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March 14, 2011

Dr. Frank Kelly  
Regional Director  
National Weather Service Alaska Region  
222 West 7<sup>th</sup> Avenue #23  
Anchorage, AK 99513

Dear Dr. Kelly:

The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 members nationwide, submits the following comments on a recently announced decision by The National Weather Service (NWS) to discontinue weather reporting at two stations on the west side of Cook Inlet, AK that are important to the aviation community. Hayes River and Big River Lakes are both at strategic locations on routes that connect major population centers of the state with western and southwestern Alaska. Due to the lack of roadway infrastructure in these areas, aviation is the major mode of transportation, with a heavy reliance on Visual Flight Rules (VFR) operations given to the remote nature of many destinations in smaller communities, lodges and recreational areas.

Hayes River (PAHZ) is situated at the east end of Rainey and Ptarmigan Passes that connect Anchorage, the Mat-Su Valley and Kenai Peninsula with western Alaska. The current A-Paid station located at a choke point in the mountain pass that pilots report is often where they encounter weather conditions significantly different from what is experienced in the pass, or at Skwenta, the next reporting station in the Mat-Su Valley. The report from this location is often a go/no-go decision point for pilots planning to transit the pass.

Big River Lakes (PALV) is located at the east end of Lake Clark Pass, which connects the same population centers with southwestern Alaska. It is also used by pilots flying along the west side of Cook Inlet enroute to the Alaska Peninsula. This station is at a bend in the pass often associated with weather conditions that interfere with VFR operations. While there are weather cameras in Lake Clark pass, they are located at higher elevation, and are reportedly frequently out of service. Our members indicate that they use the Big River Lakes observation as a key indicator of whether to depart on a flight through this area, and for traffic that continues down the west side of Cook Inlet.

Based on numerous comments received on this issue, our members report that they fly through these mountain passes on a year-round basis, with a higher frequency (between weekly and daily) in the spring, summer and fall months. Use drops off to between weekly and monthly during other times of the year.

AOPA understands that the National Weather Service is working with the Federal Aviation Administration (FAA) Alaska Region to evaluate a variety of means to obtain weather information in these areas. The responses from our members indicate that these are both important locations to the aviation community for operations under visual flight rules. Some members indicated that they

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monitor these stations frequently to determine if weather conditions will allow them to depart. Without reports from these areas, pilots are forced to “go take a look” which is a safety concern. We strongly encourage both agencies to find a solution to providing weather for these locations.

AOPA also understands that the National Weather Service is looking at the remaining A-Paid stations that they support in Alaska in response to budget concerns. Alaska already suffers from a sparse network of weather observations. Preliminary results from an FAA study of recent aircraft accidents in Alaska indicates that flight from VFR to Instrument Meteorological (IMC) conditions is the cause of about 20% of the serious aviation accidents. Almost 80% of these accidents involve one or more fatality. At a time when the FAA is focused on reducing the accident rate, it is critically important to maintain important tools for pilots that enable them to evaluate current weather conditions and make an informed go/no-go decision. AOPA requests that both the FAA and NWS work collaboratively with the user community prior to making decisions that will affect the availability of weather reporting. Such a process needs to be transparent and involve engagement with the pilot community who utilize these services.

To date, a number of AOPA members have commented on the NWS’s decision to close the weather reporting stations. The overall theme reported is that weather in Alaska is dynamic and changes frequently. Having the weather reports from the two affected stations provides a bigger picture view overall, and specifically for these two areas which are reported by members as frequently traveled.

While we support consideration of other means of collecting weather, it is important not to reduce the amount of weather data available to forecasters and pilots for operational decision making. We are committed to working with both the NWS and FAA to help find solutions to augmenting the weather reporting network in Alaska.

Sincerely,

A handwritten signature in black ink, appearing to read "Heidi J. Williams", with a stylized flourish at the end.

Heidi J. Williams  
Senior Director  
Airspace and Modernization

cc. Bob Lewis, FAA Alaska Regional Administrator  
Jeff Osiensky, NWS Alaska Regional Aviation Meteorologist