

REMARKS FOR MARCH 29<sup>TH</sup>, 2011 - MEETING SKI OPERATIONS. DRAFT DECISION MEMO AND MATRIX.

THE MEMORANDUM AND MATRIX USE TERMS WHICH DESCRIBE CONDITIONS THAT WHEN PRESENT JUSTIFIES THE AIRPORT STAFF CLOSURE OF ALL OR PORTIONS OF THE LAKE HOOD SEAPLANE BASE AND GRAVE STRIP.

THE THESE TERMS ARE NOT WITHOUT FURTHER DEFINITIONS OF PARAMETERS, AND SUPPORTED BY STATISTICAL DATA DO NOT THEMSELVES CLEARLY DEFINE CONDITIONS WHICH ARE UNSAFE FOR ALL TYPES OF AIRCRAFT.

WHAT WE HAVE GOTTEN OURSELVES INTO IS THE POSITION WHERE AIRPORT MANAGEMENT IS LOOKING TO FIND REASONS TO CLOSE THE FACILITY AS OPPOSED TO KEEPING IT OPEN.

IF MANAGERMENTS #1 GOAL WAS KEEPING THE LAKE HOOD SEAPLANE BASE **OPEN** THEN INSTEAD OF AIRPORT MANAGEMENT ASKING US THE GENERAL PUBLIC TO TELL THEM WHEN THEY SHOULD BE ALLOWED TO CLOSE THE FACILITY, THE ROLE WOULD BE REVERSED.

AIRPORT STAFF WOULD BE REQUESTING PERSONS WANTING THE AIRPORT CLOSED – BE IT THE GENERAL PUBLIC OR STATE OR FEDERAL STAFFERS TO MAKE THE CASE FOR CLOSING THE FACILITY REQUIRING THEM TO SUPPLY AIRPORT MANAGEMENT WITH SCIENTIFIC, ANALYTICAL AND STATISTICAL DATA SUPPORTING THE NEED FOR CLOSURE. AND THE CLOSURE OF THE FACILITY FOR WHICH LACKED

SCIENTIFIC, ANALYTICAL AND STATISTICAL DATA WOULD NOT BE EVEN CONSIDERED.

IF PRIMARY GOAL WAS KEEPING THE FACILITY OPEN, REASONS FOR CLOSURE THAT ARE NOW ACCEPTED USING SUBJECTIVE TERMINOLOGY LIKE *OVERFLOW - CONDITIONS UNKNOWN - ROUGH ICE - THIN ICE - UN-GROOMED SNOW - TOO MUCH SNOW - WATER ON ICE - MEN AND EQUIPMENT WORKING OR ON RUNWAY - WOULD REQUIRE* DEFINING THESE TERMS BEFORE THEY ARE USED TO DEFINE A REASON FOR CLOSURE. JUST DEFINING THESE TERMS WOULD NOT ALONE BE SUFFICIENT JUSTIFICATION TO CLOSE A FACILITY. THERE WOULD NEED TO BE ANALYTICAL AND STATISTICAL DATA BACK UP. SUCH AS ACCIDENT STATISTICS AND A DETERMINATION THAT SUCH WERE HIGHER THAN A NATIONAL AVERAGE OR SOME OTHER RECOGNIZED DATA LINE.

THE AIRPORT MANAGEMENT RATIONALE FOR CLOSING ITS LAKE HOOD SEAPLANE BASE AND STRIP FOR SOME OR ALL TERMS I JUST STATED ARE NOT SUFFICIENT REASONS AS STATISTICAL DATA FAILS TO SUPPORT THAT CLOSING THE LAKE HOOD SEAPLANE BASE HAS CAUSED FEWER ACCIDENTS TO OCCUR.

WHILE THE AIRPORT HAS BEEN CLOSED AIRCRAFT WERE ALLOWED FOR THE PAST 29+ YEARS TO OPERATE ON AND OFF THE CLOSED FACILITY. THE STATISTICAL DATA FOR THAT 29 YEAR PERIOD IN THE FORM OF NTSB ACCIDENT REPORTS (1982 THROUGH MARCH 1, 2001) DOES NOT INDICATE ANY ACCIDENT WHICH WAS ATTRIBUTABLE TO THE CONDITIONS WHICH THE AIRPORT MANAGEMENT GAVE FOR CLOSING THE LAKE HOOD SEAPLANE BASE AND GRAVEL STRIP.

NTSB WEB SITE SHOWS FROM 1982 TO THE PRESENT TIME

1. THE LAKE HOOD STRIP (Z41) HAD 39 ACCIDENTS
2. THE LAKE HOOD SEAPLANE BASE HAD TOTAL OF 36 REPORTABLE INCIDENTS.
  - a. 27 OF THE 36 WERE FLOAT PLANES OPERATING ON THE WATER
  - b. ONLY 9 OF THE 36 WERE AIRCRAFT OPERATING ON THE FROZEN SURFACES.

MY REVIEW OF THE REPORT INDICATES THE MOST SERIOUS DAMAGE TO AIRCRAFT OCCURRED FROM CRASHES ON TAKEOFF WHICH CRASH OCCURRED OFF RUNWAY. THE NEXT MOST SERIOUS DAMAGE OCCURRED TO FLOAT AIRCRAFT. OF THE 9 AIRCRAFT DAMAGED WHILE OPERATING WHILE THE LAKE HOOD SEAPLANE WAS FROZEN OVER INDICATED ONLY MINOR DAMAGE, NO PERSONAL INJURIES AND THAT THE REASONS FOR A LOT OF THE ACCIDENTS WAS ATTRIBUTABLE TO UN-REPAIRED DAMAGE SUSTAINED IN AND EARLIER OFF AIRPORT INCIDENT WHICH THE PILOT KNEW ABOUT. AND SUSPECT MIGHT BE A PROBLEM WHEN LANDING AT LAKE HOOD.

IF AIRPORT MANAGEMENT GOAL WAS TO KEEP THE AIRPORT OPEN IT WOULD NOT HONOR REQUEST FROM AIRPORT STAFFERS, ATTORNEYS, RISK MANAGEMENT PERSONNEL OPERATIONS PERSONNEL ECT, TO CLOSE THE AIRPORT FOR SAFETY OR LIABILITY ISSUES UNLESS THOSE REQUESTING CLOSURE COULD PRODUCE DOCUMENTED EVIDENCE, STATIC'S DATA WHICH CLEARLY SHOWED

THE ACCIDENT RATES WERE EXCESSIVE BASE ON NATIONAL STATIC'S. I HAVE NOT SEEN SUCH A STATIC AND THE AIRPORT MANAGEMENT HAS NOT OFFERED ANY.

AIRPORT MANAGERMENTS DECISION MEMORANDUM IS SO FACTUALLY (see high lighted portions) FLAWED WITH UNTRUE AND UNSUPPORTED STATEMENTS AND FACTS. IS NOT BE WORTHY OF CONSIDERATION. THE MATRIX FIRST OF HAS BEEN CHANGED FROM THE PRIOR MATRIX GIVEN ON OUT MARCH 1, WITHOUT ANY EXPLANATION OF FOR THE CHANGE. THE DOES NOT DEFINE THE SUBJECTIVE TERMS USED. WHICH LEAVES THE TERMS OPEN TO INDIVIDUAL INTERPRETATION.

AGAIN IF AIRPORT MANAGERMENTS PRIMARY GOAL IS TO KEEP THE AIRPORT OPEN THEN THERE IS NO NEED FOR THIS DECISION MEMORANDUM OR MATRIX.

IN CONCLUSION I HAVE NOT SEEN STATISTICAL DATA WHICH SUPPORT THE AIRPORTS MANAGERMENTS ARGUMENTS FOR CLOSING THE LAKE HOOD SEAPLANE BASE ON THE SUBJECTIVE TERMS USED IN THE PAST. THE AIRPORTS MANAGEMENT HAS NOT SHOWN TO DATE ANY JUSTIFIABLE CIRCUMSTANCE OR REASON FOR CLOSING THE FACILITY.