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BY REGULATIONS.GOV

April 10, 2020

Docket Operations and Media Management  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
West Building Ground Floor  
Room W12-140  
Washington, D.C. 20590

**Re: Docket DOT-OST-2020-0037, Maui County Mayor Letter of Support for Exemption  
Request of Hawaiian Airlines from Obligation to Serve Lahaina and Certain Mainland  
Points**

On behalf of Hawaiian Airlines, Inc. (“Hawaiian”), enclosed please find a letter of support of the above-referenced application for an exemption of Hawaiian’s obligation to serve Lahaina and certain points on the mainland United States from the Mayor of the County of Maui Michael P. Victorino.

Importantly, please note that the point of Lahaina is within Mayor Victorino’s jurisdiction. Mayor Victorino supports Hawaiian’s application to for an exemption from its obligation to serve Lahaina because adequate air service can be provided to the island of Maui at its primary airport, Kahalui Airport.

Should you have any questions, please contact me.

Sincerely,

A handwritten signature in black ink, reading "J. Parker Erkmann", is positioned above a solid horizontal line.

J. Parker Erkmann  
Counsel for Hawaiian Airlines, Inc.

Enclosures

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing letter of support was served this 10th day of April 2020 via email transmission or U.S. mail on the following:

dheffernan@cozen.com (Alaska)	mayor@boston.gov (Boston Mayor Martin J. Walsh)
agoerlich@ggh-airlaw.com (Allegiant)	efreni@massport.gov (Massport Director of Aviation)
robert.wirick@aa.com	officeofthemayor@lasvegasnevada.gov (Las Vegas Mayor)
alex.krulic@delta.com	VassiliadisR@mccarran.gov (Las Vegas Airport Director)
chris.walker@delta.com	smarinko@panynj.gov (Law Department (Port Authority of New York and New Jersey)
steven.seiden@delta.com	brubinst@panynj.gov (Port Authority of New York and New Jersey)
robert.cohn@hoganlovells.com (Frontier)	mayor.gallego@phoenix.gov (Phoenix Mayor)
patrick.rizzi@hoganlovells.com (Frontier)	james.bennett@phoenix.gov (Phoenix Airport Director)
robert.land@jetblue.com	mayorwheeler@portlandoregon.gov (Portland Mayor)
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esahr@eckertseamans.com (JetBlue)	nicholc@saccounty.net (Sacramento Director)
dderco@eckertseamans.com (JetBlue)	SupervisorSerna@saccounty.net (Sacramento Supervisor)
bob.kneisley@wnco.com	kevinfaulconer@sandiego.gov (San Diego Mayor)
leslie.abbott@wnco.com	kbecker@san.org (President of San Diego County Regional Airport Authority)
dkirstein@yklaw.com (Spirit)	Tyson.miyake@co.maui.hi.us (Office of the Maui Mayor Michael Victorino)
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/s/ Erin Combs  
Erin Combs

MICHAEL P. VICTORINO  
Mayor

SANDY K. BAZ  
Managing Director



COUNTY OF MAUI  
**OFFICE OF THE MAYOR**  
200 SOUTH HIGH STREET  
WAILUKU, HI 96793

April 9, 2020

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

Dear Secretary Chao:

**Re: Docket DOT-OST-2020-0037, Continuation of Certain Air Service under the CARES Act**

I would like to start by expressing my thanks to the Department of Transportation for recognizing the importance of air travel to and between the islands of the State of Hawai'i, especially during this national health crisis. Our state is uniquely dependent on air transportation to move critical supplies and personnel. However, the transportation of passengers from outside our state also poses serious risks of spreading the deadly COVID-19 infection.

On March 22<sup>nd</sup> I issued a stay at home quarantine directive for Maui county that included mandatory 14-day quarantine protocols for all travelers into the county. On April 1<sup>st</sup> I sent a letter to President Trump imploring him to stop air travel to Hawai'i for non-essential purposes. These requests are shored up by Governor Ige's statewide mandatory 14-day quarantine on passengers traveling to and between our island state.

These provisions have in large measure been effective and have accomplished what they are intended to do and that is to discourage non-essential travel to the state. Visitor arrivals have plummeted on average by 95% and I applaud Hawaiian Airlines for leading the way in reducing its schedule significantly in response to these directives.

I understand the Department of Transportation issued an order requiring that air carriers reinstate minimum service levels to the State of Hawai'i. For example, that order would require Hawaiian Airlines to reinstate air service between Hawaii and Boston, Las Vegas, New York, Phoenix, Portland, Sacramento, San Diego, and Seattle at least three times per week. I also understand that Hawaiian has requested an exemption from this requirement. I fully support the Department's grant of Hawaiian Airline's exemption request.



In addition, I understand that Hawaiian Airlines has requested an exemption for its obligation to serve the point of Lahaina and specifically Kapalua Airport (JHM) on the island of Maui. I fully support Hawaiian's request for his exemption. Kahului Airport (OGG) is Maui's primary airport. Both JHM and OGG are within my jurisdiction. OGG has robust cargo facilities and can accommodate mainline aircraft flown by the nation's largest airlines, including Hawaiian Airlines' primary inter-island B717 aircraft. All required services to the island of Maui should be provided through OGG. In this time of crisis, mandatory service to JHM would not serve any practical purpose. JHM's facilities are primitive in comparison to OGG; JHM can only support commuter aircraft. JHM has only a single runway, and there are no air cargo facilities at the airport. JHM and OGG are located only 30 miles apart by road. Any transportation need that might be mandated at JHM can be better served at OGG. Indeed, Hawaiian has been providing needed supplies and moving critical personnel by serving OGG with multiple operations from HNL per day during this crisis. Requiring Hawaiian to serve JHM *jeopardizes* services to our community. I request that you grant Hawaiian's application for an exemption from its obligation to serve Lahaina.

At this time, Maui County, which comprises three (3) islands in the state, does not want these additional air services reinstated. My primary goal is protecting the health and safety of the citizens of the 3 islands and jurisdiction that I care for and represent. That means limiting the number of visitors to Hawai'i until the health threat has passed and the restrictions placed on Hawaiian Airlines have been lifted. We have been working with Hawaiian and other airlines to ensure that critical supply lines remain intact. The services contemplated by the Order are not required at this time.

We rely on the significant contributions air transportation provides to our economy. We look forward to a time when we can once again welcome visitors to our islands.

Should you have any questions or concerns, I may be reached through my Executive Secretary Darlene Ane at 808-270-5535.

Sincerely,

A handwritten signature in black ink that reads "Michael P. Victorino". The signature is fluid and cursive, with the first name "Michael" being the most prominent.

MICHAEL P. VICTORINO  
Mayor  
County of Maui