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Federal Aviation Administration

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July 15, 2002

John Schommer  
FAA Obstruction Evaluation Specialist  
222 West 7<sup>th</sup> Ave, #14  
Anchorage, AK 99513

Dear Mr. Schommer,

At your request, I have reviewed the 6 Bridge Alternatives between Revillagigedo Island and Gravina Island to determine how each will affect SVFR operations conducted under Exemption 4760 in the Ketchikan area.

The authority to grant, deny or amend an exemption lies only with the Director of Flight Standards, AFS-1. However, because the Juneau FSDO has local knowledge of the SVFR operations in Ketchikan, we often make recommendations to interested parties.

It is my opinion that each of the proposed bridges would require at the least, an amendment to Exemption 4760. Since Exemption 4760 allows aircraft to fly as low as 200ft, obviously a 250 ft high bridge presents an hindrance. If Exemption 4760 is to remain in effect, it's physical boundaries would have to be redrawn to keep traffic away from the bridge and/or its altitudes amended. It is possible that a bridge could create a greater hazard to safety, than the benefits of Exemption 4760 warrant.

Alternatives C3(a), C3(b), C4, and D(1) all propose building a bridge near the airport, which could be considered the center of the Class E Surface Area. These bridges would hinder aircraft flying in bound from the West to Ketchikan Harbor. It is my opinion that if any of these bridges are built, at a minimum the boundaries of Exemption 4760 would have to be modified to exclude any airspace West of the airport. This would greatly reduce the effectiveness of Exemption 4760, to the point that less than 10% of the current operations conducted under Exemption 4760 would still be allowed.

Alternative F(3) proposes building 2 bridges on Pennock Island, which is nearly outside the Class E Surface Area to the East. Both bridges appear to be outside of the current boundaries of Exemption 4760 airspace (as established in the airspace agreement between KTN FSS and the 135 Operators). To

reiterate, the boundaries of Exemption 4760 are significantly smaller than the boundaries of the Class E Surface Area. The bridge nearest to the Exemption 4760 airspace is proposed to be less than 100 feet high. But because of the close proximity of the bridge to the Exemption 4760 airspace, it is my opinion that the east boundaries and possibly the altitudes of Exemption 4760 would still need to be adjusted, but to a lesser degree.

Because each of the proposed bridges is within close proximity to the seaplane landing areas, it is my opinion that aircraft will be able to fly closer than 500 feet to the bridges without violating minimum altitudes because it will be necessary for take off and landing. This will happen during VFR as well as normal SVRF operations. Because of the constant floatplane operations, there will of course be several complaints and conflicts with automobile drivers.

In summary, it is my opinion that each of the Bridge Alternatives would require changes to Exemption 4760, but Alternative F(3) would be the least disruptive. As I stated above, this is my professional opinion. The final authority over exemptions lies with AFS-1.

Sincerely,

A handwritten signature in black ink, appearing to read 'MJG', with a long horizontal flourish extending to the right.

Mick J. Green  
Principal Operations Inspector