

COUNTY EXECUTIVE OFFICE

Ralph Cordova Jr.
County Executive Officer



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July 22, 2014

Secretary Anthony Foxx
United States Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

RE: Petition of El Centro, California (Imperial County Airport "IPL") for a waiver from the 10-enplanement statute, Docket DOT-OST-2008-0299

Dear Secretary Foxx:

As expressed in the attached letters of support and the following documentation, the residents and delegation of Imperial County, California are committed to ensuring the success and longevity of air travel between the Imperial Valley, San Diego and Burbank. Pursuant to DOT Order 2014-6-6 and 49 U.S.C. 41731(e), we urge you to grant a waiver and an exemption from 49 U.S.C. 41731(a)(1)(B) to Imperial County on the basis that it is clear the decline in passengers below the necessary ten per day was in fact temporary.

Imperial County Airport (IPL) is one of 13 Essential Air Service (EAS) airports that were notified by Final Order by the United States Department of Transportation (US DOT) on June 24th, 2014 that the community was no longer eligible for EAS funding because the airport failed to meet the criteria requirement to serve at least ten passengers per day during the year-ended September 30, 2013. Further, the Final Order indicates that the community needs to, "show cause as to why the Department of Transportation should not terminate the eligibility of the community under the Essential Air Service (EAS) program."

As this letter will demonstrate, the service area around IPL was hard-hit by the Global Credit and Mortgage Meltdown Crisis in 2008, but economic and demographic trends have improved since. In addition, the EAS airline and routes changed in May 2013, and in the short time since a new airline and new service has been in place, passenger acceptance has built steadily. However, the service transition was a large factor in IPL's daily passenger decline and we believe the traffic dip to be a short term, temporary issue that will improve considerably over the next year.

Introduction

IPL is located in Southeastern California bordered by Arizona to the East, San Diego County to the West, and Mexico approximately 20 miles to the South. Even though it is about 113 miles to San Diego, road access to the nearest large hub airport from Imperial County is made uniquely more challenging than distance alone due to congestion, weather and the daily traffic caused by stationary border patrol traffic stops on all major roadways leading out of the County. As demonstrated below, SAN is the closest major airport to Imperial County, but it is almost a two hour drive. It is common to have significant traffic delays along Interstate 8 and Interstate 5 in San Diego County on a regular basis. It is typical for residents to add 30 to 45 minutes to their commute to factor in the impacts of the stationary border patrol stops.

Figure 1: Distance to Major Airports from Imperial County

Airport	Miles	Drive Time
San Diego	113	1 hour, 49 minutes
Los Angeles	213	3 hours, 26 minutes
Phoenix	243	3 hours, 53 minutes
Tucson	296	4 hours, 16 minutes
Las Vegas	384	6 hours, 2 minutes
El Paso	613	8 hours, 40 minutes
San Francisco	591	9 hours, 21 minutes
Sacramento	596	9 hours, 36 minutes

Sources: California Dept of Finance; US Census Bureau; CA Employment Development Dept; Rand McNally.com

The border patrol stops increase the amount of time that passengers need to travel to other airports, as well as the community's reliance, thus importance, on IPL for access to the national and international air transportation network to support economic growth in the area. In addition, traveling to either San Diego International Airport (SAN) or Burbank's Bob Hope Airport (BUR) also means passengers are driving in two of the top 15 most congested regions in the US.¹ Traveling to Burbank involves driving along the congested Interstate 10 and Interstate 5 from the Imperial Valley.

IPL's passenger performance peaked in 2007 with 64 enplanements per day on United Express. In 2008, the economy of Imperial County was devastated by the housing crisis and economic recession, which greatly hurt the county, the state of California, and the country. That said, from 2008 to 2012, passenger performance at IPL was approximately double the US DOT's EAS threshold of ten passengers per day. So despite the hard economic times, IPL clearly valued its airport and utilized its service as much as possible.

¹ Greater Los Angeles is the 2nd most congested car travel market and San Diego is ranked 15th (Texas A&M Transportation Institute, Annual Transportation Survey)

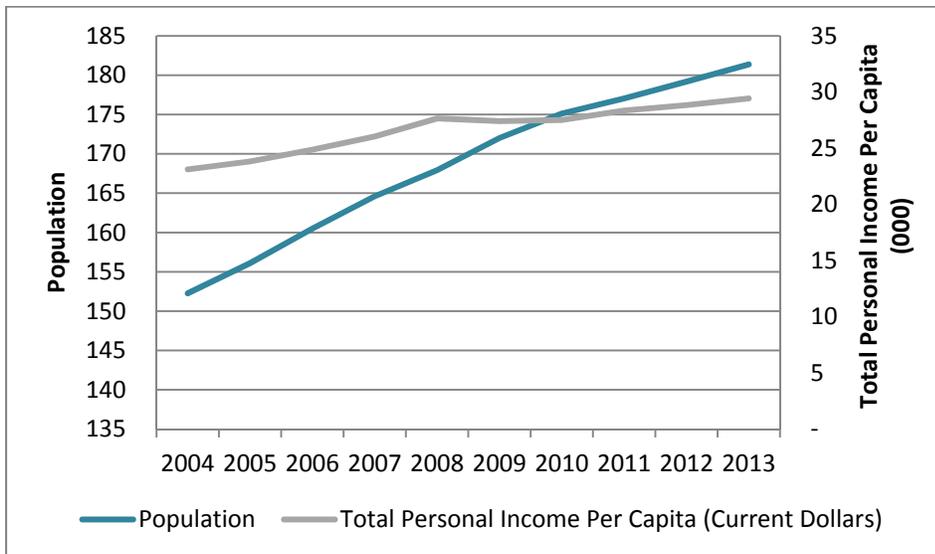
Economic and Demographic Trends in Imperial County

The economy of Imperial County was hard hit by the Global Credit Crisis and Mortgage Meltdown of 2008, but prudent investments in the future have been made there, and positive results are being achieved. Imperial County was disproportionately impacted by the poor global economy because it is a market that relied upon the agricultural sector for jobs. This coupled with the loss of construction jobs in the county due to the housing crisis left the county as one of the worst performing economic areas in California.

Offshoring of manufacturing jobs to Asia has also affected Imperial County's economy; however as wages increase in Asia, jobs are starting to return to Mexicali, Mexico, and Calexico, California which are located directly across from each other on the US-Mexico border.

Imperial County is now looking to diversify its economy with green-energy companies and a goal to become the renewable energy capital of the country. Tenaska Solar Ventures is one of the companies committing to the area with an investment of more than \$500 million in the Imperial Valley's economy. This project will lead to construction jobs, 70 percent of which will be local. It will also support more than \$20 million in construction contracts to local companies. Other companies also investing and partnering with the county include Ocotillo Wind, CalEnergy, and 8minute Energy all of which are renewable energy firms.

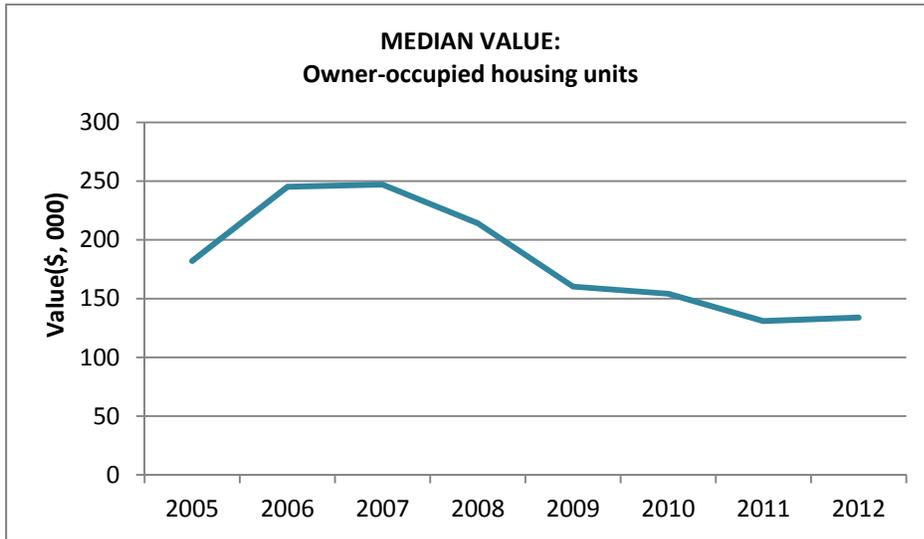
Figure 2: Imperial County's Historical Population and Total Personal Income Per Capita



Source: Woods & Poole

Housing values in Imperial County demonstrate the impact the economic recession had on the county. In 2007, median housing values peaked at almost \$250,000, but decreased to a low of \$130,000 in 2011. In 2012 the housing values began to show signs of rebounding with an increase of 2 percent per annum.

Figure 3: Median Household Value



Source: American Community Survey, US Census

Historical Passenger Performance at IPL

Of the thirteen EAS airports impacted by the US DOT’s Final Order, IPL has the highest number of passenger enplanements at 9.5 per day as shown on Figure 5. It bears noting that this is only half an enplanement per day lower than the US DOT’s minimum requirement for EAS funding, and that it rounds to the US DOT’s minimum level of ten.

Figure 4: List of Airports Listed in Tentative Order Regarding Termination of EAS Eligibility

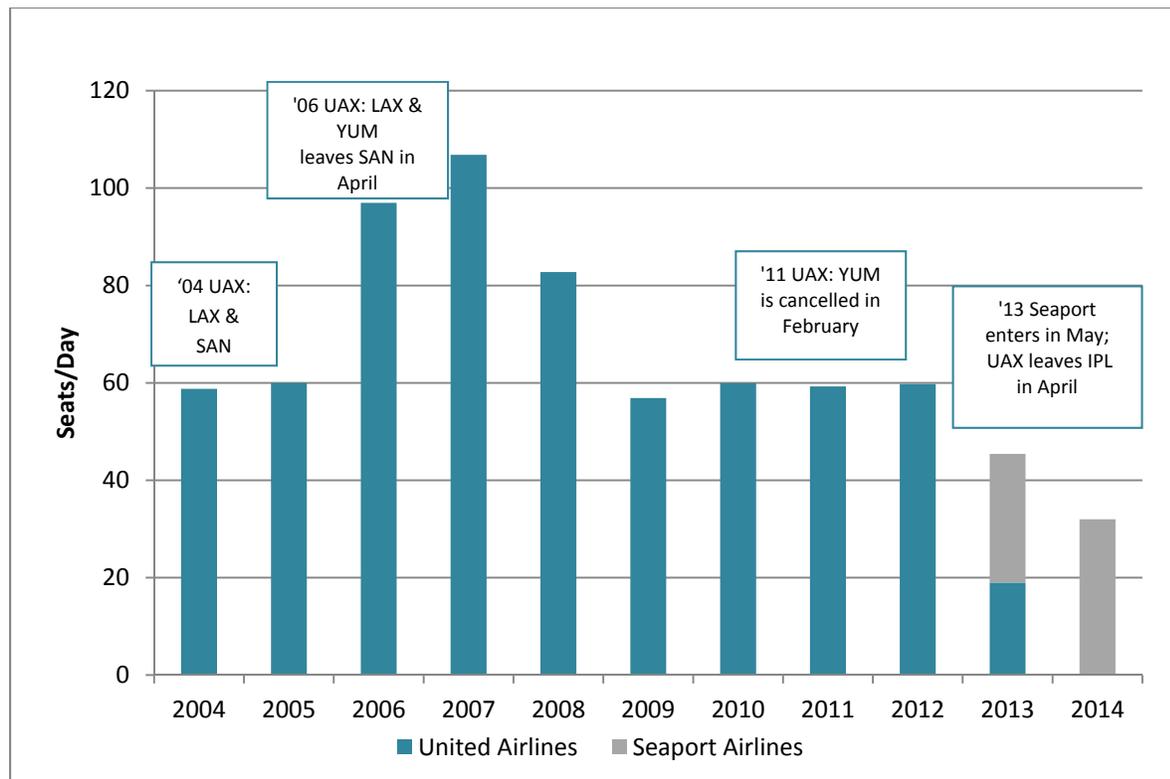
EAS Airports	State	Enplanements/Day
El Centro	California	9.5
Fort Dodge	Iowa	9.4
Greenville	Mississippi	9.3
Jackson	Tennessee	7.8
Merced	California	7.7
Bradford	Pennsylvania	6.9
Lancaster	Pennsylvania	6.3
Muscle Shoals	Alabama	6.3
Athens	Georgia	5.9
Franklin/ Oil City	Pennsylvania	5.0
Macon	Georgia	4.0
Hagerstown	Maryland	3.9
Kingman	Arizona	2.7

Source: US DOT Tentative Order Regarding Termination of EAS Eligibility

IPL has been served by two carriers, United Express, operated by SkyWest Airlines (“UAX”), which ceased service in April of 2013 and SeaPort Airlines (“SeaPort”), which took over the flying in May of 2013 when the US DOT selected SeaPort as the new EAS carrier. UAX served the market for a long time and had built a loyal following. When UAX was serving IPL, flights were operated to Los Angeles International Airport (“LAX”), the third busiest airport in the US. The UAX service benefitted passengers because LAX has considerable connecting options with a diverse group of airlines serving a large number of domestic and international cities. Connecting service is key because the majority (78%) of IPL’s passengers traveled beyond LAX in 2012 on UAX’s service.² The local origin and destination market passenger demand is low, which is typical for most non-hub airports.

SeaPort’s service replaced flights to LAX with operations to SAN, the 29th busiest large-hub passenger airport in the US, and BUR, a medium-hub facility north of Downtown Los Angeles in the San Fernando Valley. Despite the advantage of having access to two airports, this federally mandated new service initially attracted fewer passengers because it is flown on smaller aircraft (nine versus 30 seats) to new markets and its brand was unknown to most of the County. As a result of the smaller aircraft operated by SeaPort, the number of daily seats offered from IPL is approximately half the level provided by UAX as shown on Figure 6.

Figure 5: IPL’s Average Seat Departures per Day



Source: Innovata Schedules, via Diio, Annual seats divided by 365 days, Calendar Year, in 2013, United’s service transitioned to SeaPort Airlines

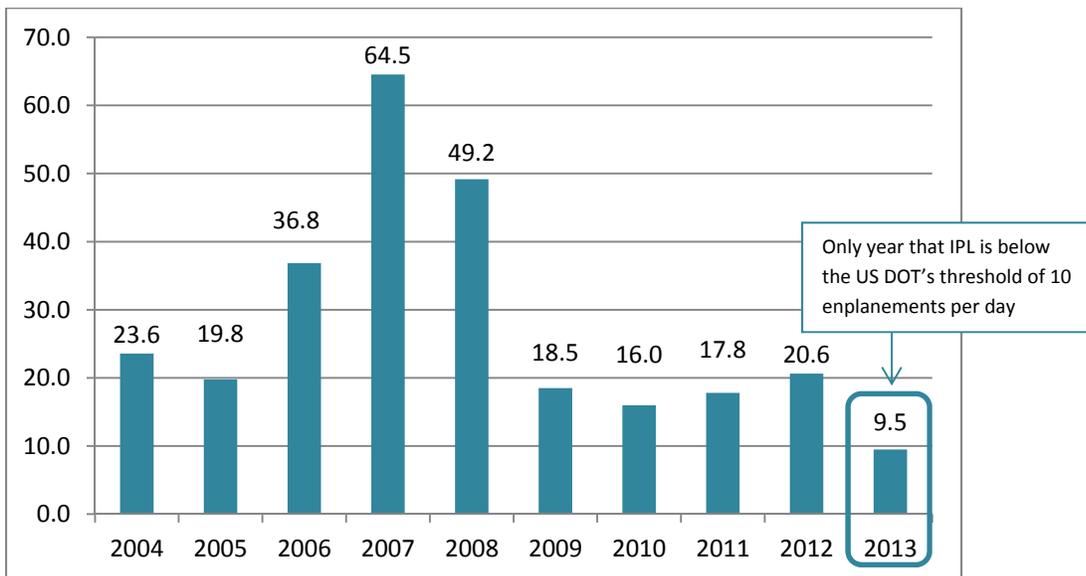
² US DOT O&D Survey, Calendar year 2012

A critical reason for IPL’s low passenger performance after SeaPort began flying was that SeaPort initially lacked the interline agreements in place to allow passengers and bags to transfer at SAN and BUR to other airlines smoothly. Furthermore, SAN and BUR service levels offer fewer connecting opportunities than LAX. For example, United, the second largest carrier at SAN behind Southwest Airlines, serves seven domestic markets, including LAX, with 35 daily flights, compared to 48 domestic and 12 international markets with 184 daily flights from LAX. Southwest has no interline relationship with any carrier across its network. Passengers can connect to/from a Southwest flight but have to retrieve their checked bags, then check in separately with Southwest. Interline agreements will typically check bags and provide tickets to passengers all the way through their journey.

Now, however, SeaPort has interline agreements with carriers operating at SAN and/or BUR, including Alaska Airlines (which has significant operations at both airports). And, although SAN and BUR may offer fewer connecting opportunities, both still offer significant connecting opportunities to domestic and transborder service- including nonstop flights from SAN to both London Heathrow (LHR), and Tokyo Narita (NRT).

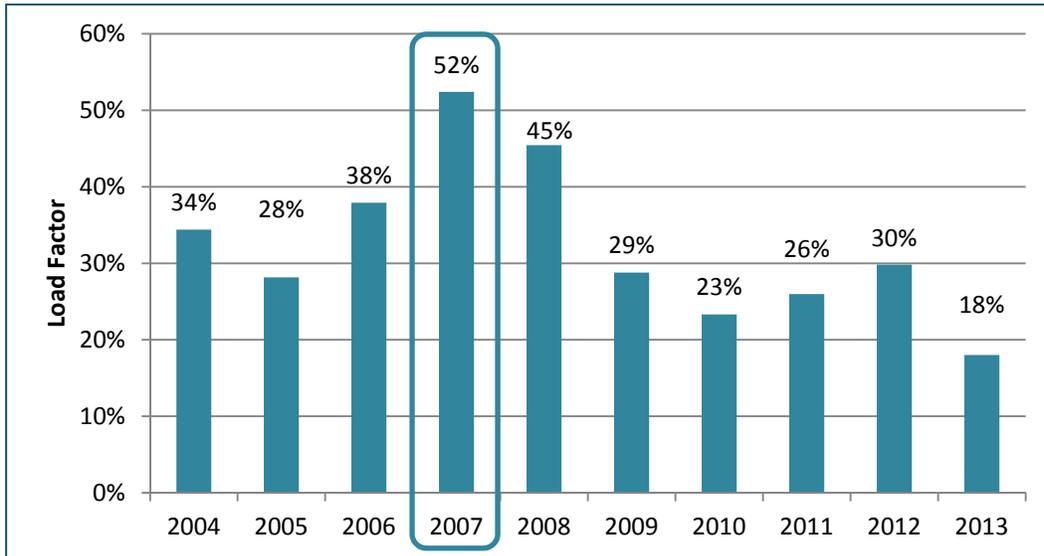
As shown on Figure 7, IPL consistently generated approximately twenty passengers per day 2009-2012. IPL passenger traffic peaked in 2007 when the airport had nearly twice daily service to LAX and Yuma, Arizona (“YUM”). United’s service with multiple online and interline connecting opportunities at LAX allowed both business and leisure passengers to travel globally and in addition, the larger 30 seat Embraer 120 aircraft can accommodate more demand.

Figure 6: Historical Enplanements per Day



Source: T-100 Data, via Diio, YE September, Based on 313 days

Figure 7: El Centro Imperial County Historical Load Factor



Source: T-100 Data, via Diio, YE September

During 2007, IPL also reached its highest load factor of 52% as shown on Figure 8. IPL was hard hit by the weak economy in 2008, 2009 and 2010 with an immediate decline in traffic and load factor. As IPL started to emerge from the recession, air travel increased to 20.6 in 2012. As the Department recognized, traffic at IPL “decreased significantly” starting in late 2012 when Skywest stopped basing an aircraft at IPL, thereby eliminating an early morning departure to the hub and late evening arrival from the hub. See DOT Order 2013-1-2, at 3. In 2013, the US DOT selected a new airline, SeaPort, serving new markets, and passenger traffic decreased. SeaPort is basing an aircraft at IPL thus permitting an early morning departure from, and late evening return to, Imperial. Such a schedule is more passenger-friendly and should help improve traffic levels.

This decrease is temporary because the community is adjusting to the new airline, destinations, flight schedules, and a smaller aircraft type. Additionally, SeaPort needed time to negotiate critical interline agreements with other airlines at BUR and SAN.

In the future, passenger traffic will benefit from the interline agreements that SeaPort Airlines has signed with Alaska Airlines (which operates at both SAN and BUR). Two more interline agreements with other airlines are due to be signed shortly. These agreements will greatly help generate passengers at IPL with convenient connections at BUR and SAN. Additionally, SeaPort is in the process of joining a major carrier’s frequent flyer program- expected to be completed by December, 2014.

SeaPort Airlines Marketing Plan

SeaPort Airlines, Inc. is implementing a mix of marketing and public relations efforts to build brand awareness, develop trust, and increase local enplanements. First and foremost, SeaPort has positioned itself as Imperial Valley's hometown service, providing Imperial Valley with convenient and reliable air service at low prices (currently as low as \$53.50 each way). Second, SeaPort bases aircraft at IPL, thereby enabling an early morning departure and late evening arrival at IPL, which even the Department has previously noted was an important aspect of having successful service. Third, SeaPort has signed interline agreements with major carriers serving both SAN and BUR, and is pursuing several other interline relationships. This will substantially broaden travel options for IPL passengers and will facilitate their travel. Fourth, SeaPort maximizes "reach" through "worldwide connections", established through extensive investment in distribution through the GDS and interline agreements, making flights easy to find and book where passengers are most likely to search online (e.g. Online Travel Agents (OTAs), meta-search, and aggregators).

Since it was selected by the USDOT to serve IPL, SeaPort's marketing strategy in Imperial Valley has leveraged both traditional and emerging media to achieve objectives, and has included the following tactics:

- Outdoor advertising (billboards)
- Radio advertising (both English-speaking and Spanish-speaking demographics)
- Local community outreach and presentations
- Event marketing
- Cause marketing
- Digital advertising/search engine marketing
- Digital marketing, content marketing, and use of social media
- E-mail marketing
- Strategic partnerships with local organizations (El Centro Chamber, Imperial Chamber & IVECD)
- Promotional fare sales

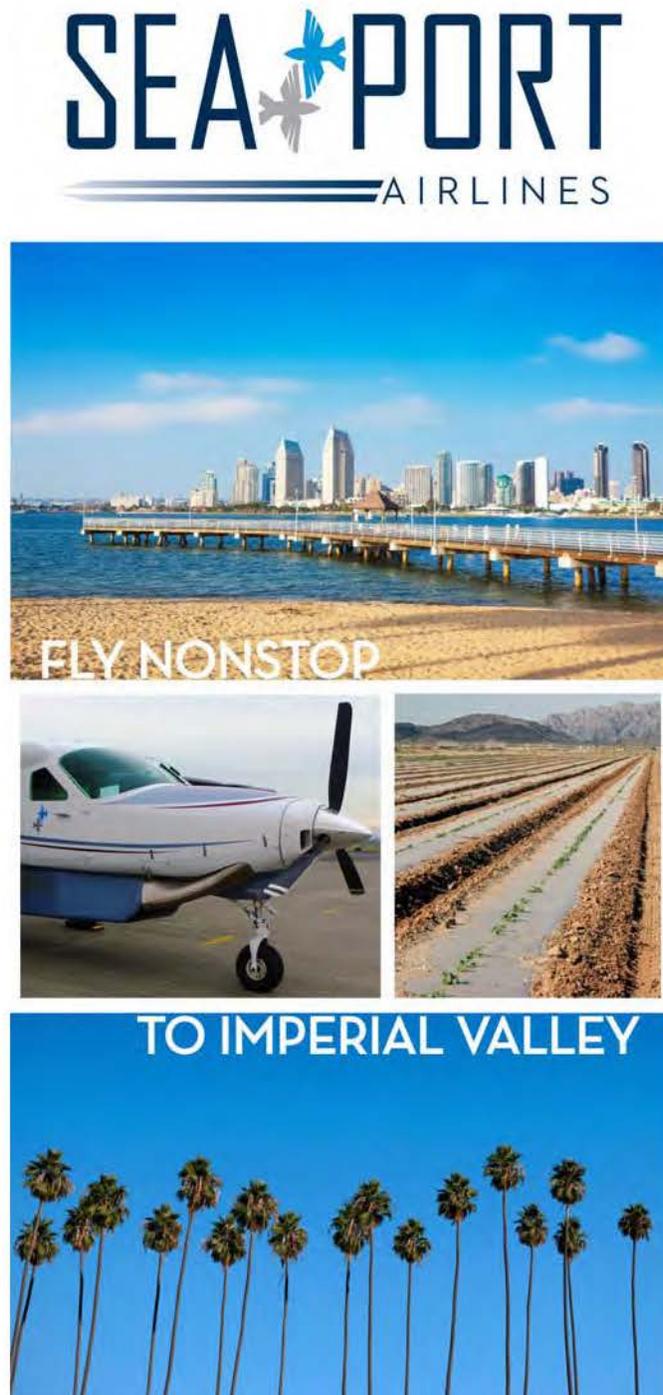
SeaPort will continue to employ this mix of tactics to reach both business and leisure travelers in Imperial Valley, and increase its efforts aggressively in the remainder of 2014, in light of the recent endangerment of EAS eligibility in Imperial Valley. Specific campaigns planned immediately include:

- Use of moveable trailers and signs throughout the valley to promote service ("migrating billboards")
- KXO radio "Hometown service. Worldwide connections." campaign promoting interline connectivity from Imperial Valley.
- Heavy distribution of printed materials (like rack cards), in both Spanish and English
- Summer fare sale
- Satellite community outreach

SeaPort will continue to pursue more interline agreements to increase Imperial Valley connectivity and visibility. Additionally, SeaPort's planned website redesign 2014-2015 will include implementation of a multi-language site, opening up reach even further globally.

It is also worth noting that jurisdictions within Imperial County have instituted Travel Justification Forms that require out of town travel to utilize SeaPort Airlines service. Directing important business travelers to use SeaPort's service will also help to build awareness and traffic at IPL.

Figure 8: SeaPort Airlines Card Rack Marketing



Source: SeaPort Airlines

Figure 9: SeaPort Airlines Billboard in Imperial Valley



Source: SeaPort Airlines

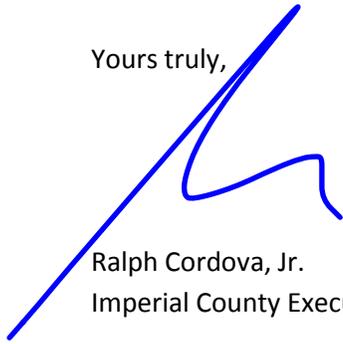
Conclusion

Despite the effects of the recession, IPL's traffic levels had remained above the mandatory ten enplanements per day by at least six passengers every year except for 2013. SeaPort Airlines entered the Imperial Valley market in 2013, and even during that transitional time enplanements were only *slightly* below the required 10 daily passengers and higher than any of the other at-risk EAS communities.

The economy of Imperial Valley continues to improve and the SeaPort Airlines service is vital in the recovery. Once SeaPort's interline agreements take effect, IPL should easily exceed the threshold of ten enplanements per day as the flights will have the benefit of connecting passengers. The entire Imperial County, including many of its most important constituents are dedicated to developing SeaPort's success.

As such, it is certain that the passenger performance below US DOT EAS minimums is a temporary circumstance related to the entrance of a new carrier serving new markets from IPL. The community of Imperial County is unified in its support of the SeaPort service and will take every opportunity to use the service when travelling by air. Under these circumstances, I feel a waiver is in order and I urge the USDOT to grant it forthwith to Imperial County so we can preserve our important air travel link.

Yours truly,

A handwritten signature in blue ink, consisting of a long diagonal stroke followed by a loop and a short horizontal tail.

Ralph Cordova, Jr.
Imperial County Executive Officer

Attachments:
Letters of Support

United States Senate

WASHINGTON, DC 20510

June 27, 2014

The Honorable Anthony Foxx
Secretary
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

Dear Secretary Foxx:

We write to you today to express our support for the petitions submitted by Imperial County and Merced Regional Airports for waivers to remain in the Essential Air Service Program (EAS). We understand that both airports had a temporary decline in enplanements last fiscal year, and because of that fell under the threshold necessary to continue receiving EAS support.

Both airports have conveyed that these declines in enplanements during fiscal year 2013 were temporary. Imperial County Airport had a change in air carriers during the first half of last year. This new air carrier initially lacked interline agreements with other airlines, and the community is still adjusting to new schedules and different routes.

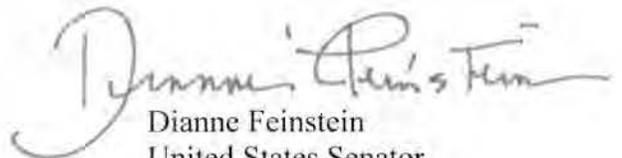
Merced Regional Airport historically averaged above the minimum threshold, but also had several scheduling changes in 2013, as well as some issues with a major destination terminal that have since been resolved.

We believe that the continuation of these two EAS programs in California is vital for the communities that depend on affordable transportation options and hope you consider these petitions favorably. Thank you for your attention to this issue and we look forward to your response.

Sincerely,



Barbara Boxer
United States Senator



Dianne Feinstein
United States Senator

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FAX: (760) 321-9664

VARGAS.HOUSE.GOV



Congress of the United States
House of Representatives

Juan Vargas

51st District, California

COMMITTEE ON FOREIGN AFFAIRS

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COMMITTEE ON HOUSE ADMINISTRATION

JOINT COMMITTEE ON PRINTING

July 10, 2014

Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590.

Dear Secretary Foxx,

I write to express my concerns with the U.S. Department of Transportation's Final Order to terminate the Essential Air Service (EAS) program in El Centro, California located in the Imperial County portion of the 51st Congressional District, which I represent. I understand the Department's order intends to implement the reforms included in the "Federal Aviation Administration Modernization and Reform Act," which requires subsidized communities to maintain an average of 10 passenger enplanements per service day in order to remain in the EAS program. However, as you consider a waiver, I urge you to cogitate the circumstances that contributed to Imperial County Airport's (IPL) unique year in which they were unable to meet the 10 enplanement average by 0.5 passengers. Furthermore, I ask that you consider the detrimental economic impacts that may occur as a result of terminating the program.

The Imperial County Airport has a tremendous track record of surpassing the EAS program requirements put forth by the government. According to the Department of Transportation, the Imperial Valley Airport dramatically exceeded the enplanement minimum in four of the last five years. Beginning in FY 2009 and ending in FY 2012, the airport logged in 16, 17.7, 20, and 20.7 enplanements, respectively. Unfortunately, in FY 2013, the Imperial County Airport barely fell below the ten enplanement threshold, by reaching 9.5 enplanements for the first time. I trust that this is a temporary decline, as there were various factors that contributed to this momentary decrease in daily enplanements.

During FY 2013, Imperial County residents were forced to adapt to a change in EAS service carriers and adjust to new routes. The Imperial County Airport was served by SkyWest United until it ceased operations there in April 2013. During that time, flights were operated to Los Angeles International Airport (LAX), which greatly benefitted passengers because LAX is one of the largest airports in the United States. Furthermore, United's service included interline

agreements with a diverse group of airlines which enabled passengers to connect to a large number of domestic and international cities.

In May 2013 the Department selected Seaport Airlines as the new EAS carrier. Their service replaced flights to LAX with service to large-hub San Diego International Airport (SAN) and Burbank's Bob Hope Airport (BUR), a medium-hub airport north of LAX. Despite the advantage of having access to two airports, this federally mandated service attracted fewer passengers because it is flown on a smaller aircraft, and Seaport did not initially have interline agreements in place to allow passengers to transfer at SAN and BUR to other airlines. In addition, SAN and BUR offer fewer connecting opportunities than LAX, because fewer airlines and routes are served from SAN and BUR.

Seaport Airlines has shared their current and future marketing efforts, and has informed me of the recent, steady increase in daily enplanements. In addition, they established an interconnection agreement with Alaska Airlines in March 2014. I was also notified that several local governments and agencies in Imperial County have committed to utilize the local air carrier in support of sustaining the airport as much as possible. As you might imagine, we are all hopeful that all these changes are and will continue to contribute to the rise in daily enplanements so that Imperial County can continue to participate in the EAS program.

Lastly, in addition to considering the unique factors impacting the Imperial County community in FY 2013, I ask that you consider revisiting the way in which enplanements are averaged. Rather than look at a community's average enplanements on an annual basis, I urge the Department of Transportation to consider the average enplanements over the last three fiscal years to truly gauge the community's activity and needs. This more comprehensive approach would ensure that communities encountering a temporary challenge would continue to be eligible for the EAS program.

As you know, the Essential Air Service was put into place to guarantee that small communities, including those within the Imperial County, continue to be served by certificated air carriers. It is essential to consider all factors before terminating a much-needed program in a region with such need. Over the last several years, Imperial County has experienced the highest unemployment rate in the nation. I believe that we should work together to encourage economic growth. Thank you for your time and kind consideration of my request. Should you have any questions, please feel free to contact my Legislative Director, Janine Pairis at (202) 225-8045.

Sincerely,



JUAN VARGAS
Member of Congress

California State Senate

SENATOR
BEN HUESO
FORTIETH SENATE DISTRICT



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VETERANS AFFAIRS
CHAIR
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TRANSPORTATION
& HOUSING
SELECT COMMITTEES
CALIFORNIA'S ENERGY
INDEPENDENCE
CHAIR
CALIFORNIA-MEXICO
COOPERATION

May 12, 2014

Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Docket DOT-OST-2008-0299

Dear Secretary Foxx,

As the local State Senator for the region, I write to express my concerns with the Department of Transportation's Tentative Order to terminate the Essential Air Service (EAS) program in El Centro, California located in Imperial County. I urge you to consider the negative economic impacts that may occur as a result of the proposed termination of the program.

The Imperial County Airport has a tremendous track record of surpassing the EAS program requirements put forth by the government, as they have dramatically exceeded the enplanement minimum in four of the last five fiscal years. Unfortunately, in FY 2013, the Imperial County Airport barely fell below the ten enplanement threshold, by reaching 9.5 enplanements for the first time.

As you know, the Essential Air Service was put into place to guarantee that small communities, including those within the Imperial County, continue to be served by certificated air carriers. Over the last several years, Imperial County has experienced the highest unemployment rate in the nation. Our federal government should encourage economic growth, and consider all factors before terminating a much-needed program in the region.

As you prepare the Final Order, I urge you to consider the Imperial Valley's track record over the last three fiscal years, and ask that you consider the void that will be left should the Department of Transportation ultimately decide to terminate the much-needed



California State Senate

SENATOR
BEN HUESO
FORTIETH SENATE DISTRICT



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INDEPENDENCE
CHAIR

CALIFORNIA-MEXICO
COOPERATION

(PAGE 2-CONTINUED)

Essential Air Service program currently in effect at the Imperial County Airport. Thank you for your time and consideration of my request.

Sincerely,

A handwritten signature in black ink, appearing to read "Ben Hueso", written over a horizontal line.

BEN HUESO
California State Senator, District 40

CC: Rep. Juan Vargas
John Renison, Chairman, Imperial County Board of Supervisors



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STANDING COMMITTEES:
Government Organization
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Jobs, Economic
Development & the Economy
Revenue and Taxation

May 7, 2014

Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Docket DOT-OST-2008-0299

Dear Secretary Foxx,

I write to express my concerns with the Department of Transportation's Tentative Order to terminate the Essential Air Service (EAS) program in El Centro, California located in Imperial County. I urge you to consider the negative economic impacts that may occur as a result of the proposed termination of the program.

The Imperial County Airport has a remarkable track record of surpassing the EAS program requirements put forth by the government, as they have dramatically exceeded the enplanement minimum in four of the last five fiscal years. The one exception is FY 2013, when Imperial County Airport fell just slightly below the ten enplanement threshold, achieving 9.5 enplanements.

As you know, the EAS program was put into place to guarantee that small communities, including those within Imperial County, continue to be served by certificated air carriers. Over the last several years, Imperial County has experienced the highest unemployment rate in the nation. The EAS program supports local economic activity and growth, which our region needs more than ever.

As you prepare the Final Order, I urge you to consider the Imperial Valley's solid track record over the last three fiscal years, and I ask that you consider the devastating void that will be left should the Department of Transportation decide to terminate the much-needed EAS program at the Imperial County Airport. Should you have any questions, please feel free to contact my Senior Representative Bianka Velez in my El Centro office at 760-336-8912. Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink that reads "V. Manuel Pérez". The signature is written in a cursive style and is positioned above the printed name of the Assemblymember.

V. MANUEL PÉREZ
Assemblymember, 56th District

DISTRICT OFFICES

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JOHN R. RENISON

DISTRICT 2
JACK TERRAZAS

DISTRICT 3
MICHAEL W. KELLEY

DISTRICT 4
RYAN E. KELLEY

DISTRICT 5
RAY CASTILLO



Board of Supervisors

County of Imperial

COUNTY ADMINISTRATION CENTER

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FAX: (760) 482-4215

May 12, 2014

Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Docket DOT-OST-2008-0299

Dear Secretary Foxx,

I write to express my concerns with the Department of Transportation's Tentative Order to terminate the Essential Air Service (EAS) program in El Centro, California located in Imperial County. I urge you to consider the negative economic impacts that may occur as a result of the proposed termination of the program.

The Imperial County Airport has an incredible track record of surpassing the EAS program requirements put forth by the government, as they have significantly exceeded the enplanement minimum in four of the last five fiscal years. Unfortunately, in FY 2013, the Imperial County Airport barely fell below the ten enplanement threshold, by reaching 9.5 enplanements for the first time.

As you know, the Essential Air Service was put into place to guarantee that small communities, including those within the Imperial County, continue to be served by certificated air carriers. Over the last several years, Imperial County has experienced the highest unemployment rate in the nation. Now more than ever with our economy still shaky, we need to keep the Essential Air Service program. Our federal government should encourage economic growth, and consider all the factors prior to terminating a much-needed program in the region.

As you prepare the Final Order, I urge you to consider the Imperial Valley's track record over the last three fiscal years, the loss of this vital lifeline would not only greatly inconvenience travelers but would derail economic development efforts. I ask that you consider the void that will be left should the Department of Transportation in the end decide to terminate the much-needed Essential Air Service program currently in effect at the Imperial County Airport.

Thank you for your time and consideration of my request,

Sincerely,

A handwritten signature in blue ink that reads "John R. Renison".

John Renison
Chairman
Board of Supervisor



CITY COUNCIL
Geoff Dale – Mayor
Mark Gran – Mayor Pro-Tem
Rick Breland – Council Member
Doug Cox – Council Member
Betty Sampson – Council Member

CITY CLERK
Debra Jackson

CITY TREASURER
Stacy Cox

July 15, 2014

Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, D.C. 20590

RE: Petition of El Centro for a waiver from the 10-enplanement statute, Docket –DOT-OST-2008-0299

Dear Secretary Foxx,

This letter is in support of the Essential Air Service (EAS) contract for Seaport Airlines from the Imperial County Airport (IPL). The City of Imperial recognizes that the air service provider did not maintain a minimum of 10 enplanements per day, as required by the program, however this is a temporary situation and we support a waiver for this order.

Imperial County Airport is located in the City of Imperial in the Southeastern corner of California. It is bordered by Arizona and Mexico. Even though it is about 114 miles to San Diego, road access to the nearest large hub airport is made uniquely more challenging than distance alone due to congestion, unpredictable border crossings, and road closures due to weather conditions on all roadways leading out of Imperial County. This increases the amount of time that passengers need to travel to other airports, as well as increases the community's reliance on IPL and its EAS for access to the international air transportation network to support economic growth in the area.

IPL has been served by two carriers, United Airlines operated by SkyWest, which ceased service in April of 2013, and Seaport Airlines, which began service in May 2013 when the US DOT selected Seaport as the new EAS carrier. Seaport's service replaced flights to LAX with service to large-hub San Diego International Airport "SAN" and Burbank's Bob Hope Airport "BUR", a medium-hub airport North of LAX. Despite the advantage of having access to two airports, this federally mandated service attracted fewer passengers because it is flown on smaller aircraft, and Seaport did not initially have interline agreements in place to allow passengers to transfer at SAN and BUR to other airlines. As a result of the smaller aircraft operated by Seaport, the number of daily seats offered from IPL was approximately half the number offered by United.

IPL consistently generated approximately twenty passengers per day in 2009 through 2012. IPL passenger traffic peaked in 2007 when the airport had nearly twice daily service to LAX and YUMA, Arizona "YUM". United's service with online and interline connecting opportunities at LAX allowed both business and leisure travelers to travel globally and on a larger aircraft, the 30-seat Embraer 120. During

2007, IPL also reached its highest load factor of 52%. IPL was hit hard by the weak economy in 2008, 2009 and 2010 with an immediate decline in traffic and load factor. As IPL started to emerge from the recession, air travel increased to 20.6 in 2012. In 2013, the US DOT selected a new airline, serving new markets and passenger traffic decreased.

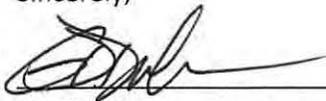
This temporary decline is because the community must adjust to the new air service patterns at IPL, and Seaport needed time to negotiate interline agreements with other airlines at BUR and SAN. Additionally Seaport needed to fully establish their service hubs at these other airports which proved to be a longer process than expected. At this time Seaport has an active interline agreement with Alaska Airlines and is negotiating additional opportunities. All three hubs are now working together for smooth customer service for both business and leisure travelers.

As such, it is certain that the passenger performance below US DOT minimum was a temporary decline related to the entrance of a new EAS carrier serving new markets from IPL using a new type of aircraft. The City of Imperial and the Imperial County region are unified in its support of the Seaport service.

The Essential Air Service program was developed to guarantee small communities, like Imperial County, continue to be served by certificated air carriers and have access to the National Transportation System. The City of Imperial, like many agencies and organizations, has made Seaport Airlines their first option when traveling outside the County. As you evaluate the waiver phase of the EAS evaluation process, I urge you to seriously consider Imperial County Airport's track record over the past several years. We request that you grant our airport the much needed waiver it deserves to prove it can successfully and effectively utilize the EAS subsidy to support the critical air service our region needs.

Thank you for your consideration. Should you have any questions, please contact the City of Imperial at the office of the City Manager, Ms. Marlene Best, (760) 355-4373 or email mbest@cityofimperial.org.

Sincerely,



Geoff Dale

Mayor

City of Imperial

cc. Susan Kurland, Aviation and International Affairs

Rebecca Terrazas-Baxter, Office of Congressman Juan Vargas, CA-51

Kevin Schlemmer, Essential Air Service & Domestic Analysis Division

Jamie Jones, David Turch & Associates

Marlene Best, City of Imperial



*Mayor and
Council Members*
Cheryl Viegas-Walker
Efrain Silva
Sedalia Sanders
Jason Jackson
Alex Cardenas

May 9, 2014

Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

**RE: Docket DOT-OST-2008-0299
Essential Air Service Eligibility Waiver – Imperial County Airport [California]**

Dear Secretary Foxx:

Imperial County Airport (“IPL”) is one of 13 airports that were notified by Tentative Order by the United States Department of Transportation (“US DOT”) on April 24, 2014 that the community may lose Essential Air Service (“EAS”) eligibility because IPL has served fewer than ten passengers per day during the year-ended December 31, 2013. Further, the Tentative Order indicates that the community needs to “show cause as to why the Department of Transportation should not terminate the eligibility of the community under the Essential Air Service (EAS) program.”

I urge you to grant a waiver so that IPL does not lose its EAS eligibility on the basis that it is a temporary circumstance. IPL’s passenger performance has dropped below ten passengers per day, however enplanements are improving.

The service area around IPL was hard-hit by the recession in 2008, but economic and demographic trends have improved since. In addition, the EAS airline and routes changed in May 2013, and in the short time since the new service has been in place, passenger acceptance has built steadily.

It is important to note that IPL exceeded EAS enplanement minimums in four of the last five fiscal years. In FY 2013, with a new carrier taking over the service in May, IPL fell below the ten enplanement threshold, at 9.5 passengers.

El Centro City Hall

1275 Main Street, El Centro, CA 92243 (760) 337-4540 Fax (760) 352-6177

This is a temporary abnormality. The new carrier, SeaPort Airlines, has shared with us its five year strategy and commitment to this market. We are confident that enplanements will continue to steadily increase as both the economy improves and SeaPort executes its marketing strategy.

IPL is located in Southeastern California bordered by Arizona to the East, San Diego County to the West, and Mexico to the South. Even though it is about 114 miles to San Diego, road access to the nearest large hub airport to Imperial County is made uniquely more challenging than distance alone due to congestion, weather [high winds, snow through the mountains], occasional wild fires], and the unpredictably of stationary/fixed border patrol traffic stops on all major roadways leading out of the County. This increases the amount of time that passengers need to travel to other airports, as well as increases the community's reliance on IPL for access to the national and international air transportation network to support economic growth in the area.

The City of El Centro is the County seat and home to several federal and state government agencies, such as the Social Security Administration, Employment Development Department, Internal Revenue Service, Department of Homeland Security, Bureau of Land Management, and others. Access to IPL for federal and state agencies is critical to control personnel travel time/costs.

IPL is also essential for our community's economic survival. Our unemployment rate hovers around twenty-four percent (24%) and our median household income is \$38,297 compared to \$61,632 statewide. IPL plays a crucial role in our ability to move potential investors in and out of Imperial County to encourage and support economic growth.

Loss of Essential Air Service in Imperial County will have a devastating impact on our already disadvantaged community. For these reasons, we respectfully request that the DOT grant a waiver to allow Imperial Valley to continue its participation in the EAS program.

Sincerely,



Cheryl Viegas-Walker
Mayor

CC: Honorable Congressman Juan Vargas
Honorable Senator Ben Hueso
Honorable Assembly Member V. Manuel Perez
City of El Centro Council Members
Diane Caldwell, City Clerk
Ruben A. Duran, City Manager
Kris Becker, City Attorney



CITY OF BRAWLEY

ADMINISTRATIVE OFFICES

383 Main Street
Brawley, CA 92227
Phone: (760) 351-3048
FAX: (760) 351-3088

May 7, 2014

Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Docket DOT-OST-2008-0299

Dear Secretary Foxx,

I write to express the City of Brawley's concerns with the Department of Transportation's Tentative Order to terminate the Essential Air Service (EAS) program in El Centro, California located in Imperial County. The City of Brawley urges you to consider the negative economic impacts that may occur as a result of the proposed termination of the program.

The Imperial County Airport has a tremendous track record of surpassing the EAS program requirements put forth by the government, as they have dramatically exceeded the enplanement minimum in four of the last five fiscal years. Unfortunately, in FY 2013, the Imperial County Airport barely fell below the ten enplanement threshold, by reaching 9.5 enplanements for the first time.

As you know, the Essential Air Service was put into place to guarantee that small communities, including those within the Imperial County, continue to be served by certificated air carriers. Over the last several years, Imperial County has experienced the highest unemployment rate in the nation. Our federal government should encourage economic growth, and consider all factors before terminating a much-needed program in the region.

As you prepare the Final Order, the City urges you to consider the Imperial Valley's track record over the last three fiscal years, and asks that you consider the void that will be left should the Department of Transportation ultimately decide to terminate the much-needed Essential Air Service program currently in effect at the Imperial County Airport.

Thank you for your time and consideration of our request.

Sincerely,

Rosanna Bayon Moore
City Manager

cc: Brawley City Council

**Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590**

Dear Secretary Foxx,

Firstly I want to take the opportunity to wish you a most successful tenure as Secretary of the US Department of Transportation. I vividly remember the meetings we held when you were the Mayor of the Queen City, and myself as Consul General of Mexico in the Carolinas, particularly during the National Democratic Convention of 2012.

Today, I write to you in order to convey many opinions that have arisen within the Hispanic population of Imperial Valley, in southern California in regard to the decision to terminate the Essential Air Service (EAS) program at Imperial County Airport (IPL), located in El Centro, California in Imperial County. Many users of the services at IPL, both from the US side, as well as from the neighboring Mexican city of Mexicali, Baja California (capital of the Mexican State of Baja California) have commented about the negative economic impacts that will ensue.

Imperial County Airport ("IPL") has an interesting track record of surpassing the EAS programs daily enplanement requirement established by the government, as they have dramatically exceeded the enplanement minimum over the last decade. Unfortunately, in FY 2013, IPL had a major disruption to its service as United Express discontinued its link to LAX and Seaport Airlines replaced the operation with flights to San Diego and Burbank. This disruption led to IPL falling *slightly* below the ten daily enplanement threshold, reaching 9.5 enplanements for the first time.

Key to the new airlines success is developing a brand in the market and important agreements with airlines that support smooth connections of passengers and bags at San Diego and Burbank. Seaport has been working hard to promote its service in the Imperial market and establish important relationships with other carriers to maximize connections for travelers.

The Essential Air Service program was developed to guarantee small communities, like Imperial County, continue to be served by certificated air carriers and have access to the National Transportation System. As you evaluate the Waiver phase of the EAS evaluation process, I urge you to seriously consider Imperial County/El Centro Airport's track record over the last decade. I/We request that you grant our airport the much needed waiver it deserves to prove it can successfully and effectively utilize the EAS subsidy to support the critical air service our market needs.

Again, please accept my friendly and respectful comments which are representative of many users of "IPL".

Finally, I take this opportunity to provide my contact information in eastern southern California

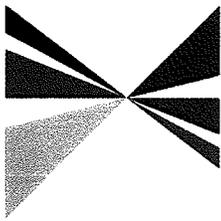
Sincerely



**Carlos Flores Vizcarra
Consul of Mexico**

**408 Heber Avenue,
Calexico, CA. 92231-2811
Tels. (760) 357 10 10 Fax:(760) 357 6284
E-mail: cfloresv@sre.gob.mx**

SOUTHERN CALIFORNIA



**ASSOCIATION of
GOVERNMENTS**

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Los Angeles, California
90017-3435

t (213) 236-1800

f (213) 236-1825

www.scag.ca.gov

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First Vice President

Cheryl Viegas-Walker, El Centro

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Michele Martinez, Santa Ana

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**Executive/Administration
Committee Chair**

Carl Morehouse, San Buenaventura

Policy Committee Chairs

Community, Economic and
Human Development
Margaret Finlay, Duarte

Energy & Environment
Deborah Robertson, Rialto

Transportation
Alan Wapner, San Bernardino
Associated Governments

May 13, 2014

Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Secretary Foxx,

The Southern California Association of Governments (SCAG) is writing in support of El Centro's appeal to reverse the Department of Transportation's Tentative Order to terminate the Essential Air Service (EAS) program in El Centro, California located in Imperial County.

The Southern California Association of Governments (SCAG) is the largest Metropolitan Planning Organization (MPO) in the country representing six counties, 191 cities and over 18 million residents. SCAG advocates for a sustainable Southern California, while enabling dialogue between elected officials, agencies and citizens throughout the Region. Imperial County's Regional Council members and SCAG staff regularly utilize the flights between Imperial County and the Burbank Airport.

In 2014, the travel time via single occupancy vehicle between Bob Hope Airport (BUR) and the City of El Centro ranges between 213- 265 minutes to travel 225 miles (SCAG 2012- 2035 Regional Transportation model). While the DOT eligibility is based on mileage and even with improvements to the surface transportation network, the driving times are long and unpredictable. Flying allows for more productivity.

In the adopted 2012-2035 Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS) the adopted Aviation Element advocates for a decentralized aviation system in Southern California that provides airport access across the Region. It is forecast Imperial County's population will grow from 180,000 to 270,000 which will yield substantial passenger growth at Imperial County Airport by 2035. This growth relies upon Imperial County's ability to provide quality education, encourage business growth and create good quality jobs in the future. Imperial County has one of the highest unemployment rates in the United States. The El Centro EAS service is the only reasonable means for Imperial County residents to discover opportunities for a more prosperous future.

SCAG strongly supports El Centro's request to reverse the Tentative Order Regarding Termination of EAS Eligibility for El Centro, CA.

Sincerely,

Hasan Ikhata (H)

Executive Director

The Regional Council consists of 86 elected officials representing 191 cities, six counties, six County Transportation Commissions, one representative from the Transportation Corridor Agencies, one Tribal Government representative and one representative for the Air Districts within Southern California.

July 7, 2014



Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Secretary Foxx,

The Imperial Valley Economic Development Corporation (IVEDC) respectfully requests the Department of Transportation (“DOT”) to reconsider their Final Order to terminate the Essential Air Service (EAS) program at Imperial County Airport (“IPL”) located in El Centro, California in Imperial County. The negative economic impacts that will occur in our local market as a result of the proposed termination of the program and our commercial air service will be significant.

Imperial County Airport (“IPL”) has a tremendous track record of surpassing the EAS programs daily enplanement requirement established by the government, as they have dramatically exceeded the enplanement minimum over the last decade. Unfortunately, in FY 2013, IPL had a major disruption to its service as United Express discontinued its link to LAX and Seaport Airlines replaced the operation with flights to San Diego and Burbank. This disruption led to IPL falling *slightly* below the ten daily enplanement threshold, reaching 9.5 enplanements for the first time.

Key to the new airlines success is developing a brand in the market and important agreements with airlines that support smooth connections of passengers and bags at San Diego and Burbank. Seaport has been working hard to promote its service in the Imperial market and establish important relationships with other carriers to maximize connections for travelers.

The Essential Air Service program was developed to guarantee small communities, like Imperial County, continue to be served by certificated air carriers and have access to the National Transportation System. As you evaluate the Waiver phase of the EAS evaluation process, IVEDC urges you to seriously consider Imperial County/El Centro Airport’s track record over the last decade. We request that you grant our airport the much needed waiver it deserves to prove it can successfully and effectively utilize the EAS subsidy to support the critical air service our market needs.

Sincerely,

A handwritten signature in cursive script that reads "Timothy E. Kelley".

Timothy E. Kelley
President & CEO



IID

A century of service.

www.iid.com

May 14, 2014

Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Secretary Foxx:

RE: Docket DOT-OST-2008-0299

On behalf of Imperial Irrigation District, I write to express our concern with the Department of Transportation's Tentative Order to terminate the Essential Air Service program in El Centro, California.

IID is the largest irrigation district in the nation and the third largest publicly owned power provider in the state of California. IID is a fiscally responsible public agency whose mission it is to provide reliable, efficient and affordably priced water and energy service to the communities we serve. The district is governed by an elected Board of Directors whose primary duty is to serve the public, and as a public-service agency, we urge you to give your highest consideration to this request.

As you are already aware, the EAS program was put in place to guarantee that small communities, like Imperial County, continue to be served by certificated air carriers. Imperial County Airport has a record of surpassing the EAS program requirements by exceeded the enplanement minimum in four of the last five fiscal years. Unfortunately, in FY 2013, Imperial County Airport fell just short of the ten enplanement threshold for the first time.

Before you finalize your order, we urge you to take into consideration the airport's positive track record over the last three years while also evaluating the negative economic and social impact to our local communities if the EAS program were to end.

Thank you for your consideration of the district's views on this matter.

Sincerely,

Kevin E. Kelley
General Manager

cc: Congressman Juan Vargas
Congressman Raul Ruiz



1405 N. IMPERIAL AVE., SUITE 1
EL CENTRO, CA 92243-2875
PHONE: (760) 592-4494
FAX: (760) 592-4497

May 12, 2014

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

RE: Docket DOT-OST-2008-0299

Dear Secretary Foxx,

On behalf of the Imperial County Transportation Commission, I write to request reconsideration of the Department of Transportation's Tentative Order to terminate the Essential Air Service (EAS) program in El Centro, California located in Imperial County. Please consider the negative economic impacts that may occur as a result of the proposed termination of the program.

The Imperial County Airport has a tremendous track record of surpassing the EAS program requirements put forth by the government, as they have dramatically exceeded the enplanement minimum in four of the last five fiscal years. Unfortunately, in FY 2013, the Imperial County Airport barely fell below the ten enplanement threshold, by reaching 9.5 enplanements for the first time.

As you know, the Essential Air Service was put into place to guarantee that small communities, including those within the Imperial County, continue to be served by certified air carriers. Over the last several years, Imperial County has and continues to experience one of the highest unemployment rates in the nation. It is also important to note that 23% of our County population lives below the poverty level (U.S. Census Bureau, 2012). The EAS program is vital to our economy, please consider all factors before terminating a much-needed program in the region.

As you prepare the Final Order, please also consider the Imperial Valley's track record over the last three fiscal years. Please consider the void that will be left should the Department of Transportation ultimately decide to terminate the much-needed EAS program currently in effect at the Imperial County Airport.

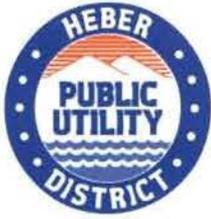
Thank you for your time and consideration of my request.

Sincerely,

A handwritten signature in blue ink that reads 'Mark Baza'.

Mark Baza
Executive Director

**CITIES OF BRAWLEY, CALEXICO, CALIPATRIA, EL CENTRO, HOLTVILLE, IMPERIAL, WESTMORLAND, IMPERIAL
IRRIGATION DISTRICT AND COUNTY OF IMPERIAL**



Heber Public Utility District

1078 Dogwood Rd., Suite 103 • P. O. Box H
Heber, CA 92249
TEL. (760) 482-2440 • FAX (760) 353-9951
www.heber.ca.gov

May 23, 2014

Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Docket DOT-OST 2008-0299

Dear Secretary Foxx;

Heber Public Utility District serves residents and businesses in the community of Heber in the Imperial County. As elected officials of this Special District, the Board unanimously decided to authorize this letter written in **opposition to the Department of Transportations' Tentative Order to terminate the Essential Air Services (EAS) program in El Centro, California located in Imperial County.** We urge you to consider the negative economic impacts that may occur as a result of the proposed termination of the program.

The Essential Air Service was put into place to guarantee that small communities, including those like Heber, continue to be served by certificated air carriers. Over the past several years the Imperial County has experience some of the highest unemployment rates in the nation, and the community of Heber is considered a severely disadvantage community according to the State standards. We need more jobs and economic benefits, and we urge you to consider the impacts to families in the Imperial County, and ask that you consider the void that will be left should the Department of Transportation ultimately decide to terminate the Essential Air Service program in the Imperial County.

On behalf of the Heber Public Utility District Board of Directors, we thank you for your time and consideration of our request.

Sincerely,

A handwritten signature in cursive script that reads "Laura Fischer".

Laura Fischer
General Manager

Cc: HPUD Board
Senator Hueso

May 9, 2014

Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Docket DOT-OST-2008-0299

Dear Secretary Foxx,

I write to express my concerns with the Department of Transportation's Tentative Order to terminate the Essential Air Service (EAS) program in El Centro, California located in Imperial County. I urge you to consider the negative economic impacts that may occur as a result of the proposed termination of the program.

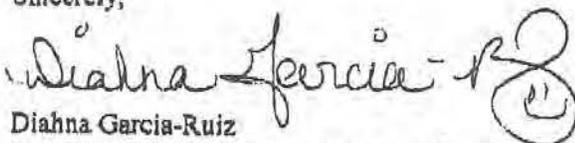
The Imperial County Airport has a tremendous track record of surpassing the EAS program requirements put forth by the government, as they have dramatically exceeded the enplanement minimum in four of the last five fiscal years. Unfortunately, in FY 2013, the Imperial County Airport barely fell below the ten enplanement threshold, by reaching 9.5 enplanements for the first time.

As you know, the Essential Air Service was put into place to guarantee that small communities, including those within the Imperial County, continue to be served by certificated air carriers. Over the last several years, Imperial County has experienced the highest unemployment rate in the nation. Our federal government should encourage economic growth, and consider all factors before terminating a much-needed program in the region.

As you prepare the Final Order, I urge you to consider the Imperial Valley's track record over the last three fiscal years, and ask that you consider the void that will be left should the Department of Transportation ultimately decide to terminate the much-needed Essential Air Service program currently in effect at the Imperial County Airport.

Thank you for your time and consideration of my request.

Sincerely,



Diahna Garcia-Ruiz
Board Member, Heber Public Utility District

IMPERIAL
COUNTY
OFFICE OF
EDUCATION

1398 SPERBER ROAD • EL CENTRO, CALIFORNIA 92243 • (760) 312-6464 • FAX (760) 312-6565

ANNE J. MALLORY
SUPERINTENDENT

Anne J Mallory, Superintendent

May 7, 2014

Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Docket DOT-OST-2008-0299

Dear Secretary Foxx,

I write to express my concerns with the Department of Transportation's Tentative Order to terminate the Essential Air Service (EAS) program in El Centro, California located in Imperial County. I urge you to consider the negative economic impacts that may occur as a result of the proposed termination of the program.

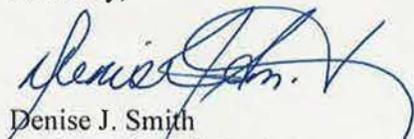
The Imperial County Airport has a tremendous track record of surpassing the EAS program requirements put forth by the government, as they have dramatically exceeded the enplanement minimum in four of the last five fiscal years. Unfortunately, in FY 2013, the Imperial County Airport barely fell below the ten enplanement threshold, by reaching 9.5 enplanements for the first time.

As you know, the Essential Air Service was put into place to guarantee that small communities, including those within the Imperial County, continue to be served by certificated air carriers. Over the last several years, Imperial County has experienced the highest unemployment rate in the nation. Our federal government should encourage economic growth, and consider all factors before terminating a much-needed program in the region.

As you prepare the Final Order, I urge you to consider the Imperial Valley's track record over the last three fiscal years, and ask that you consider the void that will be left should the Department of Transportation ultimately decide to terminate the much-needed Essential Air Service program currently in effect at the Imperial County Airport.

Thank you for your time and consideration of my request.

Sincerely,



Denise J. Smith
Assistant Superintendent
Administrative Services

County Board of Education

Sharon Anderholt

Alicia Armenta

Sabrina C. Barber

Annette Buttner

Susan E. Manger



IMPERIAL VALLEY COLLEGE

Serving Imperial County

PO Box 158, Imperial, CA 92251-0158 760.355.6219

Phone 760.355.6219

Fax 760.355.6461

www.imperial.edu

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Victor M. Jaime, Ed.D.
victor.jaime@imperial.edu

July 3, 2014

Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Secretary Foxx,

I write to express my disappointment with the Department of Transportation's ("DOT") Final Order to terminate the Essential Air Service (EAS) program at Imperial County Airport ("IPL") located in El Centro, California in Imperial County. I urge you to consider the negative economic impacts that will occur in our local market as a result of the proposed termination of the program and our commercial air service.

Imperial County Airport ("IPL") has a tremendous track record of surpassing the EAS programs daily enplanement requirement established by the government, as they have dramatically exceeded the enplanement minimum over the last decade. Unfortunately, in FY 2013, IPL had a major disruption to its service as United Express discontinued its link to LAX and Seaport Airlines replaced the operation with flights to San Diego and Burbank. This disruption led to IPL falling slightly below the ten daily enplanement threshold, reaching 9.5 enplanements for the first time.

Key to the new airlines success is developing a brand in the market and important agreements with airlines that support smooth connections of passengers and bags at San Diego and Burbank. Seaport has been working hard to promote its service in the Imperial market and establish important relationships with other carriers to maximize connections for travelers.

The Essential Air Service program was developed to guarantee small communities, like Imperial County, continue to be served by certificated air carriers and have access to the National Transportation System. As you evaluate the Waiver phase of the EAS evaluation process, I urge you to seriously consider Imperial County/El Centro Airport's track record over the last decade. I/We request that you grant our airport the much needed waiver it deserves to prove it can successfully and effectively utilize the EAS subsidy to support the critical air service our market needs.

Thank you for your time and consideration of my request.

Should you have any questions, please contact me at 760-355-6219.

Sincerely,

Victor M. Jaime, Ed. D.
Superintendent/President of Imperial Valley College

June 30, 2014

Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Secretary Foxx,

I write to express my disappointment with the Department of Transportation's ("DOT") Final Order to terminate the Essential Air Service (EAS) program at Imperial County Airport ("IPL") located in El Centro, California in Imperial County. I urge you to consider the negative economic impacts that will occur in our local market as a result of the proposed termination of the program and our commercial air service.

Imperial County Airport ("IPL") has a tremendous track record of surpassing the EAS programs daily enplanement requirement established by the government, as they have dramatically exceeded the enplanement minimum over the last decade. Unfortunately, in FY 2013, IPL had a major disruption to its service as United Express discontinued its link to LAX and Seaport Airlines replaced the operation with flights to San Diego and Burbank. This disruption led to IPL falling *slightly* below the ten daily enplanement threshold, reaching 9.5 enplanements for the first time.

Key to the new airlines success is developing a brand in the market and important agreements with airlines that support smooth connections of passengers and bags at San Diego and Burbank. Seaport has been working hard to promote its service in the Imperial market and establish important relationships with other carriers to maximize connections for travelers.

The Essential Air Service program was developed to guarantee small communities, like Imperial County, continue to be served by certificated air carriers and have access to the National Transportation System. As you evaluate the Waiver phase of the EAS evaluation process, I urge you to seriously consider Imperial County/El Centro Airport's track record over the last decade. I/We request that you grant our airport the much needed waiver it deserves to prove it can successfully and effectively utilize the EAS subsidy to support the critical air service our market needs.

Thank you for your time and consideration of my request.



Larry Lewis, CEO
Pioneers Memorial Hospital

LL/eb

SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY

P.O. BOX 82776, SAN DIEGO, CA 92138-2776
619.400.2400 WWW.SAN.ORG

July 7, 2014

Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Secretary Foxx:

I write to express my regret with the Department of Transportation's ("DOT") Final Order to terminate the Essential Air Service (EAS) program at Imperial County Airport ("IPL") located in El Centro, California. I urge you to consider a waiver for Imperial given its strong historical enplanement figures and its recent unique economic circumstances.

Imperial County Airport ("IPL") has a consistently strong track record of surpassing the EAS program's daily enplanement requirement established by the government. IPL has dramatically exceeded the enplanement minimum over the last decade. Regrettably, due to the recession and issues related to the transition to a new EAS provider, enplanements have fallen *slightly* below the ten daily enplanement threshold, reaching 9.5 enplanements per day for the first time.

We believe there will be improvement in the enplanement numbers for Imperial in the coming year. It would be regrettable if EAS funding were discontinued just as the new service began to grow and stimulate the market. Seaport has been working hard to promote its service in the Imperial market and establish important relationships with other carriers to maximize connections for travelers.

Several factors argue in favor of a waiver for Imperial:

- Imperial was extremely hard-hit by the recession, in fact its unemployment rate was among the highest in the nation during this period. The fact that it was able to maintain the most enplanements of the EAS markets in question during a period of extreme economic hardship is laudable.
- The airline that has invested in the San Diego – Imperial route has taken concrete steps to increase ridership including upgrades to its reservation system and conclusion of interline agreements. The total anticipated benefits from these upgrades to the Imperial route have not yet been realized.

IPL is exactly the historically strong market the Essential Air Service program was developed to help nurture. It is essential that Imperial County continue to be served by Seaport Airlines and have access to the National Transportation System. As you evaluate the waiver phase of the EAS evaluation process, I urge you to seriously consider IPL's track record over the last decade. We request you grant Imperial a waiver so that it can continue to effectively utilize the EAS subsidy. We look forward to a favorable response from the department in the coming weeks.

Sincerely,



Thella F. Bowens
President / CEO
San Diego County Regional Airport Authority



SAN DIEGO
INTERNATIONAL
AIRPORT



July 2, 2014

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

Dear Mr. Secretary:

I write on behalf of the Burbank-Glendale-Pasadena Airport Authority ("BGPAA") to express our disappointment with the Department of Transportation's Final Order terminating the Essential Air Service ("EAS") subsidy at Imperial County Airport ("IPL") in El Centro, California. The BGPAA urges you to consider the entirety of IPL's history in the EAS program.

IPL has a tremendous track record of surpassing the EAS program's daily enplanement requirement, having dramatically and consistently exceeded the enplanement minimum over the last decade. Unfortunately, in FY 2013, IPL had a major disruption to its service because United Express discontinued operations to LAX. Although Seaport Airlines replaced that operation with flights to Bob Hope Airport in Burbank and to San Diego International Airport, this disruption led to IPL falling *slightly* below the ten daily enplanement threshold, reaching 9.5 enplanements for the first time.

Key to any new airline's success is development of a brand in the market and execution of interline agreements with other air carriers to facilitate smooth connections of passengers and bags. Seaport has been working extremely hard to promote its service in the Imperial County market and to consummate contracts with other air carriers to maximize connections for travelers at Bob Hope Airport and San Diego International Airport.

As you know, the EAS program was developed to ensure that small communities, like Imperial County, continue to be served by certificated air carriers and have access to the National Transportation System. When you evaluate IPL's waiver application, the BGPAA urges you to give significant weight to IPL's track record over the last decade. We respectfully request that you grant IPL a waiver so that it can continue its remarkably successful utilization of the EAS subsidy to support the critical air service that the Imperial County market needs.

Thank you for your time and consideration of our request.

Sincerely,


Dan Feger
Executive Director

cc: Commissioners, Burbank-Glendale-Pasadena Airport Authority

Holtville Chamber of Commerce and Agriculture

101 WEST FIFTH STREET • HOLTVILLE, CA 92250 • (760) 356-2923 • FAX (760) 356-2925

Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Secretary Foxx,

I write to express my disappointment with the Department of Transportation's ("DOT") Final Order to terminate the Essential Air Service (EAS) program at Imperial County Airport ("IPL") located in El Centro, California in Imperial County. I urge you to consider the negative economic impacts that will occur in our local market as a result of the proposed termination of the program and our commercial air service.

Imperial County Airport ("IPL") has a tremendous track record of surpassing the EAS programs daily enplanement requirement established by the government, as they have dramatically exceeded the enplanement minimum over the last decade. Unfortunately, in FY 2013, IPL had a major disruption to its service as United Express discontinued its link to LAX and Seaport Airlines replaced the operation with flights to San Diego and Burbank. This disruption led to IPL falling *slightly* below the ten daily enplanement threshold, reaching 9.5 enplanements for the first time.

Key to the new airlines success is developing a brand in the market and important agreements with airlines that support smooth connections of passengers and bags at San Diego and Burbank. Seaport has been working hard to promote its service in the Imperial market and establish important relationships with other carriers to maximize connections for travelers.

The Essential Air Service program was developed to guarantee small communities, like Imperial County, continue to be served by certificated air carriers and have access to the National Transportation System. As you evaluate the Waiver phase of the EAS evaluation process, I urge you to seriously consider Imperial County/El Centro Airport's track record over the last decade. I request that you grant our airport the much needed waiver it deserves to prove it can successfully and effectively utilize the EAS subsidy to support the critical air service our market needs.

Thank you for your time and consideration of my request.



Chamber president - July 4th, 2014



THE CARROT
CAPITAL
OF THE
WORLD



May 8, 2014

Secretary Anthony Foxx

U.S. Department of Transportation

1200 New Jersey Avenue, SE Washington, DC 20590

RE: Docket DOT-OST-2008-0299

Dear Secretary Foxx,

I write to express my deep concerns with the Department of Transportation's Tentative Order to terminate the Essential Air Service (EAS) program in El Centro, California located in Imperial County.

I urge you to consider the negative economic impacts that may occur as a result of the proposed termination of the program.

The Imperial County Airport has a tremendous track record of surpassing the EAS program requirements put forth by the government, as they have dramatically exceeded the enplanement minimum in four of the last five fiscal years. Unfortunately, in FY 2013, the Imperial County Airport barely fell below the ten enplanement threshold, by reaching 9.5 enplanements for the first time.

As you know, the Essential Air Service was put into place to guarantee that small communities, including those within the Imperial County, continue to be served by certificated air carriers.

Over the last several years, Imperial County has experienced the highest unemployment rate in the

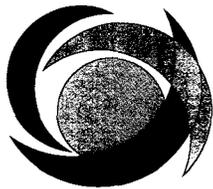
nation. Our federal government should encourage economic growth, and consider all factors before terminating a much-needed program in the region.

As you prepare the Final Order, I urge you to consider the Imperial Valley's track record over the last three fiscal years, and ask that you consider the void that will be left should the Department of Transportation ultimately decide to terminate the much-needed Essential Air Service program currently in effect at the Imperial County Airport.

Thank you for your time and consideration of my request on behalf of the entire County of Imperial.

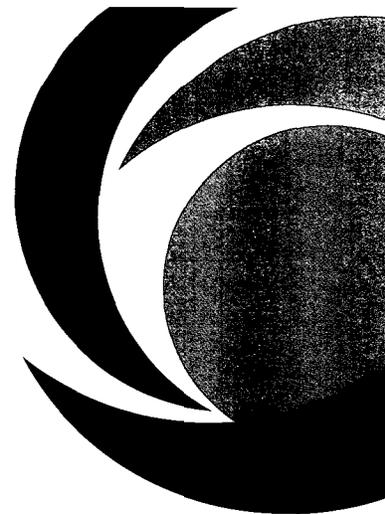
Sincerely,

Gregory Siota
Chief Executive Officer
Imperial Chamber of Commerce



CALEXICO
Chamber Of Commerce

June 30, 2014



Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Secretary Foxx,

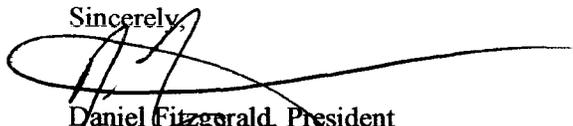
I write to express my disappointment with the Department of Transportation's ("DOT") Final Order to terminate the Essential Air Service (EAS) program at Imperial County Airport ("IPL") located in El Centro, California in Imperial County. I urge you to consider the negative economic impacts that will occur in our local market as a result of the proposed termination of the program and our commercial air service.

Imperial County Airport ("IPL") has a tremendous track record of surpassing the EAS programs daily enplanement requirement established by the government, as they have dramatically exceeded the enplanement minimum over the last decade. Unfortunately, in FY 2013, IPL had a major disruption to its service as United Express discontinued its link to LAX and Seaport Airlines replaced the operation with flights to San Diego and Burbank. This disruption led to IPL falling *slightly* below the ten daily enplanement threshold, reaching 9.5 enplanements for the first time.

Key to the new airlines success is developing a brand in the market and important agreements with airlines that support smooth connections of passengers and bags at San Diego and Burbank. Seaport has been working hard to promote its service in the Imperial market and establish important relationships with other carriers to maximize connections for travelers.

The Essential Air Service program was developed to guarantee small communities, like Imperial County, continue to be served by certificated air carriers and have access to the National Transportation System. As you evaluate the Waiver phase of the EAS evaluation process, I urge you to seriously consider Imperial County/El Centro Airport's track record over the last decade. I/We request that you grant our airport the much needed waiver it deserves to prove it can successfully and effectively utilize the EAS subsidy to support the critical air service our market needs.

Sincerely,



Daniel Fitzgerald, President
Calexico Chamber of Commerce

Cc: Board File

www.calexicochamber.net



**El Centro
Chamber of Commerce
& VISITORS BUREAU**

1095 South 4th Street
Post Office Box 3006
El Centro, CA 92244 - 3006
(760) 352-3681
Fax (760) 352-3246

Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Secretary Foxx,

I write to express my disappointment with the Department of Transportation's ("DOT") Final Order to terminate the Essential Air Service (EAS) program at Imperial County Airport ("IPL") located in El Centro, California in Imperial County. I urge you to consider the negative economic impacts that will occur in our local market as a result of the proposed termination of the program and our commercial air service.

Imperial County Airport ("IPL") has a tremendous track record of surpassing the EAS programs daily enplanement requirement established by the government, as they have dramatically exceeded the enplanement minimum over the last decade. Unfortunately, in FY 2013, IPL had a major disruption to its service as United Express discontinued its link to LAX and Seaport Airlines replaced the operation with flights to San Diego and Burbank. This disruption led to IPL falling *slightly* below the ten daily enplanement threshold, reaching 9.5 enplanements for the first time.

Key to the new airlines success is developing a brand in the market and important agreements with airlines that support smooth connections of passengers and bags at San Diego and Burbank. Seaport has been working hard to promote its service in the Imperial market and establish important relationships with other carriers to maximize connections for travelers.

The Essential Air Service program was developed to guarantee small communities, like Imperial County, continue to be served by certificated air carriers and have access to the National Transportation System. As you evaluate the Waiver phase of the EAS evaluation process, I urge you to seriously consider Imperial County/El Centro Airport's track record over the last decade. I/We request that you grant our airport the much needed waiver it deserves to prove it can successfully and effectively utilize the EAS subsidy to support the critical air service our market needs.

Thank you for your time and consideration of my request.

Darletta D. Willis
Chief Executive Officer

"Where the Sun Spends the Winter"®

www.elcentrochamber.com



**El Centro
Chamber of Commerce
& VISITORS BUREAU**

1095 South 4th Street
Post Office Box 3006
El Centro, CA 92244 - 3006
(760) 352-3681
Fax (760) 352-3246

Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Secretary Foxx,

I write to express my disappointment with the Department of Transportation's ("DOT") Final Order to terminate the Essential Air Service (EAS) program at Imperial County Airport ("IPL") located in El Centro, California in Imperial County. I urge you to consider the negative economic impacts that will occur in our local market as a result of the proposed termination of the program and our commercial air service.

Imperial County Airport ("IPL") has a tremendous track record of surpassing the EAS programs daily enplanement requirement established by the government, as they have dramatically exceeded the enplanement minimum over the last decade. Unfortunately, in FY 2013, IPL had a major disruption to its service as United Express discontinued its link to LAX and Seaport Airlines replaced the operation with flights to San Diego and Burbank. This disruption led to IPL falling *slightly* below the ten daily enplanement threshold, reaching 9.5 enplanements for the first time.

Key to the new airlines success is developing a brand in the market and important agreements with airlines that support smooth connections of passengers and bags at San Diego and Burbank. Seaport has been working hard to promote its service in the Imperial market and establish important relationships with other carriers to maximize connections for travelers.

The Essential Air Service program was developed to guarantee small communities, like Imperial County, continue to be served by certificated air carriers and have access to the National Transportation System. As you evaluate the Waiver phase of the EAS evaluation process, I urge you to seriously consider Imperial County/El Centro Airport's track record over the last decade. I/We request that you grant our airport the much needed waiver it deserves to prove it can successfully and effectively utilize the EAS subsidy to support the critical air service our market needs.

Thank you for your time and consideration of my request.

Jaime Honold
President, Board of Directors

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Preparing Students For Work:
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Imperial Valley Regional Occupational Program

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www.ivrop.org

Edwin P. Obergfell
Superintendent

May 8, 2014

Secretary Anthony Foxx
US Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Docket DOT-OST-2008-0299

Dear Secretary Foxx,

I write to express my concerns with the Department of Transportation's Tentative Order to terminate the Essential Air Service (EAS) program in El Centro, California located in Imperial County. I urge you to consider the negative economic impacts that may occur as a result of the proposed termination of the program.

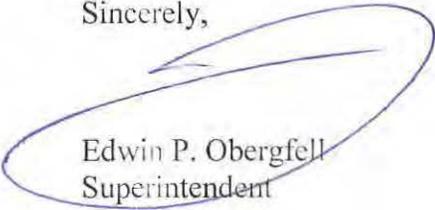
The Imperial County Airport has a tremendous track record of surpassing the EAS program requirements put forth by the government, as they have dramatically exceeded the enplanement minimum in four of the last five fiscal years. Unfortunately, in FY 2013, the Imperial County Airport barely fell below the ten enplanement threshold, by reaching 9.5 enplanements for the first time.

As you know, the Essential Air Service was put into place to guarantee that small communities including those within the Imperial County, continue to be served by certificated air carriers. Over the last several years, Imperial County has experienced the highest unemployment rate in the nation. Our federal government should encourage economic growth, and consider all factors before terminating a much-needed program in region.

As you prepare the Final Order, I urge you to consider the Imperial Valley's track record over the last three fiscal years, and ask that you consider the void that will be left should the Department of Transportation ultimately decide to terminate the much-needed Essential Air Service program currently in effect at the Imperial County Airport.

Thank you for your time and consideration of my request.

Sincerely,



Edwin P. Obergfell
Superintendent



329 Applestill Road • El Centro, CA 92243
(760) 370-0966 • info@ivfoodbank.org

May 9, 2014

Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Docket DOT-OST-2008-0299

Dear Secretary Foxx,

I write to express my concerns with the Department of Transportation's Tentative Order to terminate the Essential Air Service (EAS) program in **El Centro, California** located in Imperial County. I urge you to consider the negative economic impacts that may occur as a result of the proposed termination of the program.

The Imperial County Airport has a tremendous track record of surpassing the EAS program requirements put forth by the government, as they have dramatically exceeded the enplanement minimum in four of the last five fiscal years. Unfortunately, in FY 2013, the Imperial County Airport barely fell below the ten enplanement threshold, by reaching 9.5 enplanements for the first time due to the change in the mandated air carrier that occurred in 2013.

There are extenuating circumstances that have led to the decline in enplanements. The uncertainty of the air carrier change from United based SkyWest to Seaport Airlines, which occurred in May of 2013, has been a difficult and unpopular transition. The change in timing (SkyWest service was extended for two months after its original announcement) in aircraft carriers and the learning curve for local user of the airport to transition to purchasing tickets from a system that was not linked to any major aircraft carrier was cumbersome and unfortunate. To this day, those who fly from Imperial to San Diego have to leave the commuter terminal and go through security again before they can fly to their real destinations. Many local people have simply opted not to use this service. The uncertainty of the timing needed between flights is too risky to leave it to chance. If the Imperial County community had never had SkyWest previously, and known the convenience of flying directly to LAX with the ease of changing planes to anywhere in the world, then Seaport might be an adequate airline.

It is my understanding that your office made the decision to change from SkyWest to Seaport Airlines as the mandated carrier at the Imperial County Airport. It is unfair that less than one year after that decision was made, our local community and economy are being punished for this decision by a threat to discontinue service. We are a resilient community and we will adjust



329 Applestill Road • El Centro, CA 92243
(760) 370-0966 • info@ivfoodbank.org

to Seaport airlines, but we will need more time to raise the .5 enplanements needed for your criteria.

The El Centro Airport is crucial to a number of key industries in Imperial County. The alternative energy market is essential to the economic growth of the county. Our solar, wind and geothermal facilities are visited frequently by the national corporation representatives that run these facilities and those who are interested in building more facilities in a county blessed with 360 days of sunshine a year. Our agricultural community represents 33% of our county's economic engine. Key leaders from the Ag industry serve on elected boards and committees both in Sacramento and Washington and need the ability to get to those places quickly and efficiently. Many Imperial County residents are important leaders in their fields. Education, Government, Medical and non-profit leaders, like myself, require the ability to get to Sacramento and national conference locations without adding an extra day of travel on to the front and back ends of trips.

The Imperial County houses one of the strategic training facilities for Homeland Security's Border Patrol and operates from that base a large patrol area along the Mexican Border. The Naval Air Facility El Centro is also a strategic training facility for aircraft carrier fighter pilots and helicopter training. The elimination of the Imperial County Airport would affect other government bureaus and departments in very negative ways.

As you know, the Essential Air Service was put into place to guarantee that small communities, including those within the Imperial County, continue to be served by certificated air carriers. Over the last several years, Imperial County has experienced the highest unemployment rate in the nation. Our federal government should encourage economic growth, and consider all factors before terminating a much-needed program in the region.

As you prepare the Final Order, I urge you to consider the Imperial Valley's track record over the last five fiscal years, and ask that you consider the void that will be left should the Department of Transportation ultimately decide to terminate the much-needed Essential Air Service program currently in effect at the Imperial County Airport. It is truly essential.

Thank you for your time and consideration of my request.

Sincerely,

Sara Griffen
Executive Director
Imperial Valley Food Bank

June 26, 2014

Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Secretary Foxx,

I write to express my disappointment with the Department of Transportation's ("DOT") Final Order to terminate the Essential Air Service (EAS) program at Imperial County Airport ("IPL") located in El Centro, California in Imperial County. I urge you to consider the negative economic impacts that will occur in our local market as a result of the proposed termination of the program and our commercial air service.

Imperial County Airport ("IPL") has a tremendous track record of surpassing the EAS programs daily enplanement requirement established by the government, as they have dramatically exceeded the enplanement minimum over the last decade. Unfortunately, in FY 2013, IPL had a major disruption to its service as United Express discontinued its link to LAX and Seaport Airlines replaced the operation with flights to San Diego and Burbank. This disruption led to IPL falling *slightly* below the ten daily enplanement threshold, reaching 9.5 enplanements for the first time.

Key to the new airlines success is developing a brand in the market and important agreements with airlines that support smooth connections of passengers and bags at San Diego and Burbank. Seaport has been working hard to promote its service in the Imperial market and establish important relationships with other carriers to maximize connections for travelers.

This Air Service program is essential to our area in that we use it frequently to assist us in providing safety net medical services along the border areas in the desert of California. This was developed to guarantee small communities, like Imperial County, ability to continue the service by certificated air carriers and have access to the National Transportation System. As you evaluate the Waiver phase of the EAS evaluation process, I urge you to grant our airport the much needed waiver it deserves to prove it can successfully and effectively utilize the EAS subsidy to support the critical air service our market needs.

Thank you for your time and consideration of my request.

Sincerely,



David R. Green
Chief Executive Officer

June 30, 2014

Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Secretary Foxx,

I write to express my disappointment with the Department of Transportation's ("DOT") Final Order to terminate the Essential Air Service (EAS) program at Imperial County Airport ("IPL") located in El Centro, California in Imperial County. I urge you to consider the negative economic impacts that will occur in our local market as a result of the proposed termination of the program and our commercial air service.

Imperial County Airport ("IPL") has a tremendous track record of surpassing the EAS programs daily enplanement requirement established by the government, as they have dramatically exceeded the enplanement minimum over the last decade. Unfortunately, in FY 2013, IPL had a major disruption to its service as United Express discontinued its link to LAX and Seaport Airlines replaced the operation with flights to San Diego and Burbank. This disruption led to IPL falling *slightly* below the ten daily enplanement threshold, reaching 9.5 enplanements for the first time.

Key to the new airlines success is developing a brand in the market and important agreements with airlines that support smooth connections of passengers and bags at San Diego and Burbank. Seaport has been working hard to promote its service in the Imperial market and establish important relationships with other carriers to maximize connections for travelers.

The Essential Air Service program was developed to guarantee small communities, like Imperial County, continue to be served by certificated air carriers and have access to the National Transportation System. As you evaluate the Waiver phase of the EAS evaluation process, I urge you to seriously consider Imperial County/El Centro Airport's track record over the last decade. I/We request that you grant our airport the much needed waiver it deserves to prove it can successfully and effectively utilize the EAS subsidy to support the critical air service our market needs.

Thank you for your time and consideration of my request.



Larry Lewis, CEO
Pioneers Memorial Hospital

LL/eb



May 13, 2014

Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: DOCKET DOT-OST 2008-0299

Dear Secretary Foxx,

I am writing this letter to express our severe concerns with the Department of Transportation's Tentative Order to terminate the Essential Air Service ("EAS") program in El Centro, California located in Imperial County. We, therefore, strongly request that you rescind the Tentative Order.

8minutenergy Renewables, LLC is one the largest solar developers in the State of California. Imperial County is the area where we have our largest presence. Therefore, effective and rapid means of transportation are essential for our business and for the local economy. The local airport was a significant factor in making our decision to develop in Imperial County.

To put into perspective our economic presence in Imperial County, since 2009 our projects have contributed approximately \$40 million to the local economy in the form of payments to the local governmental agencies, employment wages, and land acquisition for the multiple development projects. We are about to spend an additional \$20 million for a project that we plan to start construction late this year. In addition, we are planning on commencing construction on a second project that would be a 100 MW solar farm late this year. The 100 MW solar farm has a construction cost of approximately \$200 million. The construction costs provide a direct and indirect benefit to the local economy.

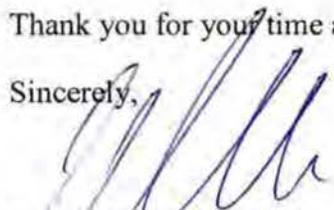
Further, we believe that the termination of the EAS may be in violation of the National Environmental Policy Act and contrary to the department's principle of Environmental Justice.

"Each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, . . . disproportionately high and adverse . . . environmental effects of its programs . . . on minority population."

We, therefore, request for you to rescind the Tentative Order because to terminate the EAS would disproportionately impact Imperial County's minority population by eliminating their opportunity to having adequate means of air travel and severely handicap the local economy.

Thank you for your time and consideration to our request.

Sincerely,



Martin Hermann, CEO
8minutenergy Renewables



**Burgers
& Beer**

The Best Burger In Town

Main Office
260 Imperial Avenue
El Centro, California 92243
(760) 337-5788 - Office
(760) 353-4431
(760) 337-5663 FAX

May 7, 2014

Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Docket DOT-OST-2008-0299

Dear Secretary Foxx,

I write to express my concerns with the Department of Transportation's Tentative Order to terminate the Essential Air Service (EAS) program in El Centro, California located in Imperial County. I urge you to consider the negative economic impacts that may occur as a result of the proposed termination of the program.

The Imperial County Airport has a tremendous track record of surpassing the EAS program requirements put forth by the government, as they have dramatically exceeded the enplanement minimum in four of the last five fiscal years. Unfortunately, in FY 2013, the Imperial County Airport barely fell below the ten enplanement threshold, by reaching 9.5 enplanements for the first time.

As you know, the Essential Air Service was put into place to guarantee that small communities, including those within the Imperial County, continue to be served by certificated air carriers. Over the last several years, Imperial County has experienced the highest unemployment rate in the nation. Our federal government should encourage economic growth, and consider all factors before terminating a much-needed program in the region.

As you prepare the Final Order, I urge you to consider the Imperial Valley's track record over the last three fiscal years, and ask that you consider the void that will be left should the Department of Transportation ultimately decide to terminate the much-needed Essential Air Service program currently in effect at the Imperial County Airport.

Thank you for your time and consideration of my request.

Sincerely,

Jaime Honold / Vice President
Burgers and Beer



**Burgers
& Beer**

The Best Burger In Town

Main Office
260 Imperial Avenue
El Centro, California 92243
(760) 337-5788 - Office
(760) 353-4431
(760) 337-5663 FAX

May 7, 2014

Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Docket DOT-OST-2008-0299

Dear Secretary Foxx,

I write to express my concerns with the Department of Transportation's Tentative Order to terminate the Essential Air Service (EAS) program in El Centro, California located in Imperial County. I urge you to consider the negative economic impacts that may occur as a result of the proposed termination of the program.

The Imperial County Airport has a tremendous track record of surpassing the EAS program requirements put forth by the government, as they have dramatically exceeded the enplanement minimum in four of the last five fiscal years. Unfortunately, in FY 2013, the Imperial County Airport barely fell below the ten enplanement threshold, by reaching 9.5 enplanements for the first time.

As you know, the Essential Air Service was put into place to guarantee that small communities, including those within the Imperial County, continue to be served by certificated air carriers. Over the last several years, Imperial County has experienced the highest unemployment rate in the nation. Our federal government should encourage economic growth, and consider all factors before terminating a much-needed program in the region.

As you prepare the Final Order, I urge you to consider the Imperial Valley's track record over the last three fiscal years, and ask that you consider the void that will be left should the Department of Transportation ultimately decide to terminate the much-needed Essential Air Service program currently in effect at the Imperial County Airport.

Thank you for your time and consideration of my request.

Sincerely,

Kurt Honold / President
Burgers and Beer



Station:
420 Main St.
El Centro, CA 92243
(760) 352-1230

Mailing:
P. O. Box 140
El Centro, CA 92244



Secretary Anthony Foxx
U. S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Docket DOT-OST-2008-0299

Dear Secretary Foxx,

I'm writing to express my concerns with the Department of Transportation's Tentative Order to terminate the Essential Air Service (EAS) program in El Centro, California located in Imperial County. I can't urge you enough to consider the negative economic impacts that may occur as a result of the proposed termination of the program.

The Imperial County Airport has a tremendous track record of surpassing the EAS program requirements put forth by the government, as they have dramatically exceeded the enplanement minimum in four of the last five fiscal years. Unfortunately, in Fiscal Year 2013, the Imperial County Airport barely fell below the ten enplanement threshold, by reaching 9.5 enplanements for the first time.

As you know, the Essential Air Service was put into place to guarantee that small communities, including those within the Imperial County, continue to be served by certificated air carriers. Over the last several years, Imperial County has experienced the highest unemployment rate in the nation. Our federal government should encourage economic growth, and consider all factors before terminating a much-needed program in the region.

As you prepare the Final Order, I urge you to consider the Imperial Valley's track record over the last three fiscal years, and ask that you consider the void that will be left should the Department of Transportation ultimately decide to terminate the much-needed Essential Air Service program currently in effect at the Imperial County Airport.

Thank you for your time and consideration of my request.

Sincerely,

Gene P. Brister
President/General Manager
KXO AM1230/FM 107.5 Radio

Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Docket DOT-OST-2008-0299

Dear Secretary Foxx,

I write to express my concerns with the Department of Transportation's Tentative Order to terminate the Essential Air Service (EAS) program in El Centro, California located in Imperial County. I urge you to consider the negative economic impacts that may occur as a result of the proposed termination of the program.

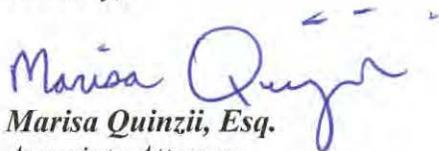
The Imperial County Airport has a tremendous track record of surpassing the EAS program requirements put forth by the government, as they have dramatically exceeded the enplanement minimum in four of the last five fiscal years. Unfortunately, in FY 2013, the Imperial County Airport barely fell below the ten enplanement threshold, by reaching 9.5 enplanements for the first time.

As you know, the Essential Air Service was put into place to guarantee that small communities, including those within the Imperial County, continue to be served by certificated air carriers. Over the last several years, Imperial County has experienced the highest unemployment rate in the nation. Our federal government should encourage economic growth, and consider all factors before terminating a much-needed program in the region.

As you prepare the Final Order, I urge you to consider the Imperial Valley's track record over the last three fiscal years, and ask that you consider the void that will be left should the Department of Transportation ultimately decide to terminate the much-needed Essential Air Service program currently in effect at the Imperial County Airport.

Thank you for your time and consideration of my request.

Sincerely,



Marisa Quinzii, Esq.
Associate Attorney
Plourd and Breeze, APC
1005 W. State Street
El Centro, CA 92243
Tel: 760-352-3130
Fax: 760-352-4763



May 7, 2014

Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Docket DOT-OST-2008-0299

Dear Secretary Foxx,

I write to express my concerns with the Department of Transportation's Tentative Order to terminate the Essential Air Service (EAS) program in El Centro, California located in Imperial County. I urge you to consider the negative economic impacts that may occur as a result of the proposed termination of the program.

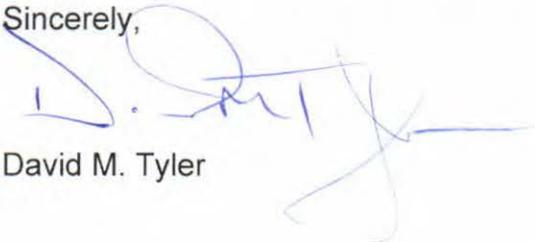
The Imperial County Airport has a tremendous track record of surpassing the EAS program requirements put forth by the government, as they have dramatically exceeded the enplanement minimum in four of the last five fiscal years. Unfortunately, in FY 2013, the Imperial County Airport barely fell below the ten enplanement threshold, by reaching 9.5 enplanements for the first time.

As you know, the Essential Air Service was put into place to guarantee that small communities, including those within the Imperial County, continue to be served by certificated air carriers. Over the last several years, Imperial County has experienced the highest unemployment rate in the nation. Our federal government should encourage economic growth, and consider all factors before terminating a much-needed program in the region.

As you prepare the Final Order, I urge you to consider the Imperial Valley's track record over the last three fiscal years, and ask that you consider the void that will be left should the Department of Transportation ultimately decide to terminate the much-needed Essential Air Service program currently in effect at the Imperial County Airport.

Thank you for your time and consideration of my request.

Sincerely,


David M. Tyler



Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Secretary Foxx,

I write to express my disappointment with the Department of Transportation's ("DOT") Final Order to terminate the Essential Air Service (EAS) program at Imperial County Airport ("IPL") located in El Centro, California in Imperial County. I urge you to consider the negative economic impacts that will occur in our local market as a result of the proposed termination of the program and our commercial air service.

Imperial County Airport ("IPL") has a tremendous track record of surpassing the EAS programs daily enplanement requirement established by the government, as they have dramatically exceeded the enplanement minimum over the last decade. Unfortunately, in FY 2013, IPL had a major disruption to its service as United Express discontinued its link to LAX and Seaport Airlines replaced the operation with flights to San Diego and Burbank. This disruption led to IPL falling *slightly* below the ten daily enplanement threshold, reaching 9.5 enplanements for the first time.

Key to the new airlines success is developing a brand in the market and important agreements with airlines that support smooth connections of passengers and bags at San Diego and Burbank. Seaport has been working hard to promote its service in the Imperial market and establish important relationships with other carriers to maximize connections for travelers.

The Essential Air Service program was developed to guarantee small communities, like Imperial County, continue to be served by certificated air carriers and have access to the National Transportation System. As you evaluate the Waiver phase of the EAS evaluation process, I urge you to seriously consider Imperial County/El Centro Airport's track record over the last decade. I/We request that you grant our airport the much needed waiver it deserves to prove it can successfully and effectively utilize the EAS subsidy to support the critical air service our market needs.

Thank you for your time and consideration of my request.

Very truly yours,

Jeff E. Brothers

By: _____
Jeff E. Brothers, President
SOL ORCHARD, LLC



May 7, 2014

Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Docket DOT-OST-2008-0299

Dear Secretary Foxx,

I write to express my concerns with the Department of Transportation's Tentative Order to terminate the Essential Air Service (EAS) program in El Centro, California located in Imperial County. I urge you to consider the negative economic impact that may occur as a result of the proposed termination of the program.

The Imperial County Airport has a tremendous track record of surpassing the EAS program requirements put forth by the government, as they have dramatically exceeded the enplanement minimum in four of the last five fiscal years. Unfortunately, in FY 2013, the Imperial County Airport barely fell below the ten enplanement threshold, by reaching 9.5 enplanements for the first time.

As you know, the Essential Air Service was put into place to guarantee that small communities, including those within the Imperial County, continue to be served by certificated air carriers. Over the last several years, Imperial County has experienced the highest unemployment rate in the nation. Our federal government should encourage economic growth, and consider all factors before terminating a much-needed program in the region.

As you prepare the Final Order, I urge you to consider the Imperial Valley's track record over the last three fiscal years, and ask that you consider the void that will be left should the Department of Transportation ultimately decide to terminate the much-needed Essential Air Service program currently in effect at the Imperial County Airport.

Thank you for your time and consideration of my request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Fidel Gonzalez', is written over a large, light-colored oval scribble.

Fidel Gonzalez
President/CEO

BRAWLEY OFFICE:
| 409 W. Main St.
| Brawley, CA 92227
| (760) 351-2988

EL CENTRO OFFICE:
| 1602 W. Main St.
| P.O. Box 3247
| El Centro, CA 92243 | 92244
| (760) 352-1540

CALEXICO OFFICE:
| 2534 Rockwood Ave. Unit 1-A
| Calexico, CA 92231
| (760) 357-5117

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935 North Imperial Avenue
El Centro CA 92243
760-353-9482
www.uniforms911.com

7 May 2014

Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: **Docket DOT-OST-2008-0299**

Dear Secretary Foxx:

I write to express **my objection** to the Department of Transportation's Tentative Order to terminate the Essential Air Service (EAS) program in El Centro, California located in Imperial County. There will be severe negative economic impacts that occur as a result of the proposed termination of the program.

Imperial County Airport has a steady track record of surpassing the EAS program requirements put forth by the DOT, as we have dramatically exceeded the enplanement minimum in four of the last five fiscal years. Unfortunately, in FY 2013, the Imperial County Airport barely fell below the ten enplanement threshold, by reaching 9.5 enplanements for the first time

Over the last several years, Imperial County has experienced the highest unemployment rate in the nation. Our federal government should encourage economic growth, and consider all factors before terminating a much-needed program in the region. The EAS improves economic growth in a region, and our region needs it more than ever. The recent, temporary downturn in enplanements is due in part to the change in air carriers, which causes people who use Expedia and other internet travel planners, to miss the availability of air service into Imperial Airport. I myself experienced this same problem shortly after the change in air carriers.

As you prepare the Final Order, I urge you to consider the Imperial Valley's track record over the last three fiscal years, and ask that you consider the void that will be left should the Department of Transportation ultimately decide to terminate the desperately-needed Essential Air Service program currently in effect at the Imperial County Airport. Also, the lost time & expense traveled by passengers who will have to use the San Diego airport (a 350-mile round trip), and the extra greenhouse gasses polluting the environment produced by all those extra car trips, are not considered in your proposed Termination Order. **Please rescind the Tentative Order to Terminate the Essential Air Service (EAS) program in El Centro, California.**

Very Truly Yours,

Bill DuBois
El Centro CA

May, 9 2014

Secretary Anthony Foxx

U.S. Department of Transportation

1200 New Jersey Avenue, SE

Washington, DC 20590

RE: Docket DOT-OST-2008-0299

Dear Secretary Foxx,

I write to express my concerns with the Department of Transportation's Tentative Order to terminate the Essential Air Service (EAS) program in El Centro, California located in Imperial County.

Mr. Foxx I moved to the Imperial Valley in California only a year ago, but I did notice one thing almost immediately. The Imperial Valley has one of the highest unemployment rates in the country, but this could be changed. At this moment there are solar and wind farms being built in the Imperial Valley, and they require skilled laborers. As more solar and wind farms are built, I only see this need increasing over time. These skilled laborers are coming in from outside of the Imperial Valley at this time, and they need a local airport to service many of their needs. There are local businesses in the area that also need a local airport to service their needs too. The Imperial Valley is made up of small businesses, and as we all know small businesses are the backbone of the American economy.

At this time Sea Port Airlines is the only airline servicing the air travel needs of the Imperial Valley, which was 5,950 passengers last year. Sea Port Airlines is a small business, and closing the Imperial County Airport would cost them the sale of those airline tickets. I am sure that isn't a whole lot of money if you compare it with the ticket sales of a much larger airline. It is a lot of revenue if you are a small airline like Sea Port. Today I see so many of the large airlines merging into even bigger airlines, and I feel that is cutting down on competition. We need to help out small airlines like Sea Port so that they may grow and become competition to the airline giants. The closing of the Imperial County Airport would also affect the other areas and states the Sea Port Airlines services, places like Pendleton Oregon, and Athens Georgia.

The Imperial County Airport has a tremendous track record of surpassing the EAS program requirements put forth by the government, as they have dramatically exceeded the enplanement minimum in four of the last five fiscal years. Unfortunately, in FY 2013, the Imperial County Airport barely fell below the ten enplanement threshold, by reaching 9.5 enplanements for the

first time. As you know, the Essential Air Service was put into place to guarantee that small communities, including those within the Imperial County, continue to be served by certificated air carriers.

As you prepare your final order, I hope that you consider the Imperial County Airports track record over the past few years as well as the economic impact to Sea port Airlines, the other airports the service, and the Imperial Valley. Thank you for your time in reading and considering my request.

Sincerely, Aaron Leach

County Executive Office

Ralph Cordova, Jr.
County Executive Officer



County Administration Center
940 West Main Street, Suite 208
El Centro, CA 92243-2875
Telephone: (760) 482-4290
Fax: (760) 352-7876
ralphcordova@co.imperial.ca.us
www.co.imperial.ca.us

Memo

May 21, 2014

From: Ralph Cordova, Jr.

To: All Department Heads

Subject: Travel with Seaport Airlines

The Imperial Airport is currently being served by Seaport Airlines with scheduled round-trip air service to San Diego and Burbank. The existing Essential Air Service funding provided by FAA is in jeopardy unless passenger travel from our airport is maintained above a certain level. In order to help sustain this vital connection, I am requesting that all county departments strongly consider the use of Seaport's service when making out-of-county travel requests.

Besides the obvious benefit of retaining local passenger air service, there are other reasons to utilize the Seaport option. All of our most common travel destinations are readily available from connecting flights out of San Diego or Burbank. Flying out of Imperial eliminates the expense of driving to San Diego or elsewhere to catch a flight, and parking at our Imperial County Airport is free. In addition, Seaport offers very reasonable fares, especially if booked far enough in advance. The use of employee's time is another factor – instead of burning up hours driving to San Diego, they can leave directly from here. All flight schedule, fare and reservation information can be viewed at www.seaportair.com.

A revised Travel Justification form is attached for your use, which includes a question about airline selection. All future travel requests submitted to this office will be scrutinized and may be subject to denial if a non-local airline choice is not adequately explained.

Please distribute this memo to the appropriate personnel in your departments, especially those responsible for making travel arrangements.

Thank you.