

6-03-02

**Ketchikan Gateway Borough
Department Of Transportation Services**

Memo to: Steve Corporon, Assistant Borough Manager
From: David Allen, Director *DA*
Date: Monday, June 03, 2002
Re: Airport Safety Concerns

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JUN 03 2002

BOROUGH MANAGERS OFFICE

There have been many comments of late concerning potential effects of recent airport budget proposals I submitted through the interim manager to the Borough Assembly. Many of these comments suggest management's decisions will jeopardize public safety, and that we were making poor, uninformed decisions that place budget reductions ahead of public safety. I wish to respond to these concerns and show how by implementing these proposals the airport will more efficiently meet all of its operational, security, and safety requirements.

In order to operate, the airport must be in compliance with regulatory standards provided by the FAA and the new Transportation Security Administration (TSA). The changes I have proposed meet or exceed the standards these agencies require. I have coordinated the proposed changes with both agencies.

Significant statements made to date are in italics. My responses follow.

The budget proposal eliminates all airport police positions and reduces an already understaffed ARFF staff.

The budget as proposed does not eliminate any airport police positions. The primary role of our airport police, however, is to support TSA requirements for aviation safety. TSA eventually intends to place federal officers at the airport. In the meantime, TSA released the airport from previous law enforcement requirements and directed us to assign airport police to perform the TSA functions. It is unclear if we will have any law enforcement responsibilities, as they pertain to aviation safety, once TSA has officers in place. Depending on future TSA guidance, a review of airport police and security needs may become prudent.

There is no understaffing of current ARFF personnel. The FAA agrees we are in compliance by ensuring one ARFF-qualified individual is on standby at all times when required. We historically maintained two ARFF personnel on shift. However, ARFF personnel are cross-trained to perform other tasks associated with operations and maintenance. The second individual frequently was assigned tasks away from the emergency response vehicles, oftentimes away from the airport altogether.

Having one Aircraft Rescue and Fire Fighting (ARFF) person on duty in the event of an emergency at the airport is unsafe. Our ARFF vehicles are designed so that one individual can perform all tasks. Our capable ARFF personnel prove to the FAA each year that one person

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can perform the mission unaided. Having two personnel on standby, which generally has not occurred since the second individual is performing other duties elsewhere, would provide no measurable increase in support. It would take four personnel on standby each shift to provide the next level of increased support. The FAA has determined that this increased level of support is not necessary.

The airport's geographical separation from the rest of the Borough causes excessive delays for mutual aid responses by other local emergency agencies. Between the quick, professional responses of the mutual aid agencies and the airport ferry crews, additional emergency support typically reaches the airport in less than 15 minutes. This is an acceptable response time at most airports, and also meets or exceeds the response time to many other locations in Ketchikan.

A proposal made by several organizations to increase the minimum ARFF requirements from one to three personnel has already been approved by FAA and is awaiting legislative approval. The FAA developed a re-write to 14 CFR Part 139, which defines ARFF support requirements. While there are many significant changes included in the Notice of Proposed Rule-Making, the FAA did not include an increase of ARFF staffing. A copy of the NPRM can be found at www.faa.gov/avr/arm/n00-05.doc.

There would be a lack of immediate triage support following an accident. Airport Police receive the same emergency medical training as ARFF personnel, and would provide this support until mutual aid arrives. If there was ever a future reduction in airport police staff, other personnel can be trained to perform triage.

Every other airport in the US is increasing both ARFF and law enforcement support. I have regular contact with other airport managers and airport associations. As far as I know, no airports are increasing their ARFF support except where a new type of aircraft serving that airport requires such a change. Some airports are increasing their law enforcement personnel, but that is directly attributable to compliance with the new TSA directive. We are in compliance with all requirements for ARFF and law enforcement support.

It is interesting to note that as recently as March 18, 2002, an ARFF employee, who was serving as a union representative, was advocating a minimum ARFF staffing of one per shift for the airport. This was to allow several ARFF employees to schedule overlapping vacations this summer. Only after the layoffs were announced did the union's position about minimal ARFF staffing change to reflect "safety concerns."

The mission of the Department of Transportation Services is to provide and promote safe, dependable, and efficient transportation infrastructure and services for the general public. Safety is measured by standards imposed by federal regulations. Dependability is measured through our ability to provide continuous, uninterrupted operations. Meeting those standards efficiently means using only those resources required for a safe and dependable system. I believe we are accomplishing our mission.