



Sent by E-Mail

August 15, 2025

Mr. Venkatesh Paluvai
Essential Air Service &
Domestic Analysis Division
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590
E-mail: Venkatesh.paluvai@dot.gov; EAS@dot.gov

RE: Supplemental Comments - Essential Air Service at Saint Paul Island, Alaska; Docket DOT-OST-2019-0038

Dear Mr. Paluvai:

The City of Saint Paul (CSP), working in concert with the main Community Organizations, the Aleut Community of St. Paul Island (ACSPI - local Tribal Government), the Tanadgusix Corporation (TDX - local ANCSA Village Corporation), and the Central Bering Sea Fishermen's Association (CBSFA - local Community Development Quota Group), wish to supplement our review comments dated July 21, 2025.

The community of Saint Paul Island withdraws its qualified support for awarding the Essential Air Service (EAS) contract to Kenai Aviation LLC (Kenai). As we described in previous correspondence and during subsequent discussions with your office, **use of a Beechcraft Super King Air (either Model 200 or 300 series) is nonresponsive to the specified requirement contained the U.S. DOT EAS RFP that proposals submitted by air carriers "will be consistent with what [service] the community currently receives."** That level of service has been three weekly round trips between Saint Paul and Anchorage using a 25-seat or 30-seat DeHavilland Dash-8 Series 100 aircraft.

Section II.C. of our July 21 letter outlines several other concerns with the proposed service using the Super King Air. The community's current challenges to use charters to fill the gap caused by Ravn's departure, coupled with more research of the likely problems that will be encountered if service with a Super King Air is initiated later this fall, has led us to conclude we need to find a more acceptable and sustainable solution that will serve our aviation service needs.

We remain appreciative of the willingness of Kenai Aviation to offer a proposal to serve Saint Paul Island.

Thank you for your attention to this matter.

Sincerely,



Jacob Mercurief, Mayor
City of Saint Paul



John Wayne Melovidov, President
Aleut Community of St. Paul Island



Raymond Melovidov, President
Central Bering Sea Fishermen's Association



John Lyons, Chief Executive Officer
Tanadgusix Corporation

cc. Saint Paul City Council
Tribal Council of St. Paul
CBSFA Board of Directors
TDX Corporation Board of Directors
Governor Mike Dunleavy
Lt. Governor Dahlstrom
Senator Murkowski
Senator Sullivan
Representative Begich
Lyman Hoffman, Alaska State Senator
Bryce Edgmon, Alaska State House Representative
DOT/PF Commissioner Anderson
Todd M. Homan, Director, US DOT Office of Aviation Analysis
Kevin Hubbard, Acting Regional Administrator, Alaska Region, Federal Aviation
Administration
Phillip A. Zavadil, City Manager, City of Saint Paul
Patrick Baker, Executive Director, Pribilof Islands Aleut Community of Saint Paul Island
Chris Arnim and Dean Fasnacht, Trident Seafoods