

**Statement of Chris Rozansky, C.M.**  
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**On Behalf of the American Association of Airport Executives**  
**Before the House Committee on Transportation and Infrastructure Subcommittee on Aviation**  
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Chair DeFazio, Ranking Member Graves, Chair Larsen, Ranking Member Graves, and members of the subcommittee, thank you for the opportunity to appear before you today to highlight the perspective of a general aviation airport operator on the state of the general aviation industry. My name is Chris Rozansky, and I am the Executive Director of the Naples Airport Authority.

I am testifying today on behalf of the American Association of Airport Executives (AAAE), where I serve as a Vice Chair of the association's General Aviation Committee. AAAE is the world's largest professional organization representing individuals who manage and operate more than 850 public-use commercial and general aviation airports across the country.

The Naples Airport is a general aviation airport located in Southwest Florida, an increasingly popular destination known for its pristine beaches and quality of life. Originally built in 1943 in support of World War II, the airport is now one of the top ten busiest in the nation for private jet activity that drives an immense economic impact locally. As I will describe later in my testimony, the airport also serves a critical role in flight training; public safety and health with law enforcement; firefighting; and medical transportation.

### **The Impact of General Aviation**

Let me begin by thanking all of you for your steadfast support for general aviation airports and the broader GA industry. As you will hear from my colleagues today, GA is an integral part of our National Airspace System (NAS). In fact, the U.S. has the largest and most diverse system of GA airports in the world, supporting more than 1 million jobs and helping generate nearly \$250 billion in economic impact annually. To illustrate the reach of GA airports, there are over 4,400 public-use GA airports in the United States.

General aviation airports function like Swiss Army knives, delivering an array of vital services that you won't find elsewhere in town. GA airports typically provide convenient and timely transportation with facilities close to passengers' final destinations. When traveling for business, GA airports can accommodate passengers' travel needs in multiple cities on the same day and potentially help them return home in time for dinner. When hurricanes strike, GA airports oftentimes act as staging areas to deliver critical relief and help get their communities back on their feet. For Naples, its airport was a lifeline following Hurricane Irma in 2017.

I can personally attest to the value of having life-saving medevac operators nearby when my own son needed urgent pediatric care a few years ago. He recovered and is just fine now, but admittedly, it's the best helicopter ride you never want to take. More recently, select GA airports began serving as testbeds for revolutionary technologies like electric vertical takeoff and landing or eVTOL's that are sure to change society as we know it. And this is just the tip of the iceberg – law enforcement; firefighting; aerospace engineering and manufacturing; air cargo; agriculture; and recreation are just a few of the other functions at GA airports.

The state of Florida plays a leading role in the NAS, with 108 public GA airports that support more than 108,000 jobs and generate an economic impact of more than \$18 billion annually according to the Florida Department of Transportation's Statewide Aviation Economic Impact Study in 2019. Furthermore, Florida is home to more student pilots, federal contract towers, and business jet operations than any other state in the nation.

Demand at most general aviation airports has never been greater. One analyst recently estimated there are nearly two million new passengers using general aviation since the onset of the COVID-19 pandemic. In a recent survey conducted by the Naples Airport Authority, 98 percent of passengers traveling through the airport indicated that they intend to continue flying privately rather than go back to the airlines. This shift in travel preferences coupled with overall growth trends has also led to a number of challenges such as community concerns over increased aircraft noise exposure and pollution. We are currently working closely with the FAA, airport stakeholders, and our neighbors to address those issues through a Part 150 Noise Study.

### **COVID-19 and Ongoing Recovery**

The COVID-19 pandemic and the subsequent recovery have provided a clear illustration of the importance and flexibility that GA airports provide the NAS. We are grateful to this subcommittee and to the Congress for recognizing that the economic and operational struggles caused by the pandemic were not limited to commercial service airports and for ensuring that portions of the various pandemic relief packages included designated funding for GA facilities. Those resources were important for GA airports and the communities they serve.

While air traffic at commercial service airports is returning to over 90 percent of pre-pandemic enplanement levels, we have seen many GA airports, particularly in leisure markets, exceed their pre-pandemic levels. These positive trends are a result of various factors, from increased flight training and charter activity to the proliferation of remote work, which has allowed many Americans to relocate to more desirable areas. Private jet travel in the U.S. is above 2019 levels despite record fuel prices. I would note, though, that while the industry overall is thriving, not every airport has recovered fully. The old adage that if you've seen one airport, you've seen one airport, still applies.

Frequent flight disruptions and cancellations that have plagued the airlines this summer have exposed the crippling effect that workforce challenges continue to have on the aviation system. Flight schools at GA airports are playing a pivotal role in addressing the ongoing pilot shortage. Already, flight schools have seen upticks in their enrollments, particularly as airlines are ramping up recruiting and training programs and increasing financial incentives for new pilots. GA airports uniquely support the needs of these future airline and military pilots by allowing them to train in less congested airspace.

Finally, the COVID-19 pandemic has made clear that remote work for some is here to stay. With countless businesses continuing to promote work from home policies, many Americans are choosing to move outside major urban areas to smaller communities. As the airlines continue to reduce or eliminate commercial service, reaching smaller cities or more remote locations has become more difficult. Business aviation is providing another travel option in those places.

These trends are occurring nationwide, but particularly in leisure markets like Naples, which has seen unprecedented demand for private air travel. Initially, this was due to health concerns arising from the COVID-19 pandemic, but it has continued as a result of changing consumer patterns and the challenges

airlines are facing to meet demand. In 2021, private jet activity in Naples increased by more than 40 percent despite setting new records in 2020; however, the rate of growth in 2022 finally began flattening earlier this summer. We are projecting a slight pullback in 2023 as customers settle into their post-pandemic norms and as we face continued inflation and fuel price volatility.

### **Rising Infrastructure Needs**

As demand for travel continues to rise at GA and commercial service airports, there is a growing need for infrastructure investment. The Infrastructure Investment and Jobs Act (IIJA) provided airports with \$20 billion over five years for infrastructure and terminal grants, with \$2.5 billion of that total specifically allotted for nonprimary commercial service and GA airports. We are grateful for that investment, which will help airports of all sizes build critical infrastructure and prepare for the ongoing recovery and rising demand.

We particularly appreciate how the IIJA will help improve the Naples Airport and enhance aviation safety. We plan to use infrastructure funds for navigational aid improvements, LED airfield lighting conversion, and electrical vault improvements. These funds will help us to complete much-needed safety improvements that don't compete as well for AIP discretionary funds like those projects involving runway and taxiway improvements.

While IIJA funding will serve as an important down payment to help bridge the enormous funding gap for airport infrastructure nationwide, the need for additional federal investment remains. According to the FAA's National Plan of Integrated Airport Systems (NPIAS) for 2021-2025, airports have \$43.6 billion in Airport Improvement Program-eligible projects – or \$8.7 billion annually. And that figure does not include other necessary infrastructure projects, which increases total airport capital needs to more than \$20 billion annually, according to ACI-NA.

The AIP-eligible infrastructure needs for GA airports identified in the NPIAS total over \$14.5 billion. But that estimate does not factor in rising inflation; increasing labor and construction costs; and supply chain constraints. We are seeing the impacts of inflation firsthand in Naples. We recently updated our capital improvement program budget after seeing several bids come in well above our 2022 budget. We now project costs to increase nearly 50 percent from 2019 projections. These price increases bring our 5-year capital needs to \$105 million.

As members of this subcommittee know, GA and smaller commercial service airports disproportionately rely on AIP funding to meet their infrastructure needs; however, the authorization for traditional AIP funding hasn't increased since 2012. As Congress prepares for the next FAA reauthorization bill, AAEE is urging Congress to increase traditional AIP funding and continue to authorize funds for supplemental discretionary grants to help GA and commercial service airports meet their ongoing infrastructure needs.

In conjunction with increasing AIP funding, we ask Congress to reexamine the AIP entitlement for all nonprimary airports, including GA airports, since it has remained the same amount for every airport for more than 20 years despite inflation and the dramatic differences in aircraft activity, operations, and economic impact at the wide array of GA airports. The NPIAS categorizes nonprimary airports based on their activity level as either national, regional, local, or basic. National airports, like Naples, have "very high levels of activity" and are in metropolitan areas. The Naples Airport has nearly 400 based aircraft, 105,000 annual operations and a \$440 million annual economic impact.

Regional airports have “high levels of activity” and are also in metropolitan areas. A regional airport near Naples has 33 based aircraft, 58,000 annual operations and a \$32 million annual economic impact. Local airports have “moderate levels of activity” and often accommodate flight training and emergency services. Basic airports have “moderate to low levels of activity” and provide facilities for private GA pilots.

Considering rising inflation over the past 20 years and the wide diversity of GA airports, I believe that Congress should work with the airport community to consider proposals that would refine the AIP nonprimary entitlement to address increased costs and to align with each of the nonprimary categories versus the current one-size-fits-all policy.

### **FAA Contract Tower Program**

I would like to thank the leadership and members of this subcommittee for being strong supporters of the FAA Contract Tower (FCT) Program – a successful public private partnership that enhances aviation safety at GA and commercial service airports around the country. Naples is one of 260 airports from 46 states, including 26 in Florida, that currently participate in the FCT program, which manages 28 percent of the nation’s air traffic control operations at towered airports. The program has been audited numerous times by the Department of Transportation Office of Inspector General, which has consistently validated that contract towers are cost effective and maintain safety records comparable to FAA-staffed towers.

The IIJA included at least \$300 million over five years to repair or replace aging air traffic control towers at FCT airports – \$100 million for sponsor-owned facilities and \$200 million for FAA-owned facilities. Considering that many air traffic control towers are 50 years of age or older, this funding is a welcome step in the right direction. But we urge Congress to provide additional resources to replace outdated towers, and to make NextGen equipment and radar displays available for installation at contract towers. These actions would ensure contract towers can continue to operate safely and efficiently.

The pilot shortage has understandably received a great deal of attention in recent weeks. But we’re facing an increasing shortage of air traffic controllers, too. The companies that operate contract towers are experiencing intensifying staffing pressures brought upon by COVID-19, prior vaccine mandates, the rising cost of living, and frequent vacancies created when younger controllers leave their positions at FCT airports to serve at FAA-staffed towers.

The Naples Tower has only a manager and seven controllers to fill a 16-hour daily schedule with up to four controllers working simultaneously during peak periods of activity. Additionally, I only recall two brief periods in my six-year tenure where the Naples Tower was fully staffed. With a small staff, even one vacancy can have a big impact.

We urge Congress to ask the FAA to refine its staffing methodology and to work with contractors to minimize the adverse impact when the FAA hires controllers from contract towers to work at FAA-staffed facilities, especially with short or no notice. We encourage the FAA to work with the companies that operate contract towers to allow innovative hiring and training processes to increase the stream of applicants to be qualified controllers. We also recommend that the FAA collaborate with their colleagues at the Department of Labor to address the rising cost of living for controllers by updating the

Service Contract Wage Act. Further, we urge the FAA to carefully consider how any proposed realignment of service areas could impact the successful FCT program.

Finally, I would like to thank Representatives Julia Brownley (D-CA) and Rodney Davis (R-IL) for introducing H.R. 1283, the Continuity for Operators with Necessary Training Required for ATC Towers (CONTRACT) Act and everyone on this subcommittee who cosponsored it. This bipartisan legislation, which currently has 75 cosponsors, would provide an incentive for retired federal air traffic controllers to continue working as controllers at contract tower airports and help reduce staffing challenges those airports are facing. The CONTRACT Act would help reduce some of those intense staffing strains, and I urge Congress to pass the legislation as soon as possible.

### **Aircraft Noise**

Like many other communities, Naples is extremely noise sensitive with residential development surrounding the airport. Downtown Naples is less than a mile from the end of our primary runway. Naples has long been known as an industry leader in noise abatement as the only airport to successfully complete a Part 161 Study known as a Notice and Approval of Airport Noise and Access Restriction that resulted in the ban of Stage II noise emission jets 15 years ahead of their nationwide phase out in 2015. The airport is once again working to develop noise abatement strategies in response to the rapid growth in jet activity over the past few years through its fourth Part 150 Noise Study.

During a hearing before this subcommittee in May, the FAA indicated that, “Since the mid-1970s, the number of people living in areas exposed to significant levels of aircraft noise in the United States has declined from roughly 7 million to about 440,000 in 2019.” However, the FAA’s recent Neighborhood Environmental Survey, released in January 2021, indicates that community annoyance associated with aircraft noise is considerably greater than in the past. Despite significant advancements in aircraft engine technology coupled with the Naples Airport Authority’s long history of noise abatement and public engagement efforts, we have found that members of the community are still substantially affected by aircraft noise. It’s clear that federal noise policy established decades ago has proven to be extremely beneficial, but it’s time we reevaluate how to best respond to the current environment.

The viability of many GA airports may be at risk by maintaining the status quo. On behalf of the Naples Airport Authority and our community, I believe a fundamental update of federal noise policy is needed along with a more collaborative approach between the FAA, airports, and local communities. One example may be to permit common sense measures like seasonal contours for communities like Naples (where two thirds of jet activity occur in a five-month period) that would better help to address unique dynamics rather than the one-size-fits-all policy we have today. Changes to philosophy in airspace design that give greater consideration to community noise exposure would help to build greater trust between the FAA, airports, and the communities they serve. Additional research towards further reductions in aircraft engine and airframe noise should also be considered.

### **Leaded Avgas**

Like our counterparts at commercial service airports, GA airports are doing our part to reduce greenhouse gas emissions and to promote sustainability. For decades, the GA industry has also been focused on a smart and safe transition toward an unleaded high-octane fuel that meets the needs of the entire GA fleet. So far, only low-compression engines can burn the unleaded fuels that are currently

available. However, 75 percent of the total GA aviation gas (avgas) consumption is by aircraft requiring 100-octane fuel, which presently can only be achieved with a lead-based additive.

Through AAAE, GA airports are participating in the Eliminate Aviation Gasoline Lead Emissions (EAGLE) initiative, a public-private partnership between the federal government and industry stakeholders to transition to lead-free avgas for piston-engine aircraft by the end of 2030. Like the proposed blender's tax credit for sustainable aviation fuels, we believe similar incentives to scale up production and distribution of these new GA fuels will be critical to a successful transition.

GA airports are eager to be part of the solution to transition away from leaded avgas and better understand what types of infrastructure improvements are needed to support widespread use of the new fuel. Updated AIP eligibility criteria for new storage and distribution systems at GA airports is likely needed. Nevertheless, I believe the premature ban of leaded avgas before a viable replacement is approved would threaten the economic viability of most GA airports and should be rejected.

## **PFAS**

Since the 1970s, FAA has required Part 139 commercial service airports to provide aircraft rescue and firefighting (ARFF) services using aqueous film forming foams (AFFF) that meet specific standards for firefighting. These approved foams contain PFAS. Many GA airports have relied upon and followed FAA guidance in using AFFF to ensure aviation safety. Like Part 139 airports, GA airports are anxiously awaiting the FAA to approve a fluorine-free foam.

On May 31, the U.S. Navy provided industry with an opportunity to comment on a draft MIL-SPEC for a fluorine-free foam, signaling that the Department of Defense (DOD) and FAA are making significant progress in finding a suitable replacement foam to AFFF and are on track to meet the January 2023 deadline set in the FY20 National Defense Authorization Act. However, without a proactive transition plan from FAA in collaboration with other relevant federal stakeholders, the transition from AFFF to fluorine-free foam for airports of all sizes that have either used AFFF by regulation or in accordance with FAA guidance will likely face numerous hurdles.

I encourage this committee to press the FAA, in coordination with the Environmental Protection Agency and DOD, to provide timely guidance for all airports to prepare for such a transition. That guidance should include: acceptable standards and practices for the decontamination of existing ARFF vehicles and other equipment; timelines to procure fluorine-free foam; cost-effective options for the disposal of existing foam; and how airports can properly train firefighters to use new fluorine-free foam.

## **Resiliency Planning**

Much of the U.S. population and air transportation infrastructure is located at relatively low coastal elevations. Rising sea levels combined with more frequent, greater intensity storms are increasingly placing many airports at risk. The Federal Emergency Management Agency's updated Flood Insurance Rate Maps reflect the growing vulnerability of coastal areas, and the changes in Base Flood Elevation are increasingly inhibiting airport growth and redevelopment.

In Southwest Florida, both the Army Corps of Engineers and National Oceanic and Atmospheric Administration have recently undertaken separate efforts to study and plan for the adaptation of coastal urban and natural ecosystems. However, in my experience, the FAA has not been aligned with those

initiatives. For example, it was critical for us to include a resilience planning component to Naples' recent Master Plan update given the low elevation of our airfield facilities at only five to seven feet above sea level. Disappointingly, though, the FAA deemed that element ineligible for AIP funding.

In the past, the FAA has successfully partnered with other federal agencies on important environmental issues such as wildlife hazards at airports. We urge Congress to explore opportunities for the FAA to better collaborate with airports, their communities, and other federal agencies to help plan for and fund resiliency efforts.

### **Advanced Air Mobility**

The future of Advanced Air Mobility (AAM) is quickly becoming the present for the aviation industry, with several companies currently developing eVTOL aircraft. These aircraft, which will range in size from single-passenger aircraft to large shuttles, will bring accessibility to cities, underserved communities, and geographically distant regions, while also offering immense environmental advantages. Existing infrastructure, and in particular, GA airports, will likely play a major role in this new, AAM ecosystem.

As federal stakeholders develop various regulations and standards to help advance the maturation of AAM aircraft operations and vertiport design, it is imperative that GA airports play an integral part in that process. The House-passed Advanced Air Mobility Coordination and Leadership Act, which was introduced by Representative Sharice Davids (D-KS) and Ranking Member Graves, would do just that by ensuring that airport operators have a seat at the table as federal and industry stakeholders coordinate efforts to safely integrate these new technologies into the NAS.

Concurrently, Congress should provide additional funding for AAM vertiport infrastructure at GA airports without jeopardizing funding for traditional airport infrastructure projects. The House-passed AAIM Act, introduced by Chairman Larsen and Ranking Member Graves, would accomplish this by making airport sponsors eligible for planning grants to develop and deploy vertiport infrastructure required for AAM operations. I would like to thank the members of this subcommittee for your continued leadership on this important issue and for supporting these two pieces of legislation, which will help bring us one step closer into making AAM a reality.

### **Conclusion**

In closing, GA airports like Naples are complex aviation centers, acting as national assets that play an indispensable role in meeting the specific needs of the communities they serve. The COVID-19 pandemic has showcased just how critical GA airports are to the NAS, and with continued support from Congress, the future for GA airports is brighter than ever.

I am grateful for the opportunity to provide these views of the general aviation airport community on how we can maintain and grow GA operations across the country. On behalf of AAIE and all my colleagues at GA and commercial services airports around the country, we look forward to working with this subcommittee as you gear up for the next FAA reauthorization bill. Thank you for your consideration and the opportunity to testify.