

File EA corresp



# CREAMER & NOBLE ENGINEERS

P.O. BOX 37 • ST. GEORGE, UTAH • 84771

PH (435)673-4677 • FAX (435)673-8484 • E-MAIL crenoble@infowest.com

September 25, 2000

Mr. Reed E. Harris, Utah Field Supervisor  
U.S. Fish and Wildlife Service  
Lincoln Plaza  
145 East 1300 South, Suite 404  
Salt Lake City, UT 84115

Post-It® Fax Note	7671	Date	9-25-00	# of pages	4
To	Larry Bullock	From	Terry Hickman		
Co./Dept.		Co.			
Phone #		Phone #			
Fax #		Fax #			

Dear Mr. Harris:

The City of St. George is proposing an alternative primary access road for the St. George Replacement Airport from that presented in the Draft Environmental Assessment. I have enclosed a map of the proposed route. The road is approximately 16,300 feet in length and will follow an existing roadway corridor. A total of 5,300 feet of this existing roadway is unpaved. The project will consist of widening the pavement on both sides of the existing roadway and construction of gravel shoulders. A three lane wide pavement section will be provided: two 3.6 m travel lanes and a 4.3 m two-way center left turn lane. In addition, two shoulders ranging from 0.6 m to 2.4 m in width would be constructed.

A threatened, endangered and candidate inventory was conducted for plants (Dale Ross) and wildlife (Dr. Bill Mader) for the proposed access road (reports enclosed). No plants of special concern were located during the survey and it appears that none exist in the area. A spot check will be conducted in May during the flowering period to verify the conclusion. No federally listed or candidate species of wildlife were observed during the survey. Two Utah sensitive species were observed, chuckwalla and ring-tailed cat. These species will be mitigated for, as discussed in the Draft Environmental Assessment, if any are encountered during construction.

By way of this letter, we are requesting your concurrence with the findings in the sensitive species inventories and approval of this route as the primary access road for the proposed St. George Replacement Airport. Since we need to finalize the environmental assessment by 1 November 2000, we are requesting your response within 30 days of receipt of this letter. We will assume your approval and clearance of this access route if we do not receive any comments

Mr. Reed Harris  
September 25, 2000  
Page 2 of 2

within 30 days. We appreciate your cooperation in this matter and look forward to your response.

Sincerely,

CREAMER & NOBLE ENGINEERS

A handwritten signature in cursive script, reading "Terry J. Hickman". The signature is fluid and elegant, with a large initial "T" and a long, sweeping underline.

Terry J. Hickman  
Environmental Coordinator

TJH/bam

Enclosures

**CREAMER & NOBLE ENGINEERS**

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PH (435)673-4677 • FAX (435)673-8484 • E-MAIL crenoble@infowest.com

September 25, 2000

Mr. John Kimball, Director  
Department of Natural Resources  
Division of Wildlife Resources  
1594 West North Temple, Suite 2110  
P.O. Box 146301  
Salt Lake City, UT 84114-6301

Dear Mr. Kimball:

The City of St. George is proposing an alternative primary access road for the St. George Replacement Airport from that presented in the Draft Environmental Assessment. I have enclosed a map of the proposed route. The road is approximately 16,300 feet in length and will follow an existing roadway corridor. A total of 5,300 feet of this existing roadway is unpaved. The project will consist of widening the pavement on both sides of the existing roadway and construction of gravel shoulders. A three lane wide pavement section will be provided: two 3.6 m travel lanes and a 4.3 m two-way center left turn lane. In addition, two shoulders ranging from 0.6 m to 2.4 m in width would be constructed.

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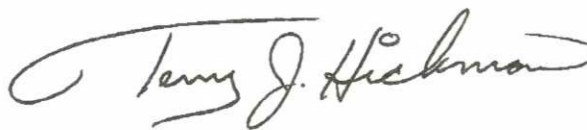
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September 25, 2000  
Page 2 of 2

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CREAMER & NOBLE ENGINEERS

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Terry J. Hickman  
Environmental Coordinator

TJH/bam

Enclosures

ryk@bd-c.com

Bryan Montgomery  
Mike McGary

702 346 5295  
(702) 249 2639 cell

✓ Jim Eardley  
632 7747

✓ Ryk  
918 629 4034 cell

Mesquite ??

FAA letter from Congressmen

Mesquite Airport

Apr 2000

Then people <sup>were</sup> ~~saying~~ on collision course

FAA says Two separate projects

Need to Preclude talk re regional airport

✓ John Bashnell

Dan Johnson (appraiser)

Evelle Converse FWL

524 5001 135

Scott

Mike 3-3579

Jeff R Larsen  
Vice President

Marsh USA Risk & Insurance Services  
60 East South Temple, Suite 1600  
Salt Lake City, Utah 84111  
801 539 7431 Fax: 801 539 7427  
Jeff.Larsen@marshmc.com

April 7, 2000

MARSH

Mr. Larry Bullock  
Public Works Facility of St. George City  
197 East 200 North  
St. George, Utah 84770

**Subject: Owner Controlled Insurance Programs (OCIP)**

Dear Mr. Bullock:

Mr. Scott Hirschi provided your name to me a couple of weeks ago as an individual I should introduce myself to and the organization that I represent. This letter is in regard to the new airport construction project for the St. George/Washington County area.

There is a cost saving method to provide for the insurance requirements of a construction project, which protects the interests of the owner, general contractor, and all tiers of contractors on a specific project. In addition savings are generated which can be confirmed to the owner. This concept provides higher limits of protection, provides higher safety standards, and provides for minority contractors to bid given the same construction requirements are for all contractors.

This concept is called an Owner Controlled Insurance Program (OCIP). I have prepared some materials providing general information on this risk management alternative. I would appreciate the opportunity to talk to you about it further. If an owner (St. George City) wants to do an OCIP, it should put the information into the bid specifications that go out. The reason for such is the contractors will bid without insurance costs, and will have to provide verification of this cost for review by the administrator. Our organization would fulfill the requirements for administration and assisting the City with the necessary information for bid purposes.

We have been involved with about 12 OCIPs in our office. We currently are representing 5 clients with single, or multi-site locations.

I have attached the most recent annual report of which Marsh is on a global basis. In Utah Marsh is the largest premium writer and is administering more OCIPs than all other brokers combined.

It is a tested concept. We have completed one project in St. George, and will have additional ones in the future. We hope to include the St. George airport as another success story.

I will call you in about 10 days to discuss this with you further. Thank you in advance for your time in reviewing this recommendation.

Sincerely,

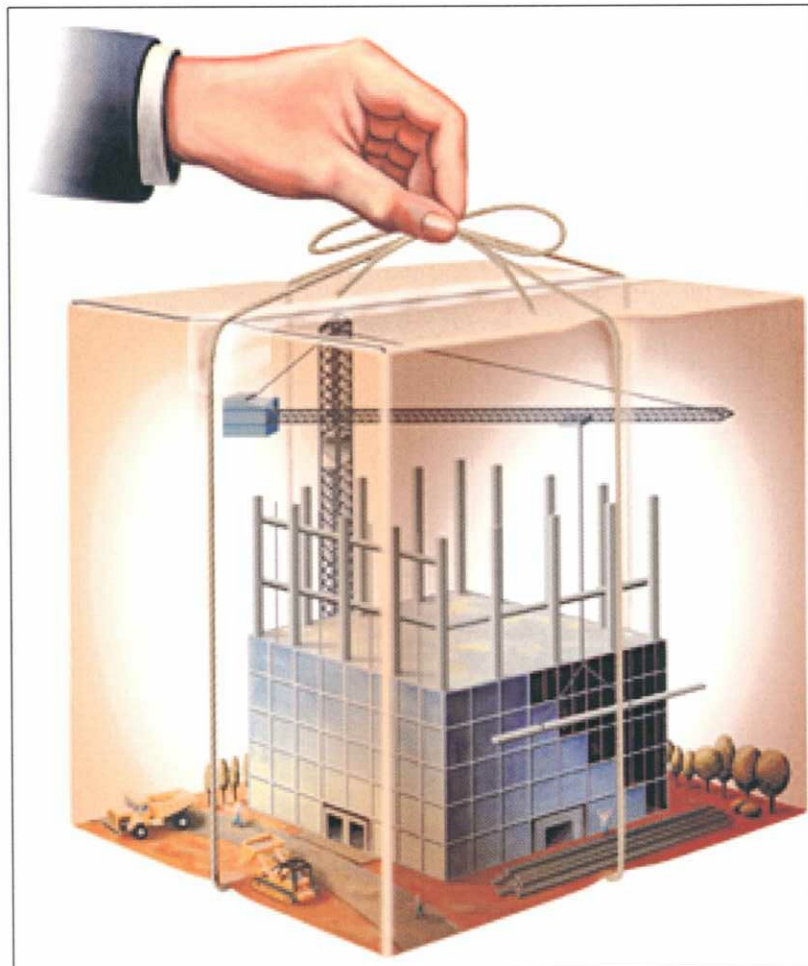


Jeff R Larsen

cc: Mr. Scott Hirschi -Washington County Economic Development

## Owner Controlled Insurance Programs Information Services

### Wrap-Up Primer



## 1. HISTORY

Although not as old as mankind, Wrap-Ups (Controlled Insurance Programs -- Owner or Contractor) have been around for many years. Many attribute the programs as originating in the late 1940s, early 1950s with the mega-projects of that generation; and wrap-ups have been used ever since as a program to consolidate insurance purchase for construction projects.

## 2. DEFINITION

A single insurance program, the wrap-up covers the job-site risks of the owner, construction manager, general contractor, contractors, and subcontractors. It is a risk management technique for handling loss exposures related to single and multiple site construction activities. The program sponsor procures certain insurance coverage on behalf of some or all parties working at the job-site, rather than having each firm supply its own insurance. The wrap-up does not shift the chain of liability. Negligent parties are still responsible for their own actions. The only difference between a wrap-up and other insurance arrangements is that a single entity buys insurance policies that will respond to most claims.

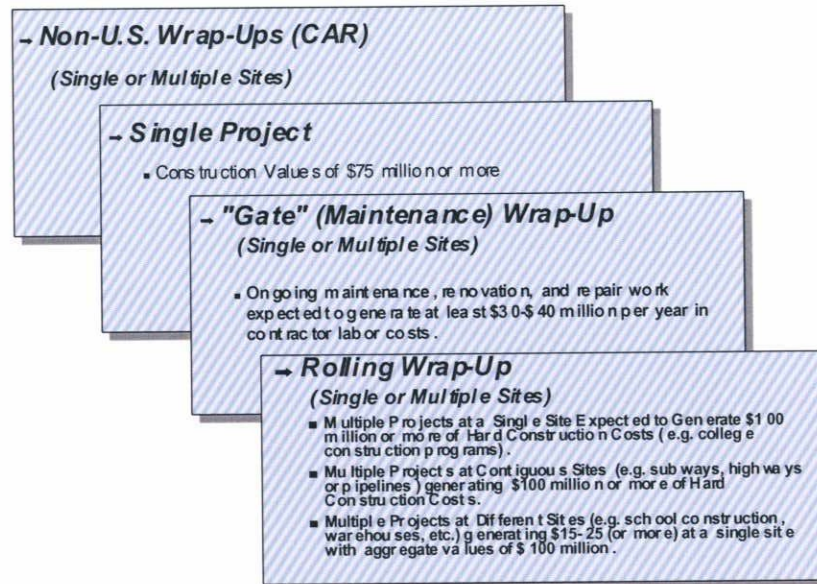
Wrap-Ups are also known as:

- OCIP = Owner Controlled Insurance Program (Owner Sponsored)
- CCIP = Contractor Controlled Insurance Program (Contractor Sponsored)
- CIP = Controlled Insurance Program
- OPIP = Owner Provided Insurance Program

1. History
2. Definition
3. Types of Wrap-Ups
4. Advantages
5. Perceived Disadvantages
6. Legislative Hurdles
7. Forms of Coverage
8. Loss Control
9. What's the Role of the Program Sponsor?
10. Who are the Major Carriers Writing Wrap-Ups?
11. Can a Wrap-Up be Written on a Global Basis?
12. What is the Process to Implement a Wrap-Up?
13. Conclusion

### 3. TYPES OF WRAP-UPS

Besides traditional, single project wrap-ups, the list of types of wrap-ups is continuing to grow to include:



The "types" listed above should not limit how the wrap-up concept is applied. Instead, think of a wrap-up as a risk management technique that can be used to package insurance coverage for all identified parties that have a common risk performing work for a single source.

### 4. ADVANTAGES

The advantages of a wrap-up can be categorized as: cost savings, control, and public relations. To highlight the major elements of each:

- ☑ **Cost Savings** stem from the structure of the insurance program. Loss-sensitive programs, such as large deductible plans, incurred - or paid-loss retrospectively rated plans, and, in some cases, captives or self-insurance, enable the program sponsor to capitalize on favorable loss experience.

In these plans, insurance costs consist of a basic, fixed administration charge plus actual sustained losses, subject to a maximum amount per claim. Alternatively, some programs are written on a discounted guaranteed cost basis, locking in some portion of the savings potential at program inception.

Additional savings are achieved through:

- Economies of Scale - a single program eliminates administrative redundancies and creates purchasing leverage, as well as opportunities to negotiate advantageous cash flow programs because of the premium volume.
- Elimination of mark-ups - under a wrap-up, insurance charges are **not** included in contractor bids, therefore pass-throughs and related costs the contractor otherwise could apply to its profit and overhead costs are reduced.
- ☑ **Control** -- In light of such issues as the courts' changing interpretation of tort liability, the financial instability of some insurers, the unpredictability of jury awards, and the ability to control costs through effective claim and loss management, firms that represent the "deep pockets" (owners, prime contractors and/or construction managers) view wrap-ups as a means to extend their influence over several important aspects of the insurance program, including:
  - Limits - The limits carried under a wrap-up are available to all contractors enrolled in the program. No longer must the choice be made between a lower limit and a contractor's ability to obtain coverage.
  - Quality of coverage and carrier stability - Under a wrap-up, program sponsors control the decisions on these issues.
  - Claims management - The participation of multiple insurers in a non-wrap-up project increases the likelihood of lawsuits and subrogation actions between contractors, its insurers and others, as each tries to shift liability to another party in the event of a significant accident. With wrap-ups one insurer represents all covered parties, minimizing finger pointing and enhancing the ability to focus on fair, aggressive claims management.
  - Loss Control - A coordinated and focused loss control program is the cornerstone of a successful wrap-up. The presence of a loss control representative(s) at the job site enhances the likelihood of good safety performance by all.
- ☑ **Public Relations** is enhanced through:
  - Broader participation by disadvantaged, minority, and women-owned business enterprises as insurance requirements cease to be a potential barrier to bidding work.
  - Claims handling - insurance responds to legitimate claims, keeping customers and members of the public satisfied thus avoiding negative publicity.

## 5. PERCEIVED DRAWBACKS

Despite the significant economic and administrative advantages of wrap-ups, some firms are reluctant to use them.

### **Economic Validation**

Critics of the wrap-up approach cite difficulty *verifying* cost savings, particularly whether or not contractors have removed the cost of insurance from their bids. Most contractors make a good faith effort to eliminate insurance loading from bid proposals if for no other reason than to be responsive to their client and to avoid being too expensive. In cases where doubt exists, the wrap-up administrator should monitor compliance by requiring contractors to identify their insurance costs ("bid deducts"), as well as by auditing actual insurance policies.

While front-end savings cannot be guaranteed, many users believe their wrap-ups have resulted in savings -- in part through the bid deducts, but largely through the insurance program funding structure, itself.

### **Contractor Resistance**

Contracting firms come in many sizes; their resistance to wrap-ups can reflect that fact. Larger firms object because they have similar coverage -- or a better program -- and limits as competitively priced as those of the wrap-up. But they often do not pass the competitive price on to the owner, nor will their program apply to **all** contractors working at a location. Mid-size and smaller firms that have not been involved with wrap-ups often object from fear of the unknown.

Communication with them about the program, how it works, and how it can benefit them will minimize their concerns. Contractors of all sizes need to be informed about the coverage provided by the wrap-up and shown how it compliments their own insurance programs to reduce the potential of coverage gaps or the chance of duplicate charges by their insurer.

Contractors also are concerned about administrative burdens. However, many of the tasks for implementing and managing the program can be shifted to the broker/administrator. In fact, when closely examined, many administrative duties, including monitoring insurance compliance/certificates from all the contractors and subcontractors, exists whether or not the insurance is provided through a wrap-up.

Some contractors contend that the fact that the owner pays for the project insurance eliminates the contractor's motivation to prevent losses. Keep in mind that contractors still have strong contractual requirements for safe performance. Creating a partnership environment among the owner and the participating contractors can enhance accident prevention. In addition, the contractor's loss experience under the wrap-up affects its workers compensation experience costs.

When you add them up a wrap-up's advantages far outweigh the perceived drawbacks, which can be minimized through efficient management and communication.

## 6. LEGISLATIVE HURDLES

Most states permit the use of wrap-ups, in one form or another, with many states following the National Council on Compensation Insurance (NCCI) rules. However because state laws and rules are subject to change, regulations should be reviewed on a case-by-case basis. In addition, the growing trend toward continuous wrap-ups, such as rolling wrap-ups and gate/maintenance programs, has been supported by a nationwide NCCI filing intended to eliminate various restrictions on wrap-ups. These restrictions have requirements relating to:

- minimum premium
- project confined to a single location
- project construction for a definite duration

## 7. FORMS OF COVERAGE

Traditionally, wrap-up programs include:

- Workers Compensation
- General and Excess Liability

However, more recently the program parameters have been broadened to create a fully integrated wrap-up, with coverages including any or all of the following:

- Builder's Risk (CAR/EAR) including transit
- Delay in Start Up (Business Interruption)
- Additional Loss of Profits (ALOP)
- Force Majeure
- Systems Performance/Efficacy
- Environmental
- Professional Liability
- Minority Surety Support
- Other (as appropriate for a specific project)

## 8. LOSS CONTROL

Loss control and safety programs are critical to a wrap-up's success. Although safety is a non-delegable duty (i.e. each employer cannot relinquish responsibility for its employees), having a focused loss control program for all parties associated with the project helps to create and support a cohesive construction team.

The hazards created by contractors at a construction project impact many elements -- the public (bodily injury and property damage), workers, damage to existing facilities (if any), and damage to the construction work itself. A project specific safety program based on a hazard and risk analysis should be developed. The focus being toward the effective management of the loss control process with the objective of incident minimization. It is critical to a safe job that the loss control program:

- ☒ Recognize and respond to these hazards, and
- ☒ Contractually obligates each contracting party to participate and comply with the program.

Relationships and responsibilities do not change under a wrap-up, none the less, the financial results of the wrap-up often are affected by safety so it becomes a high priority for all concerned.

Since loss control is an integral part of a wrap-up, and as such, should receive high priority in the allocation of management resources. We know that the best opportunity to achieve the economic benefits of a wrap-up is by substantially reducing the number of job-site incidents which occur during the construction phase. This is accomplished by proactive involvement on the part of everyone involved in the construction process.

There are many approaches to managing a wrap-up's safety program. They range from the program sponsor establishing philosophical standards (with contractual obligation) to hands-on involvement by the sponsor.

The management and enforcement of the loss control program might involve staff provided by the owner, contractor, broker/administrator, insurance company, or an independent firm, or a combination of these interests. While there is no one right approach; the loss control program should be designed to address the specific needs of the client and project.

## **9. WHAT'S THE ROLE OF THE PROGRAM SPONSOR?**

The critical roles for a successful wrap-up are:

- Wrap-Up risk management
- Contractor liaison (Administration)
- Safety

For each category, the program sponsor must establish goals and objectives, and determine policy. The broker/administrator should focus on:

- assisting the sponsor in setting objectives,
- implementing the sponsor's decisions, and
- reducing the administrative burden of the sponsor.

A wrap-up should have clear objectives that form the basis for the overall program design as well as for measuring all segments of the program.

## **10. MAJOR CARRIERS WRITING WRAP-UPS**

Several highly qualified insurers are aggressively pursuing wrap-up business, including Aetna/Travelers, AIG, Argonaut, CIGNA, Hartford, Liberty Mutual, Reliance, St. Paul and Zurich-American. Many have established units dedicated to managing wrap-up programs. And a number of other carriers will consider writing wrap-ups, particularly if they participate on another insurance program for any of the wrap-up's principals.

## **11. CAN WRAP-UPS BE WRITTEN ON A GLOBAL BASIS?**

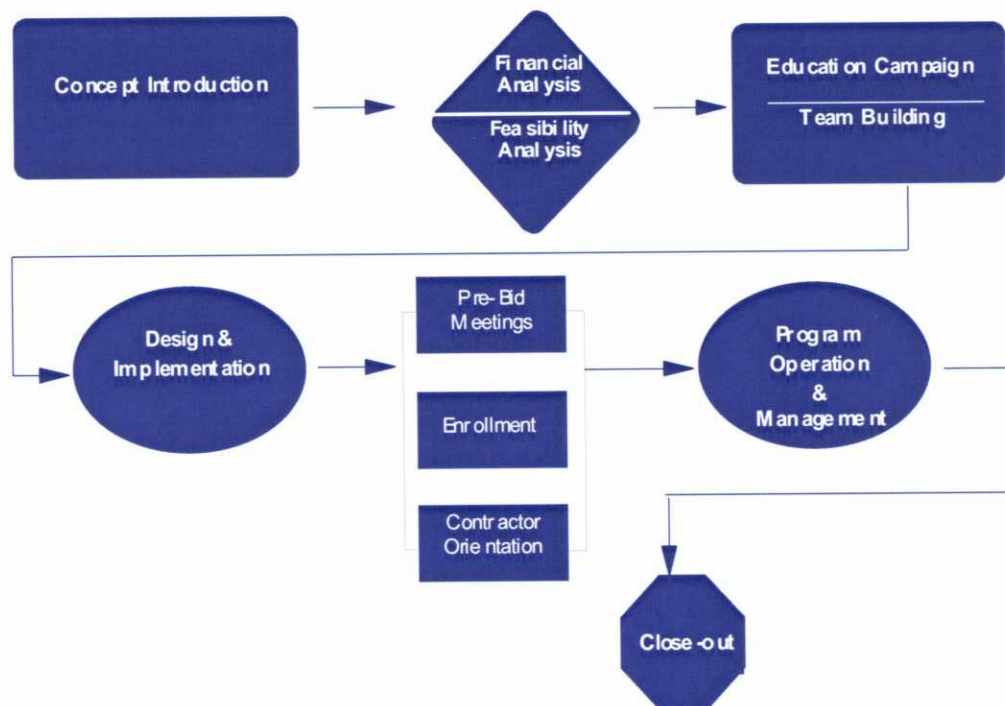
Wrap-ups are typically used for risks in the United States, rather than for international projects, because they normally focus on workers' compensation insurance for all participating contractors. Outside the U.S. workers' compensation benefits are handled much differently. Most large international construction projects are insured on a Construction All Risk/Erection All Risk (CAR/EAR) form which includes coverage for builder's risk and liability arising from operations at the project site. However in this instance, wrap-ups are structured like other insurance programs for many international projects. They involve the placement of a single insurance program covering the job-site risks of the project owner, general contractor and/or construction manager, and all contractor/subcontractors. However, under a CAR/EAR, the builder's risk insurance is the key coverage. This illustrates the difference between insurance environments in the U.S. and elsewhere.

## 12. WHAT IS THE PROCESS TO IMPLEMENT A WRAP-UP

The following flow chart outlines the process.

Thorough analysis of risk, careful program design, realistic goals and objectives, and internal support and buy-in are the keys to program success.

### The Wrap-Up Life Cycle



## 13. CONCLUSION

Wrap-ups offer some clear advantages for certain construction projects. While not a panacea, they offer an effective way to address the risk management needs of project owners, contractors, and design firms. Although the traditional wrap-up is U.S. based, the concept can apply to worldwide risks. Providing a fully integrated program can be a major benefit for a project -- simplifying insurance purchases and claims adjustment.

**JEFF KLEIN**

PO BOX 1268  
ST. GEORGE, UT 84771  
(435) 574-2627 FAX 574-3948

***Via Facsimile: 435-674-4261***

***Please Immediately Forward to the Mayor***

April 6, 2000

ST. GEORGE CITY OFFICES  
MAYOR MCARTHUR  
175 East 200 North  
ST. GEORGE, UT 84770

*Re: April 6<sup>th</sup> City Council Meeting - Agenda Item Airport Overlay Zone*

Dear Honorable Mayor:

I am unable to attend tonight's meeting. This letter should serve as my notice requesting the staff to cease and desist from any and all illustrations, references, or representations to a secondary runway. This should include airport areas of influence, approach paths, etc., located on adjoining property within the city limits of St. George. The City's staff has indicated both publicly and privately that St. George City has no immediate intentions to, and/or, may not ever acquire or construct a secondary runway in its proposed location.

Sincerely,



Jeff Klein  
Member Twin Falls LLC  
Private Land Owner

MICHAEL SCHNEIDERMAN

Phone memo 29 Mar 2000

Reviewed Dec 99 EA draft plus FAA comments & ch 2 & 4  
revisions

Not much hazard. Don't see the danger  
Seattle office is very competent

Do what you are doing & let Seattle do its job  
Go thru hearing process

Nothing we can do <sup>today</sup> to make EA more defensible

All work to date is the right work. Right  
where we ought to be.

Money better spent if a battle ensues.

Key moment is when comments come in.  
Evaluate problem at that time.

Noise study was smart thing to do. Well done

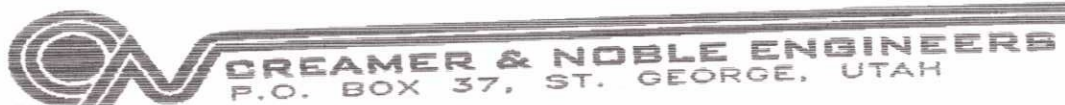
NPS not focusing on So. Ut Parks

(Michael is working on Halls Crossing case)

NPS issues usually start with a Park Supt

No need to provoke NPS issues by trying to  
anticipate problems in EA.

Welcome to send final EA & comments. Will  
advise of any concerns.

**FAX COVER SHEET**DATE: 3-28-2000TO: Larry BullochFAX NUMBER: 674-4226NUMBER OF PAGES, INCLUDING COVER SHEET: 5FROM: TERRY J. HICKMAN

FAX NUMBER: (435) 673-8484

IF THERE ARE ANY PROBLEMS IN TRANSMISSION OR YOU DO NOT RECEIVE THE NUMBER OF PAGES INDICATED ABOVE, PLEASE CALL:

(435) 673-4677



**MESSAGE:** As part of the FAA comments on the EA, I was asked to include a section on cumulative impacts for traffic circulation, Southern Corridor Route and the Redevelopment Plan. I have attached my write-up on this section (4.21-pages 45-48). Would you mind reviewing these items, since you are very familiar with them, to make sure I have made accurate statements. Also, in reviewing my notes, Cynthia wanted me to include (as part of enviro. analysis of redevelopment plan) a comparison of present & future analysis (with redevelopment plan in place) of estimated # of people at the site, vehicle trips/day and traffic circulation. Does your office have an estimate of this data? Thanks, Terry

construction of the proposed project.

#### **4.20.3 Mitigation**

To mitigate short term impacts to air and water quality which result as part of the construction of the proposed St. George Municipal Airport, measures outlined in the State of Utah Department of Environmental Quality letters (Appendix A-27 and 28) and from the Governor of Utah (Appendix A-49) will be implemented. The operation of construction equipment can result in very short term noise levels between 80 and 93 dBA at a distance of 50 feet (refer to Section 4.1.2 of this document). However, as there are no sensitive land uses in the vicinity of the preferred alternative site that would be affected by construction noise, this is not considered a significant impact.

#### **4.21 Cumulative Impacts**

Three factors that could possibly result in cumulative impacts as a result of the proposed St. George Municipal Airport have been identified. They are traffic circulation, Southern Corridor Route and the Redevelopment Plan. Each of these items are addressed in this section.

##### **4.21.1 Traffic Circulation**

The St. George area is accessed primarily by Interstate 15 and Utah State Highway 18 (Figure \_\_\_\_). Presently, access to the preferred alternative site is limited. Current vehicle access to this site from St. George is by way of a narrow undivided paved road which connects to Little Valley road and enters the project area on the northwest boundary. From St. George, you proceed on River Road to 2450 South, then go east on 2450 South to Little Valley Road, then go south on Little Valley Road to the paved Washington County Road, then up the grade to the west boundary of the proposed site. This is the same road that was used to access the old CAA facility. If the preferred route was not constructed (Southern Corridor Route), this route could be an alternative access route to the preferred site. *All access roads* ~~The Washington County Road~~ would be upgraded to St. George City standards and the width increased to accommodate a 4-lane road.

#### 4.21.2 Southern Corridor Portion of the Proposed Regional Beltway

The proposed access route to the preferred site is via the proposed Southern Corridor portion of the Regional Beltway Route. The Southern Corridor Route is proposed as a 4-lane limited access highway, which would be located adjacent to the southern boundary of the preferred site. This portion of the regional beltway route would be connected to Interstate 15 at the proposed Atkinville Wash interchange (located between the existing Port of Entry and Rest Area ~~interchange~~ near Mile Post 3).

An environmental assessment is currently being prepared for the Southern Corridor Route. The design and alignment of this route has accommodated an airport access road to the southern boundary of the preferred site (Figure \_\_\_\_). ~~Approximately~~ 1 million dollars has been budgeted for this environmental assessment and it is expected to be completed by the end of 2000. To date, the alignment of this route has been finalized, environmentally analyzed and right-of-ways ~~acquired~~. *identified*

The access road off of the Southern Corridor Route to the preferred site boundary has been environmentally cleared through a combination of the studies conducted for this document and the studies completed for the Southern Corridor environmental assessment.

Planning for the Regional Beltway Route has been ongoing for over five years. The concept has received a broad base of support from property owners, local and county governments, Utah Department of Transportation and the Federal Highway Administration. Federal funding of 8 million dollars has been allocated for the construction of the proposed Atkinville Wash interchange on Interstate 15. The present schedule for completion of the Southern Corridor Route is compatible with the proposed airport schedule.

The Southern Corridor portion of the Regional Beltway Route would have less financial and human impact than any of the other access routes that were analyzed. It would provide the most accessible and shortest route to the preferred site with the least impact to environmental and social resources compared to any of the other access routes that have been analyzed. Coordination with the Utah

Department of Transportation (Appendix A-47) and the Federal Highway Administration (Appendix A-48) was conducted pertaining to the use of the Southern Corridor portion of the Regional Beltway Route as the primary access route to the preferred airport site. Use of this route as the access route to the proposed airport site, would result in the fewest impacts to the environment and the present infrastructure of the local area compared to any of the other alternatives available.

#### 4.21.3 Redevelopment Plan

A Redevelopment Plan has been developed for the existing St. George Municipal Airport site. The plan is necessary because the City of St. George intends <sup>to abandon</sup> ~~on abandoning~~ the site once the proposed airport is operational. The FAA requires that prior to abandonment of such a facility, a redevelopment plan must be prepared to insure that the site is environmentally compatible with surrounding land uses and can be economically utilized for other purposes. The plan also assists the City of St. George in disposing of the property in a manner that they can recognize the greatest economic gain possible, while at the same time, assure that the proposed future development is compatible with adjacent land uses.

The efforts required to redevelop the site and related cost estimates are divided into two phases of work. The first phase includes all the work necessary to restore the existing airport site to pre-development conditions, including removal of fuel storage facilities, asphalt pavements, buildings and miscellaneous structures. ~~With the recent regulations adopted regarding the use of underground fuel facilities,~~ all underground fuel tanks have been removed in accordance with the Utah State Department of Environmental Quality, Division of Environmental Response and Remediation Regulations.

<sup>the City intends to reclaim an old</sup>  
In addition, it ~~will be necessary to also reclaim the~~ abandoned City dump along a portion of the westerly edge of the airport plateau. The dump has not been used for over 50 years and has not posed any threat to the safety and operation of the airport, however, to ensure optimum future development of this area, the abandoned dump will require a certain amount of reclamation work.

*trash removal & an earthen cover.*  
This work will include ~~the removal and burial of all exposed trash and debris now present and then covering the remainder of the dump site with earthen cover material.~~

The second phase of this Redevelopment Plan includes all the work required to provide the airport property with the necessary access and utilities for the planned future development. This work will include construction of new access roadway, ~~culinary water transmission~~ *sewer* lines, storm drainage facilities and ~~wastewater outfall~~ lines.

It is estimated that the existing airport site will provide 249 acres of developable land. This site is located in the middle of the most rapidly growing area within the City of St. George. As part of the Redevelopment Plan, the balance between the needs of commercial and residential development will be considered. In addition, consideration will be given to the environmental and economic concerns as well. At present, the airport property is zoned Open Space while surrounding property is zoned for light commercial and residential development. There are no apparent major obstacles to overcome in obtaining compatibility between the Redevelopment Plan for the existing airport site and the comprehensive zoning and development plan presently adopted by St. George City. It is not anticipated that any significant negative impacts will occur to the surrounding environment or residential community as a result of implementation of the Redevelopment Plan.

#### **4.22 Environmental Consequences - Other Considerations**

##### **4.22.1 Possible Conflicts with Plans, Policies, and Controls**

The development of the proposed project is consistent with the St. George Municipal Airport Master Plan (1999) and the St. George City General Plan (1995).

##### **4.22.2 Any Inconsistency of a Proposed Action with any Approved Federal, State or Local Plans and Laws**

The proposed action is consistent and in compliance with applicable Federal, State and Local



DENVER AIRPORTS DISTRICT OFFICE  
26805 E. 68th Ave., Suite 224  
DENVER, COLORADO 80249-6361  
(303) 342-1265

FEDERAL AVIATION  
ADMINISTRATION

March 28, 2000

Larry Bulloch, P.E.  
Public Works Director  
175 East 200 North  
St. George, UT 84770

Re: Comments on the St. George Replacement Airport Site Noise Analysis

Dear Mr. Bulloch,

We have completed our review of the draft noise analysis for the proposed replacement airport. We found the general results of the noise analysis acceptable. Our main concern with the study is the unclear presentation of the text and graphics. The report should be easily understood to people with and without a technical background. Also, it is crucial that the assumptions in the report be consistent throughout the document and with other planning documents. To achieve this end, we request that you incorporate the following comments in the next report:

LOCATION	COMMENT
Title	Change title from 'new' to "replacement" airport site.
Introduction	The report needs an executive summary that clearly states the results of the study, discusses the impact and describes the methodology used.
Figure 9a	Label proposed airport site.
On all figures: 9b, 10a, 10b, 11a, 11b	Clearly identify and label existing airport, proposed new airport, and Zion.
Pg. 32 paragraph 1, line 6	Change "flying away from," to "visiting".
Pg. 32 Paragraph 1, line 7	Is closed pattern synonymous with local operations?
Table 2	How does the data in table 2 correlate with the fourth paragraph in appendix B?
Pg. 33, paragraph 5	Numbers operations are not consistent with table 2. Appendix A should be changed to show that the operations by flight track.

Figures 10b and 11b	Change to show where planes meet cruise altitude. This would be similar to "Figure X." In addition to the points include a line that ends where planes reach cruise altitude. Also, label the tracks so they match with the Creamer and Nobel drawings.
Pg. 36 paragraph 1, last line	Typo. Change "levels" to "level."
Pg. 36 paragraph 2, line 2	Typo. Should read levels "were" instead of levels "was."
Pg. 36, paragraph 2, last two sentences	Describe what is meant by "typical" and "majority."
Pg. 37, paragraph 1, line 1	On what basis was 15 percent "assumed?"
Pg. 37, paragraph 1, line 5	It is stated that "This assumption is conservative." Explain the reasoning rather than using the word conservative.
Pg. 37 paragraph 2, line 1	Put the first two sentences in bold type.
Table 3	Close the box on right side. Labels within box should say "Existing" instead of "Ex."
Pg. 39, paragraph 3, line 8	Typo. Should read "Appendix A"
Pg. 39, paragraph 3	Operations do not correlate to table 4.
Table 5	Labels within box should say "Existing" instead of "Ex."
Pg. 42, paragraph 1, line	Clarify in the sentence beginning with "For the Year 2008" that this is relative to 1998 operations
Pg. 43, paragraph 1, line 6	Should "existing" be "with project?"
Pg. 43, paragraph 2	Operations do not seem to match table 6.
Pg. 46, paragraph 5	Operations do not correlate to table 7.
Pg. 47, paragraph 2, line 4	Should it be "2008" instead of "2018?"
Table 8	Labels within box should say "Existing" instead of "Ex."
Pg. 49, paragraph 3	Operations do not correlate to table 9.
Pg. 51, paragraph	Include some discussion in this final section on audibility. What impact is the project going to have? Will the human ear be able to distinguish a difference?
Pg. 52, paragraph 4	"FAA criteria" from where? We would like to know what written reference this is based on. Do not include in the text unless our office concurs with the citation.
Pg. 53, paragraph 1, line 2.	Reword and clarify sentence beginning with "However."
Appendix A	Needs to include numbers and type of aircraft on each flight track.
Appendix B	Figures should be in color. Remove red circle around the airports. Label the Zion park boundary. Legend should be readable on an 8.5 x 11. Verify that lines end where planes reach cruise altitudes.

According to the project coordination schedule, the final noise report is due on April 14, 2000. We would like one more opportunity to review the above changes. Please update and submit a final draft to our office by April 3, 2000.

Sincerely,



Cynthia Romero  
Environmental Planner

cc: Ryk Dunkelberg, Bernard Dunkelberg  
Terry Hickman, Creamer and Noble



# CREAMER & NOBLE ENGINEERS

P.O. BOX 37 • ST. GEORGE, UTAH • 84771

PH (435)673-4677 • FAX (435)673-8484 • E-MAIL: crenoble@infowest.com

March 27, 2000

Mr. Michael Schneiderman  
Hopkins and Sutter  
3 First National Plaza  
41<sup>st</sup> Floor  
Chicago, IL 60602

Post-It <sup>®</sup> Fax Note	7671	Date	3-27-00	# of pages	1
To	Larry Bulloch	From	Terry J. Hickman		
Co./Dept	This was sent	Co.			
Phone #	Via next day	Phone #			
Fax #	Service at 310 pm on	Fax #	3-27-00		

RE: Draft EA for Proposed St. George Municipal Airport

Dear Mr. Schneiderman:

Mr. Larry Bulloch, St. George City, asked me to send you a copy of the Draft EA that was submitted to FAA in December 1999. I am in the process of addressing FAA's comments (letter enclosed), therefore, the EA will change substantially in some areas. I have enclosed examples of some of these revisions.

If you have any questions, please contact me at (435) 673-4677.

Sincerely,

CREAMER & NOBLE ENGINEERS

Terry J. Hickman  
Environmental Coordinator

TJH/bam

Enclosures

Jamy Bullock



March 23, 2000

Mr. Larry Pinnock  
Leucadia Financial Corp.  
529 East South Temple  
Salt Lake City, Utah 84102-1087

RE: South Block Property

Dear Mr. Pinnock:

I am in receipt of your letter dated February 3, 2000 addressing your concerns regarding the July 16, 1998 MOU between the City and Leucadia.

For many years Leucadia and St. George City have worked cooperatively to address a myriad of Leucadia land development issues. The long running relationship between the City and Leucadia has, I believe, been mutually beneficial. The three-way land exchange finalized in July 1998 after three years of cooperative effort was another recent example of working together to solve issues.

As you may recall, while the land exchange was proceeding through the various hoops, the City was narrowing the list of possible airport relocation sites. At the time the MOU was signed, the extent of the airport related issues was not fully understood by either party. Neither Leucadia nor the City had completed any land use master planning for the area. The MOU, therefore, stated there would be "no representations or warranties with respect to the use or condition of the properties" and that "The entire South Block Property shall be zoned in accordance with a master plan prepared for the property and mutually acceptable to both parties." After the MOU was signed, the City's airport consultant recommended land use restrictions to provide for long term viability and safety of the proposed airport facility. Although the land use restrictions contained in the proposed Airport Overlay Zone preclude residential development within the Flight Pattern and Approach Zones, a variety of commercial and industrial uses are allowed. Although you have indicated that these restrictions will eliminate some more preferable uses, the City feels that the uses allowed afford a reasonable alternative for development. Your cooperation in this planning matter will help assure the long term success of the new airport facility.

**CITY OF ST. GEORGE**

175 East 200 North, St. George, Utah 84770  
(435) 634-5800  
[www.ci.st-george.ut.us](http://www.ci.st-george.ut.us)

**MAYOR**

Daniel D. McArthur

**CITY MANAGER**

Gary S. Esplin

**CITY COUNCIL**

Sharon L. Isom  
Suzanne B. Allen, Larry H. Gardner,  
Robert Whatcott, James J. Eardley



DENVER AIRPORTS DISTRICT OFFICE  
26805 E. 68th Ave., Suite 224  
DENVER, COLORADO 80249-6361  
(303) 342-1265

FEDERAL AVIATION  
ADMINISTRATION

March 21, 2000

Larry Bulloch, P.E.,  
Public Works Director  
175 East 200 North  
St. George, UT 84770

**Re: Revised Project Coordination Schedule #5**

Dear Mr. Bulloch,

At the last regularly scheduled project telecon on March 20, 2000 all parties involved discussed the following changes in the schedule.

**Project Coordination Schedule Revision 5 (changes in bold)**

By May 30, 1999	ADO approves aviation forecasts.
By June 1, 1999	ALP comments received from FAA region.
By July 1, 1999	Draft masterplan submitted to ADO.
August 9, 1999	Begin supplemental noise study.
By August 31, 1999	Benefit-Cost Analysis submitted to the ADO.
By September 30, 1999	Financial plan submitted to the ADO.
By September 30, 1999	ADO completes review of ALP, masterplan, benefit cost analysis.
By October 15, 1999	ADO receives draft masterplan and ALP.
By October 29, 1999	ADO completes review of financial plan.
By October 30, 1999	ADO receives final versions of ALP, masterplan, and benefit cost analysis.
By November 15 <sup>th</sup> , 1999	ADO receives final version of financial plan.
By December 20, 1999	Draft Environmental Assessment submitted to ADO.
January 12, 2000	ADO receives draft technical noise analysis
By January 28, 2000	ADO completes review of environmental assessment.
<b>March 7, 2000</b>	<b>ADO receives draft noise study</b>
<b>March 31, 2000</b>	<b>Denver ADO and region comment on draft noise analysis.</b>
<b>By April 14, 2000</b>	<b>Denver ADO receives updated noise analysis.</b>
<b>By April 21, 2000</b>	<b>ADO receives final environmental assessment &amp; noise study.</b>
<b>By April 28, 2000</b>	<b>ADO reviews final documents.</b>
<b>May 5, 2000</b>	<b>Advertise public hearing.</b>
<b>By June 7, 2000</b>	<b>Hold public hearing in St. George.</b>
<b>By July 7, 2000</b>	<b>Allow for written public comments.</b>
<b>By August 7, 2000</b>	<b>Completed EA with responses to comments submitted to FAA</b>
<b>August 21, 2000</b>	<b>FAA makes environmental finding</b>

Please notify us immediately if you foresee any changes to this schedule.

Sincerely,

*Cynthia Romero*

Cynthia Romero  
Environmental Planner

cc: Terry Hickman, Creamer and Noble  
Ryk Dunkelberg, Barnard Dunkelberg and Company



## **CREAMER & NOBLE ENGINEERS**

**P.O. BOX 37 • ST. GEORGE, UTAH • 84771**

**PH (435)673-4677 • FAX (435)673-8484 • E-MAIL crenoble@infowest.com**

March 8, 2000

Ms. Cynthia Romero  
FAA Denver ADO  
26805 E. 68<sup>th</sup> Avenue  
Suite 224  
Denver, CO 80249-6361

RE: St. George Replacement Airport Draft Environmental Assessment

Dear Ms. Romero:

This is my understanding of the clarification of your comments to the DEA that were sent to Larry Bulloch on January 28, 2000. I had called you on February 29, 2000, to get an explanation of some of the major comments that were unclear to me. Following is a summary of my understanding of our phone conversation.

### General Comments

1. 5050.4A states you need to have three types of maps (location, vicinity and airport layout plan). The DEA needs a better location map.
2. The comparative summary of potential environmental impacts is to be included in the executive summary; in Chapter 4.0, the summary is not repeated, only a listing of each parameter that is evaluated is required in the introduction to this chapter.
3. Create new headings for wildlife and vegetation resources from DEA; divide them into biotic community and T&E species. Put these new parameters in the comparative summary and provide an analysis in Chapter 4.0.
4. Double, single or other spacing is acceptable in the text.
5. Reference to Red Hawk, Leucadia, etc., will be omitted, it will be stated that all land within the 65 DNL noise contour is on airport property.

6. A resolution to pursue land use compatibility (similar to the one prepared for Hulett Airport) will be prepared by St. George City and will be included in the DEA.

#### Chapter 2.0

1. Include a general discussion (using information from Chapter 4.0) on why Alternative 2 was not selected. This will be a more detailed discussion compared to the other alternatives that were dropped.

#### Chapter 3.0

1. Combine Alternatives 1 and 1A (preferred alternative site) for the information used on affected environments for this chapter. Do not include specific information on Alternative 2.
2. Only discuss the following parameters in this chapter: land use, socioeconomics, geology and soils and aesthetics.
3. Provide a general discussion of the region of influence (similar to that presented in Chapter 3.0 of the DEA).

#### Chapter 4.0

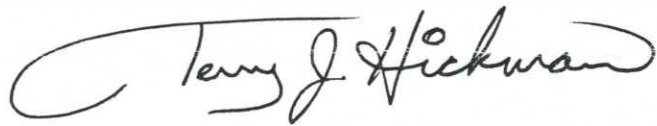
1. The 20 parameters, as defined in FAA Order 5050.4A, are the ones to be examined in this chapter. A list of these parameters were provided to FAA (which were included in the comparative summary of potential environmental impacts matrix) on February 18, 2000. These parameters and summary were subsequently approved.
2. For each of the 20 parameters, include an analysis for no action, preferred alternative (combination of Alternatives 1 and 1A) and mitigation. Do not include a separated heading entitled affected environment. Also, the preferred alternative is to be presented as follows under each parameter: Preferred Alternative (Combination of Alternatives 1 and 1A).
3. Include a cumulative impact category that discusses the Southern Corridor access route, redevelopment plan and traffic and circulation (3.12 from DEA). Include this in Chapter 4.0.

Ms. Cynthia Romero  
March 8, 2000  
Page 3 of 3

I am in the process of revising the DEA based upon the above comments and those found in the January 28, 2000, letter to Larry Bulloch. If you have any questions about my understanding of our phone conversation or if I have omitted any critical information, please contact me.

Sincerely,

CREAMER & NOBLE ENGINEERS

A handwritten signature in black ink, reading "Terry J. Hickman". The signature is fluid and cursive, with a large, sweeping initial "T" and a stylized "H".

Terry J. Hickman  
Environmental Coordinator

TJH/bam

cc: Larry Bulloch



FEDERAL AVIATION  
ADMINISTRATION  
February 25, 2000

DENVER AIRPORTS DISTRICT OFFICE  
26805 E. 68th Ave., Suite 224  
DENVER, COLORADO 80249-6361  
(303) 342-1265

Terry Hickman  
Creamer and Noble Engineers  
P.O. Box 37  
St. George, UT 84771

Re: Comments on St. George environmental

Dear Mr. Hickman,

This is in response to your letter dated February 18, 2000 regarding the revisions to the St. George Replacement Airport Draft Environmental Assessment. Your concern was that we may be omitting valuable data from the document. We would like to clarify that we have asked that the document be reorganized. In no way have we asked you to omit valuable data.

The great majority of the revisions address the organization of the document with the intent of retaining the actual supporting data. Furthermore, we believe that the revisions enhance the document and are in accordance with FAA regulations and environmental law.

As always, call if I can answer any questions.

Sincerely,

*Cynthia Romero*

Cynthia Romero  
Environmental Planner

✓ Cc: Larry Bulloch, City of St. George



## **CREAMER & NOBLE ENGINEERS**

**P.O. BOX 37 • ST. GEORGE, UTAH • 84771**

**PH (435)673-4677 • FAX (435)673-8484 • E-MAIL crenoble@infowest.com**

February 18, 2000

Ms. Cynthia Romero  
Federal Aviation Administration  
Denver Airports District Office  
26805 E. 68<sup>th</sup> Avenue, Suite 224  
Denver, CO 80249-6361

RE: St. George Replacement Airport Draft Environmental Assessment

Dear Ms. Romero:

Please find attached a summary chart with environmental impact categories for your review. It is my understanding that this chart is to be included in the Executive Summary of the St. George Replacement Airport Draft Environmental Assessment (DEA). Should it also be included in Chapter 3, Affected Environment?

Based upon the review letter you sent to Mr. Bulloch (1/28/00), and several phone conversations the past 30 days pertaining to the DEA, I am proceeding with the following major format changes. Chapter 3, Affected Environment, will be reduced from 50 pages (as it exists) to approximately 4 pages of narrative and a few pages of figures. Chapter 4, Environmental Consequences, will be reduced by approximately 20 pages by taking out all reference to Alternatives 1, 1A and 2, and combining the analysis of Alternatives 1 and 1A into the preferred alternative. I will add an approximate 2 page discussion on Alternative 2 in Chapter 2, Proposed Action and Alternatives, pertaining to the reasons why it was not selected as the preferred alternative.

My concern is that we may be omitting valuable data from the DEA. I am still not sure why Alternative 2 was taken out of Chapter 4. It is my understanding that the only items not evaluated for Alternative 2, that were evaluated for the preferred alternative, were the en route noise study done for Zion National Park and the environmental audit. The cost-benefit analysis would seem to be as applicable to Alternative 2 as it is to the preferred alternative. These concerns notwithstanding, I am proceeding with the re-write of the DEA as requested by the FAA. Also, I am planning to put all of the figures in an appendix (Appendix F, after the En-

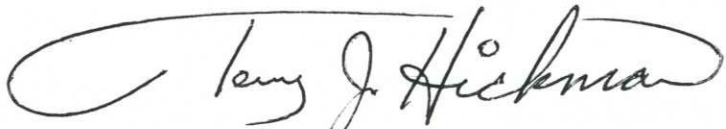
Ms. Cynthia Romero  
February 18, 2000  
Page 2 of 2

Route Aircraft Noise Study in Appendix E). I think this would facilitate the production of approximately 150 copies of the DEA.

If you have any questions or changes pertaining to the action described above, please contact me.

Sincerely,

CREAMER & NOBLE ENGINEERS

A handwritten signature in black ink, reading "Terry J. Hickman". The signature is fluid and cursive, with a large, sweeping initial "T" and "H".

Terry J. Hickman  
Environmental Coordinator

TJH/bam

Enclosures

cc: Larry Bulloch

# **COMPARATIVE SUMMARY OF POTENTIAL ENVIRONMENTAL IMPACTS**

<b>Environmental Category</b>	<b>Take No Action</b>	<b>Preferred Alternative</b>
<b>Noise</b>	No Significant Impact	All land within the 65 DNL contour is on airport property.
<b>Compatible Land Use</b>	No Impact	The City of St. George will commit to pursue zoning which protects the airport from incompatible land uses.
<b>Social Impacts</b>	No Significant Impact	No business or residences will be relocated.
<b>Induced Socioeconomic Impacts</b>	No Significant Impact	Increased aviation activity and induced economic growth.
<b>Air Quality</b>	No Impact	The proposed airport is in an attainment area for National Air Quality Standards. A Governor air quality certification letter has been obtained.
<b>Water Quality</b>	No Impact	Storm Water Permit is required. A Governor water quality certification letter has been obtained.
<b>DOT Act - Section 4(f)</b>	No Impact	The project site is located approximately 25 miles from Zion National Park. There are no section 4(f) lands impacted.
<b>Historical, Architectural, Archaeological, and Cultural Resources</b>	No Impact	A determination of no effect was made on Historical, Architectural, Archaeological, and Cultural Resources.
<b>Biotic Communities</b>	No Impact	There will be no adverse impact to biotic communities.

**COMPARATIVE SUMMARY OF  
POTENTIAL ENVIRONMENTAL IMPACTS (Cont'd)**

<b>Environmental Category</b>	<b>Take No Action</b>	<b>Preferred Alternative</b>
<b>Threatened and Endangered Species of Flora and Fauna</b>	No Impact	There will be no adverse impact to threatened and endangered species.
<b>Wetlands</b>	No Impact	There are no wetlands within the airport boundary.
<b>Floodplain</b>	No Impact	There are no floodplains within the airport boundary.
<b>Coastal Zone Management</b>	Not Applicable	There are no coastal zones associated with the proposed airport.
<b>Coastal Barriers</b>	Not Applicable	There are no coastal barriers associated with the proposed airport.
<b>Wild and Scenic Rivers</b>	No Impact	There are no wild and scenic rivers in the project area.
<b>Farmlands</b>	No Impact	No active, prime, unique, state-wide or locally important farmlands occur in the project area.
<b>Energy Supply and Natural Resources</b>	No Significant Impact	No significant increases in electrical power, natural gas or other fuel consumption will occur as a result of the proposed airport.
<b>Light Emissions</b>	No Significant Impact	Airport activity will result in light emissions.
<b>Solid Waste Impact</b>	No Significant Impact	Solid waste generation will moderately increase with the proposed airport.
<b>Construction Impacts</b>	No Significant Impact	Construction activity may cause temporary noise, and air and water quality impacts.



FEDERAL AVIATION  
ADMINISTRATION  
January 28, 2000

DENVER AIRPORTS DISTRICT OFFICE  
26805 E. 68th Ave., Suite 224  
DENVER, COLORADO 80249-6361  
(303) 342-1265

Larry Bulloch, P.E.  
Public Works Director  
175 East 200 North  
St. George, UT 84770

Dear Mr. Bulloch,

We have reviewed the December 1999 Draft Environmental Assessment and have included comments on the format and content which we believe would improve the document. We would like to compliment you on your continued efforts to ensure the comprehensive evaluation of the proposed replacement airport at St. George.

You will be receiving comments on the St. George redevelopment plan in the near future.

**St. George comments on Draft Environmental Assessment December 1999**

**Overall**

1. All the basic required components in the EA are in place.
2. Consider using single space and perhaps a different font (see Master Plan) to cut down on the volume of the document.
3. The index to the coordination letters is a helpful addition.
4. Streamline the Affected Environment section. Discuss the St. George area in general by summarizing the information in Appendix D. Laying out the specific alternatives is more appropriate in Chapter 4. Examples of this approach will be sent to your consultant.
5. In Chapter 4 analyze the no-action alternative, alternative 2 and the preferred alternative. Information from Alternatives 1 and 1a may need to be incorporated in the preferred alternative analysis. Be consistent with format under all categories. The format under each category should be: no action, alternative 2 and the preferred alternative.

### Executive Summary

1. On page 1 the 1<sup>st</sup> sentence should be re-worded. One suggestion is to simply say, "The purpose of this environmental assessment is to identify and evaluate the potential environmental impacts associated with the proposed replacement airport in St. George, Utah."
2. In paragraph 3 beginning on page 1, reference the Master Plan/Site Selection study. At the end of the paragraph, refer reader to a figure of the preferred alternative.
3. In paragraph 3 on page two, re-word the descriptions of Chapter 3 and 4 to reflect the overall format change.
4. In paragraph 4 on use the NEPA definition found in 5050.4A instead of the second sentence.
5. Remove the Major Conclusions and Findings of this section and replace with a summary chart. Examples of this approach will be sent to your consultant.
6. On page 5, remove the Controversial and Unresolved issues section. Create a section titled National Park Service. Put this and the related paragraph on page 6 in the Affected Environment.
7. Place the mitigation section on page 6 under the discussion of Alternative 2.

### Chapter 1 Purpose and Need

1. Make it clear within the first paragraph that a major motivation for St. George is the concern for standards.
2. Include the 2008 forecasts.
3. Figure 2, Vicinity map needs a scale.

### Chapter 2 Proposed Action and Alternatives

1. Include a scale on Figure 3. Also, include the Nevada border if possible.
2. Include a scale and the Nevada border on Figure 4.
3. On page 21 in the third paragraph, end the paragraph with "study." Remove "Each of the three sites...are described as follows."
4. Instead of Figure 10 Preferred Site Generalize Zoning, include a preferred alternative schematic Airport Layout Plan.
5. On page 27 in the 3<sup>rd</sup> paragraph, should the second sentence say "inadequate" instead of "adequate?"
6. On page 32 remove the last few words of the paragraph "as shown in this environmental assessment, for Site 1."

7. Explain in this section why site 2 was not selected. Further explain the first sentence of the fourth paragraph in this section.
8. On page 33 either leave this section out or discuss the general research that has been conducted in terms of cost evaluation and how that was included in the Benefit Cost Analysis.

#### Chapter 3.0 Affected Environment

1. See "overall" comments section. Discuss the general affected environment. The information is good information. Incorporate site-specific analysis and figures into Chapter 4.
2. Note on the data in this section: Please get a written confirmation from F&W that the species list from F&W is still up to date.
3. Do the drawings show the latest southern corridor route?

#### Chapter 4.0 Environmental Consequences


1. The lead in to this chapter should discuss that it is an examination of the specific impact categories as defined in FAA Order 5050.A. List the categories for the reader in the introduction so that they are easy for the reader to follow. Discussion of these categories is to determine if any impacts are significant or less than significant.
2. State that agencies at the local, state and federal level that have a responsibility to or an interest in specific environmental areas were sent information regarding the replacement airport and responses can be found in the appendices of the report.
3. You will need preferred alternative figures throughout this section.
4. Land Use—Please include a more comprehensive discussion of land use and a map in this section. Include the latest Airport Influence Zone and discuss city resolution (this if forthcoming). Include a discussion about the different types of property including the BLM property and the acquisition process.
5. Noise – Mention that the FAA approved Integrated Noise Model (INM) version 6 (latest) was used to delineate the affected area and noise intensity.
6. Section 4.27 will change given the revision of the supplemental noise study. Comments will be forthcoming.
7. Historical, Archeological and Cultural Resources - State what information is based on i.e. cultural resources survey. In your appendix regarding, "Consultation with Native American Groups, is Ms. Anderson a recognized spokesperson for a variety of Native American groups? If this is true it should be stated in the appendix. If not, we will need to discuss this further.
8. Geology and Soils -Bring in the data from section 3.

input

9. Wetlands-State what this determination is based on.
10. Include a cumulative impacts category.
11. Environmental Consequences/Other considerations -The City of St. George must provide an update on the status with the City of Washington.

Please contact me if you have any questions regarding the above comments.

Sincerely,



Cynthia Romero  
Environmental Planner

cc: Ryk Dunkelberg, Bernard Dunkelberg  
Terry Hickman, Creamer and Noble



# United States Department of the Interior

## NATIONAL PARK SERVICE

Zion National Park  
Springdale, Utah 84767

IN REPLY REFER TO:

L38 (ZION-S)

January 6, 2000

Bryan Montgomery  
Mesquite City Manager  
Mesquite City Hall  
10 East Mesquite Boulevard  
Mesquite, Nevada 89027

Dear Mr. Montgomery:

It has recently come to our attention that plans are progressing for a new, larger airport just south of Mesquite. We understand the city is now working with the Federal Aviation Administration (FAA) to complete an Airport Master Plan and an Environmental Assessment Study. We would very much appreciate the opportunity to obtain an updated status of the planning, as well as to provide input at this stage before the study is completed.

Zion National Park is located about 65 miles from the proposed airport site. At this distance we may well be within the area potentially affected by approach-departure patterns for a major airport. We have an interest in protecting the park from noise impacts and want to provide assistance relating to flight patterns, altitude projections, and other impact analyses in the environmental assessment study.

We believe these issues can be successfully mitigated with respect to Zion National Park through cooperative planning. We would like the opportunity to meet with you, city officials, and the FAA to discuss these matters further. You may contact me by telephone at (435) 772-0140. We look forward to working with you as planning for the new airport progresses.

Sincerely,

Donald A. Falvey  
Superintendent

cc:

Mayor, City of Mesquite  
Joe Rodriguez, Project Manager, FAA  
✓ Larry H. Bulloch, Public Works Director, City of St. George  
Rick Arial, Office of Congressman James Hansen  
Dennis Mewshaw, Clark County Department of Aviation  
Superintendent, Lake Mead National Recreation Area  
Superintendent, Grand Canyon National Park



FEDERAL AVIATION  
ADMINISTRATION

August 30, 1999

Larry Bulloch, P.E.  
Public Works Director  
175 East 200 North  
St. George, UT 84770

DENVER AIRPORTS DISTRICT OFFICE  
26805 E. 68th Ave., Suite 224  
DENVER, COLORADO 80249-6361  
(303) 342-1265

Re: Revised Project Coordination Schedule #1

Dear Mr. Bulloch,

In our meeting with you and your consultants Creamer and Noble on April 28, 1999, we discussed a project coordination schedule for planning work associated with the replacement airport at St. George. It has come to our attention that certain elements of the project schedule have slipped. Listed below are specific dates and items that reflect these changes and clarify our goal regarding environmental planning process.

Project Coordination Schedule Revision 1

By May 30, 1999	ADO approves aviation forecasts.
By June 1, 1999	ALP comments received from FAA region.
By July 1, 1999	Draft masterplan submitted to ADO.
August 9, 1999	Begin supplemental noise study.
By August 31, 1999	Benefit-Cost Analysis submitted to the ADO.
By September 15, 1999	Financial plan submitted to the ADO.
By September 30, 1999	ADO completes review of ALP, masterplan, financial plan, benefit cost analysis.
By October 15,	ADO receives draft masterplan and ALP.
By October, 30, 1999	ADO receives final versions of ALP, masterplan, financial plan, and benefit cost analysis.
By November 15, 1999	Environmental Assessment including a completed noise study submitted to the ADO.
By December 15, 1999	ADO completes review of environmental assessment.
By January 15, 2000	ADO receives final/updated version of environmental assessment.
By February 1, 2000	Advertise public hearing.
March 1, 2000	Hold public hearing in St. George.
By April 1, 2000	Allow for written public comments.
By May 1, 2000	Complete responses to comments. Completed EA document is submitted to FAA.
By May 15, 2000	FAA makes environmental finding.
Jan 25	Pinholder
Feb 11	Noise Study comments from FAA
Jan 28	EA comments from FAA
Mar 3	ADO receives final EA w/noise study

new  
106 reg  
archaeology  
Indian  
letter reqd

end July

2 who out  
2 who back

File Site Study  
corresp.

-0-99 THU 01:57 PM

FAX NO.

P. 02/02



FEDERAL AVIATION  
ADMINISTRATION  
August 25, 1999

DENVER AIRPORTS DISTRICT OFFICE  
26805 E. 68th Ave., Suite 224  
DENVER, COLORADO 80249-6361  
(303) 342-1265

Larry Bulloch, P.E.  
Public Works Director  
175 East 200 North  
St. George, UT 84770

**Re: Revised Project Coordination Schedule #1**

Dear Mr. Bulloch,

In our meeting with you and your consultants Creamer and Noble on April 28, 1999, we discussed a project coordination schedule for planning work associated with the replacement airport at St. George. It has come to our attention that certain elements of the project schedule have slipped. Listed below are specific dates that reflect these changes.

**Project Coordination Schedule**

By May 30, 1999	ADO approves aviation forecasts.
By June 1, 1999	ALP comments received from FAA region.
By July 1, 1999	Draft masterplan submitted to ADO.
August 9, 1999	Begin supplemental noise study.
By August 31, 1999	Benefit-Cost Analysis submitted to the ADO.
By September 30, 1999	Financial plan submitted to the ADO.
By September 30, 1999	ADO completes review of ALP, masterplan, <del>financial plan</del> , benefit cost <del>analysis</del> . Noise study to FAA.
By October 30, 1999	ADO receives final versions of ALP, masterplan, <del>financial plan</del> , and benefit cost analysis. FAA comments on financial plan
By November 15, 1999	Environmental Assessment including a completed noise study submitted to the ADO. FAA receives final draft of financial plan
By December 15, 1999	ADO completes review of environmental assessment.
By January 15, 2000	ADO receives final/updated version of environmental assessment.
By February 1, 2000	Advertise public hearing.
March 1, 2000	Hold public hearing in St. George.
By April 1, 2000	Allow for written public comments.
By May 1, 2000	Complete responses to comments. Completed EA document is submitted to FAA.
By May 15, 2000	FAA makes environmental finding.

Sincerely,

Cynthia Romero  
Environmental Planner

Mar 7 FAA receives final noise study  
Mar 31 FAA Seattle reviews noise study & provides Ryk comment  
Apr 7 Ryk resubmits noise study to FAA  
Apr 14 FAA receives updated draft EA  
Apr 21 FAA receives draft EA with noise study & review plan  
Apr 28 FAA completes review of all rfd documents  
May 5 Advertise hearing  
June 1 Hold public hearing

Oct 29  
FAA comments  
on financial  
plan

30

Oct 15

Dec 6

Nov 15

July 7

Aug 7

Aug 21

**JEFF KLEIN**

PO BOX 1268  
ST. GEORGE, UT 84771  
(435) 574-2627 FAX 574-3948

**Hand Delivered**

August 16, 1999

MR. LARRY BULLOCH  
ST. GEORGE CITY OFFICES  
175 EAST 200 NORTH  
ST. GEORGE, UT 84771

RE: ST. GEORGE CITY PROPOSED REPLACEMENT AIRPORT

Dear Larry:

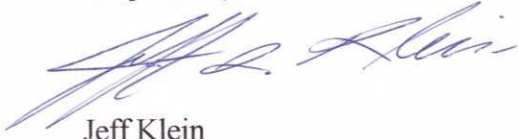
The following is in response to the recently received document titled "St. George City Municipal Airport Site Selection & Master Plan. Collectively with your submission to the St. George City Planning Commission for a zoning ordinance titled "Airport Compatibility Overlay Zone." As you know, the proposed airport site selection process, which began in 1995, is substantially behind schedule. A most recent agenda projecting the FAA's approval in February of 2000 is now slated for April. As a major landowner within the 1, 1A site, I make the following observations or recommendations.

1. **Develop an immediate economic partnership or consensus with the surrounding landowners and the adjoining City of Washington.**
2. **Formulate and execute participation agreements between landowners for the construction of an interim access or beltway to accelerate auxiliary development.**
3. **Immediately engineer the interim access, with construction of the designed improvements commencing no later than six months.**
4. **Move forward with submission of petitions for annexations supported by the private landowners and the respective cities.**
5. **Obtain corporate and industrial commitments as a catalyst for accelerating the timeline for the proposed airport and Southern Corridor.**

If the above items are not immediately accomplished and a consensus cannot be reached, then more delays are inevitable. The ongoing delays and lack of progress creates the following concerns. It is noted that the proposed airport may never materialize due to the following inherit risk factors.

Great concerns arise, due to the projects ongoing delays, and your recent move to zone properties without providing proper notice to the impacted landowners. Unfortunately, the private landowners have been left with no option but to forward this document together with your proposed Airport Compatibility Overlay Zone, to competent legal counsel. In an effort to avoid additional delays or increased opposition with regards to FAA approval, I would recommend a meeting to immediately resolve these and any other issues.

Respectfully,

A handwritten signature in blue ink, appearing to read "Jeff Klein", written over a horizontal line.

Jeff Klein

cc:

Mayor McArthur  
Gary Esplin

August 10, 1999

From: John Busby  
To: Larry Bulloch

I want to again express my appreciation to you for providing me with a draft copy of the June 1999 Site Selection & Master Plan for the new St. George Airport. As we agreed, following are my comments:

The basis upon which all of the conclusions rest is the historical data contained in Table B1 (page B.8.). The key number is *Passenger Enplanements*. The conclusion reached by the report states:

"There has been a substantial increase in passenger boardings since 1980 (i.e. an approximate 7.0% average annual growth rate for the period)... It is anticipated that this trend of consistent and moderate passenger growth will continue through the planning period...

This conclusion is simply not true. The trend is neither *consistent* nor showing *moderate growth*.

Taking the most recent data for which there is data complete enough to form any conclusions, 1994 to 1998, we see a *decline* -not growth- of 10%. On a year to year basis starting from the highest point ever (1996), 1997 *drops* 8% and 1998 *drops* an additional 4%.

There is also a slight decline in General Aviation Operations, and Total Operations are flat for the same period. If you exclude the *highly suspicious* Air Taxi increase of 400% in 1997, total operations are also *down* for the period.

But is it fair to ignore the older and incomplete data going all the way back to 1980? You bet! The credibility of data is a direct function of its age and completeness. In addition, the airport was terribly underutilized through 1992. As a taxpayer, I would sure like to know the loss incurred by the airport and the City during that time. Evidently no data exists, not surprisingly. The fact that the existing airport continues to hemorrhage red ink in 1997, 1998 and projected 1999 casts serious doubt about the future financial success of the new airport.

Anyway, Because the best and most recent data shows a *decline*, not growth, the main projections and conclusions are discredited totally.

Another conclusion that is bogus is that the new airport will capture 72% of the passenger demand, up from the present 30%. Unless the City is prepared to outlaw the van shuttles to Las Vegas, there is simply no basis for any change from the 30% rate.

Yet another problem with this study is the use of compounding. Such a technique should only be applied when complexity and uncertainty are high, such as trying to project the future of McCarran Airport. In this study, recent and future changes to enplanement are a direct result of easily known factors, namely the actions of Skywest, United and Delta. They not only should have been consulted for this study, but they should be willing to give a firm commitment as to their future involvement at the present or new airport. The absence of such a vote of confidence by the only significant airlines to serve this area is definitely a project killer.

The Boarding Load Factor is a similar problem in this study. The actual figure is apparently known for 1998 only. There is no historical Skywest data to see whether the figure of 52% is normal or a fluke. To start compounding that rate for the next 20 years is wrong.

What is also curious and damaging to the case for building an airport *larger* that we now have is the conclusion on page D.8. Basically it states that the existing airport won't even reach a use level in 20 years that is high enough to begin *planning* for a larger airport, let alone building one.

The "Bottom Line" is that the present airport is *loosing* - not gaining- demand. Our close proximity to Las Vegas (1 hour 45 minutes, not 2 <sup>1 1/2</sup> hours as in the study) is already reducing traffic from our airport and that is the trend that will continue.

The only justification that will make sense is the safety issue. The present airport is a hazard to both the flyers and the homes now located too close to the runway and approaches.

We need to downsize this project in line with reality, and also deal with the requirement that *this* airport must be *self-supporting*. And then we need to get it done - now!

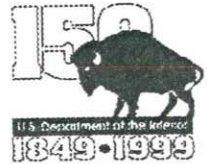
There are some other flaws in the study, but time constraints prevent me from spending more time on this.



# United States Department of the Interior

## NATIONAL PARK SERVICE

Zion National Park  
Springdale, Utah 84767



IN REPLY REFER TO:

A3815 (ZION-S)

August 10, 1999

Larry H. Bulloch, P.E.  
Public Works Director  
City of St. George  
175 East 200 North  
St. George, Utah 84770

Dear Mr. Bulloch:

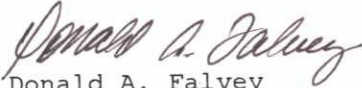
Thanks for letting us know that the draft Site Selection and Master Plan for the new airport has been completed and for providing us a copy for review. We do have a few points for your consideration.

The Site Analysis and Evaluation portion of the report includes some comments on 4(f) properties that need to be revised. On page F.31 there is a statement defining 4(f) properties and mentioning that the National Park Service has stated that "no such properties would be impacted by the development of an airport." This statement needs to be revised to reflect the concerns addressed in our August 18, 1998 letter to Mr. Hickman which specifically indicated a 4(f) determination and other impact analyses for Zion National Park will be necessary. Mr. Hickman's response to us, dated November 9, 1998 indicated that our letter would be included in appendix A of the draft environmental assessment (EA). While this Site Selection and Master Plan is not an EA, it seems that our letter should be included in this Plan's appendix also. The letter that was included with the Plan, from Gary Weiner from our Regional Office in Denver, referred only to impacts to Wild and Scenic Rivers in the local area. In my conversation with Mr. Weiner, his evaluation was only based on water quality and land based impacts of airport construction using the classification guidelines established under the Wild and Scenic Rivers Act. As you know, other publicly-owned lands qualify as 4(f) properties and require impact assessment.

In your May 20, 1999 letter, you mentioned the draft environmental assessment would include an evaluation of noise and overflight impacts over national parks. Perhaps some mention of that study should be made in the final Site Selection and Master Plan document. We look forward to meeting with you and your consultants when this study is completed as you suggested. Please let us know of your progress so we may schedule this meeting.

Larry, thanks again for furnishing us with a copy of the draft report for review. We look forward to continued involvement and working with you as this project proceeds.

Sincerely,



Donald A. Falvey  
Superintendent

cc:

James Eardley, Washington County Commission  
Rick Arial, Office of Congressman Hansen  
Gary Weiner, IMR

MICHAEL SCHNEIDERMAN

7 Aug 98 phone memo

312 558 6632

Did a nice job - Appearance of EA is good.  
letters are routine

not all that threatening

not alot of content

GCA - nothing substantive

Not clear on construction schedule  
critical issue

claim - impact on development  
that doesn't exist

- change land use themselves.

- land acq & const. e-mail

In good hands

- lawsuit against FAA

- 38 / 2 win / loss

-

Improve chances of success with Schneiderman  
- sees little need.

you're dealing with able people  
- oversee?

Don't have kind of risk that I can  
materially reduce

Only thing worried about is sched. of development  
of airport vs. surrounding

FAA approve ALP with FONSI (good candidate)

- buy land
- changes will transpire
- Update needed

Decide today how much you want to talk about future conditions

Negotiated deal

try to get easement clear - owners of land impact

Cheryl Cook 24 Oct 97

## Privatization of airports

- Tough to beat tax exempt bonds
- Generally requires giving some ownership to private investor (loss of City control).
- Never heard of private funding in return for ancillary development rights

6 Oct 97  
Cheryl Cook

Non voted revenue bond

1. Feasibility consultant
2. Underwriter / bond counsel
3. Financial advisor

Underwriter / Financial advisor

Smith Barney

AG Edwards

Dane Bosworth

Goldman

Feasibility

Lee Fisher

PB Au Plan

Ogden Director

Bond Counsel

Chapman Cutler - Richard  
Ballard Spahr - Blake



DENVER AIRPORTS DISTRICT OFFICE  
26805 EAST 68th AVENUE, SUITE 224  
DENVER, COLORADO 80249-6361  
(303) 342-1262

FEDERAL AVIATION  
ADMINISTRATION

September 22, 1997

Mr. Larry Bulloch, Public Works  
City Building  
175 East 200 North  
St. George, Utah 84770

Dear Larry:

The end of federal fiscal year 1997 is fast approaching. If you are interested in requesting federal Airport Improvement Program funding assistance for supplemental environment work for the St. George Municipal Airport in fiscal year 1998, we request that you submit an application by October 15, 1997.

If you have any questions concerning the application process, please call.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Barbara Johnson', is written over the typed name.

Barbara Johnson

cc: Frank Seegmiller, Creamer & Noble

**URBAN**  
**ENVIRONMENT**  
**ASSOCIATES, INC.**

COVER

COVER

COVER

DATE:

8/5/97

Page 1 of 4

Please deliver the following pages to:

*Larry Bullock, P.E.*  
*Public Works Director*  
*City of St. George*

SENDER'S NAME:

*Naunty Johnson*

URBAN ENVIRONMENT ASSOCIATES, INC.

200 Bryan Place at Straus Road

Cedar Hill, Texas 75104

P.O. Box 1748

Cedar Hill, Texas 75106

Phone: (972) 293-6969

FAX: (972) 293-6540

If you have any problems receiving this FAX, please call:  
(972) 293-6969

Message:

*See Attached proposal*

**URBAN**  
**ENVIRONMENT**  
**ASSOCIATES, INC.**

August 5, 1997

Larry H. Bulloch, P.E.  
Public Works Director  
City of St. George  
175 East 200 North  
St. George, Utah 84770

Dear Larry:

Attached is a proposed scope of services and an estimated budget for a needs assessment of air cargo service in Washington County. I am proposing to do an initial mail survey to all businesses with 10 or more employees (about 30% of the total number of businesses). The responses would give an indication of those who should be interviewed regarding their future air cargo shipping needs.

After you approve the scope and budget, we could begin work by September 1. I would anticipate mailing the initial questionnaire before the end of that month. I would conduct the interviews one week during the month of October and we would have the final report to you sometime during the month of November.

I will be happy to discuss this proposal with you to ascertain if it meets your needs. If you have suggestions about the scope of work, they will be welcome. I look forward to hearing from you.

Sincerely yours,



Nancy J. Johnson  
NJ/dbs  
Attch.

**URBAN**  
**ENVIRONMENT**  
**ASSOCIATES, INC.**

**NEEDS ASSESSMENT OF AIR CARGO SERVICE**  
**ST. GEORGE, UTAH**  
**PROPOSED SCOPE OF WORK**  
August 5, 1997

**Task 1. Design and mail to all businesses with 10 or more employees a short questionnaire about current and anticipated air cargo use. Estimate no more than 700 such businesses.**

**Task 2. Tabulate data from responses to mailed survey.**

**Task 3. Select from responses a sample, providing business variety and size, to interview about present and future air cargo needs.**

**Task 4. Design interview questionnaire.**

**Task 5. Conduct interviews.**

**Task 6. Tabulate and summarize interview responses.**

**Task 7. Prepare final report.**

**URBAN**  
**ENVIRONMENT**  
**ASSOCIATES, INC.**

**NEEDS ASSESSMENT OF AIR CARGO SERVICE**  
**ST. GEORGE, UTAH**  
**August 5, 1997**  
**Estimated Budget**

**PROFESSIONAL LABOR**

<u>Professional</u>	<u>Total Hours</u>	<u>Base Rate</u>	<u>Total Cost</u>
Principal-in-Charge	76	\$ 40	\$ 3,040
Programmer/Analyst	24	\$ 50	\$ 1,200
Admin. Asst.	28	\$ 17	\$ 476
Sub-Totals	128 hrs.		\$ 4,716
Fringe Benefits, G&A Overhead			\$ 4,434
<b>TOTAL PROFESSIONAL LABOR</b>			<b>\$ 9,150</b>
<b>PROFIT/FEE</b>			<b>\$ 915</b>

**DIRECT EXPENSES:**

Postage	\$ 448	
Reproduction costs	\$ 100	
Airfare, 1 RT Flt. Dallas-Las Vegas-Dallas	\$ 325	
Auto Rental, 5 days	\$ 300	
Lodging, 4 nights, 1 person	\$ 220	
Per diem 5 days	\$ 150	
Long Distance telephone/telefax	\$ 25	
<b>TOTAL DIRECT EXPENSES</b>	<b>\$1,298</b>	<b>\$ 1,298</b>
<b>TOTAL ESTIMATED BUDGET</b>		<b>\$11,363</b>



DENVER AIRPORTS DISTRICT OFFICE  
5440 ROSLYN STREET, SUITE 300  
DENVER, COLORADO 80216-6026  
(303) 286-5533

FEDERAL AVIATION  
ADMINISTRATION

June 30, 1995

The Honorable Daniel D. McArthur  
Mayor of St. George  
City Building  
175 East 200 North  
St. George, Utah 84770

Dear Mayor McArthur:

*site study*

The acceptance date for the grant offer for Airport Improvement Program Project No. 3-49-0030-10 at the St. George Municipal Airport has been extended to August 3, 1995.

Sincerely,

*Craig A. Sparks*

Craig A. Sparks, Acting Manager  
Denver Airports District Office



**CREAMER & NOBLE ENGINEERS**

P.O. BOX 37, ST. GEORGE, UTAH 84771  
PHONE (801) 673-4677

December 27, 1994

Mr. Phil Ashbaker  
Utah Department of Transportation  
Division of Aeronautics  
135 North 2400 West  
Salt Lake City, UT 84116

Dear Mr. Ashbaker:

The City of St. George is in the process of implementing an airport site selection study and an improvement project of the St. George Municipal Airport. In order to complete these desired projects, financial assistance is being requested by the City from the Federal Aviation Administration and the Utah Department of Transportation, Division of Aeronautics.

Enclosed for your review and comments is two executed copies of the Application for Financial Assistance. Copies of these applications have been submitted to the FAA.

If additional information is required please let me know.

Sincerely,

CREAMER & NOBLE, INC.

Ron Theobald  
Project Coordinator

RT/ja

Enclosure



DENVER AIRPORTS DISTRICT OFFICE  
26805 EAST 68th AVENUE, SUITE 224  
DENVER, COLORADO 80249-6361  
(303) 342-1262

**FEDERAL AVIATION  
ADMINISTRATION**

March 6, 1997

Mr. Larry Bulloch, City Engineer  
175 East 200 North  
City Building  
Saint George, Utah 84770

Dear Larry,

I have reviewed your March 4 Facsimile of a proposed scope of work for a grant to complete supplemental work associated with the environmental assessment (EA) for a proposed new airport in St. George, Utah. Since this would be for a new grant, once the City decides to approve the work, a complete grant application, scope of work, schedule, and contract will be needed. Also, additional work is needed on previous grants not associated with the EA to be able to move forward on a fiscal year 1997 grant for this additional work.

The description of work within each proposed element must be described in better detail to differentiate this grant work from the previous grant. We cannot fund duplicated efforts so the work proposed must clearly be out of the scope of the existing grant.

The existing grant does not limit the environmental analysis to one site but does imply that the analysis will be general in nature for the alternative sites assessment and more specific for an "approved development plan". Therefore, the proposed work for a second site beyond the general analysis is approved. The original scope of work implies that noise contours would have been run for all proposed sites so the only additional noise analysis approved would be applying the contours to a detailed analysis of land use and impact - that appears to be consistent with the level of analysis proposed in 11.2 supplemental.

The justification for additional analysis in element 11.3 site 1 is adequate. The justification for additional analysis for element 11.3 site 2 is not adequate. The dollars requested appear to be reasonable based on experience, but there is no description of work to back up the numbers. Additional work under this element is eligible provided it is for specific environmental analysis beyond the general analysis funded in the first grant.


The aerial photography proposed for site 2 is eligible at 5' contours as the original scope indicated was needed, \$10,000 dollars appears to be excessive for this element. We do not typically fund work for project design within the planning process. If the local community would like to fund the additional cost for 2' contours at your expense (estimated at \$706 additional) that is your option.

The additional analysis within 6.7 does not appear to be outside the scope of the original contract and therefore is ineligible. The additional analysis for elements 6.4 and 7.4 are eligible but need to be described in more detail.

One element that was not included in the additional scope but merits some consideration is that of the public process (perhaps under 12.1 or as 12.2). Has a public environmental scoping meeting been held? If not, one should be scheduled. Assuming the environmental process takes 12 months, public meetings should be held at month 3 and 6 or as needed. The Public hearing at the end of the study is already included in the original scope of work. Perhaps the original scope already accounts for the necessary public process. It is unclear. After the original scoping meeting, St. George should consider setting up a public working group made up of other affected municipalities or counties as well as interested members of the public. The purpose of this group would be to review the environmental analysis and provide public comment during the process.

Please forward a completed application, supplemental work scope, detailed schedule for completion, and contract to our office once you have made a decision. Thank you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Barbara Johnson".

Barbara Johnson

cc: Robert Barrett, Utah Aero

C: C + N



DENVER AIRPORTS DISTRICT OFFICE  
26805 EAST 68th AVENUE, SUITE 224  
DENVER, COLORADO 80249-6361  
(303) 342-1262

FEDERAL AVIATION  
ADMINISTRATION

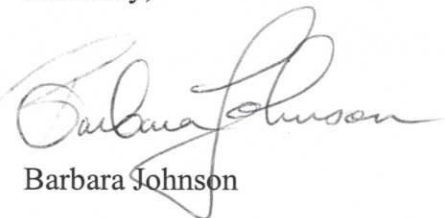
January 15, 1997

Mr. Larry Bullock, City Engineer  
175 East 200 North  
City Building  
St. George, Utah 84770

Dear Mr. Bullock:

Scott Fredericksen and I discussed your local decision to complete a full on site environmental analysis of two development alternatives associated with the proposed new airport. If you identify environmental work that is clearly outside the scope of the existing grant, you may ask to include the supplemental environmental work in the application for 1997 entitlement funds. If that is your intent, please submit the existing scope of work, the proposed supplemental work, the revised contract, the independent cost estimate, and a new schedule for completion of both scopes of work. We would appreciate the submittal of the application by February 14, 1997.

Sincerely,

  
Barbara Johnson

*Thank You!*

cc: Frank Seegmiller - Creamer and Noble Engineers