

# **Saint Paul Island Leadership Coalition**

**Aleut Community of Saint Paul Island**

**City of Saint Paul, Alaska**

**TDX Corporation, ANC Village of Saint Paul**

**Central Bering Sea Fishermen's Association**

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April 30, 2020

Commissioner MacKinnon  
Alaska Department of Transportation &  
Public Facilities  
3132 Channel Dr.  
Juneau, Alaska 99801

Re: Re-certification of Part 139 for the Saint Paul Airport

Dear Commissioner MacKinnon,

The Saint Paul Island leadership has united as a Coalition and have jointly agreed and hereby officially request that the Saint Paul Airport (SNP) be re-certified with a Part 139 Airport Operating Certificate. We request support and funding from Alaska Department of Transportation & Public Facilities (AKDOT&PF) to achieve this critical undertaking.

Due to Saint Paul Island's remote location, in the middle of Bering Sea 300 miles from the Alaska mainland; air service is our only form of scheduled passenger transportation. The community depends on scheduled air service for passenger, freight, and mail service, for basic necessities, routine medical services, and general economic well-being. With Ravn Air abruptly ceasing service, Saint Paul Island and many other communities in our region have been left isolated and stranded. In a united effort; our community leadership and the leadership of the region are working together to address our passenger air service needs, it is a critical economic, safety and health necessity.

We understand general protocol is to present a plan with a precise air carrier agreement negotiated to use a Part 139 certified airport once it's been approved, however, in this case timeliness is crucial and we are simultaneously working the communications and re-certification. Our leadership coalition is approaching Alaska Airlines to secure a conditional agreement for passenger air service to SNP; with Cold Bay being the hub, that would benefit Saint Paul Island and five neighboring Aleutian communities.

Our goal is to have Alaska Airlines operate a 737 jet from Anchorage to Cold Bay with a landing/stop in Saint Paul on the return flight to Anchorage. Smaller commuter airlines would shuttle passengers from Cold Bay to the nearby communities. This would allow for pooling of resources and consolidating of passenger loads, while continuing to provide essential air service to Saint Paul Island, which currently has an Essential Air Service contract, and to our five other regional airports.

In addition to the request for support and funding from the AKDOT&PF to re-certify and operate SNP as a Part 139 airport, the leadership coalition requests the following:

- Update prior work and related files, to provide an assessment of the SNP airport and documentation to meet Part 139 re-certification requirements;
- Conduct on site assets and airport layout, including all runway markings, lighting, and fencing; and
- Provide findings of any deficiencies, with recommendations to fix, and provide necessary funding for the SNP airport to meet qualification and to operate as certificated Part 139, airport, including, but not limited to:
  - I. Personnel and equipment required to man/operate a Part 139 airport with service from larger than 60 passenger aircraft, including the acquisition of an airport rescue fire fighting vehicle and marine rescue vessel/trailer,
  - II. Part 139 airport operations manuals and procedures,
  - III. Contract out SNP airport Part 139 manager duties, and
  - IV. Training to/for compliance and approval as Part 139 airport.

We are prepared to assist where appropriate and recognize the critical importance of working in partnership with our local leaders as well as our Congressional Delegation and the Federal Aviation Administration to accomplish attaining the certification.

Please feel free to contact Dianne Blumer at (907) 575-2279 to arrange a meeting or conference call to discuss any question or concerns.

Sincerely,



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Amos Philemonoff  
President, Aleut Community of  
Saint Paul Island Tribal Government



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Phillip A. Zavadil  
City Manager  
City of Saint Paul, Alaska



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Phillip Lestenkof  
President, Central Bering Sea  
Fishermen's Association



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Ron Philemonoff  
CEO, TDX Village ANC  
Saint Paul Island

Cc: Honorable Governor Dunleavy  
Senator Lisa Murkowski  
Senator Dan Sullivan  
Congressman Don Young  
Senator Lyman Hoffman  
Speaker Bryce Edgmon  
Deputy Commissioner John Binder