

## Memorandum

Date: November 26, 2018  
From: Jim Pivarnik, Interim Executive Director, Port of Port Townsend  
To: Mary Vargas, Airport Engineer, Seattle Airports District Office, FAA  
Subject: Request for Use of Parallel Taxiway as Temporary Runway During Phase 3 (Construction) of the JCIA Runway Rehabilitation Project

### INTRODUCTION

The Jefferson County International Airport (JCIA) is a single runway airport. The planned reconstruction of Runway 9-27 at JCIA and relocation of the center taxiway connector is anticipated to require up to eight (6-8) weeks to complete. A continuous closure of the facility for this length of time, particularly if it occurs during the peak season for flying (i.e., May – September) would pose substantial and needless impacts to the community that can be alleviated by allowing use of the adjacent parallel taxiway as a temporary runway during reconstruction.

The Port has listened, heard, and shares the concerns raised by the pilot community, the businesses located at the JCIA, and the Jefferson County Department of Emergency Management regarding runway closure. **Accordingly, we respectfully request that the Seattle Airports District Office of the FAA work with Port staff and Reid Middleton to approve use of the taxiway as a temporary runway during the runway reconstruction project.**

### RATIONALES SUPPORTING THE REQUEST

The Port believes the following rationales provide strong support for approval of parallel taxiway use as a temporary runway:

- Reducing Impacts to Airport Businesses During Construction; and
- Ensuring Continuous Emergency Response Capabilities.

These rationales, and suggested potential measures to ensure safe taxiway use as a temporary runway, are discussed in greater detail, below.

#### **Rationale #1 - Reducing Impacts to Airport Businesses During Construction:**

Three (3) full-time, active businesses are located at JCIA: the Port Townsend Aero Museum; the Spruce Goose Café; and Tailspin Tommy's. These businesses would be substantially impacted by a continuous runway closure, particularly if it were to occur during the peak of the summer recreational flying season (May – September).

The Jefferson County Pilots Association (JCPA) has submitted a letter documenting environmental concerns (i.e., socio-economic) associated with runway closure during reconstruction. This letter is included as Attachment "A" to this memorandum. While the Port believes that a categorical exclusion is appropriately issued for the project, we nevertheless share the concerns expressed by the JCPA. Specifically, that runway reconstruction during the peak flying and sales season will create an unnecessary hardship for Port businesses that could be successfully mitigated by allowing the parallel taxiway to be used as a temporary runway.

A summary of the impacted businesses, and the implications for their continued viability, is set forth below.

- Port Townsend Aero Museum: The museum is dedicated to the preservation of aviation history in the northwest, and youth education and mentorship. The museum maintains and restores historic aircraft, and provides flight training for youth. Although the museum generates a portion of its operating revenue from admissions, its youth mentorship program and maintenance/restoration shop is the source for the majority (70%) of its income. The museum estimates that a runway closure during the peak of the flying season could reduce the museum's bottom line by as much as fifty percent (50%), calling into question its continued financial viability.
- Spruce Goose Café: The café has been an iconic local eatery for more than 25 years. The restaurant has a very limited number of tables indoors. During the summer months, outdoor deck seating is available that nearly doubles the restaurant's seating capacity. Although many restaurant patrons drive to "the Goose", the restaurant's owners estimate that approximately 65% of their business is from pilots who specifically fly in to the JCIA for a meal. The restaurant estimates that a majority of its income is from pilots who visit during the peak season. Without this income, it is uncertain as to whether the restaurant could continue.
- Tailspin Tommy's Aircraft Maintenance & Rentals: Tailspin Tommy's is a full service aircraft and engine maintenance facility. The shop conducts annual inspections and performs certified repairs and maintenance of local as well as itinerant aircraft. Roughly 60% of the shop's income is estimated to come from "fly-in" customers during the peak season. In addition to maintenance and repairs, the shop operates the JCIA's only refueling business; nearly 90% of aviation gas sales occur during the peak season. This business also rents aircraft for flight training, an income source that is also dependent upon continued flight operations during the peak season. Tailspin Tommy's continued viability is highly dependent upon continued flight operations during the peak season.

- United Parcel Service (UPS): In addition to the businesses based at the JCIA, UPS also flies parcels in to the JCIA on a daily basis for truck delivery throughout northeast Jefferson County. An inability to access the Port Townsend area via delivery aircraft for a period of up to two (2) months would require changes to UPS service model. Parcel deliveries would be delayed, and costs would likely increase as packages would be sent from the Seattle area by truck.

As the foregoing makes plain, a complete closure of the runway and cessation of all flight operations for runway reconstruction – especially if it occurs during the peak flying season – would unacceptably and unnecessarily impact both the businesses located at the JCIA, as well as those dependent upon air access to the area. However, FAA approval of use of the parallel taxiway as a temporary runway during the construction phase of the project can effectively offset the loss of business to airport operators and tenants during construction.

#### **Rationale #2 - Ensuring Continuous Emergency Response Capabilities:**

East Jefferson County and Port Townsend are at the end of the road for access from the outside. In consequence, the JCIA is a critical emergency response transportation hub linking east Jefferson County and Port Townsend with the Puget Sound region. It is routinely (i.e., at least several times per week) used for fixed wing air ambulance flights to shuttle patients from Jefferson General Hospital to care centers around the region that are out of practical range for helicopter transport.

Additionally, in the immediate aftermath of a substantial earthquake (e.g., the much anticipated “Cascadia subduction zone earthquake”), air transportation may be the only viable means to deliver supplies and evacuate residents injured during the disaster. This would be most critical in the one to two (1-2) weeks preceding mobilization of a federal response. As long as the taxiway remains intact and useable, emergency responders could continue to carry out airlift supply and rescue operations.

The JCIA’s critical emergency response role is reflected in Jefferson County’s planning, not only for isolated cases of trauma that require emergency evacuations, but also for major disasters where the airport may be our community’s primary link to outside help until other transportation infrastructure is restored. Recently, a program has been coordinated between the JCPA and the Jefferson County Department of Emergency Management to incorporate general aviation pilots into the County’s emergency response plans. As a first step, the JCPA has amended its bylaws to include language facilitating pilot participation as part of the County’s Disaster Airlift Response Team (DART). In this role, qualified JCPA members would participate in emergency response activities when requested by Jefferson County Emergency Management. Included as Attachment “B” to this document is a memo from Lynn Sterbenz, Director of the Jefferson County Department of Emergency Management, and Gary Lanthrum,

President of the JCPA, detailing the important emergency management functions of the JCIA.

The Port believes that approval of taxiway use as a temporary runway is a prudent and necessary measure to ensure that a vital emergency response link to the region is maintained throughout construction.

### **ENSURING SAFE TAXIWAY USE DURING CONSTRUCTION**

We anticipate that the Seattle ADO will raise important safety concerns with the proposed temporary use of the parallel taxiway during Runway 9-27 reconstruction. These concerns can successfully be addressed through a mitigation plan to ensure safe use of the taxiway.

Potential mitigation measures to consider in developing such a plan could include, but are not necessarily limited to the following:

- Restricting flight operations to daylight hours;
- Restricting flight operations to Category 1, Group A aircraft;
- Adding an allowance for temporary closures through NOTAM and the AWOS;
- Installing lighted indicators showing when the taxiway can be used as a runway and when it cannot be used (note: an illuminated X at each end of the taxiway could be used for temporary closures);
- Removing the reflectors along the taxiway while in use as a temporary runway, since night operations would be prohibited;
- Increasing the width of the area allowed for landing by adding 5' – 10' of grass on either side of the paved taxiway;
- Ensuring there are no abrupt transitions from one surface to the other (i.e., asphalt to grass) before allowing take-offs or landings on the composite temporary runway
- Establishing a gross weight limitation for aircraft using the taxiway;
- Eliminating the IFR approach during runway reconstruction project;
- Implementing a NOTAM stipulating that prior permission is required to land (PPR);
- Mandating a safety briefing for transient pilots before using the taxiway;
- Requiring all local pilots receive the same safety briefing at a JCPA meeting before being permitted to use the taxiway as a temporary runway.

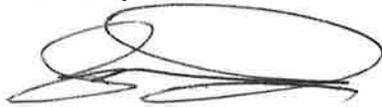
Finally, we have provided a table in Attachment "C" to this document that highlights other public airfields in the Puget Sound region with very narrow runways. We are persuaded that these narrow runways provide an important precedent for the FAA to consider when reviewing the Port's use of the parallel taxiway at JCIA as a temporary runway.

From public outreach efforts to the wider aviation community, to the publishing of a detailed NOTAM, we firmly believe that all airport users can become well versed in safe practices and operational procedures of this proposed temporary runway.

## **CONCLUSION**

In sum, FAA approval of the parallel taxiway at the JCIA is critical to the continued viability of businesses located there, and to ensure uninterrupted emergency response access to east Jefferson County. Thank you in advance for your thoughtful consideration of the Port's request, and your willingness to work with us, the JCPA, and other stakeholders to ensure continued flight operations during the JCIA runway reconstruction project.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Pivarnik". The signature is fluid and somewhat stylized, with several overlapping loops and a long horizontal stroke at the bottom.

Jim Pivarnik  
Interim Executive Director

To: Mary Vargas, Airport Engineer, Seattle Airports District Office; Sam Gibboney, Executive Director, POPT; POPT Commissioners

From: Gary Lanthrum, President, Jefferson County Pilots Association (JCPA)

Subject: Environmental Impacts Associated with Runway Rehabilitation at 0S9

The documents associated with rehabilitation of the runway at Jefferson County International Airport, 0S9 suggest that the FAA has determined this work warrants a categorical exclusion from environmental review. That seems to be based on the fact that the only disturbed land will be on the already disturbed area of the runway. In conducting a National Environmental Policy Act (NEPA) review, the Council on Environmental Quality (CEQ) requires more than land disturbance to be part of the NEPA review process. When assessing the impacts of a federal action, the CEQ requires impacts to the whole human environment to be considered. This includes socio economic impacts.

The JCPA and business tenants at 0S9 do not believe the socio-economic impacts of this action have been adequately considered in developing the alternatives analysis. Currently, there are three full-time active businesses on the Port property at 0S9. They are the **Port Townsend Aero Museum**, the **Spruce Goose Café** and **Tailspin Tommy's**. Each of these businesses will be severely impacted by a lengthy closure of the runway at 0S9 during the busy flying months of summer. The following discussion covers the impacts each of these businesses will incur if all flight operations are halted during runway rehabilitation.

**Port Townsend Aero Museum:** The Port Townsend Aero Museum preserves aviation history in the Pacific Northwest. The museum contributes to the vibrant Jefferson County community. Although the museum does have an exhibit hall and does obtain some funding from museum admissions, the economic engine that supports the museum is based on its youth mentorship program and its maintenance/restoration shop. Young adults in the youth program participate in all aspects of operations, including aircraft restoration and flight activities. Attracting these young adults to the museum's program is highly dependent on their ability to participate in flight training, and their work on aircraft that fly into the museum for service. The youth mentorship program and the maintenance/restoration shop provide 70% of the museum's total funding, and most of that contribution is accrued during the prime flying months of May through September.

Cancelling flight operations for a summer would have a devastating impact on both the youth program and the museum's aircraft restoration and maintenance business. Although 70% of our funding comes from the youth program and aircraft maintenance/restoration, 70% of that revenue is accrued during the summer months when conditions are best for flight operations. Losing access to flight operations during this critical time of the year would have a net impact of 50% on our bottom line. That could call the financial viability of the museum into question. We request the FAA seriously consider an action alternative that allows continued flight operations while the runway is being rehabilitated.

**Spruce Goose Café:** The Spruce Goose Café is a small restaurant near the middle of the field at 0S9. There are only a hand full of tables inside the restaurant. During the summer months, seating on our deck becomes viable and that nearly doubles our service capacity. Although the restaurant does have a base of customers that drive in from the local area, they only make up 35% of our business. 65% of our business comes from pilots that specifically fly here for a meal. They are attracted to both the food and the location. Being able to watch other aircraft operate while having a meal is a big part of the draw for our pilot customers. Naturally, that business peaks in the prime flying months of the summer. Over the winter, the café survives, but 75% of our operating profits come from pilots and that business peaks during the prime summer flying months. Without the increased

revenue that itinerant pilots provide during the summer months, it is uncertain if the café could survive. We implore the FAA to ensure continued flight operations are allowed while the runway is being rehabilitated.

**Tailspin Tommy's Aircraft Maintenance & Rentals:** Tailspin Tommy's is a full service aircraft and powerplant maintenance facility. This shop does annual inspections and performs certified repairs and maintenance to both local and itinerant aircraft. 85% of the shop's repair and inspection business comes from aircraft based somewhere else. Most of this fly-in business comes during the peak flying months of May through September. Those months represent 60% of our operating revenue. In addition to the maintenance business, we rent four small aircraft and sell aviation fuel. 90% of all avgas sales are in the peak flying months that coincide with peak summer construction dates. If all flight operations are curtailed during runway rehabilitation, all of our aircraft rental business would cease. The viability of our business is highly dependent on continued airport operations. Closing the runway without providing an alternative means of bringing new aircraft in, allowing repaired aircraft to fly away, and allowing our rental aircraft to operate would economically cripple this business. The margins in this line of work are small, so losing revenue during the peak earning months of the summer would be catastrophic. Please consider an alternative action that allows continued flight operations during rehabilitation of the main runway.

The JCPA pilots fly aircraft with certified aircraft engines. These engines are older (but reliable) designs that require regular operation to keep internal metal parts protected with an oil film. Sitting idle for months at a time can lead to corrosion of engine camshafts and the need for expensive repairs. The best thing that can be done for certified aircraft is to fly them regularly at high power settings. Closing the airport completely during runway rehabilitation would preclude these necessary flight operations.

All three businesses and the Jefferson County Pilots Association ask that the FAA revisit their NEPA requirements and consider the socio-economic impacts of the proposed action. This could be done by developing an Environmental Assessment, or as part of the generic impact assessment. When assessing alternative actions, inclusion of an option that would allow continued flight operations (with limitations) by using the current taxiway as a runway should be given full consideration. This would go a long way towards minimizing the socio-economic impacts of the proposed action.

Thank you for your consideration,

 Mike Payne, President Port Townsend Aero Museum (360) 379-5244 <a href="mailto:ptam@olympen.com">ptam@olympen.com</a>	 Christine Gray & Andrea Raymor Owners of the Spruce Goose Café (360) 385-3185	 Scott Erickson, Owner Tailspin Tommy's (360) 912-7005 <a href="mailto:tailspintommys@gmail.com">tailspintommys@gmail.com</a> <a href="http://www.tailspintommys.com">www.tailspintommys.com</a>	 Gary Lanthrum, President Jefferson County Pilots Association (703) 629-3134 <a href="mailto:jeffcopilots@gmail.com">jeffcopilots@gmail.com</a>
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**To** Mary Vargas, Airport Engineer, Seattle Airports District Office; Sam Gibboney, Executive Director, Port of Port Townsend (POPT); POPT Commissioners

**From** Lynn Sterbenz, Director, Jefferson County Department of Emergency Management; Gary Lanthrum, President, Jefferson County Pilots Association

**Subject** Emergency Management Functions of the Jefferson County International Airport

Mary, Sam and Port of Port Townsend Port Commissioners:

Emergency management is a challenge in smaller counties and communities. That is especially true for Jefferson County, Washington. Although Jefferson County is on a peninsula, for all practical purposes it is more like an island from an emergency response perspective. The bridges to this peninsula and the single overland road access are old and are very vulnerable to damage in a major earthquake. An earthquake greater than Magnitude 5.0 could damage transportation infrastructure sufficiently to delay external emergency support. It could also quickly exceed the ability of local government resources to effectively respond to all emergency needs<sup>1</sup>. Any federal government response is expected to take several weeks to mobilize and would like concentrate on higher population centers in the region outside of Jefferson County. As a result, the Jefferson County Department of Emergency Management relies heavily on volunteers and encourages individuals and families living in the county to stockpile at least 30 days of food, water and necessary medicine.

It is likely that land transport corridors and port facilities will be damaged by a major earthquake in the area. That limits the ability of emergency responders from outside of the county to offer aid and assistance in the critical days immediately following such an event. To maximize our ability to respond effectively, the Jefferson County Department of Emergency Management (JCDEM) is working closely with the Jefferson County Pilots Association (JCPA) to establish a Disaster Airlift Response Program (DARP) that would be staffed with volunteer general aviation pilots. These pilots would be part of a Disaster Airlift Response Team, DART. DARP & DART organizations have been established throughout the State of California, and have been formally incorporated into the Clallam County, Washington Emergency Management Plans. The Washington State Pilots Association (WPA) has an active program to encourage development of DART groups in Washington State. Coordination between the JCDEM and the JCPA has led to formal creation of a DART group as part of the JCPA organization. The JCDEM & JCPA are working on activation and communications protocols to use DART resources as part of the local emergency management response as needed. The local DART group would provide assistance until a coordinated federal and state response is able to provide committed aviation resources. JCDEM and JCPA have already conducted site surveys to identify emergency landing areas that could be used by participating bush planes in the DART that do not require paved runways to operate from.

All of the Jefferson County DART resources are based at the Jefferson County International Airport. For these resources to provide emergency support in response to a disaster, they have to be able to depart from their home airport. Although a major earthquake is a low probability

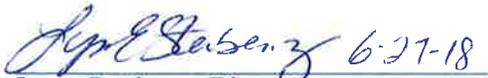
event, the consequences of such an event would be very high. The Jefferson County Emergency Operations Guides include response to these low probability, high consequence events. Those plans are being updated to incorporate DART resources into the formal response to a disaster.

The planned rehabilitation of the runway at Jefferson County International Airport has the potential to close all airport flight operations for an extended period of time. Loss of all flight operations out of this airport would cause a significant reduction in Jefferson County's initial emergency response capability. Loss of DART resources would significantly impact emergency evacuation services in the critical first week following a disaster. As mentioned earlier, federal and state aviation resources would initially be overwhelmed by emergency needs in higher population areas, making the availability of Jefferson County's DART pilots even more important. The Jefferson County Department of Emergency Management and the Jefferson County Pilots Association request the FAA's Airport District Office authorize continued flight operations out of Jefferson County International Airport during runway rehabilitation efforts currently scheduled for 2019. Both the Department of Emergency Management and the JCPA believe that flight operations could be conducted safely in parallel with runway rehabilitation with reasonable restrictions. These restrictions could include:

1. Restrict flight operations to daylight hours only;
2. Restrict Flight Operations to Category 1, Group A aircraft;
3. Add an allowance for temporary closures through NOTAM and/or AWOS broadcasts;
4. Install lighted indicators showing when the taxiway can be used as a runway and when it cannot be used. An illuminated X at each end of the runway could be used for temporary closures;
5. The reflectors along the taxiway would be removed while it is being used as a runway since no night operations will be allowed;
6. Increase the width of the area allowed for landing by adding 5' – 10' of grass on either side of the paved taxiway. Ensure there are no abrupt transitions from one surface to the other before allowing take-offs or landings on the composite temporary runway.

We sincerely hope you'll take potential emergency management needs into consideration when making a decision on whether to allow flight operations at Jefferson County International Airport in parallel with any runway rehabilitation work.

Thank-you for your consideration.

  
Lynn Sterbenz, Director  
Jefferson County  
Department of Emergency Management

  
Gary Lanthrum, President  
Jefferson County Pilots Association

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<sup>1</sup> From the Jefferson County Emergency Operations Guide for Earthquake Preparedness

**ATTACHMENT "C":  
Narrow Runways at Public Use Airports in Puget Sound**

The runways listed in the table, below, all have narrow, paved runways that have previously been used by JCIA-based pilots. These are not marginal, private, landing strips. Despite their narrowness, none of these facilities present a challenge to Category 1, Group A Aircraft. This is the category of aircraft the Port proposes to limit taxiway use to, if approved as a temporary runway by the FAA.

<b>Narrow Runways in Puget Sound Suitable for Category 1, Group A Aircraft</b>		
<b>Airport</b>	<b>Use</b>	<b>Runway Length/Width</b>
4W8 Elma Municipal	Public	2,280' x 20'
KOKH AJ Eisenberg (Oak Harbor)	Public	3,265' x 25'
13W Camano Island Airfield	Public	1,750' x 24'
8W5 Apex Airport (Silverdale)	Public	2,500 x 28'
W16 First Air Field (Monroe)	Public	2,087' x 34'
2W3 Swanson Airport (Eatonville)	Public	2,990' x 36'
S43 Harvey Field (Snohomish)	Public	2,672' x 36'
S36 Norman Grier Field (Kent)	Public	3,288' x 40'
1S1 Darrington Municipal	Public	2,491' x 40'
38W Lynden Municipal	Public	2,425' x 40'

\* NOTE: Elma, Eisenberg (Oak Harbor) and Camano Island all have runways that are as narrow, or narrower, than the existing parallel taxiway at the JCIA. By close cropping and smoothing the grass verges on either side of the taxiway at JCIA, up to 10' to 20' total serviceable width could be achieved, bringing the effective width of the taxiway in line with all of the public use airports outlined above.