

AIRPORT BOARD
AGENDA
7:00 P.M., WEDNESDAY, APRIL 11, 2012
ALASKA ROOM

- I. CALL TO ORDER
- II. ROLL CALL
- III. APPROVAL OF MINUTES: Regular Monthly Meeting of March 14, 2012
- IV. APPROVAL OF AGENDA
- V. PUBLIC COMMENTS
- VI. SPECIAL PRESENTATION: Brian Hanson, Manager, Aviation Engineering, DOWL HKM, 2012 and 2013 Juneau Runway Safety Area Construction Brief
- VII. UNFINISHED BUSINESS
 - A. **Rates and Fees Regulation** (Attachment #1): At the March 14, 2012, Airport Board meeting the Board accepted the recommendation from the Finance Committee to forward the proposed Rates and Fees Regulation through the public process. The regulation was advertised from March 16, 2012, through April 6, 2012. The updated Rates and Fees Regulation would increase large aircraft Fuel Flowage Fees and large aircraft Landing Fees. The Airport received no public comments.

Board Action: Airport Board moves to continue with the Regulation process and forward the proposed Airport Rates and Fees Regulation, attached, to the Assembly for consideration at their April 23, 2012, Assembly meeting, for an effective date of July 1, 2012.
- VIII. NEW BUSINESS
 - A. **Airport Manager's Report:**
 - 1. Brief Results of Manager March Trip to Washington, D.C. (Attachments #2 and #3)
 - 2. Food and Beverage in Departure Lounge
 - 3. Airport Engineer Report (Attachment #4)
 - 4. Airport Architect Report (Attachment #5)
- IX. CORRESPONDENCE
- X. COMMITTEE REPORTS
 - A. **Wildlife Hazards Working Group**
 - B. **Finance Committee**
 - C. **Operations Committee**

- XI. ASSEMBLY LIAISON
- XII. PUBLIC COMMENTS
- XIII. BOARD MEMBER COMMENTS
- XIV. ANNOUNCEMENTS
- XV. TIME AND PLACE OF NEXT MEETING:
 - A. Airport Board, 7:00 p.m., May 9, 2012, Alaska Room
- XVI. ADJOURN

ATTACHMENT #1

A REGULATION OF THE CITY AND BOROUGH OF JUNEAU, ALASKA

Adoption of Title 07, Juneau International Airport Chapter 10, Rates and Fees

PURSUANT TO AUTHORITY GRANTED BY THE ASSEMBLY OF THE CITY AND BOROUGH OF JUNEAU, THE MANAGER AND THE JUNEAU INTERNATIONAL AIRPORT BOARD HEREBY ADOPT THE FOLLOWING REGULATIONS:

- Section 1. Authority.** These regulations are adopted pursuant to CBJ 01.60 and CBJ 05.01.080.
- Section 2. Amendment of Regulations.** The City and Borough of Juneau Administrative Code is amended by the adoption of a new Title 07, Chapter 10, reading:

City and Borough of Juneau Administrative Code Title 07: Juneau International Airport Chapter 10: Rates and Fees

Sections:

- 010 Policy
- 020 Rates and Fees
- 030 Definitions

07 CBJAC 10.010 Policy. The policy of the City and Borough of Juneau, Juneau International Airport Board establishing the rates and fees for the Juneau International Airport are as follows:

- (a) The rates and fees charged at the Juneau International Airport shall be structured to assure that the Airport is as financially self-sustaining as possible, while ensuring fair and reasonable rates.
- (b) The Juneau International Airport shall monitor, assess and amend such rates and fees as needed to maintain (a) above.
- (c) Revenue derived from the use of obligated Airport property must be used for the operation, maintenance, or development of the Airport.
- (d) All space designated by the Airport Manager as aviation use at the Juneau International Airport shall be available for leasing on a first-come, first-served basis, but may be allocated by the Airport Manager to insure that the reasonable needs of all users may be met. All other space may be available through competitive bid or other process.

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- (e) The Juneau International Airport may be required to furnish space to a governmental agency on a “rent-free” basis in order to obtain the services of a governmental agency, or to obtain a grant or other governmental participation in the operation or cost of improving or operating the airport facility, or to honor prior grant or participation agreements.
- (f) Failure to pay applicable rates and fees outlined in this Regulation, shall be subject to citation, fines and interest on past due amount.

07 CBJAC 10.020 Rates and Fees. The following are rates and fees established by the Airport Board. These rates and fees may be subject to change by amendment and may be subject to City and Borough of Juneau Sales Tax.

- (a) **Fuel Flowage Fees.** For sales of aviation fuel and aviation fuel delivery services at the Juneau International Airport, the following fees shall apply:

- (1) Signatory.

- (A) Aircraft with maximum certificated gross weight of 12,500 lbs. or less shall pay fuel flowage fee of \$.155 per gallon.
 - (B) Aircraft with maximum certificated gross weight of more than 12,500 lbs. shall pay fuel flowage fee of ~~\$.085~~ **.125** per gallon.

- (2) Non-signatory.

All Non-signatory aircraft shall pay a fuel flowage fee of ~~\$.195~~ **.20** per gallon.

- (3) Exemption to Fuel Flowage Fees: The Civil Air Patrol (CAP) shall be exempt from Fuel Flowage Fees on missions, practice missions and fuel purchased in bulk by the CAP.

- (b) **Landing Fees.** Landing Fees shall be based on maximum take-off weight as certified by the FAA, for all types of aircraft whether empty or loaded, as follows:

- (1) Signatory.

- (A) Under 12,500 lbs., no fee.
 - (B) 12,500 lbs. and over, for each 1,000 lbs. or any fraction thereof: ~~\$ 1.98~~ **2.18** per 1,000 lbs.
 - (C) Exemptions to signatory landing fees:
 - i. Aircraft engaged in test flights.

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- ii. Aircraft compelled to return after take-off.
- iii. Aircraft compelled to land under an emergency diversion situation.
- iv. Public aircraft not engaged in commercial operations.

(2) Non-Signatory.

(A) Under 12,500 lbs., no fee.

(B) 12,500 lbs and over, for each 1,000 lbs. or any fraction thereof: \$ 2.48
2.73 per 1,000 lbs.

(C) Exemptions to non-signatory landing fees:

- i. Aircraft engaged in test flights.
- ii. Aircraft compelled to return after take-off.
- iii. Aircraft compelled to land under an emergency diversion situation.
- iv. Public aircraft not engaged in commercial operations.

(c) **Air Carrier Terminal Lease Rates.**

(1) Signatory. Terminal rental rates for air carriers are established by the Airport Board. Lease of terminal space preference shall be given to air carriers. The rates are per Square Foot, Annually, as follows:

Space Type	Rate
Counter (North Wing) plus 7 feet	\$24.62
Counter (East Wing)	\$31.01
Office (North Wing)	\$22.39
Office (East Wing)	\$24.87
Office (Old Tower, Ops)	\$24.87
Office (AK Maintenance)	\$24.87
Baggage Claim (Public)	\$24.87
Storage/Bag Make Up (Covered Bag Well)	\$19.90
Storage/Frt Rm (North Wing)	\$19.90
Canopy Storage (North Wing)	\$12.44
Hold Room/ Departure Lounge	\$ 31.01

(A) The amended rental rate for the *Counter (East Wing)* and Hold Room/Departure Lounge in (c) (1) above, shall apply retroactive to July 1, 2009.

(2) Non-Signatory.

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- (A) For non-signatory air carriers requiring the use of the terminal for one-time or occasional use (up to four times per month), the following fee schedule shall apply:

Wide Body Jets:	\$1,500 per use or turn
Narrow Body Jets:	\$ 500 per use or turn
Regional Prop (greater than 12,500 lbs)	\$ 75 per use or turn
Small carrier (12,500 lbs. or less)	\$ 25 per use or turn

- (B) Wide Body and Narrow Body jet use of the terminal shall be limited to departure lounge, available counter space, available jetway, bag claim, bag make-up and public circulation areas. Regional prop aircraft and small carrier use of terminal shall be limited to available counter space and public circulation area. Other non-signatory fees for airside use shall apply, such as landing fees, fuel flowage fees and parking or gate use also apply.

(d) **Aircraft Parking Fees.**

- (1) Assigned Parking per Month. Fees for all types of aircraft, regardless of size or weight, per month or any fraction thereof, for parking or tiedown privileges in areas designated by the Airport Manager are as follows:

(A)	Overnight parking at Air Carrier gate	\$220
(B)	Main Ramp, >12,500lbs	\$220
(C)	Main Ramp, Air Taxi	\$65
(D)	Hard-surfaced parking areas	\$49
(E)	Gravel-surfaced parking areas	\$38
(F)	Privately-owned seaplane floats	\$45
(G)	Publicly-owned seaplane floats	\$60

- (2) Transient Parking. The parking fee for transient aircraft is determined by the maximum take-off weight as certified by the FAA, as follows:

(A)	Under 6,000 lbs.	\$5 per day
(B)	6,000 lbs. to 12,500 lbs.	\$50 per day
(C)	12,501 lbs to 100,000 lbs.	\$135 per day
(D)	100,001 lbs. and over	\$200 per day
(E)	Parking at Jetway 5 Air Carrier gate	\$100 per use

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Aircraft parking fees are assessed for the first 24 hours or any fraction thereof. Subsequent days are charged for each 24 hour period or any fraction thereof. Non-commercial aircraft are exempt for the initial two hours of aircraft parking. Rates apply to the public parking areas of the airport.

- (e) **Land Lease Rates.** Certain property at the Juneau International Airport has been designated by the Assembly as available for airport related purposes. CBJ Chapter 05.20 "Airport Lands," provides for the administration of such property and authorizes the Airport Manager to negotiate certain leases subject to Airport Board approval, and according to certain terms provided therein. Airport land lease rates shall be according to airport land type and/or use as follows:

- (1) **Airfield Land Lease Rates.** The lease rate for airfield land is \$.43 per square foot per annum, except:
 - (A) Land adjacent to the Main Ramp is \$.52 per square foot per annum.
 - (B) Undeveloped Land is \$.17 per square foot per annum.
- (2) **Non-aviation Land Lease Rates.** Non-aviation land lease rates shall be set through competitive bid or other process, but shall not be less than the highest Airfield land lease rate plus 25%.
- (3) **Land Lease Wait List Fees.** The Juneau International Airport has established wait lists and application fees based on the land lease types and proposed construction types. Tenants wishing to apply for land lease space shall fill out an annual wait list application and pay the following annual application fees:
 - (A) Commercial Leases: \$25/annually
 - (B) Executive Hangar Leases: \$25/annually
 - (C) T-Hangar Leases: \$25/annually

- (f) **Rental Car Lot.** Rental car lot spaces shall be charged at the following rate:

- (1) \$60 per space, per month or any fraction thereof.

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- (g) **Commercial Vehicle Access Fees.** Access fees are per vehicle, per calendar year. A numerically sequenced permit/sticker is issued for each fee paid. Permit/sticker must be properly displayed and permanently affixed to the vehicle windshield prior to operating on the Airport premises. Failure to display and affix permit to the vehicle will be considered as conducting business at the airport without a valid permit. Prior year(s) permits must be removed or current year permit will be invalid. The following fee structure applies to the categories of Ground Transportation and Access users as indicated:

- (1) Ground Transportation Fees. (Taxicab, bus, airporter, courtesy van, or limo.)

	<u>1-7 PAX</u> <u>Rate</u>	<u>8-16 PAX</u> <u>Rate</u>	<u>17 or MORE</u> <u>Rate</u>
Annual	\$125.00	\$165.00	\$200.00

For each calendar year, each tour operator permitting multiple large buses, shuttles and/or vans, may purchase as many annual vehicle permits as needed to conduct business on the Airport premises and pay the actual cost of permits per vehicle in accordance with the above table, or \$4,000, whichever is less.

- (2) **Commercial Freight Pick-up/Delivery Vehicles.** Off-Airport businesses performing a commercial pick-up or delivery of freight transitting the Airport shall be required to purchase and display a Commercial Freight Pick-up/Delivery permit on their vehicle prior to conducting such business on the airport premises. This excludes any item that an airport tenant may use or consume for their own personal or business purposes.

	<u>1st Vehicle</u> <u>Rate</u>	<u>Each Additional Vehicle</u> <u>Rate</u>
Annual	\$125.00	\$15.00

- (3) **Airport Operational Area (Commercial freight pick-up/delivery vehicles with inside the fence access.)**

	<u>1st Vehicle</u> <u>Rate</u>	<u>Each Additional Vehicle</u> <u>Rate</u>
Annual	\$190.00	\$20.00

- (h) **Boundary Crossing Fee.** Companies or businesses conducting business within the boundaries of the Airport that do not lease property on the Airport are subject to an annual boundary crossing fee. (Separate from public ground transportation access fees and commercial access delivery fees outlined in (g) above).

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Boundary Crossing Fee: \$200 minimum per year, as negotiated based on Airport land use or boundary activity

- (i) **International Passenger Processing Fee.** Any passenger arriving or processed through U.S. Customs who has deplaned off of a scheduled or chartered international commercial flight will be assessed an international processing fee.

International Passenger Processing Fee: \$4 per passenger

- (j) **Employee Parking Fees.**

- (1) A company, business, or government agency conducting business on the Juneau International Airport, or an employee or association of employees thereof may park in the airport employee parking lot while on duty under the following terms and conditions:
 - (A) Parking fees are paid in full prior to the beginning of the calendar month or fraction thereof, for which parking is desired.
 - (B) A 10% discount shall be given for prepayment of an entire period as described in section (3) below.
 - (C) Use of the employee parking lot for any purpose, other than parking while on duty, will forfeit access to, and fees paid for, the employee parking lot for that period.
 - (D) Vehicles may not park in the employee parking lot for more than 24 hours without Airport Management approval. If an employee has been approved for extended parking, the employee must make arrangements to have the vehicle moved upon request of the Airport. Vehicles not in compliance with the subsection will be towed and impounded at the owner's expense.
 - (E) Employee vehicles must be registered with Airport Management. Vehicles parked in the employee parking lot that have not been registered will be towed and impounded at the owner's expense.
- (2) The rate for parking in the employee parking lot is \$35 per space per month, or any fraction thereof.
- (3) There will be two rental periods per year. The first period shall be from October through April, and the second period shall be from May through September.
- (4) Use of a parking space may be shared between two eligible employees and a single fee charged, provided work schedules do not overlap and/or actual use is limited at all times to a single car in the single rented space.

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- (k) **Concession Fees.** Concessions which operate at the airport shall be awarded through Bid process, Request For Proposal (RFP) process or as a sole responder with a Letter of Interest. Concession fees are established through contract negotiations, but will not be leased at a rate less than those established for Airfield/Aviation Use Land Lease Rates.
- (l) **Governmental Agency Rental Rates.** The Juneau International Airport may enter into an agreement with governmental agencies for the reimbursement of expenses incurred by the airport in providing services (which may include, but not be limited to: maintenance, utilities, supplies and janitorial services) to the “rent-free” space. The charge for such reimbursable expenses for services shall be based on the annual per square foot cost of providing such services to the entire area serviced.
- (m) **Airport Reimbursable Costs.** The Juneau International Airport may charge tenants, users or patrons of the Airport for costs associated with reimbursement of personnel costs, equipment costs or supplies for which a tenant, user or patron requests a special service which is not covered by a tenant or user agreement or is not a normally provided function of Airport operations. This may include damage to airport property for which the tenant, user or patron is responsible and whereby additional cost has been incurred by the Airport. A detailed breakdown of all costs will be provided after an emergency situation or an estimate will be supplied in advance to a request if appropriate.
- (n) **Fingerprint Fees.** For fingerprinting and electronic submission to the Federal Bureau of Investigation (FBI) for criminal history records check, the following fees shall apply:
- (1) Employees, tenants, employees of tenants, or those employees of businesses and agencies directly working with/at the Juneau International Airport, the fingerprint fee shall be: \$45 per person.
 - (2) For all others, the fingerprint fee shall be: \$75 per person.
- (o) **Badging Fees.** For access and identification badges issued at the Juneau International Airport, the following fees shall apply:
- (1) Security Identification Display Area (SIDA), 135 ramp (Non-SIDA), General Aviation AOA badges, or Airport Employee identification badges, the fees shall be:

(A)	Initial Issuance (\$15) & Deposit (\$50)	\$ 65
(B)	Renewal (Annual)	\$ 15
(C)	Re-issuance for worn or damaged	\$ 10
(D)	Lost badge	\$200
(E)	Contractor Deposit	\$200

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Deposits shall only be refunded upon return of an individual's current access badge to Airport Security or Airport Administration. If a "lost" badge is later recovered, a refund of \$190 may be issued only if the lost badge is of the current issuance lot (color, badge design).

In lieu of a deposit, an employer may issue a written letter of guarantee for their employee(s). Such letter will be on company or business letterhead, signed by an authorized agent of the company or business, and guarantee that if an authorized employee of their company or business does not return a badge or loses a badge, the company or business shall be responsible for the non-returned/lost badge and remit the \$200 fee to the Airport.

- (2) Proximity Cards (or gate access cards): \$5 per card / issuance
- (3) Non-airport identification media : \$10 per card / issuance

07 CBJAC 10.030 Definitions. For purposes of this chapter, unless the context plainly requires otherwise:

"Aviation Use" means the storage, operation, maintenance, or servicing of aircraft, or a use directly ancillary to such aviation use.

"Employee" a person employed by a company, business or governmental agency and who is stationed to work at the Juneau International Airport for that company, business or agency.

"Juneau International Airport" or "Airport" means the facilities and lands owned by the City and Borough of Juneau, or the administration which oversees the facilities and lands at the Airport, subject to this regulation.

"Signatory" means air carriers or aircraft owners/operators who have a written lease agreement with the Airport.

"Non-Signatory" means air carriers or aircraft owners/operators who do not have a written lease agreement with the Airport. A sublease agreement does not qualify at the "signatory" rate.

"Commercial Land" means that area of the Airport which is designed for businesses and commercial activity, but may be leased to private individuals at the commercial rate.

"Non-Commercial Land" means that area of the Airport which is designed for private, non-business activities, but may be leased to commercial businesses at the commercial rate.

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“Transient Aircraft” means an aircraft which is not assigned to a permanent parking space on the Airport, or which is not owned/leased by a tenant who has a written agreement with the Airport for the purpose of parking.

“Undeveloped Land” means raw land that has not been filled to grade or been permitted for development.

Section 3. Notice of Proposed Adoption of a Regulation. The notice requirements of CBJ 01.60.200 were followed by the agency. The notice period began on _____, 2012, which is not less than 21 days before the date of adoption of these regulations as set forth below.

Adoption by Agency

After considering all relevant matter presented to it, the agency hereby amends these regulations as set forth above. The agency will next seek Assembly review and approval.

Date: _____

Jerry Godkin, Chairman
Juneau International Airport Board

Legal Review

These regulations have been reviewed and approved in accordance with the following standards set forth in CBJ 01.60.250:

- (1) Consistency with federal and state law and with the charter, code, and other municipal regulations;
- (2) The existence of code authority and the correctness of the required citation of code authority; and
- (3) Its clarity, simplicity of expression, and absence of possibility of misapplication.

Date: _____

John W. Hartle
City Attorney

Assembly Review

These regulations were presented to the Assembly at its meeting of _____. They were adopted by the Assembly.

Date: _____

Laurie J. Sica, Clerk

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Filing with Clerk

I certify, as the clerk of the City and Borough of Juneau, that the following statements are true:

1. These regulations were accepted for filing by the office of the clerk at ____:____ a.m./p.m. on the _____ day of _____, _____.
2. After signing I will immediately deliver or cause to be delivered copies of this regulation to the attorney and the director of libraries.
3. A permanent file of the signed originals of these regulations will be maintained in this office for public inspection.
4. Effective date: July 1, 2012.

Date: _____

Laurie J. Sica, Clerk

ATTACHMENT #2

COMMITTEE ON ARMED SERVICES

MARK BEGICH
ALASKA

COMMITTEE ON THE BUDGET

COMMITTEE ON
HOMELAND SECURITY AND
GOVERNMENTAL AFFAIRSCOMMITTEE ON
COMMERCE, SCIENCE, AND TRANSPORTATIONCHAIRMAN, SUBCOMMITTEE ON OCEANS,
ATMOSPHERE, FISHERIES AND COAST GUARD

COMMITTEE ON VETERANS' AFFAIRS

United States Senate

WASHINGTON, DC 20510

March 26, 2012

Mr. Russell Vieco
Deputy Assistant Administrator for Legislative Affairs
Transportation Security Administration Headquarters
East Tower, Floor 11, TSA-5
601 South Twelfth Street
Arlington, VA 20598-6001

Dear Mr. Vieco:

I write regarding a cooperative agreement between the Transportation Security Administration (TSA) and the Juneau International Airport (JNU).

In 2007, the TSA and JNU entered into a binding cooperative agreement to partially reimburse JNU for the salary and training of qualified law enforcement officers (LEO). The TSA agreed to pay for a portion of LEO salary and training costs from October of 2007 through the end of September 2012, at an estimated cost of \$924,609. JNU agreed to comply with all relevant laws and TSA directions related to LEO performance. A LEO is required to be onsite at JNU in accordance with 49 USC 44903(c) and 49 CFR Part 1542, a cost JNU would be forced to pay without the cooperative agreement in place.

I have been informed the TSA has not honored the cooperative agreement. JNU has received no LEO reimbursements from the TSA in accordance with the agreement since September 2011, and no notice of modification of the cooperative agreement has been made. I encourage the TSA to continue reimbursements in accordance with the cooperative agreement, and be in contact with JNU regarding any modifications.

I appreciate your attention in this matter, and I look forward to your response.

Sincerely,



Mark Begich
United States Senator



Juneau International Airport

1873 Shell Simmons Drive, Suite 200 • Juneau, Alaska 99801 • (907) 789-7821 • FAX: (907) 789-1227

April 2, 2012

The Honorable Cass R. Sunstein
Administrator
Office of Information and Regulatory Affairs
Office of Management and Budget
1650 Pennsylvania Avenue, NW
Washington, DC 20503

The Honorable Lisa P. Jackson
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC, 20460

**RE: Opposition to EPA's proposed ban on the chemical urea as an airfield pavement deicer
(Docket ID # EPA-HQ-OW-2004-0038)**

Dear Administrators Sunstein and Jackson:

Juneau International Airport (JNU) opposes the U.S. Environmental Protection Agency (EPA's) proposed ban on the use of urea as an airfield pavement deicer and requests a reconsideration of the proposal to ban urea, a waiver and/or a compliance alternative.

While many airports in the Lower 48 states may not use urea extensively, a ban of this chemical will disproportionately and adversely affect JNU and other airports in Alaska. Further, at JNU, the ammonia discharge from urea is only very slightly behind monitoring benchmarks but can and will be improved.

Juneau is the only state capital city in the United States without road connections and can only be reached by air and water. Accordingly, aviation and aviation safety are of paramount importance to Juneau. Alaska has long been able to successfully balance growth and safety with environmental protection. Alaska has cleaner air and water than anywhere in the world, yet it is also the place where cold weather aviation techniques were developed and became Federal Aviation Administration (FAA) and industry standards. In particular, JNU has more than 150 years of hands-on airfield maintenance experience with snow and ice control, as well as general airfield maintenance and wildlife issues. This crew is considered not only experienced, but referred to as experts in snow and ice control and assessment. JNU personnel assisted the FAA in quantifying and validating a prototype for runway condition reports and braking action. FAA is in its final assessment of the prototype and hopes to adapt the system as the international standard within the next few years.ⁱ

In July 2009, JNU's comments were incorporated in a submittal by Alaska Airlines to the docket EPA-HQ-OW-2004-0038. In this letter, JNU would like to expand on those arguments.

JNU began using urea in the early 1980's (dry prill form), then mixed as hot liquid urea by the mid 1980's. The Airfield crew determines urea use (whether liquid or dry prill form) according to several environmental factors: ambient temperature, ground temperature, frost depth, current precipitation and weather forecast. Deicing is a science in and of itself, but a science that must be

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Honorable Cass R. Sunstein and Honorable Lisa P. Jackson
April 2, 2012

balanced with cost and application. Urea is shipped as a dry prill (or pelletized) form, so JNU has the option of using it in the dry prill form, or diluting into a liquid state based on the weather conditions. EPA's Notice of Proposed Rulemaking identified potassium acetate (E36) as a widely used substitute product for urea.ⁱⁱ E36 is distributed/shipped in liquid form only, and therefore much more expensive to barge by ship to Alaska. However, cost is not the only factor in JNU's aversion to E36.

JNU has the following concerns about substituting E36 for urea in airfield pavement deicing:

COST: Cost estimates will vary by year due to the fluctuating price of urea, the price of E36, transportation and delivery costs, and the weather influencing the amount used. In 2009, JNU spent \$3,000 per application of urea and estimates a cost of \$30,000 per application for E36, which is a 10 to 1 increase. In 2012, JNU spent \$135,000 on urea for airfield deicing for the year 2012. Using a similar application rate, JNU would have spent \$877,500 on E36. This means the cost ratio for E36 versus urea is 6.5 to 1 at current prices. This would be an approximate 15% increase to JNU's total budget. JNU cannot accept this increased cost burden when there are less expensive alternatives that work at JNU.

This past winter, JNU used an estimated 130,000 gallons of liquid urea; that is, urea that JNU mixed with water from its delivered dry prill state. JNU also used a nominal amount in its original dry prill form during extreme cold temperatures. At JNU, the urea is mixed in 8,000 gallon batches. An average 8,000 gallon batch requires 11 tons of pelletized (dry prill) urea. Based on the 130,000 gallons used, this equates to 178.75 tons of urea used this year; rounded to 180 tons that will be ordered (including urea used in its original dry prill form). The price of urea delivered to JNU is \$750/ton, or \$135,000 this year. E36 application rate is approximately equal to that of urea. JNU is a wet environment (Juneau is located in the coastal, temperate Tongass Rainforest climate), so application rates of any deicer will typically be greater than those airports in colder, drier climates. Based on equivalent application rates, 130,000 gallons of E36 at \$6.75/gallon delivered to JNU is \$877,500.ⁱⁱⁱ

ENVIRONMENT: Current ammonia runoff due to the use of urea is only slightly behind the monitoring benchmark; however, JNU currently has the flexibility to dilute the urea further and/or redirect runoff into an approved containment pond. JNU complies with EPA Storm Water Pollution Prevention Plan (SWPPP) requirements.^{iv} There were four areas originally identified where airport property discharges storm water into water bodies – three of the four outflows no longer require testing due to either meeting the benchmark standards or no longer discharging into waterways. The fourth area has met the benchmark standards for chemical oxygen demand (COD), biochemical oxygen demand (BOD) and pH, but is 3.32 mg/L away from meeting the ammonia benchmark (see attachment). JNU recognizes that urea is ammonia-based while E36 is not; however, urea can be diluted, and in JNU's case urea is diluted about 95-99% of the time, depending on temperature and precipitation. Further, JNU has the flexibility to reroute the outflow for this area into the Airport's float pond, if necessary. JNU's float pond is an approved containment pond for airfield runoff.

OTHER CONCERNS: Even more troubling, JNU is concerned that E36 is not compatible with galvanized metals and electrical conduit.^v JNU runway and taxiway light bases are composed of galvanized metal and the possibility for degradation of the airfield lighting system and

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navigational aids (NAVAIDs) is alarming. JNU questions the safety and cost-effectiveness of the long term use of E36 around runway/taxiway lighting and the NAVAID conduits that run throughout the airfield runway/safety areas that are not encased in pavement. This has the potential for not only costly repairs to the lighting system/NAVAIDs, but a loss of the system presents a safety concern for an airport that operates 24/7 and is a diversion port for commercial and military aircraft.

JNU believes that the proposed ban on urea would not only be cost prohibitive to JNU, but the cost would certainly exceed any presumed environmental benefits for this area. JNU is also concerned about the use of E36 around lighting systems and NAVAIDs. Safety is #1 at this Airport. We believe urea is part of that equation.

REQUESTED ACTION

We request reconsideration on the proposed ban on urea or a waiver to the ban on Alaska airports such as JNU. At a minimum, JNU requests that the final rule maintain the option in the NPRM to allow airports to continue using urea if they agree to a compliance alternative to monitor all runway outfalls to demonstrate compliance with a future proposed ammonia limit.

We appreciate your consideration on this matter. Please feel free to contact this office if you have further questions.

Sincerely,



Jeannie Johnson
Airport Manager

Jeannie_Johnson@ci.juneau.ak.us ; (907) 789-7821

Attachment

CC: U.S. Senator Lisa Murkowski; U.S. Senator Mark Begich; U.S. Congressman Don Young

ⁱ FAA Takeoff/Landing Performance Assessment Aviation Rulemaking Committee (TALPA ARC) Runway Matrix Testing (2010-11 and 2011-12).

ⁱⁱ The Seattle-based distributor for E36 stated that there is a new generation of Cryotech NAAC (sodium acetate) sold in a dry pelletized form; however the cost of NAAC is only slightly less than E36.

ⁱⁱⁱ Prices for Urea and E36 have been updated within the past month for the most current price comparisons. Please note that the above cost of E36 does not include the cost of shipping the empty containers back to the distributor on the barge. This would be an additional cost to consider.

^{iv} JNU's SWPPP was developed in 2009 by Contract Engineer (Carson-Dorn) with continued requirements to monitor the outflow points into waterways. The attached **JNU SWPPP Sampling Summary Information** (provided by Carson-Dorn) highlights the test areas and the four analysis parameters: Biochemical Oxygen Demand (BODs), Chemical Oxygen Demand (CODs), Ammonia and acidity/basicity (pH).

^v According to Cryotech, "E36 is an ionized solution and is more conductive than water. Users are advised to take precautions to prevent solutions containing E36 from entering subsurface conduits and electrical components. E36 is compatible with most materials, but exceptions occur such as with galvanized metals. Do not use E36 with galvanized materials."

ATTACHMENT #3

March 28, 2012

JNU SWPPP Sampling Summary Information

In 2009, JNU initiated an operational Storm Water Pollution Prevention Plan (SWPPP) program intended to monitor outfalls from airport property discharging storm water to streams, rivers, or water bodies. The initial program included monitoring at the following outfalls:

- Lower Duck Creek (Outfall 1)
- Jordan Creek Culvert (Outfall 7)
- Intersection G culvert (Outfall 10)
- Float Plane Pond (Outfall 11)

For each outfall, monitoring including sampling and analysis for the following parameters (benchmark concentrations shown in parentheses):

- BOD₅ (30 mg/L)
- COD (120 mg/L)
- Ammonia (2.14 mg/L)
- pH (6.5 to 8.5 s.u.)

For any monitoring site, if, after collection of 4 sequential samples, the average of the 4 monitoring values for any parameter does not exceed the benchmark concentration listed above, monitoring requirements for that parameter will have been fulfilled for the permit term.

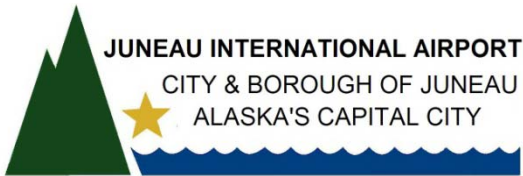
During 2010, JNU eliminated Lower Duck Creek (Outfall 1) because the Runway Safety Area (RSA) project moved Duck Creek and routed discharge from that particular outfall to the Float Plane Pond.

Also during 2010, we eliminated the Float Plane Pond outfall (Outfall 11) because it discharged into the float plane pond, not to surrounding streams, rivers, or waterways.

By the end of 2010, the Jordan Creek Outfall (Outfall 7) no longer needed to be monitored because all parameters met benchmark concentration standards.

Thus, by the end of 2010, only Intersection G (Outfall 10) was still being monitored. The only parameter for that site that had not met benchmark concentration standards was Ammonia. The benchmark concentration for Ammonia is 2.14 mg/L. For Outfall 10, the rolling average for the 2012 monitoring season is currently 6 mg/L. The averages for test years 2010 and 2011 ranged from 30.5 mg/L to 5.46 mg/L.

ATTACHMENT #4



To: Jeannie Johnson, JNU Manager

From: Thomas G. Carson, JNU Engineer

Re: JNU RSA Improvements Project Update

April 6, 2012

File: 1603.13

Construction over the past month:

- AIC discharged water from the Jordan Creek dewatering effort into the east end of the pond to avoid any SWPPP issues in the wetlands so there was a small area of open water at the very eastern end of the pond. Other than that small area, the pond was covered with ice throughout the month. Although no measurements were taken, the level of the pond was very close to elevation 17 feet.
- AIC completed the installation of the 14-foot aluminum arch culvert in the Jordan Creek infield area. By the end of the month, the two 24" lateral culverts that drain the areas between the runway and the taxiway into the new arch culvert had been installed, backfill was completed (using stockpiled material from the N.E. Development Area), and topsoil was in place.
- AIC began work on the Jordan Creek 90-foot long outfall extension on the south side of the runway. Much of the work consisted of excavation and dewatering efforts. AIC placed foundation rock for the system, installed the concrete headwall against the existing 8-foot culvert that passes under the runway, and placed and partially backfilled the pre-cast footings units for the new aluminum 14-foot arch culvert. By the end of the month, all concrete work had been completed. Work in Jordan Creek must be completed by April 15, 2012 due to ADF&G permit restrictions. It appears that AIC will meet that deadline.
- On March 10, AIC completed pipe installation for the storm drain system that runs along the western border of the N.E. Development Area. By the end of March, all connections at manholes had been grouted and backfill at the northern end of the system (in the area of the future SREF) had been completed. AIC met the March 31 contract deadline for completing backfill in this area.
- AIC finished moving the remaining embankment stockpiles in the N.E. Development area to bring much of the northern portions of the area to design grade. After all material had been moved, placed, graded, and compacted, AIC identified the need for an additional 9,000 cubic yards of embankment to bring the remaining areas of the N.E. Development Area to design grade. This final quantity will be hauled from the large stockpile at the south end of the West Finger.

Permitting and coordination activities:

- JNU staff reviewed DOWL's 90% submittal for the Phase 2 RSA project and participated in a day-long review meeting on March 29. It was confirmed at that meeting that an FAA funding shortfall would require the Phase 2 project to be broken into two parts. Phase 2A will include everything needed to move the thresholds by the end of 2013.
- JNU staff continued coordinating with FAA designers for the 08/26 MALSR project. FAA funding issues are a challenge for that project as well.

As of the end of March, AIC had earned \$31,546,650, representing 94.5% of the authorized contract amount. The pay requests for March totaled \$392,861. Overall project deadline is May 31, 2012.



This image shows the Jordan Creek infield area on March 17. Backfill over the arch pipe is almost complete. By March 19, topsoil and grading was completed. The runway is visible in the distance.



This image, taken on March 31, shows the concrete work for the Jordan Creek culvert extension on the south side of the runway. The end of the EVAR dike trail is visible in the distance, with the east end of the float pond hidden behind the furthest pickup truck. The headwall for the existing 8-foot Jordan Creek culvert is seen in the lower right corner of the image.



This March 31 image was taken from the edge of Taxiway A looking north across the N.E. Development Area. The Wings of Alaska hangar is visible to left, Fred Meyer is visible in the distance to the right. All stockpiled material has been placed and final grading is underway.

TO: Jeannie Johnson,
JNU Airport Manager

DATE: April 4, 2012

FROM: Catherine Fritz, AIA
JNU Airport Architect

FILE: 1382.16

RE: Terminal Renovation Project Update
Snow Removal Equipment Facility Project Update

Terminal Renovation.

Work continues on the Main Entry Renovation. Demolition of the front façade, including the deck, is complete. Primary steel is erected and now being structurally connected back to the main building. Materials have been ordered and subcontractors are preparing to begin their trades.

Other projects in the terminal include renovation of the Gift Shop, scheduled to begin next week. The work is carefully sequenced to ensure that operations can be maintained. Renovation of one of the North Wing vestibules is now complete, and the other two vestibules will be complete later in April. Construction of the Departure Lounge coffee shop began in March, and will be complete by the end of April.

The new art display cases for the Departure Lounge are complete and currently being installed. The first exhibit will be work of art students of the University of Alaska Southeast. This is expected to open in mid-April. A second temporary exhibit with the USDA Forest Service is underway. It will consist of banners to display the Tongass Forest. These will be located as a temporary exhibit on the first floor.

In our continuing efforts to increase visibility and community pride in the Airport, we recently began a public service announcement program through our digital advertising media. The Airport will incorporate a "Welcome to Juneau" message for community events such as the upcoming Alaska Folk Festival and Jazz & Classics Festival that will run intermittently between paid advertisements for a few days per event. There will also be live music in the terminal during these annual Spring events. We expect to host events and share the welcome messages about once per month, throughout the year.

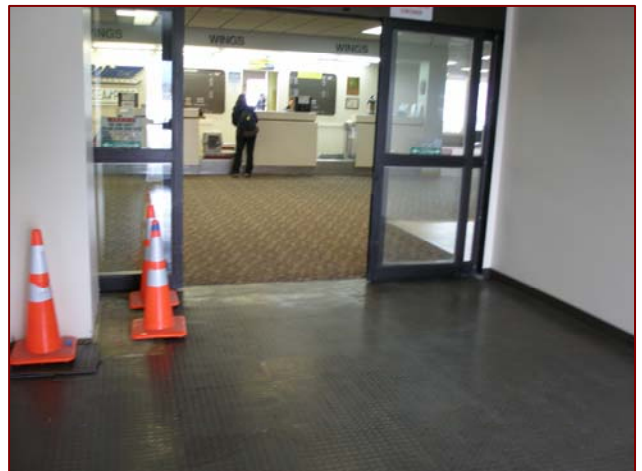
The Airport hosted a tour of our geothermal system to the American Water Resources Association on March 8, 2012. Thanks to geothermal design engineer, Doug Murray for making the presentation.

Snow Removal Equipment Facility.

The SREF construction documents are 99% complete. The project will be sent to the cost estimator next week, with final adjustment occurring thereafter. The Airport will receive the final documents at the end of April 2012. The next steps will be to prepare bid condition requirements, and secure project funding.



Primary steel is installed on the front facade.



New flooring and walls in North Vestibule.