



CITY OF CLEVELAND  
Mayor Justin M. Bibb

# Regulatory Path to Closing BKL

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*April 1, 2026*



# Agenda

- Overview
- Meeting purpose
- Regulatory options for closing Burke Lakefront Airport
- Burke tenants
- Burke operations



# Overview – Paths to Closing Burke Lakefront Airport

- There are two main paths to closing Burke Lakefront Airport in the near-term:
  - FAA Process
  - Act of Congress
- Nearly all leases at Burke are one or two year terms with renewal options at City discretion
- City is in active discussions with BKL tenants and operators about impact of closure
- Burke is not a designated reliever airport
- Cleveland Hopkins International Airport (CLE) and Cuyahoga County Airport (CGF) could absorb most of BKL's airport-related activities, including private passenger service, medical transport, and flight training



# Purpose

**To provide Cleveland City Council and the public with a clear, fact-based understanding of the legal, financial, operational, and market realities associated with Burke Lakefront Airport—so that any future decision regarding its closure or continued operation is informed, transparent, fiscally responsible, and aligned with the long-term interests of Cleveland taxpayers.**

Completed City Council meetings about Burke:

- *Historical, Legal, Operational, and other Regulatory Considerations (January 21)*
- *Burke and the Budget (February 4)*

Future City Council meetings about Burke:

- *Redevelopment Opportunities (April 15)*



# Airport Layout Plan – Full Plan Available

- Overview of the requirements for closure, potential financial and legal implications, and anticipated effect on its stakeholders

<https://www.clevelandohio.gov/city-hall/office-mayor/mayors-initiatives/shore-core-shore>



## Timing & Path Forward

There are two potential pathways to closing Burke Lakefront Airport:

- **FAA Process:** A standard, federally regulated closure pathway
- **Congressional Authorization:** Legislative action enabling closure, followed by a structured transition

The City is committed to pursuing the most responsible and efficient path forward.

[More information about the process →](#)

## Financial Overview

Burke has operated at a deficit for over 20 years, averaging approximately \$900,000 annually.

- The 2025 deficit reached a high of \$1.7 million
- Costs are expected to rise due to aging infrastructure and deferred maintenance
- Continued operations represent significant opportunity cost

[More information about the budget →](#)

## Reports & Resources

Explore the data and analysis informing this work:

- [Feasibility Study](#)
- [ESI Report \(2024\)](#)
- [ESI Report \(2026\)](#)
- [CHA Report \(2025\)](#)

[City Council hearings on the future of Burke →](#)

## AIRPORT LAYOUT PLAN (ALP) NARRATIVE REPORT WORKING PAPER #4: BKL CLOSURE ALTERNATIVE

**Burke Lakefront Airport**  
Cleveland Ohio

October 2022  
November 2022 – Revision 1  
March 2024 – Revision 2

Prepared for:  
**City of Cleveland**  
Department of Port Control  
Cleveland, Ohio

Prepared by:  
**CHA Consulting, Inc.**  
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## Federal Regulatory Basis

- FAA Order 5190.6C – *Airport Compliance Manual*
- FAA Order 5100.38D – *Airport Improvement Program (AIP) Handbook*
- 49 USC § 46319 – Requires minimum 30-day written notice to FAA
- FAA’s primary criterion – Closure must yield a “**net benefit to aviation**”
  - Net Benefit is a benefit to aviation only (economic/community benefits not considered)
  - Demonstrate existing airports can absorb displaced operations/aircraft without degrading safety
  - Evaluate airport’s role in the National Plan of Integrated Airport Systems (NPIAS), including reliever functions, corporate aviation access, etc
  - Prove closure will not increase congestions, delays, or safety risks to surrounding airports
  - Confirm alternate airports have adequate facilities to support relocated users
  - Demonstrate the closure would improve the aviation system overall



# Grant Assurance Requirements

- Airport Sponsors must comply with FAA grant obligations for the life of each project
  - *Typical Obligation – 20 years from grant acceptance*
    - Pavement reconstruction – 20 years
    - Pavement rehabilitation – 10 years
    - Buildings – 40 years
    - Vehicles/Equipment – 10 years
    - ARFF Vehicles – 15 years
    - Land acquired w/ FAA funds – obligations are in perpetuity
      - *BKL was constructed by placing fill on submerged lands leased from the State of Ohio*



# BKL Grant Obligation Timeline

- Last federal grant obligation expires: 2034
- Last state (ODOT) obligation expires: 2039
- \$7,113,139 in grant payments for un-expired obligations (as of 2026)
  - \$5,727,039 – Federal
  - \$1,386,100 – State
- No land (perpetuity) grants as BKL is located on a submerged land lease

Fiscal year	FAA Grant	Total fed funds received	Description	Grant expiration	Un-Expired Obligation
2007	3-39-0022-006-2007	\$497,648	Rehabilitate Apron, Rehabilitate Taxiway	2027	\$ 24,882
2010	3-39-0022-007-2010	\$146,249	Master plan study Phase I	2030	\$ 29,250
2011	3-39-0022-008-2011	\$496,508	Terminal Overlay Project	2031	\$ 124,127
2012	3-39-0022-009-2012	\$1,021,152	Improve Runway safety, Environmental	2032	\$ 306,346
2012	3-39-0022-010-2012	\$734,420	Improve Runway safety, Design	2032	\$ 220,326
2012	3-39-0022-011-2012	\$4,779,889	Improve Runway safety, Construction	2032	\$ 1,433,967
2013	3-39-0022-012-2013	\$9,775,388	Improve Runway safety, 06L/24R	2033	\$ 3,421,386
2014	3-39-0022-013-2014	\$224,034	Update airport master plan study	2034	\$ 89,614
2018	3-39-0022-014-2018	\$263,756	rehab taxiway	2028	\$ 52,751
2020	3-39-022-016-2020	\$78,523	Rehab Taxiway (this grant is not being fully executed. The City is required to pay back 100% of funds drawn against this grant)	n/a	\$ 78,523
				<b>Balance</b>	<b>\$ 5,727,039</b>
Fiscal year	ODOT Grant	Total state funds received	Description	Grant expiration	Obligation (ODOT does not amortize)
2018	18-03	\$613,567	Runway 6R 24L Overlay Phase 1	2038	\$613,567
2019	19-04	\$756,541	Runway 6R 24L Overlay Phase 2	2039	\$756,541
2019	M-19-12	\$15,992	State match to FAA grant 3-39-0022-014-2018 to rehabilitate taxiway	2039	\$15,992
				<b>Balance</b>	<b>\$1,386,100</b>
				<b>TOTAL</b>	<b>\$ 7,113,139</b>



# Closure Options

- Option 1 - Wait for grant obligations to expire (2034/2039)
- Option 2 - Apply for closure now with FAA
- Option 3 - Federal legislation directing closure



## Option 1 – Wait for grant obligations to expire

- Defer closure to 2039 – federal grants (2034) & state grants (2039) to expire
- After grants expire, provide FAA a 30-day closure notice
- No “federal” approval needed
- No “*net benefit to aviation*” analysis is required
- Land release would not be required
- Avoids federal approval process & federal pay back of grants
- Must operate BKL for 14 additional years w/ no federal funding



## Option 1 – Example

- Blue Ash Airport - Cincinnati, Ohio
  - 2012 - The City of Cincinnati permanently closed Blue Ash Airport after submitting a 30-day written notice to the FAA, as required under 49 USC § 46319
  - All federal grant obligations had expired by 2003, which meant the FAA had no authority to prevent closure once the City followed the statutory notice requirements.
  - Operations fell from 35,000 in 1995 to less than 15,000 by 2011
  - Sale proceeds from airport land (acquired with federal funds) remained within the airport system.
  - Airport redeveloped as recreational and mixed-use.



## Option 2 – Apply for closure now

- Submit request pursuant to FAA Order 5190.6C
- Must prove “net benefit to aviation” (economic/community benefits not considered)
- FAA has full discretion to deny
  - \*FAA *will not consider a closure if*:
    - 1) Airport serves a unique role and no comparable alternative is within its vicinity
    - 2) Airport supports a level of activity that classifies it as either “national” or “regional” in the most current NPIAS
- Payments are required for remaining un-expired obligated grants - \$7.1M

\*FAA Order 5190.6C, 22.14(A)



## Option 2 - Example

- Richard's Gebaur Memorial Airport, Missouri
  - 1987 - City of Kansas City (Airport Sponsor) sought permission to close
  - 1988 - FAA approved closure through agreement
    - Net benefit to aviation proved (given the metro area already had multiple viable airports)
    - City was required to deposit \$5 million into an FAA-controlled escrow fund for regional aviation improvements and to use all net lease proceeds for 20 years to support aviation-related projects
    - Completed National Environmental Policy Act (NEPA) documentation
  - 1999 - The city approved a 50-year lease for redevelopment of the property by Kansas City Southern Railway
  - 2022 - Citizen groups (Friends of Richards-Gebaur Airport and others) challenged both the FAA's environmental decision and its authority, but the Eighth Circuit denied the petitions and affirmed the FAA's decision to release the property and allow closure



## Option 2 - Example

- St. Clair Regional Airport - St. Clair, Missouri
  - *Process began in late 1990s / closed in 2017*
  - *Required full payment of unamortized federal grants*
  - *Concluded closure was acceptable for the aviation system (net benefit / no negative impact)*
- Differences between BKL & St. Clair Regional
  - *BKL is a “regional” general aviation airport with 30+ based aircraft vs. St. Clair’s 6 based aircraft*
  - *Un-expired grants – BKL (\$7.1M) vs. St. Clair Airport (\$760,000)*
  - *St. Clair had no long-term tenants (ex. Signature)*
  - *FAA could determine BKL closure is not a net benefit to aviation*
    - *BKL’s runway capacity, corporate jet activity, and medical transport activity could all contribute to FAA decision*



## Anticipated Costs of FAA Process

- FAA process for closure is negotiated, it's not a formulaic, defined process
- Administrative costs vary (legal, additional studies of the land, benefit/cost analysis, etc.)
- Net-Benefit to Aviation Study – approx. \$250,000
- Financial & Implementation Plan – approx. \$200,000
- National Environmental Policy Act (NEPA) Study – approx. \$300,000
  - *Closing an airport is a federal action; therefore, NEPA compliance may be required*
  - *May not be required, if grant obligations end*



## Option 3 – Congressional Legislation

- Congress passes law ordering FAA to close BKL
- Bypasses most FAA requirements
- Could relieve federal grant payments for un-expired obligations
- ODOT grant payback is 100% if less than 20 years
- Bottom Line – whatever is in the legislation is the direction the FAA must follow



## Option 3 - Example

- Banning Municipal Airport, California
- Congress directed the FAA to close airport via the FAA *Reauthorization Act of 2024 (Public Law 118-63)*
- City of Banning, California (Airport Sponsor)
  - *Unexpired portion of FAA development grants were repaid*
  - *Equipment was directed to go to other neighboring airports*
  - *Land (20 acres) purchased with FAA funds in 1983 had to obtain a current FMV and repay FAA*

### SEC. 756. BANNING MUNICIPAL AIRPORT.

(a) IN GENERAL.—The United States, acting through the Administrator, shall release the City of Banning, California, from all restrictions, conditions, and limitations on the use, encumbrance, conveyance, and closure of the Banning Municipal Airport, as described in the most recent airport layout plan approved by the FAA, to the extent such restrictions, conditions, and limitations are enforceable by the Administrator.

(b) CONDITIONS.—The release under subsection (a) shall not be executed before the City of Banning, California, or its designee, transfers to the United States Government the following:

(1) A reimbursement for 1983 grant the City of Banning, California received from the FAA for the purchase of 20 acres of land, at an amount equal to the fair market value for the highest and best use of the Banning Municipal Airport property determined in good faith by 2 independent and qualified real estate appraisers and an independent review appraiser on or after the date of the enactment of this Act.

(2) An amount equal to the unamortized portion of any Federal development grants other than land paid to the City of Banning for use at the Banning Municipal Airport, which may be paid with, and shall be an allowable use of, airport revenue notwithstanding section 47107 or 47133 of title 49, United States Code.

(3) For no consideration, all airport and aviation-related equipment of the Banning Municipal Airport owned by the City of Banning and determined by the FAA or the Department of Transportation of the State of California to be salvageable for use at other airports.



## Leases at Burke Lakefront Airport

- 18 lease agreements; 15 unique tenants
- Seven of 15 tenants are Aviation-related tenants
- Nearly all leases are one-year to two-year terms with renewal options at City discretion
- Signature Flight Support ground lease through 2043

### Major Leases & Agreements

- Aitheras (Hangar): 238,472 sq. ft.
  - Term w/ options through 2028
- Signature Flight Support (Ground): 12.025 acres
  - Term through 2043
- Cleveland National Air Show (Terminal/Display)
  - Term through 2028–2029
- CHA Consulting (Terminal): 4,350 sq. ft.
  - Term w/ options through 2029
- Women's Air and Space Museum (Terminal): 2,440 sq. ft.
  - Term w/ options through 2033
- Public Safety / Aviation HS (MOU): 9,432 sq. Ft.



# Burke's Operations

- BKL is no longer considered a reliever airport
  - *Reliever Airport are “airports designated by the FAA to relieve congestion at Commercial Service Airports and to provide improved general aviation access to the overall community”*
  - *National Plan of Integrated Airport Systems (NPIAS)*
    - *FAA report outlining the national funding needs for the next five years - published every 2 years, most recently October 2025*
- NE Ohio reliever airports are Cuyahoga County, Lorain County Regional, Lake County Executive, & Medina Municipal
- Medical operations at BKL are a combination of fixed wing and helpicopter operations
  - City in active discussions with operators about moving operations to Hopkins if BKL closed
- Cleveland Hopkins International Airport (CLE) and Cuyahoga County Airport (CGF) could absorb most of BKL’s airport-related activities, including private passenger service, medical transport, and flight training



**Table 1-1. Airfield Capacity Summary**

Airport	Runway(s)	Runway Dimension (in feet)	Displaced Threshold	Landing Fees	ATCT	Notes
<b>CGF</b>	06 / 24	5,502 x 100	318' / 500'	No	Yes	<ul style="list-style-type: none"> <li>Recently reconstructed 20,000 square yards of apron</li> <li>Corporate hangar space (20,000 square feet) on the north side of the airport; however, could impact wetlands</li> <li>The south side of the runway is open for development; however, no taxiway infrastructure is currently present</li> <li>Approach lights and ILS</li> <li>Taxiway 'A' will be relocated to provide standard runway-taxiway separation</li> <li>Has ability to absorb some corporate GA traffic</li> </ul>
<b>CLE</b>	06L / 24R	9,000 x 150	N/A	Yes	Yes	<ul style="list-style-type: none"> <li>Recent Master Plan Update has plans for corporate hangar development on south side.</li> <li>Most likely would only absorb the sports teams that utilize BKL and some additional corporate GA.</li> </ul>
	06R / 24L	9,953 x 150	Runway 6R - 1,923 ft			
	10 / 28	6,018 x 150	N/A			
<b>LNN</b>	05 / 23	5,028 x 100	Runway 5 – 428 ft	No*	No	<ul style="list-style-type: none"> <li>Has ability to absorb some corporate GA traffic given runway length</li> <li>No parallel taxiway on either runway</li> <li>Has an existing waiting list for hangars</li> </ul>
	10 / 28	4,272 x 100	Runway 28 - 1,124 ft			
<b>LPR</b>	07 / 25	5,002 x 100	N/A	No	No	<ul style="list-style-type: none"> <li>Approach lights and ILS</li> <li>Available room for hangar development</li> </ul>
<b>1G3</b>	01 / 19	4,000 x 60	Runway 1 – 53 ft	No*	No	<ul style="list-style-type: none"> <li>Hangar rehabilitation needed</li> </ul>
<b>1G5</b>	01 / 19	2,868 x 60	Runway 19 – 737 ft	No	No	<ul style="list-style-type: none"> <li>Smallest apron space available</li> <li>Shortest runway</li> </ul>
	09 / 27	3,556 x 75	N/A			

Notes: RWY = Runway; ATC = Airport Traffic Control Tower

\*Landing Fees may vary at these locations based and aircraft type and services needed.

Source: Publicly available airport information; FAA Airport 5010, September 2021; CHA 2022





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# Questions?

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*Regulatory Path to Closing BKL*

