



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

March 22, 2011

**Detroit Airports District Office  
11677 South Wayne Road  
Suite 107  
Romulus, MI 48174**

Mr. Dennis Sokol  
President, Huron County Airport Authority  
Huron County Board of Commissioners  
961 US Route 20 E  
Norwalk, Ohio 44857

Dear Mr. Sokol:

Norwalk Huron County Airport, Norwalk, Ohio  
Proposed Egress Plan for Summit Motorsports Park

We have completed our review of public comments received during the 30 day comment period. We have carefully considered these comments and a summary of the results is enclosed.

The FAA does not endorse, nor condone, options that unreasonably deny aeronautical access to federally funded airports. However, in accordance with 49 U.S.C. 47107(a)(8), the FAA will consider proposals for temporary, nonaeronautical airport closures that provide significant and immediate benefits to the airport, included among these are financial considerations.

As you know, the Norwalk Huron County Airport received over \$650,000 in federal funding since 2006 for projects at the airport. Many of these projects completed included: designs necessary to enhance safety and rehabilitate critical airport infrastructure, removal of obstructions in the approach to Runway 10, rehabilitation of taxiway, apron and runway lighting, land acquisitions, and airport drainage improvements. The FAA is charged with ensuring the taxpayers' investments in the national system of airports through these grant projects is protected. Allowing nonaeronautical closures is not consistent with the FAA's goal to protect and enhance the aviation system. However, the FAA does understand that there may be limited, unique occasions when such a use may provide a greater benefit to civil aviation in the long term. For example, Norwalk-Huron County Airport has a pending grant application on file with the FAA requesting \$557,895 to remove obstructions and rehabilitate apron pavement. The FAA believes these are necessary projects to sustain the airport's long term needs.

As we reviewed the comments regarding this proposed temporary closure a significant number of commenters cited an economic impact study which found the Motorsports Park generates \$99 million in annual economic benefits for the town and surrounding communities. We also learned that during the comment period, the Motorsports Park offered discounted tickets (nearly \$3.00 per ticket) to race fans as an incentive to send the FAA comments in support of the proposed temporary airport closures. In addition, the FAA found a majority of commenters supported the proposed temporary closure because of the financial benefit it would have for the airport.

Clearly, there is a significant economic benefit to the Motorsports Park and the community to use the airport; thus, the FAA, as well as most commenters, believes this benefit should be shared with the airport. The FAA has set forth a plan below that will ensure protection of the airport and the taxpayer investment, as well as provide the airport with the financial support it needs to achieve these goals. In this specific instance, based on the comments and all pertinent information that has been provided, the airport and its users must be compensated for any use of the airport's property for these events.

**Financial Benefit** - The nature of the request makes it difficult to establish a fair market appraisal value. The FAA considered recommending \$3.00 per ticket sold for each event necessitating an airport closure. However, based on published attendance figures for events, this amount could be far in excess of what has typically been required to operate the airport. As such, we are willing to allow this closure if the event sponsor compensates the airport's operating fund in the amount of \$35,790 for all five events. This amount represents the County's general fund contribution to the airport in each of the years 2006 through 2008 and the local match needed for half of the \$600,000 in federal grant funds currently available to the airport. This amount excludes any funds needed for clean-up, repairs, or personnel necessary to carryout the event plan. Therefore, the Airport Authority must receive a written contractual commitment from Summit Motorsports Park that these costs will be reimbursed in a timely manner and without undue protest or delay. The Airport Authority should develop a plan to accurately document these expenses. For example, the FAA recommends appointing airport board members or perhaps tenants to inspect the airport and make recommendations for damages, repairs, and remediation after each temporary closure. The FAA's primary concern is safety. Thus, this approval is also contingent upon liability assurances from the event sponsor that the airport property will be returned to its pre-closure condition prior to re-opening its runway, and this will occur within the time periods approved for closure cited below.

This letter serves only as a conditional approval. In order for the FAA to provide final approval, the airport sponsor, in coordination with the event sponsor, must submit the following to my office no later than 30 days prior to the first proposed temporary closure. The FAA will review the submissions, and if deemed acceptable, will provide the airport sponsor with a final approval notice.

**Special Event Operations Plan covering the following at a minimum:**

1. Provide a diagram depicting the portions of the airport that will be used. Please include any barricade locations and type used to carry out the plans. Sufficient lighted barricades must be provided and maintained to physically prevent inadvertent entry onto areas not intended for vehicle traffic during the event. Also include a narrative that explains why the alternate egress can not be carried out utilizing any other plan and property.
2. Provide sample NOTAM(s) language the airport sponsor intends to use to carry out this plan. Please keep in mind it is the airport sponsor's responsibility for issuing and maintaining the appropriate NOTAMs associated with this activity.
3. Provide locations and functions of personnel necessary to carry out the plan. The FAA will require at least one airport sponsor agent, whether it be an airport manager or board member or tenant, inspect the airport prior to resuming normal operations after each event. This person will certify the condition of the airport prior to its reopening. This person's time as charged to the airport must be reimbursed to the airport fund by the event sponsor in addition to the \$35,790 cited above.
4. When the airport is temporarily closed, the runways should be clearly designated closed with "X's" in accordance with AC 150/5370-2E, paragraph 3-8 (c). Lighted "X" is preferred. The airport may not be charged for procuring any barricades or lighted "X"s used in conjunction with these events. Any equipment required to meet the FAA's safety standards must be purchased either directly by the event sponsor or must be refunded to the airport fund within 30 days of purchase. The airport beacon, runway and taxiway lights, and other navigational aids must be turned off during the temporary closures.
5. Please describe how adequate oversight is maintained throughout the set-up and tear down of the event.
6. Describe the procedures that will be utilized prior to reopening any portion of the airfield, in accordance with the airport self-inspection program. The inspection shall include emphasis on the presence of Foreign Object Debris (FOD) that could damage aircraft, and any area on the airfield where accidents or incidents occurred during the event. Again, the FAA will require an airport appointed person certify the conditions of the airport.
7. Liability/Risk - identify how the proposal will avoid or at least significantly mitigate risks to airport users, aviation system users, the airport directly, and the event participants and spectators. e.g. proof of and extent of insurance, named insured (including the airport as a named insured). Additionally the Motorsports Park must agree to will reimburse the airport for any submitted claims of damage, liability, and

injury resulting from any future unauthorized access in conjunction with ingress to or egress from the Motorsports Park. Any unauthorized access will also be grounds for termination of any future use agreement.

8. Submit a diagram clearly depicting where federal investments have been spent on airport infrastructure impacted by the egress plan.

Pending receipt and approval of the above and documentation of the \$35,790 compensation, the FAA will allow the Airport Authority to close and allow for restricted operations during the following dates and times subject to the aforementioned conditions.

May 14, 2011	9 p.m. to 1 a.m.
June 24, 2011	9 p.m. to 1 a.m.
June 25, 2011	4 p.m. to 8 p.m.
June 26, 2011	4 p.m. to 8 p.m.
August 13, 2011	9 p.m. to 1 a.m.

Safety cannot be compromised, and we reserve the right to terminate our concurrence with the event based upon a valid complaint or safety concern at any time. Please keep in mind this concurrence is for the events in 2011 outlined above and does not guarantee such approval will be granted for future events. Approval of any future requests for this type of activity will be based on the progress made toward an ultimate solution that allows for the use of the Motorsports Park with no impact to the airport or its users.

Please submit your aeronautical study for a special event as soon as possible so coordination of the plan can begin. If there are any questions, please do not hesitate to contact me at 734-229-2900.

Sincerely,



Stephanie R. Swann  
Assistant Manager  
Detroit Airports District Office

cc: Airport Compliance Office, Washington DC  
ODOT, Office of Aviation

## **Summary of Comments**

Approximately 45% of the comments supported the temporary closure request. Almost half of these supported the temporary closure because it would improve their personal experience at the races.

Approximately 27% described the temporary closure plan as a positive opportunity for the airport itself. Many of these comments note that the airport will financially benefit as a result of the arrangement.

Approximately 18% supported the temporary closure request because of the economic boost and benefits provided by Summit Motorsports Park. Many of these comments cited an economic impact study which found that the Motorsports Park generates \$99 million in annual economic benefits for the town and surrounding communities.

Approximately 10% of the comments opposed the temporary closure request.