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October 19, 2010

The Honorable Gary W. Bauer
The Honorable Mike Adelman
The Honorable Larry J. Silcox
Huron County Commissioners
180 Milan Avenue
Norwalk, OH 44857

Dear Commissioners:

The Aircraft Owners and Pilots Association (AOPA) represents the general aviation interests of 405,000 members, more than two-thirds of the nation's pilots – including 12,539 in the state of Ohio. AOPA is committed to ensuring the future viability and development of general aviation airports and their facilities as part of a national and state transportation system.

We are writing to express our concerns over recent newspaper articles sent to us describing a movement to close the Norwalk-Huron County Airport (5A1) in order to allow the Summit Motorsports Park to expand and acquire the airport. AOPA certainly understands your interest in supporting the Motorsports Park, but we must strenuously object to such a drastic measure as closing such a valuable asset to the community as the airport and selling off the land. It is also our understanding that the Federal Aviation Administration (FAA) met with the Airport Authority and the County Commissioners recently and laid out their concerns with this proposal, including specifically telling the County that they cannot close the airport.

There are several factors that preclude the county's ability to close the airport. First and foremost is the fact that the County, as the airport sponsor, has accepted more than \$1 million dollars in FAA Airport Improvement Program (AIP) funds since 1985. \$989,283 of that are considered current grants with obligations to keep the airport open as an airport until 2027. In 2003 and 2007 a total of \$486,502 in federal funds purchased land for airport use. Under FAA policy the use of federal funds to purchase property for the airport obligates the sponsor to keep the entire facility in use as an airport in perpetuity.

While the FAA has a process in place that allows an airport sponsor to petition the Associate Administrator of Airports for release from the grant obligations, the FAA is not interested in allowing publicly owned, public use airports to close. To underscore the FAA's position on this enclosed are three letters for your information. Two letters deal with the Albert Whitted Airport in St. Petersburg, FL and the third is the FAA's detailed response to the City of Bakersfield, CA when they petitioned the FAA to release them from their obligations because the airport was not self-sustaining and the City was supporting them with part of the City's funds. In both cases and in other examples as close as the Elyria-Lorain County Airport the FAA is adamant that federally obligated airports will remain open.

Second, the airport has a current master plan and airport layout plan that depicts a shift of the runway to the west in order to better accommodate ingress and egress from the Motorsports Park. Instead of discussing closing the airport the County should be working with the FAA to implement the projects on that FAA-approved document. There is no reason to believe that the airport and the Park cannot be compatible attractions for the County, providing a destination point and attracting more business aviation uses in addition to the personal aviation currently at the airport. Close coordination and cooperation between the County, the Motorsports Park and the FAA is necessary for this to happen.

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Third, one of the newspaper articles we reviewed mentioned the possibility of building a new airport somewhere else in the county. While this may be a desired avenue at some point in the future, it is not a realistic plan for immediate results. It takes between 7 to 10 years to build a new airport starting from square one. This includes conducting a feasibility study and site selection process, updating the Ohio State Aviation System Plan and the National Plan of Integrated Airport Systems, preliminary environmental planning, land acquisition, master planning, an environmental impact analysis and finally airport development – engineering design and construction. While all this is going on and being paid for by the airport sponsor, the current airport must be kept open until such time as the new airport is operational. The proceeds from the sale of the old airport will be used to pay for the new airport, but the FAA will not fund two airports at the same time. It is our understanding that the Motorsports Park owner is looking for something faster than this particular process. Again, closure of the airport is not the quickest option, rather working with the FAA to begin the process of shifting the runway would be a faster solution.

Fourth, even if a decision is reached with respect to shifting the runway, the Motorsports Park will need to utilize the airport as a method of ingress and egress next year for several of their larger events. This will require securing permission from the FAA and ensuring that there is a safety plan in place to prevent the mixing of aircraft and motor vehicles on the movement surfaces of the airport. Additionally, if this plan includes closing the airport, no matter how temporary, the Motorsports Park must compensate the County as the airport sponsor for its use of the airport at a rate commensurate with the use. As a suggestion, the County's matching share for upcoming projects related to shifting the runway should be considered as a reasonable fee.

In summation, AOPA is strongly opposed to the closure of the Norwalk-Huron County Airport. We respectfully suggest that the County seriously look at shifting the runway as depicted on the airport layout plan. Thank you for your consideration of our views on this issue. If we can be of further assistance please contact me at 301-695-2200.

Sincerely,



John L. Collins
Manager
Airport Policy

Enclosures

cc:

Mr. Alex Erskine, Program Manager, Federal Aviation Administration Detroit Airports District Office
Mr. James Bryant, Aviation Administrator, Ohio Department of Transportation, Division of Aviation
Mr. Ronald Davis, President, Ohio Aviation Association
Mrs. Deborah Lake-Wagner, AOPA Airport Support Network Volunteer 5A1