



**Statement of Gregory Pecoraro,
President and CEO, National Association of State Aviation Officials (NASAO)
Before the
U.S. House of Representatives, Committee on Transportation & Infrastructure,
Subcommittee on Aviation
“The State of General Aviation”
July 13, 2022**

Chair Larsen, Ranking Member Graves, and members of the Subcommittee on Aviation, thank you for holding today’s hearing on the “State of General Aviation”. My name is Greg Pecoraro, and I have the privilege of representing the National Association of State Aviation Officials, or NASAO. For more than 90 years, NASAO has represented the men and women in the state government aviation agencies serving the public interest in all 50 states, Guam and Puerto Rico. Like you, in your roles on this committee, we serve the public interest. The views I share with you today are those of state aviation professionals who are public servants across the nation.

The Role of State Aviation Agencies

State aviation agencies continue to play an important role in managing the National Aviation System (NAS). Within that network, the role of states in managing and promoting aviation as a vital access point to the entire transportation network is not as widely known as that of the Federal Aviation Administration (FAA). State aviation agencies, through NASAO, participate in several memorandums of understanding with the FAA and other federal agencies to create cooperative efforts to manage the NAS. Ten states administer block grants for FAA Airport Improvement Program (AIP) grants to general aviation airports, many others act as channeling states¹ for the FAA, and most states provide funds to help meet the matching requirements for FAA AIP grants.

¹ State channeling of federal airport grants occurs in various forms within numerous states. Normally, when an airport is in a channeling act state, the sponsor submits payment request information to the state, who then submits the request to the FAA. In this case, the FAA makes payments to the state, and the state then distributes

Many state aviation agencies assume inspection authority for general aviation airports. Many states operate runway inspection and other aviation safety programs. A few states own and operate airports, both in and outside the National Plan of Integrated Airport Systems (NPIAS). Unlike the FAA, which is solely focused on safety, state aviation agencies are also engaged in supporting an aviation system that is both the safest in the world and a vital contributor to strong and vibrant local economies. Looking to the future of aviation, many states are already actively engaged in managing uncrewed aircraft systems (UAS) and advanced air mobility (AAM) initiatives.

State aviation agencies work closely with the general aviation airports in their states. General aviation airports often lack the staffing and expertise available to larger airports and rely on their state aviation agencies for a wide range of technical support and guidance, as well as for assistance in interacting with the FAA. State aviation agencies are also important resources for state pilot communities and many aeronautical businesses.

Federal Support for Robust Aviation Funding

NASAO deeply appreciates the funding Congress provided during the pandemic to support all airports, in particular general aviation airports, to keep vital goods and services flowing throughout the country. NASAO is also grateful for the Infrastructure Investment and Jobs Act (IIJA), which provided much needed funding for airports and associated infrastructure, however additional investment at the federal level is needed to clear the over \$40 billion backlog of priority AIP-eligible projects needed between 2021 and 2025², invest in planning and infrastructure for emerging aeronautical technologies, and support a greener more environmentally sustainable aviation system. Of the \$40 billion, the FAA indicates that \$14

the payment to the sponsor. In some cases the state may also provide technical oversight and review, which may include state submittal of grant applications and/or closeout requests. This is based on state enabling legislation, rather than federal law. In many cases, the state also signs the grant agreements. Channeling agreements based on state enabling legislation do not need approval from the FAA Airport District Office (ADO). AIP Handbook, Chapter 2, https://www.faa.gov/airports/aip/aip_handbook/?Chapter=2

² Federal Aviation Administration, National Plan for Integrated Airport Systems (2021-2025), p. 28, https://www.faa.gov/airports/planning_capacity/npias/current/media/NPIAS-2021-2025-Narrative.pdf

billion are for planned AIP-eligible projects at general aviation, reliever, and nonprimary commercial service airports.

While overall AIP levels have not changed in nearly ten years, costs certainly have. Recent inflationary pressure has aggravated the situation even more.

Currently, the nation's general aviation airports have unmet needs for construction, repair, and maintenance of runway, taxiways, and other AIP eligible projects. Hangars and maintenance facilities are all in need of renovation and repair. Looking to the future, general aviation airports must transform into greener, more sustainable facilities, as well as increase their connection to a multi-modal transportation system. Better connections to an improved national electric grid are vital as airports need to facilitate electric vehicle (EV) charging, electrification of ground support equipment, on airport clean power generation, and LEED certified facilities.

Maintaining the existing system and transformation to meet these future needs will require significant federal support.

To sustain the existing aviation system and meet future system needs, NASAO urges Congress to provide robust aviation funding by:

- **Increasing AIP investment by \$250 million each year over the next five years to a new authorization of \$4 billion.**
- **Raising and indexing the \$4.50 Passenger Facility Charge (PFC) Cap.** If the PFC cap were raised, commercial airports would be able to collect and use PFC revenue for airport infrastructure and forgo their AIP entitlements. This would result in a greater share of AIP entitlement funds to general aviation airports, who have fewer options to raise airport revenue.

Nonprimary Entitlement Program Reform

We also suggest that Congress look at how to reform the Nonprimary Entitlement (NPE) program to better meet the needs and realities of nonprimary airports. The NPE program provides up to \$150,000 annually from AIP to general aviation, reliever, and nonprimary commercial service airports for critical projects that would otherwise go unfunded. However, in today's environment, these annual NPE grants are so small that they must be carried over for a period of years to accumulate up to \$600,000 to go toward an airport project. More meaningful paving projects start at \$1 million *today*. If the NPE program is to provide most airports with a meaningful opportunity to make improvements, the program must be reformed to ensure that these airport projects are moving forward.

NASAO encourages Congress to consider increasing funding for general aviation airports by **increasing the maximum amount an airport may receive from NPE from \$150,000 to \$250,000 per year and correspondingly increase State Apportionment to ensure that an increase in NPE does not further reduce State Apportionment funds.**

Enhancing the State Block Grant Program

Block Grant States (BGS) play a critical role in the development and maintenance of airport infrastructure on behalf of the FAA for eligible general aviation airports within their states. The BGS have been instrumental in administering annual AIP grants and COVID relief funds and will continue to be instrumental as they prepare to administer the Infrastructure Investment and Jobs Act funds. The BGS have taken on these responsibilities to meet the needs of general aviation airports in their states. However, with more tasks and responsibilities being shifted to BGS, this has exhausted BGS staff and has been done without any additional funds and resources. **NASAO encourages Congress to provide these states with administrative relief as they execute federal airport grants on behalf of the FAA**, like other federal transportation block grant programs. More broadly, NASAO believes it is critical for the FAA to work more collaboratively with the states in addressing current and future program needs.

Infrastructure Investment and Jobs Act Implementation

As with any initiative of this tremendous size and scope, challenges with IJA implementation were sure to arise. NASAO has created a working group of state aviation professionals from across the country to review the IJA and its impact on state aviation programs. Many of these discussions are centering around technical details and the need for clarifications in how the FAA is implementing the law. We hope that sharing these issues will assist the FAA in working with states and local airport sponsors in meeting the goals of the IJA. We plan to complete this review over the next few months and share our findings with the FAA and Congress in hope of collaborating on developing some adjustments.

Ensuring Air Service to Small Communities

Since its inception, the Essential Air Service (EAS) program has provided a vital link for many otherwise unserved communities to the nation's airways. Unfortunately, rising costs and the ongoing shortage of commercial airline pilots have disrupted service to many of these smaller communities. It is critical for Congress to continue to maintain its commitment to access to aviation for all Americans by fully funding the EAS program.

Unfortunately, one of the impacts of the pandemic for some communities that "graduated" out of the EAS program found that the conditions that supported stable aviation access have eroded or disappeared. NASAO supports **allowing those communities that successfully exited EAS and were then locked out of EAS due to provisions in the FAA Modernization and Reform Act of 2012 (P.L. 112-95) to rejoin the program to help restore scheduled air service** that has been reduced or suspended as a result of the pandemic. Allowing these communities to be eligible to receive EAS assistance would ensure they continue to have access to the national air transportation system and give them the opportunity to reestablish their markets.

Preparing for New Era of Aviation

AAM and UAS have the potential to create incredible opportunities within aviation. General aviation airports are most likely to benefit immediately from their promise to open up new

markets and expand access to small communities. The prospect of connecting urban, suburban, and rural areas, some of which are not conveniently served by surface transportation, or underserved by existing aviation activities, in a new way that's cleaner, quieter, and more efficient - is exciting to us all, and can revolutionize how many people access the aviation system.

But before this new technology can launch and disrupt existing transportation systems, many questions need to be answered. The FAA has a lot of work to do in certifying aircraft and finalizing criteria for their landing facilities. We still don't know how we will integrate AAM with other aviation activities and the larger transportation network or manage public access and security for AAM and UAS facilities and aircraft. We also need to address how AAM activities will contribute financially to the maintenance of the aviation system. To the extent that they use publicly funded infrastructure, use services, require inspections, and require regulation, AAM and UAS activities should pay some share of these costs, just as other users of the system do.

And of course, as excited as some of us in aviation are about these new technologies, much work must be done by industry and governments to develop a broader public awareness and acceptance of this new aeronautical activity.

State aviation agencies have an important role in this exciting future. State and local governments can and must play their part in managing the integration of these emerging technologies into the larger transportation system. Land use and siting decisions, multi-modal transportation planning, adaptation of existing infrastructure and development of new facilities, integration into existing airspaces, and local acceptance of new modes of flight and their facilities will all require close cooperation and planning at the state and local levels. Unfortunately, many state and local aviation and planning agencies are understaffed and already facing heavy workloads. It is vital that Congress provide funding to assist in planning for

integration of these new technologies, both on and off the airport, including development of vertiports. Congress can support integration of these new technologies by:

- **Tasking the FAA with establishing a national standard to address AAM airspace coordination and control** informed by the ongoing work of the Advanced Aviation Advisory Committee, an aviation stakeholder led advisory committee that provides advice and recommendations to the FAA on UAS and AAM integration issues. Allowing for third party providers operating under the guidance of the FAA and the established standards would enable the federated system to expand more rapidly as AAM aircraft become certified while maintaining the appropriate level of safety.
- **Enacting H.R. 5315, the Drones Infrastructure Inspection Grant (DIIG) Act**, to support the efforts of state, local and tribal governments to capitalize on the benefits of using drone technology to inspect aging infrastructure while investing in workforce development programs to bolster the workforce of the future. We greatly appreciate Representatives Greg Stanton and Garret Graves for their leadership and the Committee for its support in advancing this important legislation.
- **Directing the FAA to establish an outline for a constructive Federal regulatory framework for drone integration strategies** that supports the application of a low-altitude drone activity and require the FAA to work collaboratively with states to develop an acceptable framework.

The Greening of General Aviation

Creating a greener and more sustainable aviation system has been challenging due to some of the industry's particular technical needs. While advances in aircraft design and manufacturing have continued to reduce emissions and lower noise, aviation remains one of the hardest modes of transportation to turn green. However, general aviation airports have an opportunity

to not only transform as part of a greener aviation system, but also to become more multimodal as EVs and AAM will eventually become more commonplace.

State aviation agencies and airport sponsors need assistance with this transformational challenge. They will need to access expertise and funding to plan for airport transformation, charging for eVTOL aircraft, electrification of ground support equipment, on airport clean power generation, and EV charging for airport parking facilities. Congress should encourage and fund the development and implementation of these solutions by **directing the FAA to develop plans and policies and identify how to make federal funding available to support both on and off airport development for AAM.** With both electric and hydrogen propelled aircraft in development, it is critical that the FAA start planning how it will support airports and off airport transportation nodes with these new infrastructure needs.

Additionally, the aviation industry faces significant hurdles in its quest for clean and sustainable fuel for aircraft of all types. General Aviation urgently needs an acceptable 100LL drop in replacement fuel standard given the growing concerns over the environment and impending action by the Environmental Protection Agency (EPA). This will require both incentives to produce and distribute meaningful quantities of a replacement fuel within the United States and easing the path for permitting the required refining and production facilities. Similar to the ongoing discussions on sustainable aviation fuels (SAF), our aviation system will be more resilient if we act now to address the 100LL replacement fuel and SAF. NASAO supports the joint FAA/aviation industry/fuel producers' effort known as the Eliminate Aviation Gasoline Lead Emissions (EAGLE) Initiative.

Provide Federal Support for PFAS Clean-up Efforts at Airports

A growing problem amongst general aviation airports, as well as commercial airports, is their use over many years of fire suppression products containing PFAS, or per- and polyfluoroalkyl substances in aqueous film-forming foam (AFFF). For decades, AFFF containing PFAS has been

used extensively at airports throughout the world to protect the safety of passengers, crew and others.

The FAA has long required airports to train with and use AFFF fire suppression systems. Airports are faced with difficult choices when called upon to extinguish fires using the only FAA-approved firefighting foams, thereby potentially contaminating the watershed, and potentially being subject to environmental enforcement actions. Airports should not be held liable for PFAS contamination as a result of complying with a federal requirement. **NASAO urges policymakers to review and provide liability protections for all airports faced with this challenge.**

In addition to providing liability protections, **NASAO urges Congress and the FAA to swiftly implement federally assisted clean-up programs for PFAS contamination at airports** stemming from the FAA-required use of firefighting foams containing PFAS. Direct Federal support of airports (separate from the Airport Improvement Program) is needed to accelerate the clean-up process at contaminated sites.

Conclusion

Chair Larsen, Ranking Member Graves, and members of the Subcommittee, the nation's state aviation professionals deeply appreciate the opportunity to share their views on the "State of General Aviation", and the value you place in their professional judgements on the needs of the industry.

We ask you to remember that more investment is needed to keep the United States in the forefront of aviation. Although Congress has provided a much needed influx of funding for aviation infrastructure, there is still an enormous unmet need to repair and maintain existing general aviation airports, as well as a need to begin planning and developing the sustainable airports of the future.

Thank you for this opportunity to appear today, and NASAO looks forward to continuing to work with this Committee as you consider important policy changes in the upcoming FAA reauthorization bill.