June 4, 2021

The Honorable Maria Cantwell
Chair
Committee on Commerce, Science, & Transportation
United States Senate
Washington, DC 20510

The Honorable Roger F. Wicker
Ranking Member
Committee on Commerce, Science & Transportation
United States Senate
Washington, DC 20510

The Honorable Peter A. DeFazio
Chairman
Committee on Transportation & Infrastructure
United States House of Representatives
Washington, DC 20515

The Honorable Sam Graves
Ranking Member
Committee on Transportation & Infrastructure
United States House of Representatives
Washington, DC 20515

Dear Chair Cantwell, Chairman DeFazio, Ranking Member Wicker, and Ranking Member Graves:

On behalf of the National Association of State Aviation Officials (NASAO), I write you regarding the upcoming infrastructure package. The nation’s state aviation agencies encourage Congress to take this opportunity to make a significant contribution to repairing and updating existing aviation infrastructure, and to upgrading that infrastructure to take advantage of exciting new aeronautical technologies that will keep the United States in the forefront of global aviation. NASAO also encourages you to strike the right balance in funding airports of different categories, ensuring that the nation’s General Aviation (GA) airports receive the additional funds they need to maintain their current role and prepare for the future of aviation. As you craft legislation, NASAO urges you to consider the below proposals.

**Invest in Alternative Aviation Fuels**

*Establish tax credits, such as proposed in the Sustainable Skies Act (H.R.3440)/Sustainable Aviation Fuel Act (H.R. 741), to incentivize the production of Sustainable Aviation Fuel (SAF).* Providing a tax credit for new blenders is critical to incentivizing the production of SAF. While large commercial aircraft will rely on combustion engine technology for the foreseeable future, Congress has an opportunity to significantly reduce harmful greenhouse gas (GHG) emissions and ultra-fine particulate matter by encouraging the production and use of SAF. SAF is a viable bridging strategy to reduce carbon emissions while advanced air mobility aircraft have time to mature.

*Direct FAA and Transportation Research Board (TRB) (in consultation with the U.S. Department of Energy) to conduct a study on the infrastructure needs at airports to support alternative fuels and electric aircraft.* This study should focus on developing and updating the nationwide system of airports to be capable of supporting advanced aircraft propulsion systems. This must include GA airports as those are the facilities most likely to see these alternative fuels first and are best positioned to base these emerging aircraft.
Improve Airport Sustainability

America’s airports of all types can and should be part of addressing environmental concerns and achieving sustainable operations. New technologies are critical to achieving this goal, and Congress should fund and encourage development of these solutions.

Expand the FAA’s Zero Emissions Vehicle (ZEV) and Infrastructure Pilot Program and the Voluntary Airport Low Emissions (VALE) Program. NASAO urges you to expand and modify the programs in the following ways:

ZEV and Infrastructure Pilot Program
- Provide funding for the program commensurate with the number of zero emissions vehicles projected to be based at participating airports over the next five to ten years.
- Encourage airport sponsors to demonstrate their plan for the adoption and use of ZEVs.
- Streamline the process and enable airports to make purchases within the typical 5-year AIP planning and approval timeline.

VALE Program
- Provide increased funding for the program overall and allow the program to include electrical infrastructure upgrades, on-airport sustainable power generation and energy storage systems (such as battery banks).
- Use the VALE program to set up a 4-year Advanced Air Mobility (AAM) integration pilot program available to 100 National Plan of Integrated Airport Systems (NPIAS) airports from different categories nationwide. This will not only make our airports more environmentally sustainable but will set the conditions for the use of both electric ground support equipment and advanced air mobility aircraft. This pilot should:
  - Encourage airports to demonstrate their plan to reduce emissions, to facilitate AAM, if applicable, and to do so with documented support from stakeholders.
  - Streamline the process and enable airports to begin projects within the typical 5-year AIP planning and approval timeline.

Establish a grant program to monitor and remediate PFAS at public-use airports. This program should provide funding for all public-use airports which have stored and used aqueous film forming foam (AFFF) at any point. Grant funding should be made available to test for Per- and polyfluoroalkyl (PFAS) contamination in ground water, surface water, and soil and to remediate contamination to Federal standards developed by the Environmental Protection Agency (EPA). Testing and remediation should be completed through a process developed and approved jointly by FAA and EPA.

Increase Airport Planning and Infrastructure Funding

Congress has invested billions of dollars in building and supporting airports in the NPIAS – a network that would be impossible to duplicate under current conditions. The national interest demands that these airports be updated and repaired to full operational potential and be
improved to incorporate the infrastructure necessary to accommodate new aeronautical technologies.

**Prioritize GA airports for any new AIP funding.** The nation’s GA airports today are less able to generate the funds necessary for capital improvements than commercial airports that generate far more revenue. NASAO urges Congress to consider this factor as you develop a formula for apportioning new funds for AIP eligible projects. In addition, with the U.S. experiencing an increase in the use of GA airports by charter, private aviation, and fractional ownership activity as a result of the pandemic and changes to travel patterns, it will be important to allocate funds for improvements, including aprons, at these facilities. Lastly, NASAO urges Congress to allow these funds to be used for land acquisition, fuel, utility, and other infrastructure projects when safety needs have been met.

**Establish a DOT/FAA grant program to fund terminal and “non-airside” improvements.** Much of the revenue generated at commercial airports comes from passenger related activities such as parking or concessions in a passenger terminal, as well as Passenger Facility Charges allowed by Congress. However, at non-commercial airports, much of the economic activity is derived from hangar rentals or the aviation related activities that they house. Many GA airports are desperately short on these revenue generating facilities that significantly enhance the value of the airport. A grant program that provides GA airports with the means to build or upgrade “non-airside” improvements, such as hangars, will support aircraft maintenance, flight training, and many other essential activities that make GA airports more financially self-sustaining, while contributing jobs and activity to the local economy.

**Direct FAA and TRB, in coordination with state aviation agencies and relevant stakeholders, to conduct a study to determine GA airport infrastructure needs.** GA airports have been significantly underfunded for many years and there is a large backlog of needed infrastructure improvements at the smaller airports. FAA and TRB should work with the appropriate stakeholders to determine immediate and long-term infrastructure needs at GA and non-primary airports and how to strategically fund needed improvements.

**Ensure multimodal planning includes airports.** Airports at every level are an integral part of the nation’s transportation system. As other infrastructure programs help enhance our highway transit, and electric power systems, planners must consider and improve connections to community airports. NASAO urges Congress to ensure that any new or existing multimodal transportation program addresses ways to:

- Facilitate the needs of users getting to and from terminal or other airport facilities, as well as from rental car facilities, offsite parking and public transportation; and
- Facilitate the movement of increasing cargo on and off airports to freight transportation systems.

**Direct FAA to include state aviation agencies within their definition of airport sponsors to streamline grant funding transfers.** Non-primary entitlement (NPE) funds are specifically for GA airports that often rely on state agencies to represent them. Keep these funds local by making state aviation agencies eligible to accept or transfer unused NPE funds when requested by
airport and agency is authorized to accept funds by state statute. Allowing non-State Block Grant Program States to transfer NPE funds within their state would ensure the funds are made available for AIP eligible projects within their state before the funds expire.

**Reinvigorate NextGen**

Reinvigorate NextGen to provide cost-effective methods of increasing efficiency, safety, and environmental sustainability. The FAA should continue to pursue solutions such as, Remote Towers, cloud-like ATC communications with redundancy, high altitude Air Route Traffic Control Center (ARTCC) system, real-time coordination between take-off and landing slots, and incentives for aircraft owners to install ADS-B.

**Enhance the State Block Grant Program**

Provide Block Grant States the authority to distribute non-primary grant funds in the same manner as the distribution of State Apportionment funds. Allowing the block grant states to distribute the funds to GA airports with viable current needs will ensure the efficient and appropriate expenditure of limited but much needed federal resources. To assure fair treatment, Block Grant States should be required, upon application for eligible project needs, to invest over a given time the amount of funds each airport would have received had the airport used their formula non-primary funds each year.

NASAO stands ready to engage and support your efforts to draft and pass an infrastructure bill that provides the federal policy and funding needed to invest in our aging airport infrastructure.

Respectfully,

Gregory Pecoraro  
President and CEO

Cc:  
The Honorable Krysten Sinema, Chair, Subcommittee on Aviation Safety, Operations, and Innovation, U.S. Senate  
The Honorable Ted Cruz, Ranking Member, Subcommittee on Aviation Safety, Operations, and Innovation, U.S. Senate  
The Honorable Rick Larsen, Chairman, Subcommittee on Aviation, U.S. House of Representative  
The Honorable Garret Graves, Ranking Member, Subcommittee on Aviation, U.S. House of Representative