicago are investigating
whether the airport was
negligent.

A Southwest Airlines F-377 tests its nose in an intersection outside Midway Airport on Friday after crashing off the end of the runway, slamming through a barrier, careening across a sidewalk and striking a

At 1:40 a.m. on June 27, 1979, the aircraft, a Boeing 737, was damaged in a collision with the barrier. The pilot

The Federal Aviation Admi-
istration said in a statement
that it was considering the
possibility of requiring all
airports to have runway safety
features.

Among other things, lawyers
for passengers who were injured
in the crash at Midway Airport
in Chicago are investigating
whether the airport was
negligent.

A Southwest Airlines F-377 tests its nose in an intersection outside Midway Airport on Friday after crashing off the end of the runway, slamming through a barrier, careening across a sidewalk and striking a

A Southwest Airlines F-377 tests its nose in an intersection outside Midway Airport on Friday after crashing off the end of the runway, slamming through a barrier, careening across a sidewalk and striking a
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  F: zacor@infowest.com  Tel: 435-627-8555  Fax: 435-627-8388
Preferred New St. George Airport Site
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: 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
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.

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

SULLIVAN REPORTING, INC.
(435) 635-0270
**PUBLIC HEARING 10/19/05**

**APPEARANCES:**

MARK A. PERRYMAN  
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Cincinnati, Ohio 45242  
513-530-1235

JEFFREY N. THOMAS  
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MARK A. PERRYMAN: My name is Mark Perryman. I'm with the firm of Landrum & Brown. We were the consultants selected to assist the FAA in preparation of the Environmental Impact Statement. What I'm going to do at this time is just give a very brief overview, highlighting a couple of the facets of the Environmental Impact Statement. If you heard me at the introductory boards, you're going to hear a lot of the same material.

Basically, the project, the Proposed Replacement Airport for St. George, has been thought about roughly for the last 15 years, since the late '80s, early '90s. There was a site selection study that concluded in 1998 that recommended the site that we are assessing. And an environmental assessment, which is a notch below the Environmental Impact Statement level, was prepared and issued, and the FAA issued a finding of no significant impact or, jargon, you're going to see a lot of that tonight, FONSI, was issued in 2001.

Subsequent to that, there was a challenge by the Grand Canyon Trust. The FAA was asked by the Court to go back and take a more comprehensive look...
at some of the noise analysis especially relative to
Zion National Park. In doing so, the FAA decided to
prepare an Environmental Impact Statement and
include all additional analysis that the court
requested. That's what we're here about tonight.

Where we are in the process, our little
snake diagram, as we call it. The EA is up here to
the upper left. We've gone through a series of
scoping processes. The draft document has been
prepared. It was released last month, roughly 30
days ago. Today we're at our public hearing. The
comment period is a 60-day window that will conclude
on November 8th. All comments need to be into the
FAA by November 8th.

From here, we will take a look at those
comments. The document will be changed as
necessary, additional review and analysis, if
necessary, and then the FAA will issue a final
Environmental Impact Statement, followed by a record
of decision as to what the agency's final decision
is. At this point, the FAA has not made a decision.
This is merely a disclosure document as to what it
is considering in its decision-making process. Then
once the FAA makes a decision, the City of
St. George can then go forward with design and
construction.

A little bit about why -- you already have
an airport here in St. George, why do you need
another one. This is truly a replacement airport to
accommodate the future demand here in St. George and
the region around St. George. Currently the airport
can only accommodate smaller turboprop aircraft,
32-seat or less. There is a great demand. All
planes coming in today, for instance, have been sold
out. People are wanting to come to St. George;
you're wanting to go to other locations. There is
definitely a need for additional capacity, a larger
aircraft to be able to fly into and out of
St. George.

The project of building a replacement
airport will accommodate that need. That's what it
basically comes down to. It doesn't mean that the
existing airport is unsafe. It just means that it
is restricted to smaller aircraft. That is the
bottom line. And larger aircraft are necessary to
accommodate the demand.

This slide shows the existing airport
site. Relative to the proposed airport site, we're
about halfway in between, a little bit south of the
existing. A little closer view of the proposed site
development. It's a little bit hard to read here.
If you want to get up close and personal, there are
boards out in the other room where you can look at
all the various facilities. It will be a
fully-instrumented, fully-developed airport. It
will have all the facilities that you have today at
the existing airport.
Again, coming back to the why, the
aircraft on the right is what flies in and out of
St. George today. The aircraft on the left here,
the regional jet, the 50- and 70-seat regional jet
is what is proposed to be flying into the proposed
replacement airport in the future.
The key to this, and I shouldn't have gone
so quick, is relative to noise effects, the new
aircraft, the jet, is just as quiet as the
turboprop. So there is really little difference.
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change from one aircraft to the other.
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analysis, bar none, in the country, especially for
an airport this size. There was more noise analysis
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at O'Hare in Chicago, for instance. This is very
comprehensive.
We started with taking a look at the local area and worked our way out, so the close-in proximity effects of noise. And we looked at the standard that we use for that is day/night average sound level, the DNL. We looked to see how many homes or people were impacted within the 65, which is the federal level of significance. There are no homes within the 65 of the existing airport, and there would be no homes in the 65 of the future airport. So there was no change in total impacts from that perspective.

Just to give you an example, these -- turn down these lights a little. The spanning network that we have here is the flight tracks into and out of the existing airport. And they would be very similar for the proposed replacement airport. This is a little zoomed in. That was a wide-angle view. This is a little bit more zoomed in. The existing airport over to the left and the replacement airport over to the right. And showing the relative change in flight tracks and overflight areas.

The resulting noise contours, as I described earlier, this is the existing airport and the effects of noise. The yellow band all the way around is 60 DNL, is actually 5 DB less than -- or
greater than what we were required to look at versus
the 60 DNL for the proposed replacement airport.
Again, those footprints are relatively compact and
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We then took a broader look at the noise
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4F303C areas. These are parks and recreation areas,
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methodology for these types of properties as we did
for Zion National Park.

I'll go into that a little bit more. This
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the area, all the high-altitude overflights, all of
the air tour operators that transition this area
going from Grand Canyon to Zion to Bryce throughout
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Just to give you some indication, these
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And this is a snapshot from one day of high-altitude
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Very few air tour operators actually originate out
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Basically, the bottom line is what's next?
We keep hearing that. This has been a very long
process, we know. The comment period, as I
indicated, will close on November 8th. We intend to
have a final document prepared over the winter, rest
of this year through winter of '06, and the FAA
anticipates a decision in the spring of next year, spring of '06.

That's it for my overview and introduction. If you have more detailed questions, we have a whole host of consultants and FAA personnel out at the boards. Feel free to discuss anything with them, any questions you might have.

At this point, because of the process, we will open this up for a formal public hearing. Mr. Thomas will be the hearing officer this evening. His whole purpose here is to help regulate, make sure everyone has the opportunity that wants to speak that can speak.

Your comments, whether written or whether given orally, are treated equally. I want to underscore that so that everyone understands that if you don't want to speak you can go out to the table. There's a self-addressed comment form that all you have to do is fold it, either drop it in the box on your way out or take it home and you can write your comment out and mail it in. With that, I'll turn it over.

JEFFREY N. THOMAS: Thank you, Mark. Good afternoon. My name is Jeff Thomas. I'd like to welcome you all in the audience to the public
hearing on the Draft Environmental Impact Statement
for the Proposed Replacement Airport at St. George.
I am the hearing officer for today's hearing,
responsible for maintaining order for these
proceedings. Looks like a pretty orderly crowd.

In compliance with the National
Environmental Policy Act (NEPA), the FAA is
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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.

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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.
Thank you for your interest in this project. Your comments have been noted.
National Parks, Zion Natural History Association, Utah Travel Regions, Washington County Museums, local chambers and lodging groups to jointly promote tourism in Southern Utah as well as the entire state.

The St. George Area Convention and Visitors Bureau does support the need for the new proposed replacement airport, however has concerns for the potential impact of noise and other distractions that may adversely affect some of the most spectacular scenery and historic sites in the world.

Utah is part of a global economy inviting domestic and international business and travel markets to Southern Utah. Since 9/11, we have seen continued growth of the tourism markets into our area. Zion National Park is reporting the highest visitation in the past ten years. 2004 was the busiest year on record with nearly 2.7 million visitors finding safety, variety, hospitality, value and unsurpassed beauty.

Sports, adventure, arts and events are all seeing unprecedented interest and growth. The St. George area is listed in "100 Best Art Towns in America" and in the top 10 for retirement.
communities, active communities and best unknown
golf getaways in the United States.

The Canyon Softball Complex has been NSA's
facility of the year for the last seven years,
hosting 40 softball events annually. St. George
Marathon is the 15th largest marathon and was named
one of the 10 most scenic.

Regarding the dinosaur prints, quoting
Gerald Gerlinski from the Polish Geological
Institute, "The St. George collection is going to be
the most important in the world for research on
early Jurassic footprints." Dr. James Kirtland,
Utah State Paleontologist, says, "This is the most
significant dinosaur track site in western North
America."

The convention industry is a growing
economic engine in the area. Our location is
central for western meetings and growing more
popular for national meetings and events. In 2004,
the Dixie Center, convention hotels and other
meeting venues brought in over 150,000 meeting
delegates that stayed for an average of 2.5 days.
The convention center has seen continued growth in
bookings since opening in '98 and is considering
doubling our meeting space to coincide with the
opening of the proposed airport.

One common concern with many groups is the lack of a major airport in the area. There are only 240 seats daily into St. George through the current flight capacity, not enough to handle the needs of groups over 500. This past month, the influx of over 20,000 Senior Games and 12,000 marathon visitors put a heavy load on the airport. Many events and conventions are limited by available venues, hotels and air transportation. With the growth that is occurring, more hotels and venues will be built, thus increasing the need for more air transportation into the city.

The convention and tourism industry is changing rapidly with the advent of new technology. The need to continually update venues and elevate marketing goals to accommodate and plan for the future, while preserving our National Parks and Historic Sites is crucial. The great weather, golf, attractions and especially the spectacular beauty of Zion National Park make this area an inviting tourist and business destination worldwide.

Consideration for all these factors needs to be carefully reviewed to find the best possible solutions for all. Thank you.
Thank you for your interest in this project. Your comment has been noted.

JEFFREY N. THOMAS: Voin Campbell.

Voen Campbell: I appreciate your time and opportunity to comment. My name is Voin Campbell. I also am a member of the Action Committee of the Chamber of Commerce and the chairman of the Environmental Subcommittee. I will make just some brief comments today and will follow-up later with written comment.

The Action Committee of the Chamber of Commerce strongly endorses and supports the City's proposed replacement airport. We have looked at the data that has been made available up to this point and are satisfied that the City is quite capable of meeting all of the standards of safety and also can develop roots that will not be disruptive to the parks and other areas of particular interest.

This replacement airport is absolutely fundamental to the continued economic growth and the future of the area generally. We believe that St. George is now a staging point for many tourists who travel through these parts and enjoy them. And as a replacement airport comes in, it will be an even greater friend of these parks in providing staging points for travel to and from these areas of interest.
Thank you for your interest in this project. Your comments have been noted.
read, I think it's up in Cedar City. I think that's 45 miles away. So I would argue that what you have today available for regional transportation very close to St. George is very acceptable and is going to be even better. I'm not sure that we need that here.

You guys are the environmental folks, but I got to tell you that even in the last couple of years, if you look around here, you've seen, particularly with the construction going on, visibility has dropped dramatically just in the last couple of years. Traffic has gotten tremendous.

My property taxes. Always tell everybody going to be self-sufficient, it will be paid for with something else. Everyone knows as well as I do that any time you build a new public infrastructure like this, whatever the cost is going to be, you probably need to add another quarter or 50 percent on top of that. So I worry about what happens when the property taxes have gone up about 40 percent for water this year and 20 percent for schools. That's in one year, let alone with the new assessment that you're going to get.

I'm just worried about the cost of it, the traffic that it's going to bring, and the change

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.
it's going to make to St. George. I would argue
that having a nice airport in somebody else's back
yard 30 miles away would benefit us greatly with
less impact. Thanks.

JEFFREY N. THOMAS: Thank you.

At this point, we have no one else who has
signed up. Are there any others in the audience who
wish to make oral comments? We'll close the hearing
now and restart it on the top of the hour.

(First segment of hearing
adjourned at 3:33 p.m.)

(4:00 p.m. segment begins.)

MARK A. PERRYMAN: My name is Mark
Perryman. I'm with the firm of Landrum & Brown. We
were the consultants selected to assist the FAA in
preparation of the Environmental Impact Statement.
What I'm going to do at this time is just give a
very brief overview, highlighting a couple of the
facets of the Environmental Impact Statement. If
you heard me at the introductory boards, you're
going to hear a lot of the same material.

Basically, the project, the Proposed
Replacement Airport for St. George, has been thought
about roughly for the last 15 years, since the late
'80's, early '90's. There was a site selection
study that concluded in 1998 that recommended the
site that we are assessing. And an environmental
assessment, which is a notch below the Environmental
Impact Statement level, was prepared and issued, and
the FAA issued a finding of no significant impact
or, jargon, you're going to see a lot of that	onight, FONSI, was issued in 2001.

Subsequent to that, there was a challenge
by the Grand Canyon Trust. The FAA was asked by the
court to go back and take a more comprehensive look
at some of the noise analysis especially relative to
Zion National Park. In doing so, the FAA decided to
prepare an Environmental Impact Statement and
include all additional analysis that the court
requested. That's what we're here about tonight.

Where we are in the process, our little
snake diagram, as we call it. The EA is up here to
the upper left. We've gone through a series of
scoping processes. The draft document has been
prepared. It was released last month, roughly 30
days ago. Today we're at our public hearing. The
comment period is a 60-day window that will conclude
on November 8th. All comments need to be into the
FAA by November 8th.

From here, we will take a look at those
comments. The document will be changed as necessary, additional review and analysis, if necessary, and then the FAA will issue a final Environmental Impact Statement, followed by a record of decision as to what the agency's final decision is. At this point, the FAA has not made a decision. This is merely a disclosure document as to what it is considering in its decision-making process. Then once the FAA makes a decision, the City of St. George can then go forward with design and construction.

A little bit about why -- you already have an airport here in St. George, why do you need another one. This is truly a replacement airport to accommodate the future demand here in St. George and the region around St. George. Currently the airport can only accommodate smaller turboprop aircraft, 32-seat or less. There is a great demand. All planes coming in today, for instance, have been sold out. People are wanting to come to St. George; you're wanting to go to other locations. There is definitely a need for additional capacity, a larger aircraft to be able to fly into and out of St. George.

The project of building a replacement
airport will accommodate that need. That's what it
basically comes down to. It doesn't mean that the
existing airport is unsafe. It just means that it
is restricted to smaller aircraft. That is the
bottom line. And larger aircraft are necessary to
accommodate the demand.

This slide shows the existing airportsite. Relative to the proposed airport site, we're
about halfway in between, a little bit south of the
existing. A little closer view of the proposed site
development. It's a little bit hard to read here.
If you want to get up close and personal, there are
boards out in the other room where you can look at
all the various facilities. It will be a
fully-instrumented, fully-developed airport. It
will have all the facilities that you have today at
the existing airport.

Again, coming back to the why, the
aircraft on the right is what flies in and out of
St. George today. The aircraft on the left here,
the regional jet, the 50- and 70-seat regional jet
is what is proposed to be flying into the proposed
replacement airport in the future.

The key to this, and I shouldn't have gone
so quick, is relative to noise effects, the new
a aircraft, the jet, is just as quiet as the turboprop. So there is really little difference.
As you can see these little strips of noise contours on either side of the aircraft, there's really little difference relative to noise impacts when you change from one aircraft to the other.

You'll hear a lot about noise in this project because of the proximity to a lot of natural resources, most notably Zion National Park, and others, Little Black Mountain to the south, and a whole host of other parks and recreational facilities. We didn't just look at noise. We looked at all the various aspects. This gives you an idea of some of those that we took a look at in the Environmental Impact Statement process, from land use to solid and hazardous waste issues, construction, how is it going to be constructed. Those are all documented in that three-volume document that sits out on the table in the other room.

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JEFFREY N. THOMAS: Thank you, Mark. Good afternoon. My name is Jeff Thomas. I'd like to welcome you all in the audience to the public hearing on the Draft Environmental Impact Statement for the proposed replacement airport at St. George. I am the hearing officer for today's hearing responsible for maintaining order for these proceedings. Looks like a pretty orderly crowd.

In compliance with the National Environmental Policy Act (NEPA), the FAA is providing the public with an opportunity to comment on the analysis of potential environmental impacts, the adequacy of the proposed action and/or the merits of alternatives as presented in the Draft Environmental Impact Statement for the proposed replacement airport. The FAA's response to comments will be included in the Final Environmental Impact Statement. All of the comments, along with prepared
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The order of the people that will speak will be the order in which they signed up on the sign-up sheet with special consideration given to elected public officials who will be given priority.

To be respectful of everyone’s time, I will be enforcing the three-minute limit to ensure that everyone who wishes to speak gets the opportunity to speak and has an equal opportunity. When your name is called, please come forward and make your comments. Begin by confirming your name for the record. We will now officially open the public hearing.

Scott Hirschi. If I pronounced your name wrong, I apologize.

SCOTT HIRSCHI: Good afternoon. My name is Scott Hirsch. I’m the Director of Washington County Economic Development Council. Present the
Thank you for your interest in this project. Your comments have been noted.
Public Hearing 10/19/05

Penetrations associated with the existing facility.

For the past four decades the community
has seen an annual growth rate of over six percent,
taking a county of 10,000 residents in the mid
1960's to a population of over 130,000. The State
Growth Commission estimates the county will exceed
600,000 citizens by the year 2050. I congratulate
the City and the FAA for having the foresight to
begin the planning process for a replacement airport
many years ago. I believe the search for the
quintessential site has been comprehensive, and the
feasibility studies, including this DEIS,
substantiates the suitability of the proposed site.

Many of the clients we work with find it
necessary to fly into Las Vegas, Nevada, and then
drive two hours to arrive in the county. As the
local business community has grown, the lack of
larger aircraft and more direct routes has become a
challenge to retaining existing companies and
attracting new businesses.

Quoting from the Utah Economic and
Business Review, "Acting as catalysts for business
expansion, job growth and the development of
tavel-sensitive industries, state-of-the-art
airports are critical to both national and
metropolitan growth. In today's economy, an
efficient airport is an essential ingredient for a
community to successfully compete for industrial and
commercial development." Our experience confirms
the validity of that statement. We must replace the
existing airport if the area is to continue to enjoy
a strong and healthy economy.

One of the premier companies of the
community is SkyWest Airlines. SkyWest's corporate
offices are located in St. George, and because of
that the community enjoys excellent connects to both
Los Angeles and Salt Lake City. However, SkyWest,
like many other carriers, have found it necessary to
phase out of 30-passenger aircraft, replacing them
with larger, regional jets. The existing airport
cannot accommodate the larger aircraft, thereby
jeopardizing not only commercial air service for
St. George but also the very important economic
impact of SkyWest's corporate offices.

I participated with the land use planning
associated with this DEIS. I appreciate the
cooperation of Washington City, St. George City,
Mohave County, Arizona, and Washington County in
planning land use around the proposed facility that
will protect its viability while allowing a great
Finally, I am an avid hiker. I spend many enjoyable days and nights in the wilderness of the Pine Valley mountains and the back country of Zion National Park. My personal observation is that nearly all aircraft use the Interstate 15 corridor as they proceed north from St. George. It is a rare occurrence to have low-flying aircraft over Zion, but such an occasion is not a major interruption of my otherwise peaceful outings in the natural quiet of the Park or wilderness.

I endorse the proposed User Education Program, believing that whatever small amount of overflight activity in noise-sensitive areas that now occurs will be reduced, not increased, by introduction of the new airport and the education program. In addition, the introduction of modern, quieter regional jets will reduce noise levels of commercial flights throughout the area. Sincerely,
Scott Hirschi. Appreciate the opportunity to comment.

JEFFREY N. THOMAS: We'll pause here and resume. I believe there's another speaker or two lined up.
12. Thank you for your interest in this project. Your comments have been noted.
businesses that want to relocate here. We are a
growing community. It is developing rapidly, and
this airport is not sufficient. I would like to see
that happen as soon as possible.

I think the EIS study should come to a
halt. I think they've had enough time to do this
and that we should get on with what we need to, with
business. Thank you.

JEFFREY N. THOMAS: Thank you.

We probably should wait a few minutes and
see if we have other speakers. If not, we'll
adjourn until the beginning of the next hour.

We'll officially adjourn the hearing and
restart the hearing, and we'll restart at the
beginning of the next hour.

(This segment of the hearing
concluded at 4:25 p.m.)
(There were no more speakers.)
(The hearing concluded at
(7:00 p.m.)
REPORTER'S CERTIFICATE

STATE OF UTAH

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 22nd day of November, 2005.

Jennifer Sullivan, RPR

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