



Sent by E-Mail

August 19, 2025

The Honorable Sean Duffy
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Subject: Urgent Request for Emergency Assistance and Expedited Essential Air Service
Procurement for Saint Paul Island, Alaska

Dear Mr. Secretary:

On behalf of the residents of Saint Paul Island we, the City of Saint Paul (CSP), working in concert with the main community organizations, the Aleut Community of St. Paul Island (ACSPI – local federally recognized Tribal Government), the Tanadgusix Corporation (TDX - local ANCSA Village Corporation), and the Central Bering Sea Fishermen's Association (CBSFA - local Community Development Quota Group), urgently request that you use the Department's existing emergency authorities to address the complete loss of scheduled commercial air service to our community.

Saint Paul is a remote island located in the central Bering Sea, approximately 300 miles from the nearest mainland hub and 765 miles away from Anchorage. Saint Paul has no road, ferry, or alternative passenger transportation link. Air travel is our only means of accessing critical medical care, essential goods, educational opportunities, and mainland connections.

The abrupt cessation of service by our previous EAS carrier Ravn Airlines, on July 31, 2025, has forced us to rely on costly charter flights from Security Aviation to maintain even minimal air access.¹ This stopgap measure, while essential, is financially unsustainable for our local government, tribal government, organizations, and residents. As a result, on August 7, 2025, the

¹ On August 15, 2025, the community of Saint Paul Island withdrew its qualified support for awarding the Essential Air Service (EAS) contract to Kenai Aviation LLC (Kenai) as its proposed 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. The expectation is that it will take up to 6 months to re-bid the process or to pursue the Alternate Essential Service route.

Saint Paul City Council adopted a resolution declaring an economic and social emergency for Saint Paul Island.

We therefore respectfully request that you:

1. **Use emergency funding and procurement authorities** under 49 U.S.C. §§ 41731–41748 (Essential Air Service program)—including § 41738 (expedited procedures), and § 41742 (subsidy payments)—to provide immediate financial assistance to offset the extraordinary cost of emergency charter flights until scheduled service is restored.
2. **Expedite the EAS carrier selection process** by using available statutory and regulatory flexibilities, including emergency procurement authority and direct negotiations with qualified carriers, to restore long-term scheduled passenger service as quickly as possible.
3. **Consider the federal trust responsibility to the Aleut Community of St. Paul Island, a federally recognized tribe**, in the exercise of these authorities. The majority of the population is enrolled members of the Aleut Community of St. Paul Island. The federal-tribal trust relationship reinforces the responsibility of the federal government to assist and support Tribal Nations and their citizens in furthering their self-determination and self-sufficiency through federal programs and regulatory mechanisms. Ensuring access to key critical infrastructures, such as reliable transportation routes, is included in this responsibility.
4. **Recognize the economic emergency context:** Saint Paul’s economy has been severely impacted by the closure and collapse of the Bering Sea snow crab and Bristol Bay red king crab fisheries. Under Section 312 of the Magnuson–Stevens Fishery Conservation and Management Act (16 U.S.C. § 1861a), the Secretary of Commerce has issued disaster determinations for these fisheries, and Saint Paul has been recognized as an affected fishing community entitled to federal assistance. While we have received a pro-rata allocation of such assistance, those funds cannot be diverted to sustain the prolonged cost of emergency air charters.

Given these circumstances, we believe the Department of Transportation has ample statutory authority to act. In addition to the EAS provisions above, we note that the Secretary may also draw upon:

- **49 U.S.C. § 40101 and § 40113** — granting general authority to promote safe, efficient, and accessible air transportation and to carry out the Department’s responsibilities in extraordinary circumstances;
- **49 U.S.C. § 41720–41722** — providing authority to address air carrier service disruptions affecting the public interest;
- The Department’s emergency procurement flexibilities under the Federal Acquisition Regulation (FAR) for urgent and compelling needs.

Without swift federal intervention, Saint Paul Island faces not only logistical isolation but also worsening public health risks, economic hardship, and disruption of subsistence and cultural life.

Together, all of these threaten the continued existence of a federally recognized tribe. We respectfully urge you to act without delay.

We stand ready to provide any information or support necessary to expedite the Department's review and action on this urgent request.

In conclusion, we would like to emphasize the exceptional support, availability, and responsiveness of the DOT's team at the Essential Air Service division. Their tireless efforts in working with us to identify a way forward have been invaluable. Thank you for your attention to this matter and for your commitment to supporting Alaska's most remote and vulnerable communities.

Sincerely,



Jacob Merculief, 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
Aleut Community of St. Paul Island Tribal Council
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. Zavakil, City Manager, City of Saint Paul
Patrick Baker, Executive Director, Pribilof Islands Aleut Community of Saint Paul Island
Chris Arnim, Dean Fasnacht, and Paul Doremus, Trident Seafoods