

**GENERAL AVIATION
STRATEGIC BUSINESS PLAN**

JANUARY 2022



Rhode Island

TABLE OF CONTENTS

Chapter 1 – General Aviation Strategic Business Plan (GASBP)	Page
1.1 Introduction.....	4
1.2 Purpose and Key Elements of GASBP	5
1.3 Airport Ownership Overview and Classification	5
1.4 Vision, Mission, and Core Values	6
1.5 Planning Background.....	8
1.6 GASBP Process Overview.....	9
Chapter 2 – Situational Analysis.....	10
2.1 Introduction.....	10
2.2 National Outlook on Aviation.....	10
2.3 Rhode Island Aircraft Operations Trends and Forecast	11
2.4 Infrastructure Assessment Results.....	13
2.4.1 Aerial Obstruction Surveys	13
2.4.2 Pavement Management Program	14
2.4.3 Facility Inspections and Evaluations	15
2.5 Strength, Weaknesses, Opportunities, and Threats (SWOT) Analysis.....	16
2.5.1 Goal Preparation Utilizing SWOT.....	18
2.6 Community and Stakeholder Outreach.....	19
2.6.1 Outreach Process and Response.....	21
Chapter 3 – Airport Business Development	23
3.1 Introduction.....	23
3.2 Business Development Marketing	23
3.2.1 North Central Airport (SFZ).....	23
3.2.2 Quonset State Airport (OQU).....	24
3.2.3 Newport State Airport (UUU)	26
3.2.4 Westerly State Airport (WST)	27
3.2.5 Block Island State Airport (BID).....	28
Chapter 4 – Financial Analysis.....	29
4.1 Introduction.....	29
4.2 Airport Financial Benchmark Analysis.....	29
4.3 Comparison of Total Fees.....	33
4.4 Financial Analysis.....	36
4.4.1 Operating Revenue and Expense Projections.....	37
4.4.2 Capital Improvement Program	41

4.5	Subsidy Reduction Strategies	42
4.6	Financial Recommendations	48
Chapter 5 – Strategic Action Plans, Implementation & Summary		49
5.1	Introduction.....	49
5.2	Strategic Action Plans.....	49
5.3	Implementation.....	50
5.4	Summary.....	50

List of Tables

Table 1-1:	FAA National Plan of Integrated Airport System Role.....	6
Table 1-2:	Airport Master Plan Status	8
Table 2-1:	Aviation Forecast for Based Aircraft and Operations	12
Table 2-2:	Obstruction Analysis Data Summary.....	13
Table 2-3:	Airport Pavement Analysis Data Summary	15
Table 2-4:	Airport Facility Inspection Data Summary	16
Table 2-5:	GASBP Goals	19
Table 2-6:	Stakeholder Conflicition	20
Table 3-1:	SFZ Available Parcels for Development.....	23
Table 3-2:	OQU Available Parcels for Development	25
Table 3-3:	UUU Available Parcels for Development.....	26
Table 3-4:	WST Available Parcels for Development	27
Table 3-5:	BID Available Parcels for Development.....	28
Table 4-1:	Benchmark Comparison OQU	31
Table 4-2:	Benchmark Comparison WST, UUU, SFZ, and BID	32
Table 4-3:	Projections of Additional Revenue Potential by GA Airport	40
Table 4-4:	Scenario 5 Explained, RIAC Charges Same Fuel Flowage Fee & Fuel Tax as CT ..	47

List of Figures

Figure 1-1:	RI System of Airports.....	4
Figure 1-2:	Five Primary Elements of GASBP.....	5
Figure 1-3:	Vision, Mission, and Values.....	7
Figure 1-4:	Strategic Plan and Other Airport Plans	8
Figure 1-5:	GASNP Process – The Numbers at a Glance.....	9
Figure 2-1:	Aircraft Operations Trend from 2000-2020 by Airport.....	11
Figure 2-2:	RI Aircraft Operations Trend from 1999-2020 by RI GA Airport vs National.....	12
Figure 2-3:	SWOT Analysis Matrix	17
Figure 3-1:	SFZ Aerial of Available Parcels.....	24
Figure 3-2:	OQU Aerial of Available Parcels	25
Figure 3-3:	UUU Aerial of Available Parcels	26
Figure 3-4:	WST Aerial of Available Parcels.....	27
Figure 3-5:	BID Aerial of Available Parcels	28

General Aviation Airport Strategic Business Plan

Figure 4-1: GA Airport Payroll and Benefit Percentage.....	33
Figure 4-2: How the GA Airports Revenue and Expenses Compare to CAA	34
Figure 4-3: CAA Capital Expenditures FY 2015 – FY2020	35
Figure 4-4: RIAC Comparison to Connecticut and Massachusetts Aviation Fuel Tax	36
Figure 4-5: Historical and Projected Operating Revenue (FY 2019-2030)	38
Figure 4-6: Historical and Projected Operating Expenses (FY 2019 -2030)	39
Figure 4-7: CIP by Airport & Funding Sources	41
Figure 4-8: Annual Projected Debt Service	43
Figure 4-9: Contribution/Subsidy Project (No Capital/Debt)	44
Figure 4-10: Total Contribution/(Subsidy).....	44
Figure 4-11: 1 of 2 Aviation Fuel Tax Revenue Projections by Scenario	46

Appendix A: List of Public Comments and Responses to GA Strategic Business Plan

CHAPTER 1 – GENERAL AVIATION AIRPORT STRATEGIC BUSINESS PLAN

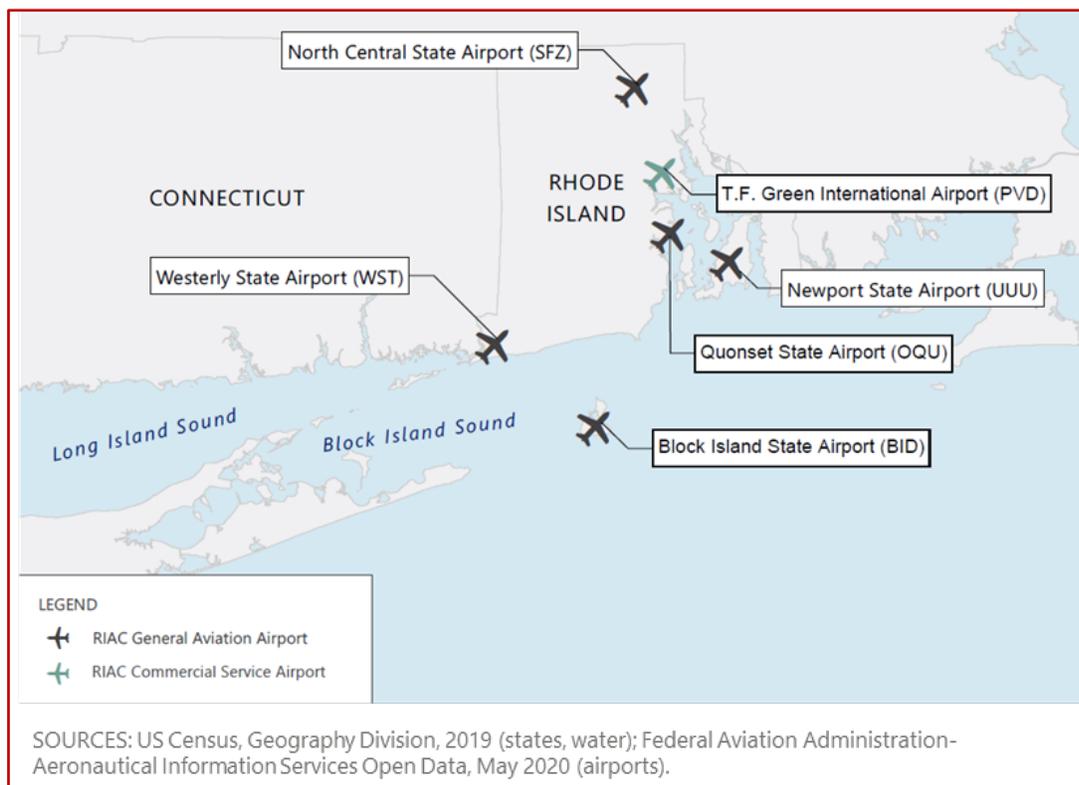
1.1 Introduction

The Rhode Island Airport Corporation (RIAC) has undertaken a measured and comprehensive approach to improve the planning process and focus on future development efforts and financial performance, informed by the RIAC staff, town leaders, stakeholders, and communities, for our General Aviation (GA) system of airports.

This method will assist RIAC with the development of effective and relevant transportation assets for the long-term benefit of the surrounding communities and the State of Rhode Island. To ensure that the GA airport's future growth is maximized to its full potential, RIAC elected to complete a GA Strategic Business Plan (GASBP). This GASBP identifies and equates the long-term Mission, Vision, and Goals of the facilities and incorporates them into a 10-year capital planning and development efforts.

The five GA airports, as depicted in **Figure 1-1**, included under this GASBP are Block Island State Airport (BID), Newport State Airport (UUU), North Central State Airport (SFZ), Quonset State Airport (OQU), and Westerly State Airport (WST).

Figure 1-1: Rhode Island System of Airports



General Aviation Airport Strategic Business Plan

The overarching goal of this strategic plan is to identify a feasible and sound strategy that will allow RIAC to progressively reduce and ultimately eliminate the annual financial subsidy from Rhode Island T.F. Green International Airport (PVD) that is required for the GA Airports to remain as financially self-sufficient as possible.

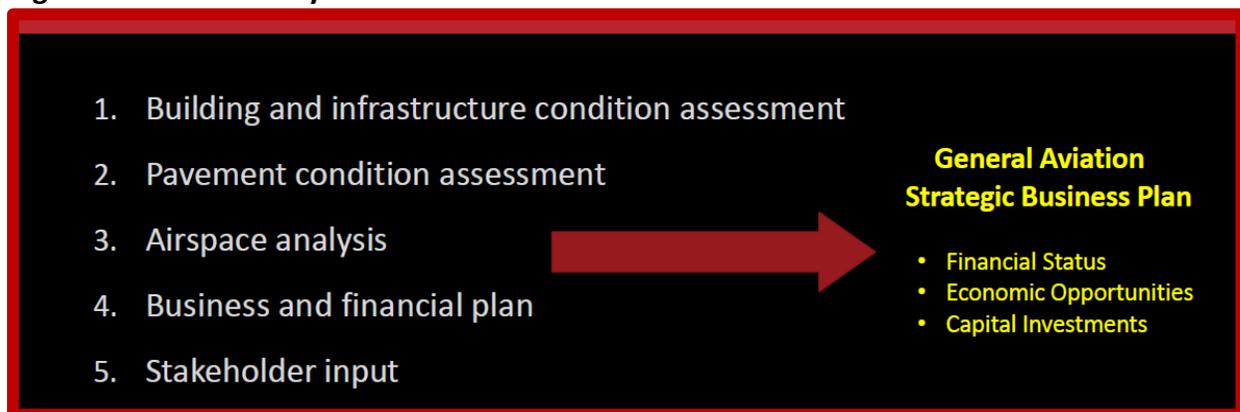
1.2 Purpose and Key Elements of the GASBP

The GASBP serves as a resource document for the RIAC and stakeholders, which utilizes a logical and disciplined structure to set out goals, objectives, and action plans that will drive the management and development of the GA airport system over the next 10 years. The purpose in implementing a GASBP is to address questions such as:

- What is the future direction of the general aviation airports in Rhode Island?
- What is the scale of desired future operations?
- How should each airports financial position be improved to reduce or perhaps eliminate the current subsidy from Rhode Island T.F. Green International Airport (PVD) over a 10-year period?
- How can communication be improved between RIAC, stakeholders, and the surrounding community for each airport?

The five critical elements necessary to address these and other questions have been identified and developed as part of this process, as shown in **Figure 1-2**.

Figure 1-2: Five Primary Elements of GASBP



The goal of the GASBP is to produce a viable plan to improve the business and operational standings of the GA airport system now and into the future.

1.3 Airport Ownership Overview and Classification

The Rhode Island general aviation airport system includes the five public airports. Along with Rhode Island T.F. Green International Airport (PVD), the airports are owned by the Rhode Island Department of Transportation (RIDOT) and operated/maintained by RIAC under a lease agreement with the Rhode Island Department of Transportation (RIDOT) since 1993. RIAC outsources for the services related to Fixed Based Operations (FBO) to include fueling and other

General Aviation Airport Strategic Business Plan

services for based and transient aircraft. The airports are maintained by dedicated and specifically assigned RIAC staff for each airport.

On a national level, the Federal Aviation Administration’s (FAA) National Plan of Integrated Airport System (or NPIAS) identifies 3,300 plus airports that are essential for an effective national system of airports. Almost 3,000 are essentially GA airports. The NPIAS categorizes them as “primary airports” (large, medium and small hub, non-hub), and “non-primary airports” (commercial service, reliever, and general aviation). The airport role also defines the federal funding for airport development as established by Congress. **Table 1-1** identifies each airport by its FAA NPIAS role, along with a corresponding description.

Table 1-1: FAA National Plan of Integrated Airport System Role

Airport	NPIAS Role	NPIAS Description
Westerly State ¹	Primary (Non-Hub)	Scheduled airline service and >10,000 enplaned passengers each year. The “Hub” designation is determined by the number of enplaned passengers at the airport as a percentage of the national total of enplaned passengers. BID and WST are classified primary non-hub airports ² . Their total enplanements are just over the 10,000 enplanement mark based on New England Air service.
Block Island State ¹	Primary (Non-Hub)	
North Central State	GA/Reliever	Designated by the FAA to relieve GA congestion at Hub airports. OQU and SFZ are GA Relievers to PVD.
Quonset State	GA/Reliever	
Newport State	General Aviation	Do not receive scheduled commercial service. This would include UUU.

1.4 Vision, Mission, and Core Values

The Rhode Island Airport Corporation’s continued success and the success of these airports, and PVD, is framed around our Vision, Mission, and core Values as presented in **Figure 1-3**.

¹ The NPIAS role WST & BID can fluctuates because the minimum qualifying passenger count can in some years be <10,000 enplanements. The Table 2-1 reflects the most current condition (2020)

² This designation is somewhat misleading because the dominant activity and aircraft design type still relates to that of a GA airport which RIAC considers both these airports.

Figure 1-3: Vision, Mission, and Values



Our Vision and Mission statements capture the intent of these GA airport to continue to grow into the future as a safe, secure, and efficient facilities that serves as an economic engine to achieve those desired growth opportunities sought after by the community and region. To fulfill the Vision and Mission, each airport must build on its current foundation and improve its capabilities into the future to accommodate those goals for operational effectiveness and economic opportunities set forth by the Airport and community.

Maintaining the Values is also key to the success of this GASBP.

- **Public Service**

As stewards of these airports, continue to foster a link between airport leadership and the needs of the aviation and surrounding communities.

- **Customer Service Excellence**

Provide a customer-friendly transportation experience that meets or exceeds expectations.

- **Entrepreneurship**

Be innovators, and a source of new ideas for services and additional revenues.

- **Continuous Improvement**

Always strive to improve services and processes through continued assessment of performance.

- **Teamwork**

Provide leadership and foster synergistic ways of working with each person committed and working towards the Vision and Mission.

Establishing an appropriate Mission and Vision for the future, and developing practical and obtainable objectives provides a road map for the success of this Plan.

1.5 Planning Background

Since RIAC’s inception in 1993, this is the first time a comprehensive and dedicated effort has been made to focus on a 10-year strategic business plan, with the goal of reducing or perhaps eliminating the subsidy over time. This is not to suggest that no planning efforts have not been made, as comprehensive system and master planning has occurred under FAA guidelines, as well as annual capital and budget planning. This GASBP will now be part of the planning process, and an asset that focuses on financial performance and actions to improve the performance over time.

The RI Airport System Plan, last updated in 2017, evaluated the airport system based on the latest inventory of data, revised forecasts and improvements implemented since the 2004. Also acting as resource documents for this effort, Master Plans have been completed, of which several are in need of an update. Master planning updates will occur following the completion of the GASBP process. **Table 1-2** provides the dates of the Master Plans and Airport Layout Plans (ALP) for each airport.

Table 1-2: Airport Master Plan Status

Airport Name	FAA Approved ALP	AMP	Status of Planning
Block Island (BID)	03/22/06	06/05	Update Recommended
Westerly State (WST)	07/16/09	04/09	Update Recommended
Newport State (UUU)	04/16/08	12/07	Update Recommended
North Central State (SFZ)	06/29/10	03/10	Update Recommended
Quonset State (OQU)	07/15/15	12/14	Current

As depicted in **Figure 1-4**, each of these two plans cover a 20 year period. Additionally, a five year Capital Improvement Plan (CIP - five year outlook) and a RIAC budgeting effort (one year outlook) are completed on an annual basis.

Figure 1-4: Strategic Plan and Other Airport Plans



1.6 GASBP Process Overview

In 2019, RIAC identified the need to take a holistic approach to developing a GASBP that included a 10-year Capital Improvement Plan (CIP) for all five of the GA airports. This approach would view the five GA airports as part of the overall airport system in Rhode Island and not as separate airports unto themselves. This started with assessing all five GA airports on pavement, facilities, and obstructions penetrating or nearly penetrating the airspace surrounding the GA airports. RIAC invested approximately \$1.24M in these assessments. Approximately 1,800 pages of assessments have been posted to the RIAC website. These assessments are the basis for the 10-year Capital Improvement Plan (CIP) that RIAC will invest \$98M with a projected economic impact of \$193M across Rhode Island.

In conjunction with the assessments, RIAC reached out to the town councils of the surrounding ten communities that abut the GA airports notifying them of RIAC's intentions of developing a 10-year GASBP and requesting their participation in future meetings. During the last three years, RIAC has posted 20 notices for public meetings, held 28 meetings with 18 elected officials and 41 stakeholders, and spent approximately 9,000 staff hours on the plan. **Figure 1-5** summarizes these numbers at a glance.

Figure 1-5: GASBP Process - The Numbers at a Glance



It is this holistic approach to the airport system that will leverage RIAC's capabilities to the fullest in providing the GA community the best services possible.

CHAPTER 2 – SITUATIONAL ANALYSIS

2.1 Introduction

The GASBP must be developed within the context of national outlook on aviation. The GA airport's future development plans are dependent upon the comprehension and application of economic factors, both positive and negative, to successfully plan a sound business course. A review of the Federal Aviation Administration' (FAA) outlook on aviation necessary to provide a comprehensive macro view of the development environment.

The following sections are intended to provide situational analysis in order to structure a picture of the current national aviation climate, RI aircraft operations trends and benchmarking review, existing condition of each airport based upon the results of the three assessments, a Strengths – Weaknesses – Opportunities – Threats (SWOT) analysis, and feedback from the community outreach efforts.

2.2 National Outlook on Aviation

Business levels at airports are influenced by national and state factors. The state of the national economy, recent trends in air travel, aircraft use, and new aircraft manufacturing all influence the volume and type of aviation activity that may occur at a general aviation airports. The combination of these influencers and the FBO's own marketing and development efforts will determine the levels of aviation activity. This section explores FAA's national airport industry trends and forecasts, and discusses recent changes in aviation activity that influence the Rhode Island system of airports future.

Information derived from the FAA Aerospace Forecasts for FY 2021 through 2041 indicates that from a national perspective, the long-term outlook for general aviation is favorable. However, the outbreak of the COVID-19 pandemic in 2020, brought a rapid and cataclysmic end to those boom years. Airline activity and profitability tumbled almost overnight and without the financial and competitive strength built up during the boom, airlines would have faced even greater challenges. The GA sector was less affected by the COVID-19 crisis than the airlines. There are new comers in the high-end business jet segment as a result of flying privately due to concerns of the virus. At the lower end new comers included student, private and commercial pilots, joining the existing GA pilot population. They are flying piston aircraft in and out of small airports as well as larger airports that do not have as many commercial flights due to the pandemic. The long-term outlook for general aviation thus is more promising than before, as growth at the high-end offsets continuing retirements at the traditional low end of the sector.

The active general aviation fleet is forecast to increase 0.1 percent a year between 2021 and 2041. While steady growth in both GDP and corporate profits results in continued growth of the turbine and rotorcraft fleets, the largest segment of the fleet – fixed wing piston aircraft will continue to shrink over the forecast period. Against the marginally declining active GA fleet

between 2019 and 2041, the number of GA hours flown is projected to increase by a total of 14.8 percent through 2041 (an average of 0.6 percent per year), as growth in turbine, rotorcraft, and experimental hours more than offset a decline in fixed wing piston hours. When the period of 2021 to 2041 is compared, the total hours flown by the GA aircraft is forecast to increase by an average of 1.0 percent per year, after declining by 9.7 percent between 2019 and 2020, and recovering partially, with a growth of 4.9 percent in 2021 from the previous year.

2.3 Rhode Island Aircraft Operations Trends and Forecast

As part of this Plan, a review of aviation activity trends was performed for Rhode Island to get a sense of Rhode Island historic and current aviation activity.

Figure 2-1 depicts the aircraft operations at each of the GA airports as compared to the national operations trend from 2000 through 2020. As shown, by airport, there was much variation in aircraft operations activity with WST showing the only positive increase, by nearly 25%. Although down by 21% compared to 2000, Rhode Island fared better than the national decline at 29%, as shown in **Figure 2-2**.

Figure 2-1: Aircraft Operations Trend from 2000-2020 by GA Airport

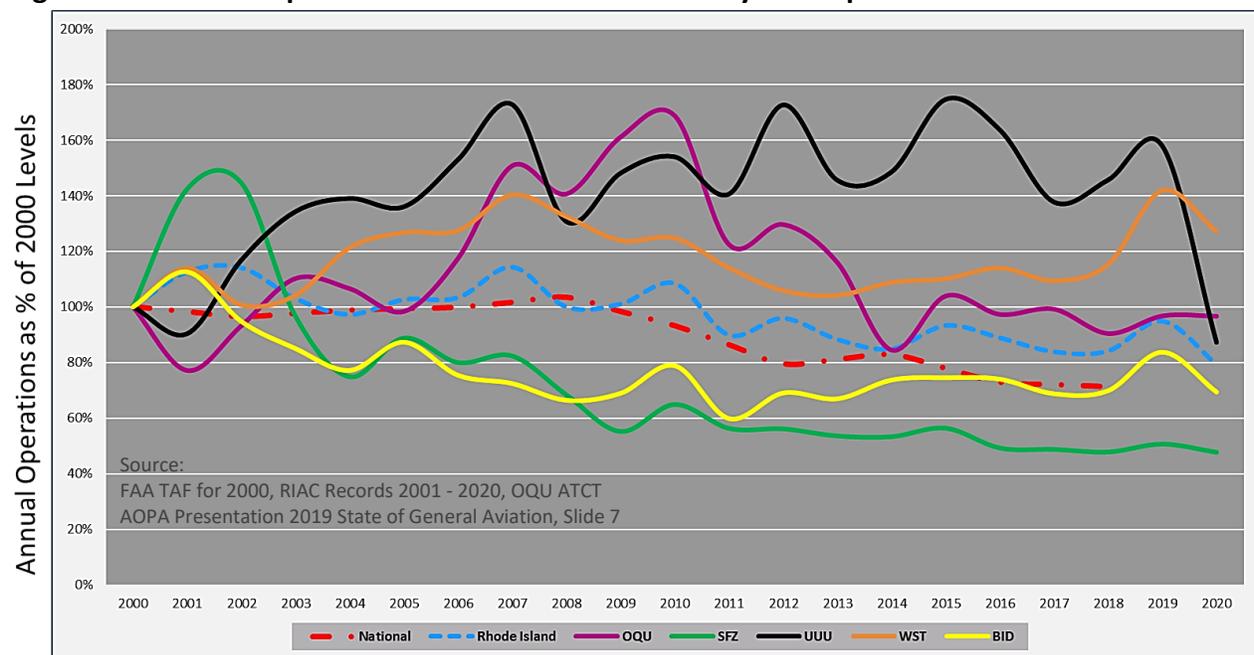
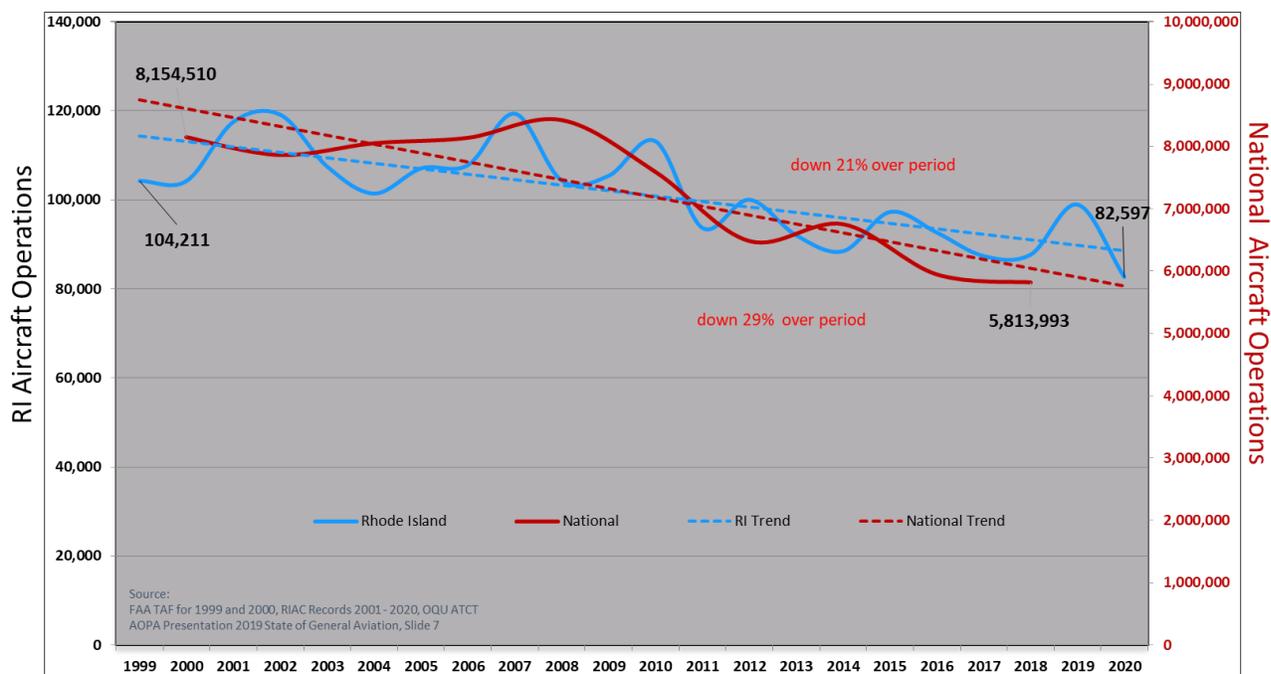


Figure 2-2: RI Aircraft Operations Trend from 1999 -2020 by RI GA Airport Total vs. National



Aviation forecasts were taken from the 2017 Rhode Island State Aviation System Plan, which adopted the FAA Terminal Area Forecast for operations and based aircraft by airport. The system forecasts, **Table 2-1**, shows a summary of the TAF Based Aircraft and Operations forecasts with a base year at 2019.

Table 2-1: Aviation Forecast for Based Aircraft and Operations

Airport Name	2019		2025		2035	
	Based A/C	OPS	Based A/C	OPS	Based A/C	OPS
Westerly [WST]	55	23,861	56	24,338	59	25,311
Block Island [BID]	4	17,600	4	17,952	4	18,670
North Central [SFZ]	90	16,858	92	17,195	97	17,882
Quonset [OQU]	48	18,721	50	19,095	52	19,859
Newport State [UUU]	35	21,852	36	22,289	38	23,180
TOTALS	290	98,892	297	100,869	312	104,902

2.4 Infrastructure Assessment Results

An integral part of this GASBP was to get a snapshot of the condition of the GA airports in three primary areas. These areas included an assessment of the airport obstructions within the airport approach surfaces for each runway end, the condition of airport pavements, and the general condition of the facilities.

2.4.1 Aerial Obstruction Surveys

Aerial surveys of the airspace surrounding each GA airport were conducted in August 2019. The imagery obtained was ortho-rectified and attributes were assigned to vertical features (points in the photography), identifying objects as natural (trees) or human-made (light pole, fence, chimney, etc.). This point data set was then imported into a software program containing the elevations and dimensions of specific airspace surfaces associated with the runways at each airport. Depending on the height of data points relative to the height of particular air surfaces, different colors were added to these points and shown on plans to graphically illustrate height of vegetation with respect to specific air surfaces. The summary of results of the obstructions analysis is provided in **Table 2-2**.

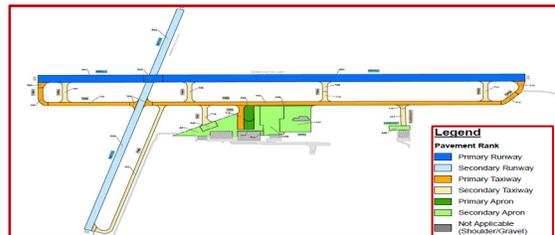


Table 2-2: Obstruction Analysis Data Summary

Airport Obstruction Analysis Project Cost \$500k	Data
Runway Ends Analyzed	18
Total Data Points Identified	1,816
Near Obstructions Data Points	1,058
On Airport Obstructions Data Points	1,246
Off Airport Obstructions Data Points	570
Avigation Easements Required	76
Estimated Cost to Remove	\$7.3M

2.4.2 Pavement Management Program

Timely and appropriate maintenance and strategic rehabilitation are essential for the pavement asset, since repair costs can increase significantly as pavement conditions deteriorate. Airport pavement distresses can also contribute to the



development of loose debris and decreased ride quality, which can both be safety concerns for aircraft operations. FAA grant assurances require airports to have a pavement management program in place for all projects that are to be funded through the Airport Improvement Program (AIP) and with revenue from the Passenger Facility Charge (PFC) Program. This direction is provided in FAA Advisory Circular (AC) 150/5380-7B 'Airport Pavement Management Program (PMP).

Recognizing the importance of airport pavements to safety and the investment they represent, RIAC implemented a Statewide Airside Pavement Management Program (APMP) for the benefit of the five GA airports in the Rhode Island system. This included a pavement condition assessment, identifying pavement-related maintenance and rehabilitation (M&R) needs and associated costs, and prioritizing the needs over the next 10 years.

The results of this program for the five GA airports can be utilized by RIAC and the FAA to identify, prioritize, and schedule pavement maintenance, repair, and major rehabilitation projects. The summary of results from the pavement analysis is provided in **Table 2-3**.

Table 2-3: Airport Pavement Analysis Data Summary

Pavement Management Project Cost \$538k	Data
Runways Inspected	9
Total SF Inspected	696,581
Average PCI for Runways	68 - Fair
Average PCI for Taxiways	68 - Fair
Average PCI for Aprons	66 - Fair
Average PCI for Landside	71 - Satisfactory
Estimated Cost - 10 Years	\$75.1M

2.4.3 Facility Inspections and Evaluations

RIAC completed the building and infrastructure assessments at all five GA airports. This effort inspected vertical facilities including buildings, fencing, vaults, tanks and drainage structures. Similar to the pavement and airspace assessments, this assessment will be instrumental in our ability to prioritize all identified projects into a system capital plan.



RIAC contracted with a qualified consultant to perform general visual inspections of RIAC’s building infrastructure. The inspectors various professional backgrounds, including architecture, mechanical engineering, electrical engineering, fuel systems engineering, and civil engineering. The facilities were inspected from July 2019 to October 2019. The effort included:

- General summary narrative of the inspections and data collection;
- Site plan showing perimeter fence line and gate inspection notes;
- Inspection notes for the various facilities;
- Photo logs corresponding to the comments included in the inspection notes; and,
- Order of Magnitude Cost Estimates for RIAC’s Capital Improvement Plan (CIP).

The summary of results from the pavement analysis is provided in **Table 2-4**.

Table 2-4: Airport Facility Inspection Data Summary

Infrastructure Evaluations Project Cost \$198k	Data
Structures Inspected	44
LF of Fence Line Inspected	63,000
Fuel Farms Inspected	4
Electrical Vaults Inspected	5
Segmented Circles/Wind Cones	5
Structures Recommended for Demo	3
Estimated Cost of Repair – 10 Years	\$16.3M

Full details for each of the assessments can be found online at:

<https://www.pvdairport.com/corporate/infrastructure-assessments>

2.5 Strengths, Weaknesses, Opportunities, and Threats (SWOT) Analysis

Generally defined, a SWOT analysis is a standard strategic business planning tool used to identify the strengths, weaknesses, opportunities, and threats associated with a particular action or area. The SWOT analysis involves specifying an objective or an object (in this case the GA airports) and identifying the internal and external factors that are favorable and unfavorable for that object being successful in a given environment. For this GASBP, the following sections summarize the SWOT analysis factors related to the airports that provide the greatest indicators of the current condition.

On June 11, 2021 the SWOT process was initiated by gathering the GASBP working group together to conduct one of the most important elements of the building of a strategic business plan – the SWOT workshop. This workshop provided a venue for the working group to input their diverse perspectives on the unique elements of the GA airports and the future development of the GASBP. The SWOT analysis workshop isolated and categorized actual and perceived strengths and weaknesses and its organization from an internal perspective and opportunities and threats from an external perspective. As noted in the workshop:

- **Strengths** – internal items accomplished particularly well or unique assets of the airports or the organization (RIAC), especially in comparison to competitive and comparable airports or organizations.

Strengths need to be preserved, built on, and leveraged.

- **Weaknesses** – internal items that: (1) are not accomplished particularly well; (2) hinder or prevent desired performance; or (3) are acutely lacking or need to be improved.

Weaknesses need to be addressed and remedied.

- **Opportunities** – external items that could help realize the mission and vision for the airports. Opportunities may be identified by studying changes or trends within the industry, the marketplace, or the community.

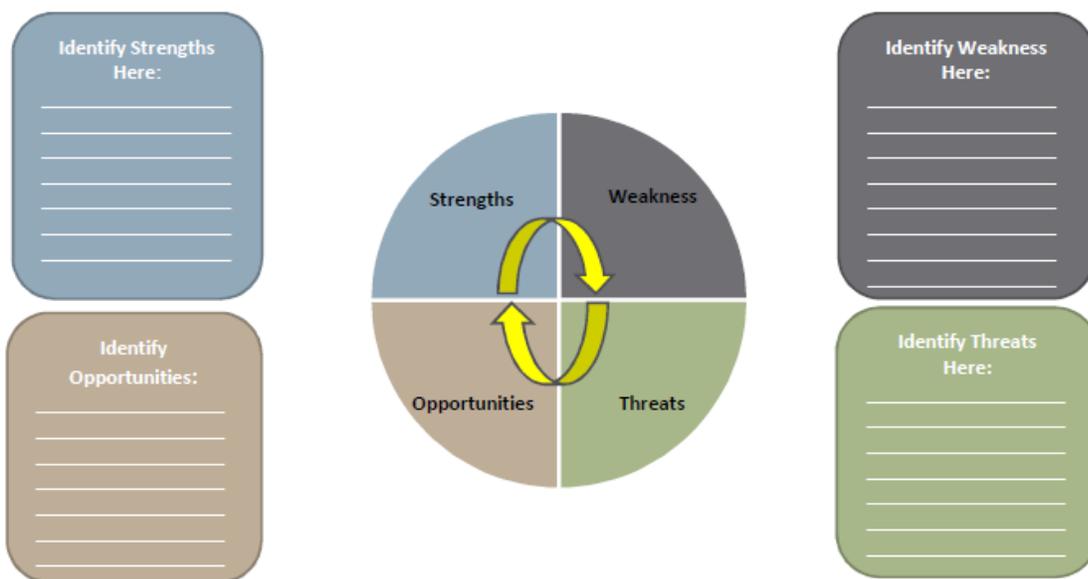
Opportunities need to be seized or capitalized on.

- **Threats** – external items that could threaten the realization of RIAC’s mission and vision. Threats are typically identified by studying changes or trends within the industry and the economy.

Threats need to be managed or, if possible, eliminated.

The following matrix depicted in **Figure 2-3** shows the inter-relationship between the various SWOT elements and how they work with each other.

Figure 2-3: SWOT Analysis Matrix



Source: ACRP Report 77: Guidebook for Developing General Aviation Airport Business Plans

The GASBP Working Group identified the following:

Strengths

- Strong leadership team and RIAC Board of Directors support

General Aviation Airport Strategic Business Plan

- Good data base from three infrastructure assessments conducted and financial analysis
- Management model with dedicated FBO services and committed RIAC attendant for airport upkeep
- Available land for development (15 parcels)
- Newly approved Minimum Standards
- Recently passed Safe Airspace bill
- RI as a destination for leisure

Weaknesses

- No aviation fuel tax as compared to surrounding states
- Financial position of 3 out of 5 airports requires subsidy
- Use of eminent domain for obstruction removal currently challenged in court system
- Lack of “pad ready” sites for development
- Heavy environmental regulations
- Backlog of pavement repair vs. available funding
- Lack of state funding

Opportunities

- Land development (15 parcels)
- Leverage available stimulus funding for projects
- Recent investment by FBO in developing OQU property
- Leverage RI as tourist destination with coastal features, beaches
- Outreach to host town officials and communities on importance of airports and airspace to garner support

Threats

- Infrastructure needs vs. available funding
- Lack of public education on operation and value of airports for emergencies and economic impact
- Vocal minority on airport noise
- Perception of airport expansions
- Reduced utility of airports due runway displacement caused by obstructions
- Economic volatility causing fuel price increases and decreased operations
- Lack of Airport Overlay Zoning from 7 out of 10 host communities
- Lawsuits on noise and obstruction removal

2.5.1 Goal Preparation Utilizing SWOT

The findings of the SWOT analysis served as the basis for the development of goals. **Table 2-5** presents a summary of proposed goals for the GASBP. It demonstrate how leveraging the strengths to take advantage of the stated opportunities, as well as addressing the weaknesses and threats.

Table 2-5: GASBP Goals

Goal #1	Through strong leadership and a focused marketing plan, develop the 15 parcels to increase revenue at the GA airports.
Goal #2	Improve communication by meeting with stakeholders and host towns quarterly to discuss issues and opportunities.
Goal #3	Leverage FAA AIP, available stimulus funding, and potential other funding sources to complete the assessment projects on 10 year CIP.
Goal #4	Explore alternative sources of revenue to reduce subsidy (see Chapter 4).

2.6 Community and Stakeholder Outreach

To gain insight into the daily challenges and direction of stakeholders associated with the airports, a number of meetings were conducted, both via the Zoom platform and in person, with airport tenants, local government, state officials, and members of the general public, to determine the primary issues at the airports and input as to the future development, if any.

In order to provide context on the varying opinions and perspective by several entities, a table was developed and presented in order to demonstrate the many conflicting positions from the FAA to the residents surrounding the airports. **Table 2-6** presents the various stakeholders, and the often conflicting positions, primarily centered on airspace and obstruction issues.

Table 2-6: Stakeholder Confliction

Federal Aviation Administration	State of Rhode Island	Airport Host Municipalities	Pilots/Stakeholders	Neighbors
<ul style="list-style-type: none"> · Mandates Preservation of Safe Airspace Bill · Controls all U.S. airspace 	<ul style="list-style-type: none"> · Passage of Preservation of Safe Airspace Bill 	<ul style="list-style-type: none"> · Two of ten formally supported Preservation of Safe Airspace Bill and two oppose 	<ul style="list-style-type: none"> · AOPA, RIPA, Skydive Newport and FlightLevel have formally supported the Preservation of Safe Airspace Bill 	<ul style="list-style-type: none"> · Property owners filed a lawsuit in March 2016 in WST preventing hazard removal via condemnation
<ul style="list-style-type: none"> · Requires airspace hazard mitigation 	<ul style="list-style-type: none"> · Passed laws mandating "airport zoning" to mitigate hazard areas in 1999 	<ul style="list-style-type: none"> · Seven of ten municipalities have not implemented airport zoning. Where zoning is in place enforcement can be a challenge 	<ul style="list-style-type: none"> · Support mitigation of airspace hazards 	<ul style="list-style-type: none"> · Mixed stances and positions
<ul style="list-style-type: none"> · Requires fair market value for easement acquisitions · Controls federal funding for easements and obstruction removal 	<ul style="list-style-type: none"> · The State judicial system issued an injunction, through the Superior Court, preventing aviation easement acquisition and obstruction removal via condemnation in 2017 	<ul style="list-style-type: none"> · No support for the ongoing litigation 	<ul style="list-style-type: none"> · Did not respond to airport request to join the lawsuit 	<ul style="list-style-type: none"> · Residents at BID have filed a lawsuit against tenant and RIAC claiming nuisance and inverse condemnation · UUU resident wants far in excess of fair market value
<ul style="list-style-type: none"> · Issues federal funding for capital improvements · Required \$92,000 in 2019 be returned for obstruction removal design at WST 	<ul style="list-style-type: none"> · State exercise condemnation on behalf of RIAC 	<ul style="list-style-type: none"> · Verbally support development at the airport but may not support aviation easements 	<ul style="list-style-type: none"> · Support capital investments 	<ul style="list-style-type: none"> · Most do not support additional development

2.6.1 Outreach Process and Response

The meetings, 28 in total, were conducted by RIAC to include presentation materials to foster discussion on historical issues, future needs, and opportunities where association with the GA airports would be beneficial to future growth. Additionally, a dedicated webpage was established in order to communicate and be transparent throughout the process. The webpage, <https://www.pvdairport.com/corporate/general-aviation-strategic-business-plan>, contains substantive documents to include meeting presentations, minutes, and press releases. While perspectives varied, there were some common themes amongst all airport meetings, which include:

- Dichotomy of keeping or reducing airport activity vs. new development (hangars, ramp);
- Perceived lack of control over aircraft operations related to noise and aircraft height;
- Increased non-aeronautical revenue such as restaurants at WST and UUU; and,
- Timing of infrastructure improvements based upon the three assessments.

At a more specific level, comments through the meeting process and emails received through the dedicated GASBP website were gathered and summarized for each airport. The comments are summarized as follows:

NOTE: this draft final document will be posted for 60-days in order to solicit additional comments to be acknowledged and responded in the final document.

Newport State Airport

- Low flying aircraft, disregard for regulation, safety issue
- Do not expand airport or its operations
- No fuel tax needed
- Displacing of runways are a concern, will likely impact operations and revenue at airport
- Lack of visual aids from runway displacement
- Promote economic impact of airport
- Having electrical outlets on ramp could be a revenue resource

Westerly State Airport

- Lack of visual aids from runway displacements
- Concern about capacity of airport once obstructions are removed
- Quality of life of surrounding residents from noise
- Need for restaurant
- More public information on value of airport economically and connection for emergency to BID

General Aviation Airport Strategic Business Plan

- Need for more hangars
- Noise is an issue and a health hazard
- Taking easements devalues properties
- No bigger jets, keep airport the same

Block Island State Airport

- Increase revenue producing space, even if non-aeronautical such as boat storage, self-storage for contractors, etc.
- Noise of aircraft – no respect for residential areas, bad quality of life, impact on home values
- Need for additional paved ramp space
- Need for commercial “buffer” zone
- No development, airport is an environmentally sensitive area
- Hangars and buildings are eye sore for residents
- More community input on land use
- Need a noise study to determine noise levels

Quonset State Airport

- Need additional hangar space
- Fuel is expensive

North Central Airport

- Need to improve minimums for the approach
- Need additional hangar space
- Airport is an economic generator for the area

CHAPTER 3 – AIRPORT BUSINESS DEVELOPMENT

3.1 Introduction

As the GASBP has progressed, the Rhode Island Airport Corporation (RIAC) has commenced with an aggressive airport business development initiative at all five GA airports. This initiative, through the efforts of a local real estate broker, is focused upon the long term development of 15 parcels totaling nearly 140 acres, primarily identified through a review of the Master Plans for each airport. Potential future revenue streams as a result of these development opportunities will assist in reducing the subsidy, and is discussed in further detail within Chapter 4 (Table 4.3), Financial Analysis.

3.2 Business Development Marketing

The most effective utilization of land at each of the GA airports will occur if the demand is identified through proper and effective marketing. This approach will allow for the most efficient development of aeronautical and non-aeronautical businesses and help promote the highest and best use of the available developable land. The following is an overview of each airport, describing the available parcels.

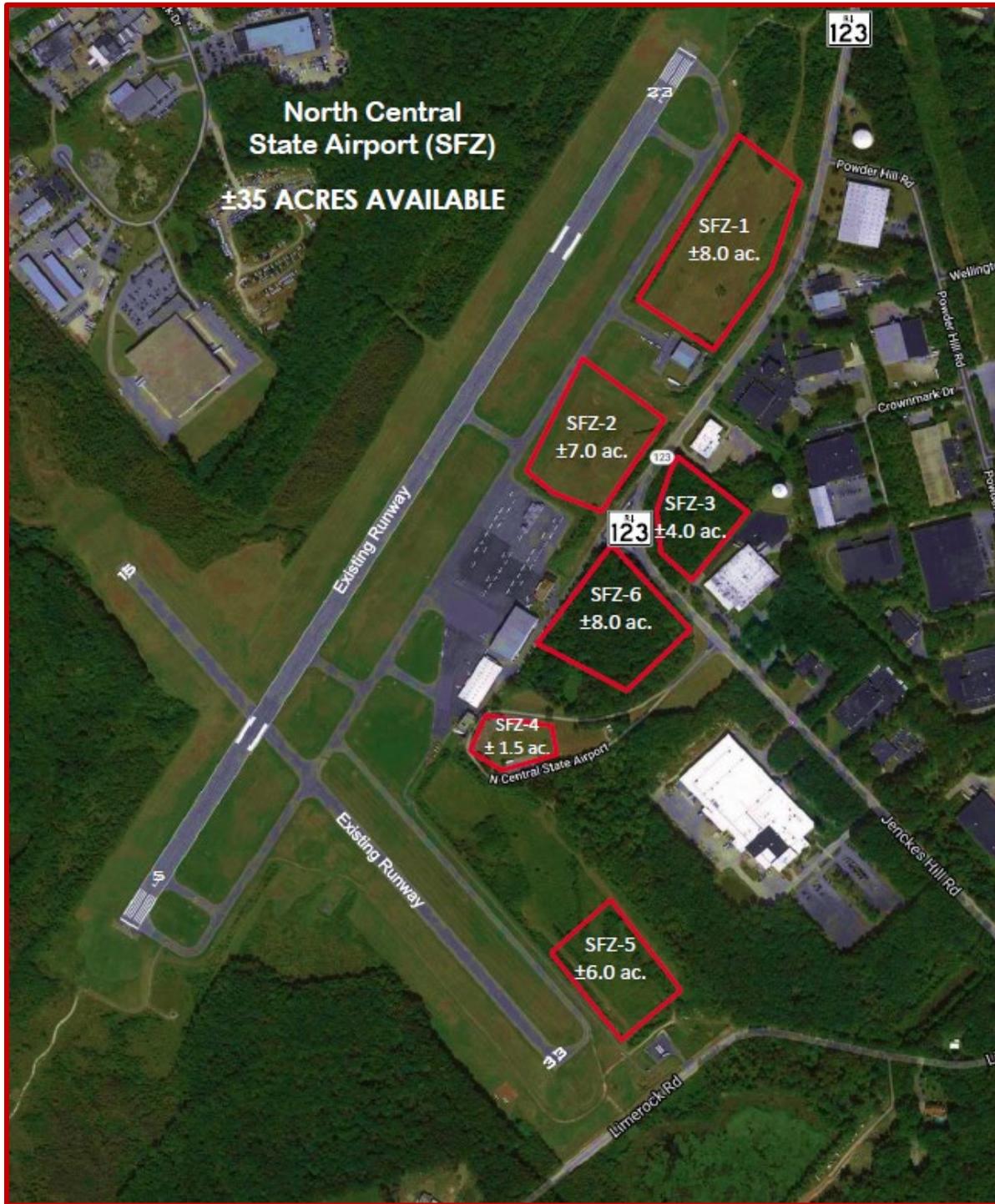
3.2.1 North Central State Airport (SFZ)

There are six identified parcels available for development as described in **Table 3-1**, and depicted in **Figure 3-1**.

Table 3-1: SFZ Available Parcels for Development

Airport	Parcel	Approx. Area (acres)	Appraised Lease Rates (\$psf/yr)	Highest & Best Use
North Central/SFZ	SFZ-1	8.00	\$ 0.30	Hangar
	SFZ-2	7.00	\$ 0.30	Hangar
	SFZ-3	4.00	\$ 0.21	Solar
	SFZ-4	1.50	\$ 0.20	
	SFZ-5	6.00	\$ 0.25	Hangar
	SFZ-6	8.00	\$ 0.21	Solar

Figure 3-1: SFZ Aerial of Available Parcels



3.2.2 Quonset State Airport (OQU)

There are two identified parcels available for development as described in **Table 3-2**, and depicted in **Figure 3-2**.

Table 3-2: OQU Available Parcels for Development

Airport	Parcel	Approx. Area (acres)	Appraised Lease Rates (\$psf/yr)	Highest & Best Use
Quonset/OQU	OQU-2	11.50	\$ 0.25	Hangar
	OQU-3	10.50	\$ 0.10	
	OQU-4	77.00	\$ 0.10	

Figure 3-2: OQU Aerial of Available Parcels



3.2.3 Newport State Airport (UUU)

There are two identified parcels available for development as described in **Table 3-3**, and depicted in **Figure 3-3**.

Table 3-3: UUU Available Parcels for Development

Airport	Parcel	Approx. Area (acres)	Appraised Lease Rates (\$psf/yr)	Highest & Best Use
Newport/UUU	UUU-1	1.67	\$ 0.25	Hangar
	UUU-2	2.00	\$ 0.25	

Figure 3-3: UUU Aerial of Available Parcels



3.2.4 Westerly State Airport (WST)

There are two identified parcels available for development as described in **Table 3-4**, and depicted in **Figure 3-4**.

Table 3-4: WST Available Parcels for Development

Airport	Parcel	Approx. Area (acres)	Appraised Lease Rates (\$psf/yr)	Highest & Best Use
Westerly/WST	WST-1	1.60	\$ 0.25	Hangar
	WST-2	0.31	\$ 0.50	Storage

Figure 3-4: WST Aerial of Available Parcels



3.2.5 Block Island State Airport (BID)

There are two identified parcels available for development as described in **Table 3-5**, and depicted in **Figure 3-5**.

Table 3-5: BID Available Parcels for Development

Airport	Parcel	Approx. Area (acres)	Appraised Lease Rates (\$psf/yr)	Highest & Best Use
Block Island/BID	BID-2	1.00	\$ 0.35	Hangar
	BID-4	0.70	\$ 0.40	Hangar

Figure 3-5: BID Aerial of Available Parcels



CHAPTER 4 – FINANCIAL ANALYSIS

4.1 Introduction

Proper execution of an airport's fiduciary responsibilities is a key factor in the long-term success of the airport system in Rhode Island. Additionally, under the FAA's Airport Improvement Program (AIP) certain grant assurances such as Airport Sponsor Assurance No. 24 apply, and the FAA requires that any AIP funded airport be as financially self-sustaining as possible given the circumstances that exist at the airport. The development and implementation of the GASBP provides the opportunity for RIAC to demonstrate that fiduciary responsibilities and the requirements under FAA are being taken seriously, as well as an opportunity to compare against other nearby airports outside of Rhode Island.

Ricondo & Associates (Ricondo) was tasked with preparing a high-level strategic plan analysis for the five-general aviation (GA) airports: (1) Quonset State (OQU), (2) Westerly State (WST), (3) Newport State (UUU), (4) North Central State (SFZ), and (5) Block Island (BID). The key elements of the financial analysis consist of an overview of each GA Airport, a benchmark analysis comparing the GA airports to other select New England region GA airports, and development of a financial analysis for each GA Airport. The financial analysis considers the GA airports individually and collectively, as a system of airports, and compares projected financial performance against RIAC's 10-year Capital Improvement Plan (CIP).

The overarching goal of this strategic plan is to identify a feasible and sound strategy that will allow RIAC to progressively reduce and ultimately eliminate the annual financial subsidy from Rhode Island TF Green International Airport (PVD) that is required for the GA airports to remain as financially self-sufficient as possible.

4.2 Airport Financial Benchmark Analysis

Seven GA airports in the New England area were identified as benchmark or comparative airports for the RIAC GA Airport Analysis. These airports include:

- Biddeford Municipal Airport
- Brunswick Executive Airport
- Chatham Municipal Airport
- Groton New London Airport
- Mansfield Municipal Airport
- Taunton Municipal Airport

General Aviation Airport Strategic Business Plan

- Westfield-Barnes Regional Airport

Three of these airports were selected to specifically compare to OQU, because OQU accommodates the greatest share of corporate jet traffic than the other four RIAC GA airports. The remaining four benchmark airports were selected to compare to WST, UUU, SFZ and BID airports. **Table 4-1** provides a summary of the OQU benchmark information and **Table 4-2** provides a summary of the benchmark information for the remaining airports.

Table 4-1: Benchmark Comparison - OQU

Benchmark	RIAC Airport	Benchmark Airport		
	OQU	Groton-New London (CT)	Westfield-Barnes Regional (MA)	Brunswick Executive (ME)
Fuel Flowage Fee	\$.13/gallon	\$.13/gallon	N/A	N/A
Aviation Fuel Tax	N/A	Avgas \$.060/gallon Jet A \$.040/gallon	Avgas \$.255/gallon Jet A \$.075/gallon	Avgas\$.300/gallon Jet A \$.034/gallon
Fuel Price/Gallon	100LL \$5.35 Jet A \$5.83	100LL \$5.30 Jet A \$4.88	100LL \$5.14 Jet A \$5.66	100LL \$5.69 Jet A \$4.89
Landing Fees	Not imposed on based RI aircraft	Varies by aircraft size	Varies by aircraft size	N/A
Facility and Airport Fees	Waived w/ fuel purchase	N/A	N/A	Varies by aircraft size
Registration Fees	Lowest registration fee in New England	> RI registration fee	> RI registration fee	> RI registration fee
Tie-down/RON Fees	Varies by aircraft size	Varies by aircraft size	Varies by aircraft size	Varies by aircraft size and waived w/ fuel purchase

NOTES:

1./ RIAC fuel pricing as on or after August 1, 2020 and provided on October 2, 2020.

2./ Benchmark airports fuel pricing as of August 24, 2020.

SOURCES: RIAC Aircraft Registration Fees in New England, July 2021; Ricondo & Associates, Inc., April 2021.

The OQU fuel flowage fee is aligned with the fuel flowage fee at Groton; however, OQU does not receive proceeds from an aviation fuel tax. OQU’s fuel prices are similar to those of the benchmark airports, but it is important to note RIAC airports do not impose a landing fee for Rhode Island based aircraft which are registered in the state. RIAC’s aircraft registration fees are also less than the benchmark airports.

General Aviation Airport Strategic Business Plan

The key takeaways from Quonset benchmarking are: (1) Quonset Airport does not benefit from supplemental aviation fuel tax revenues, (2) Quonset does not benefit from additional revenues from landing fees from Rhode Island based aircraft (3) Quonset has the lowest registration fees, and therefore the lowest associated revenue stream, within New England.

Table 4-2: Benchmark Comparison – WST, UUU, SFZ, and BID Airports

Benchmark	RIAC Airports				Benchmark Airports			
	Westerly State	Newport State	North Central State	Block Island State	Chatham Municipal (MA)	Biddeford Municipal (ME)	Taunton Municipal (MA)	Mansfield Municipal (MA)
Fuel Flowage Fee	\$.08/gallon	\$.08/gallon	\$.13/gallon	N/A	N/A	N/A	N/A	N/A
Aviation Fuel Tax	N/A	N/A	N/A	N/A	Avgas \$.255/gallon Jet A \$.075/gallon	Avgas \$.300/gallon Jet A \$.034/gallon	Avgas \$.255/gallon Jet A \$.075/gallon	Avgas \$.255/gallon Jet A \$.075/gallon
Fuel Price/Gallon	Flight Level Aviation: 100LL \$5.15 Dooney Aviation: 100LL \$5.00, Jet A \$4.85	100LL \$5.10 Jet A \$5.58	100LL \$5.35 Jet A \$5.53	N/A	100LL \$4.94 Jet A \$4.54 Jet A+ \$4.61	100LL \$4.49	100LL \$4.42	100LL \$4.55 Jet A \$4.75
Landing Fees	Not imposed on based aircraft; varies by size	Not imposed on based aircraft; varies by size	Not imposed on based aircraft; varies by size	Not imposed on based aircraft; varies by size	Aircraft > 6,000lbs MTOW \$25	N/A	N/A	N/A
Facility and Airport Fees	Waived w/ fuel purchase	Waived w/ fuel purchase	Waived w/ fuel purchase	Single engine \$5 Twin-engine \$15 Large cabin class \$25	N/A	N/A	N/A	N/A
Registration Fees	Lowest registration fee in New England	Lowest registration fee in New England	Lowest registration fee in New England	Lowest registration fee in New England	> RI registration fee	> RI registration fee	> RI registration fee	> RI registration fee
Tie-down/RON Fees	Varies by aircraft size	Varies by aircraft size	Varies by aircraft size	Varies by aircraft size	Varies by aircraft size	Varies by aircraft size	Varies by aircraft size	Varies by aircraft size

NOTES:

1./ RIAC fuel pricing as on or after August 1, 2020 and provided on October 2, 2020.

2./ Benchmark airports fuel pricing as of August 24, 2020.

SOURCES: RIAC Aircraft Registration Fees in New England, July 2021; Ricondo & Associates, Inc., April 2021.

WST, UUU, and SFZ impose a fuel flowage fee, although the benchmark airports do not. The benchmark airports receive proceeds from an aviation fuel tax, but the RIAC airports do not. WST, UUU, and SFZ’s fuel prices are slightly higher than those of the benchmark airports, but it is important to note RIAC airports do not impose a landing fee for based aircraft. Additionally, Rhode Island’s aircraft registration fees are less than the benchmark airports.

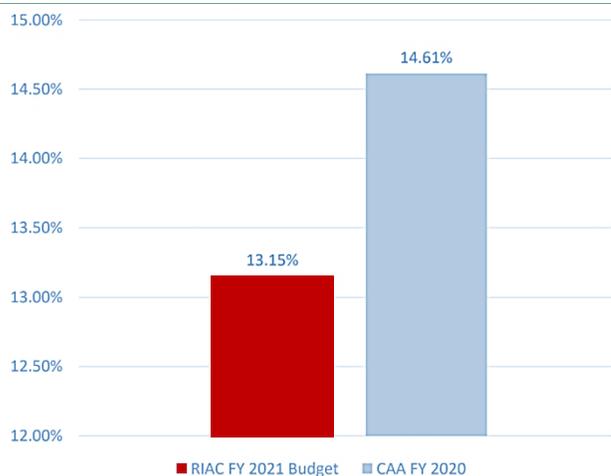
Key takeaways from the remaining RIAC GA airports benchmarking are: (1) RIAC GA Airports do not benefit from aviation fuel tax revenues in Rhode Island, and (2) RIAC GA Airports have the lowest registration fees in New England.

4.3 Comparison of Total Fees

RIAC prepared and provided the information identified in this section to supplement the benchmark information collected by Ricondo. This information provides a comparison of the expenses paid and fees collected by RI/RIAC and Connecticut Airport Authority (CAA), since the two airport systems are very similarly structured.

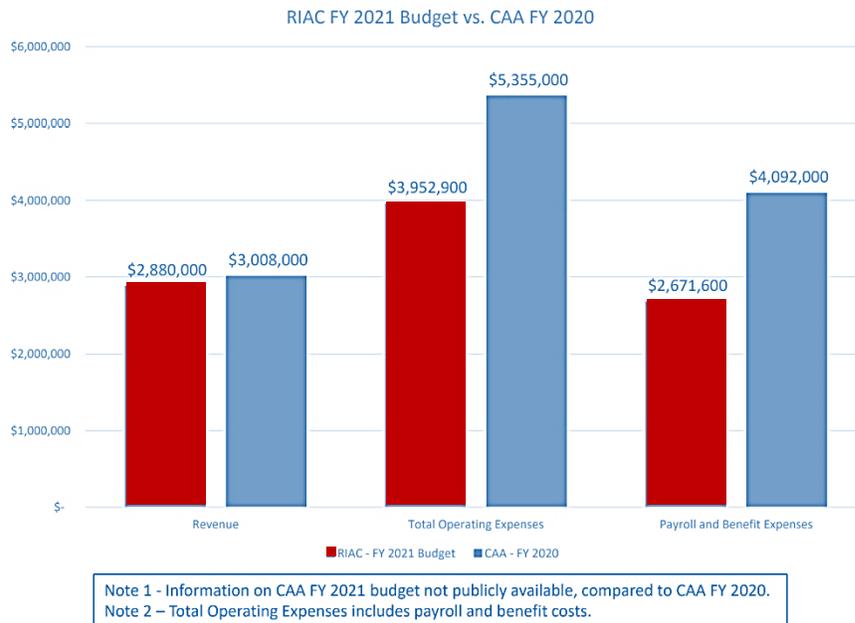
As indicated in **Figures 4-1** and **4-2**, RIAC’s FY21 budgeted payroll and benefit costs for the GA system compares favorably to CAA, 13.15% vs. 14.61% respectively. Additionally, RIAC’s GA airport metrics compare favorably to CAA’s GA airports. When compared to CAA, RIAC’s total operating expenses and payroll expenses are lower, despite a comparable basis of revenue.

Figure 4-1: GA Airport Payroll and Benefit Percentage



SOURCE: Rhode Island Airport Corporation, Information on General Aviation Airports Costs and Subsidy July 2021.

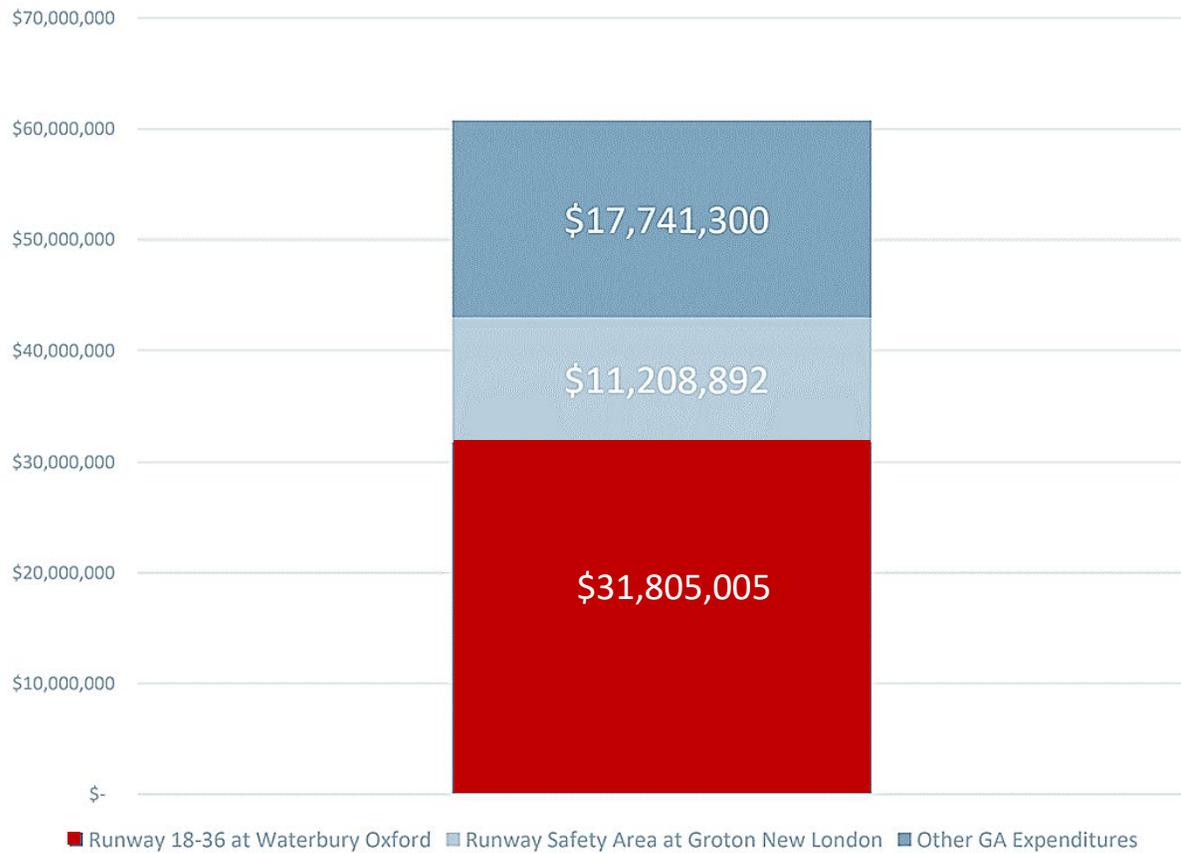
Figure 4-2: How the GA Airports Revenue and Expenses Compare to CAA



SOURCE: Rhode Island Airport Corporation, *Information on General Aviation Airports Costs and Subsidy* July 2021.

Figure 4-3 identifies the CAA’s two large, FAA funded projects from the period FY2015-FY2020. These projects totaled approximately \$43,000,000 and CAA incurred almost \$18,000,000 in other GA expenditures over the same period. RIAC’s upcoming expenditures will have similar increases with the \$57,000,000 Runway 16-34 project planned for Quonset.

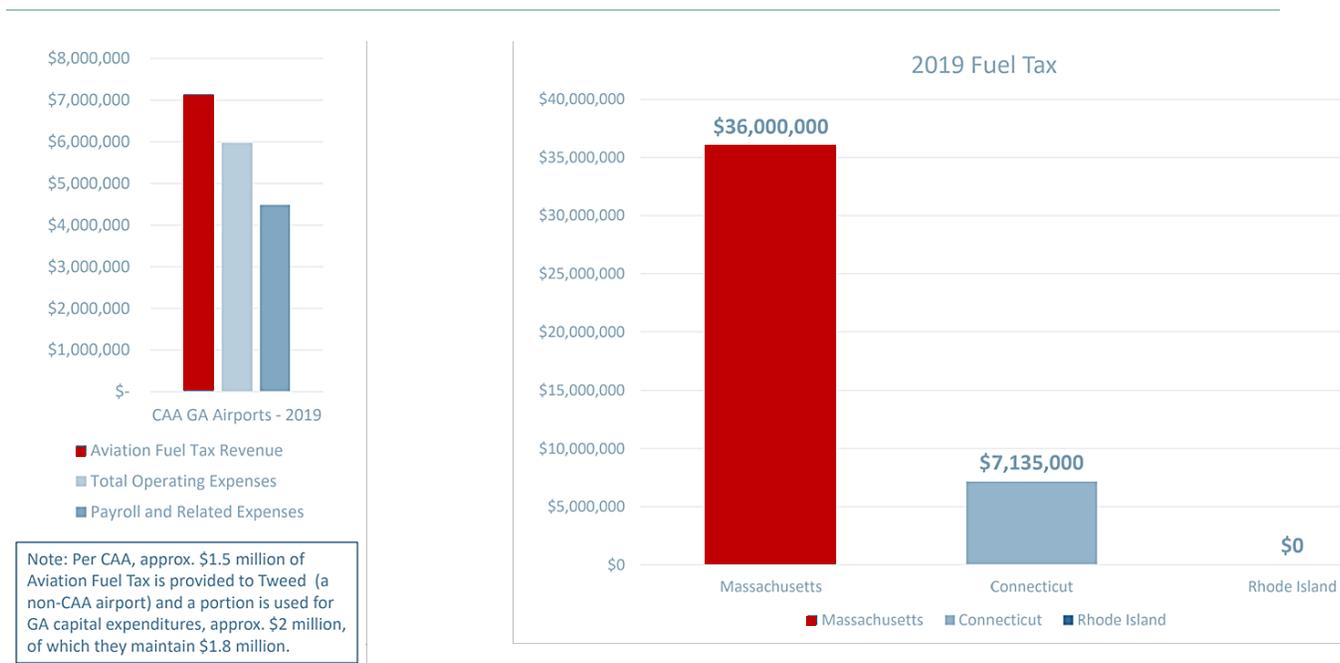
Figure 4-3: CAA Capital Expenditures FY 2015 - FY2020



SOURCE: Rhode Island Airport Corporation, *Information on General Aviation Airports Costs and Subsidy* July 2021.

Other GA Capital expenditures over the period averaged approximately \$3,000,000 per year, which is comparable to RIAC’s average over ten years from 2009-2018. The CAA receives revenues of approximately \$7,135,000 annually from Aviation Fuel Tax as shown in **Figure 4-4**.

Figure 4-4: RIAC Comparison to Connecticut and Massachusetts Aviation Fuel Tax



SOURCE: Rhode Island Airport Corporation, *Information on General Aviation Airports Costs and Subsidy* July 2021.

Comparatively, Rhode Island is at a competitive disadvantage to its neighboring states of Massachusetts and Connecticut, both of which benefit from receiving aviation fuel tax revenues from the state, which help offset their GA operational expenses. In Connecticut, for example, the fuel tax revenues realized by the CAA system in 2019 exceeded the total operating expenses or payroll and related expenses (or a combination of both).

RIAC does not have an aviation fuel tax revenue stream, at its disposal in Rhode Island, which it can deploy to help cover the cost of managing and operating its GA airports. Instead, it must use its operational revenues to subsidize the GA airports.

4.4 Financial Analysis

Existing debt and expected levels of funding from the following have been determined / considered:

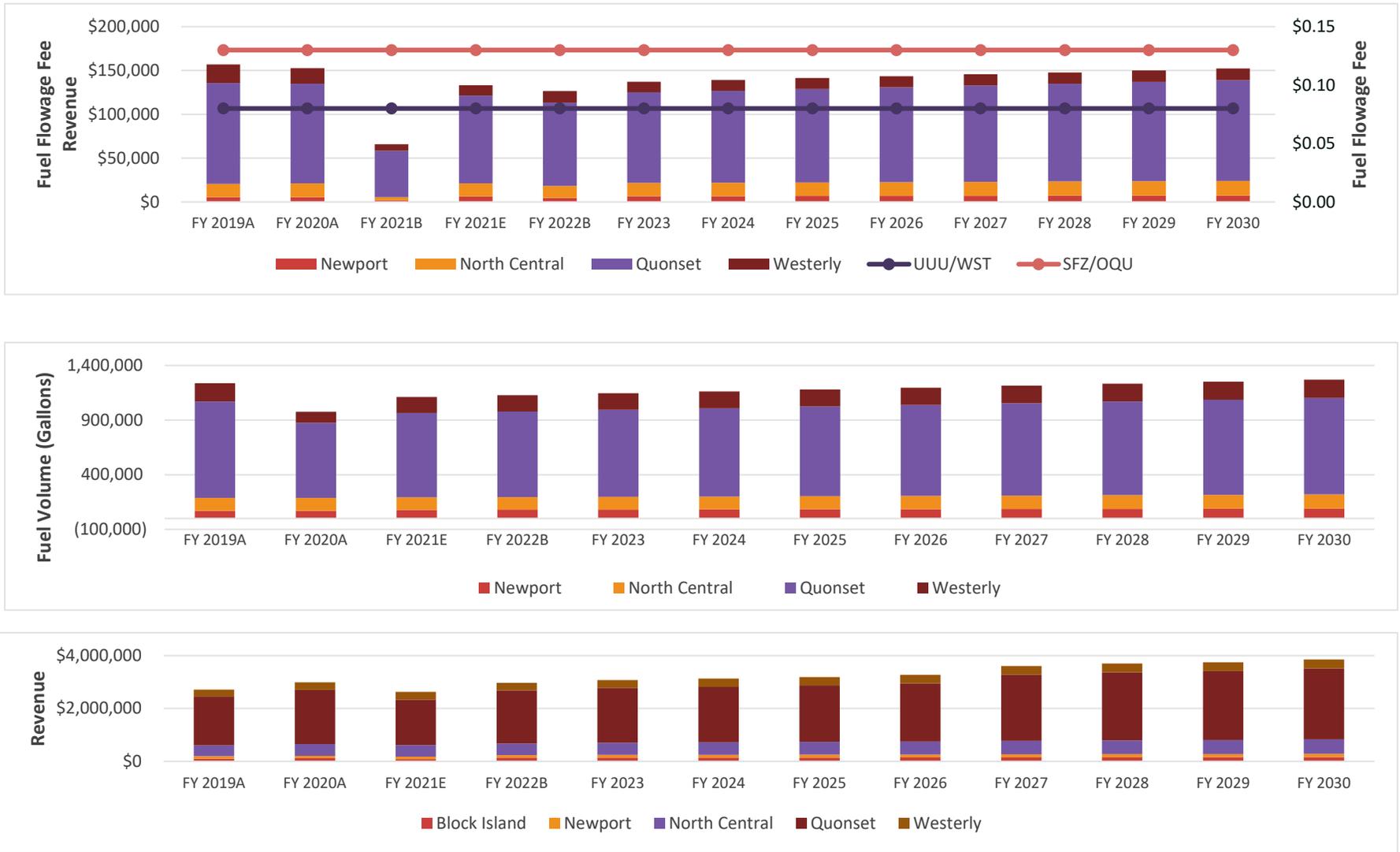
- FAA entitlement;
- RIAC funding; and,
- Third party funding opportunities.

Included in this financial plan is the identification of specific CIP funding sources and projections of operating revenues and expenses for the GA airports. The FAA’s Terminal Area Forecast (TAF) was used for forecasts of aviation activity for the period Fiscal Year (FY) 2022 – 2030.

4.4.1 Operating Revenue and Expense Projections

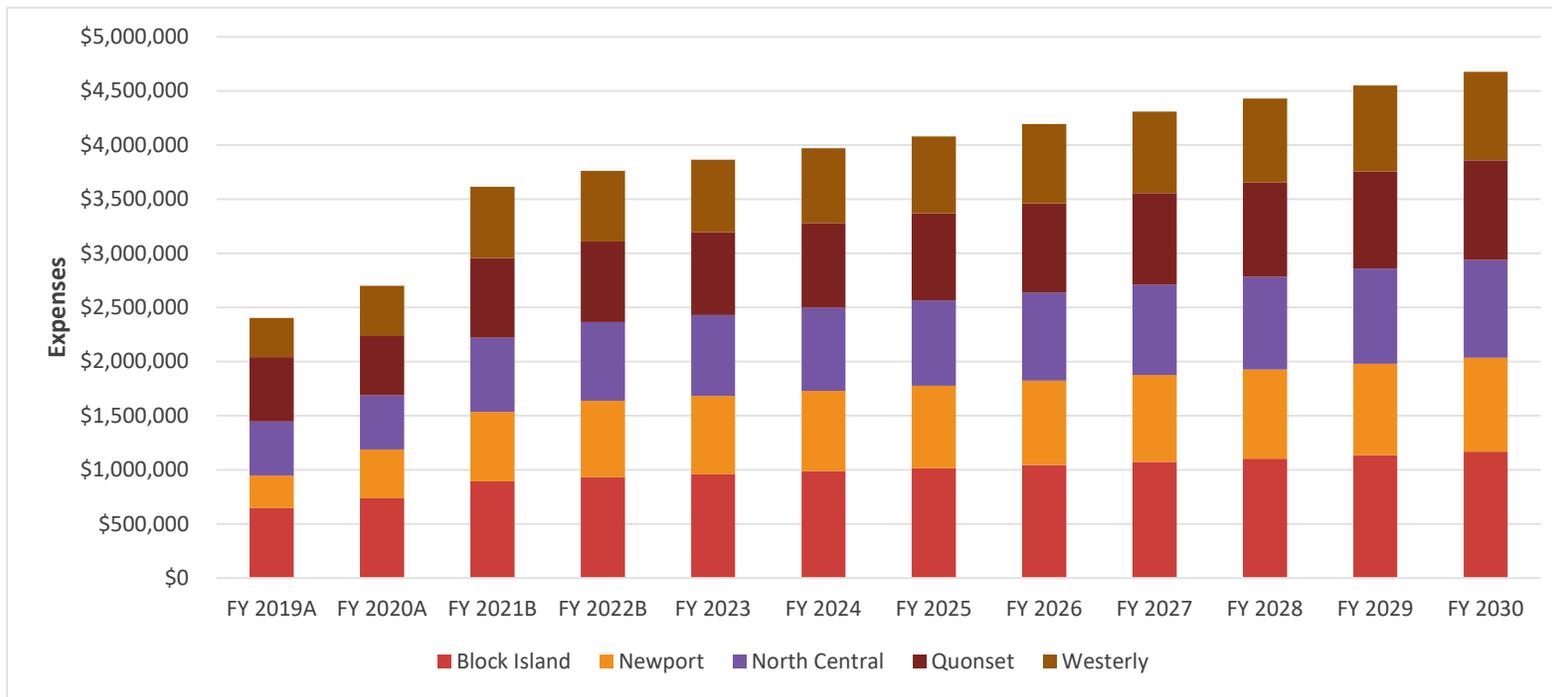
Details regarding the methodology and assumptions used to determine operating revenue and expense projections can be found in the Financial Plan and Airport Market Analysis. Based on these assumptions, projections for fuel volume, flowage fees, and revenues were calculated for each of the GA airports, as shown on **Figure 4-5**. Operating Expense projections for each GA Airport can be found on **Figure 4-6**, while **Table 4-3** provides projections of additional revenue potential through the lease of RIAC owned land at the GA airports.

Figure 4-5: Historical and Projected Operating Revenue (FY 2019 – 2030)



SOURCES: Rhode Island Airport Corporation, December 2020 (actual and budget), January 2021 (year-to-date FY 2021), July 2021 (Budget FY 2022); Ricondo & Associates, Inc., February 2021 (estimated FY 2021 and projected).

Figure 4-6: Historical and Projected Operating Expenses (FY 2019 – 2030)



SOURCES: Rhode Island Airport Corporation, December 2020 and July 2021 (historical and budget); Ricondo & Associates, Inc., February 2021 (projections).

Table 4-3: Projections of Additional Revenue Potential by GA Airport

ADDITIONAL REVENUE POTENTIAL BY AIRPORT										
AIRPORT	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025	FY 2026	FY 2027	FY 2028	FY 2029	FY 2030
Total OQU	\$5,600	\$275,500	\$578,800	\$590,00	\$601,500	\$762,700	\$861,700	\$880,500	\$900,000	\$920,000
Total SFZ	\$0	\$20,000	\$44,300	\$138,300	\$142,300	\$271,500	\$279,700	\$288,100	\$296,700	\$305,600
Total UUU	\$0	\$0	\$28,800	\$24,500	\$25,200	\$47,700	\$49,200	\$50,600	\$52,100	\$53,700
Total WST	\$0	\$0	\$7,400	\$7,600	\$28,000	\$28,900	\$29,700	\$30,700	\$31,500	\$32,500
Total BID	\$0	\$0	\$0	\$0	\$0	\$32,800	\$33,800	\$34,800	\$35,800	\$36,900
Annual Total	\$5,600	\$295,500	\$654,300	\$760,400	\$797,000	\$1,143,600	\$1,254,100	\$1,284,700	\$1,316,100	\$1,348,700

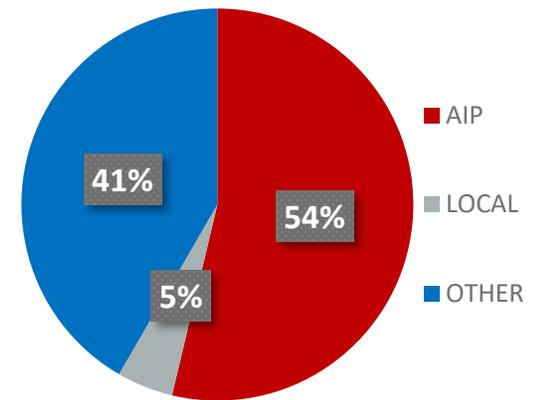
SOURCES: Rhode Island Airport Corporation, December 2020; Ricondo & Associates, Inc., December 2020.

4.4.2 Capital Improvement Program

Figure 4-7 provides a 10-year CIP for each GA Airport and funding source. As indicated, the total programmed CIP expenditure for all GA airports for the period FY 2021-2030 is \$98.5 million. Funding for the total GA Airport CIP is largely supported with Airport Improvement Program (AIP) grants; while the required local share of the CIP is provided by RIAC generated funds.

Figure 4-7: CIP by Airport & Funding Sources

AIRPORT	AIP	BOND/LOCAL ¹	OTHER	TOTAL
Block Island	\$4,044,500	\$356,800	\$0	\$4,401,300
Newport	3,986,000	604,000	0	4,590,000
North Central	2,272,500	582,500	1,525,000	4,380,000
Quonset	30,298,500	1,016,500	37,560,000	68,875,000
Westerly	5,726,700	941,300	1,900,000	8,568,000
System ²	6,570,000	1,080,000	0	7,650,000
Total	\$52,898,200	\$4,581,100	\$40,985,000	\$98,464,300



SOURCE: Rhode Island Airport Corporation, January 2021.

NOTE:

1 Bond/local funding includes the use of existing bond proceeds for certain projects.

2 System projects include General Aviation Systemwide Obstruction Removal (Phases 1 and 2) and the General Aviation Strategic Business Plan Phase II.

General Aviation Airport Strategic Business Plan

The Financial Plan and Airport Market Analysis evaluates the local share funding requirement for the CIP assuming use of RIAC cash and issuance of general airport revenue bonds (bonds) by RIAC. **Figure 4-8** depicts annual debt service projections for the period FY 2021-2030.

Based on future and local CIP funding, contribution/subsidy projections, as RIAC funds, are detailed in the Financial Plan and Airport Market Analysis. It should be noted that the RIAC preferred strategy is to fund local share with RIAC funds (versus bonds) and CIP share was factored in as a cash expense for each airport.

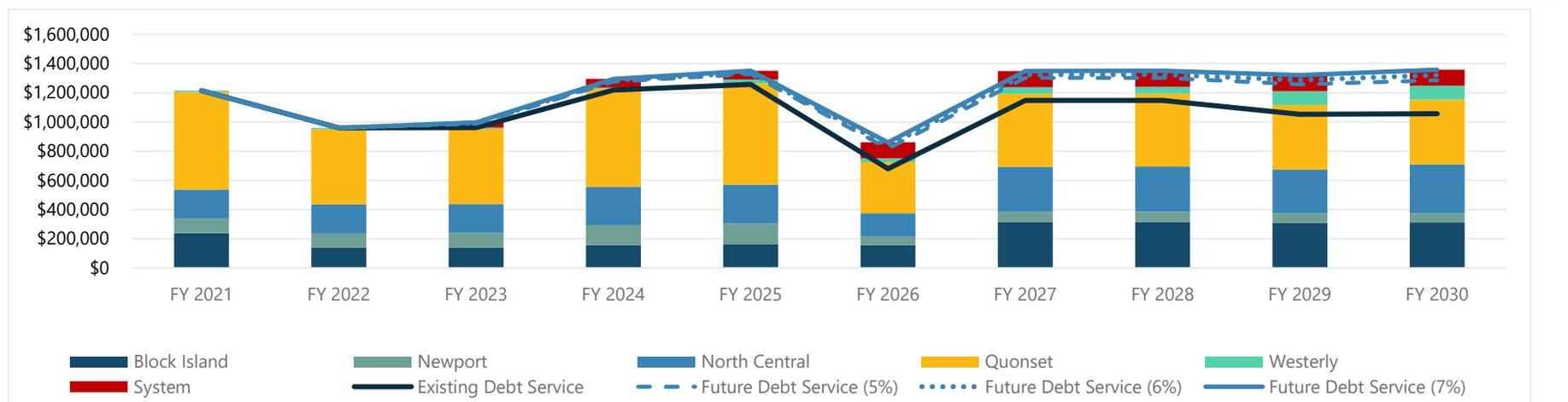
4.5 Subsidy Reduction Strategies

The contribution/subsidy projections for each airport are illustrated in **Figures 4-9 and 4-10**. The overall operating income/loss (excluding capital/debt) per each airport can be found on **Figure 4-9**. Based on these revenues, Ricondo identified several strategies to reduce or eliminate the annual subsidy from PVD to the GA airports. These strategies were applied to the financial model to test their validity and include the following:

- Increase revenues
 - Current fees fixed through FBO agreement
 - FBO agreement expiration: June 30, 2023; renewable by RIAC to June 30, 2028
 - Fuel flowage fees
 - Landing fees
 - Hangar and tie-down fees
- Reduce expenses
 - Alternative funding for capital projects
 - Reduce operating expenses
- Aviation fuel tax revenue (reference Figure 6)
 - Percentage of statewide fuel revenue
 - Fee / tax per gallon of Avgas and Jet-A

General Aviation Airport Strategic Business Plan

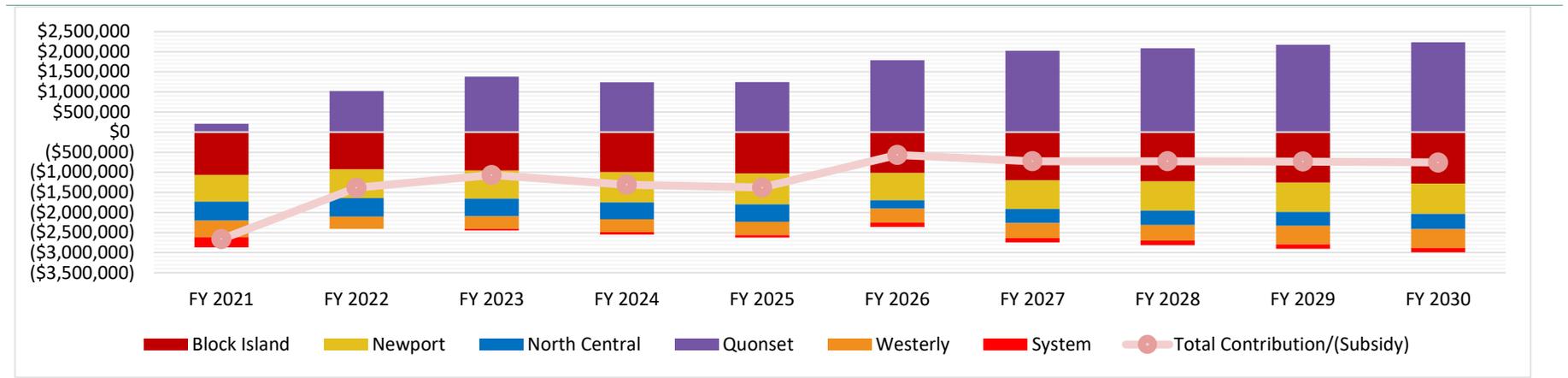
Figure 4-8: Annual Projected Debt Service



NOTE: Decrease in existing debt service for North Central and Quonset beginning in FY 2026 is due to payoff of the Series 2005 Bonds.

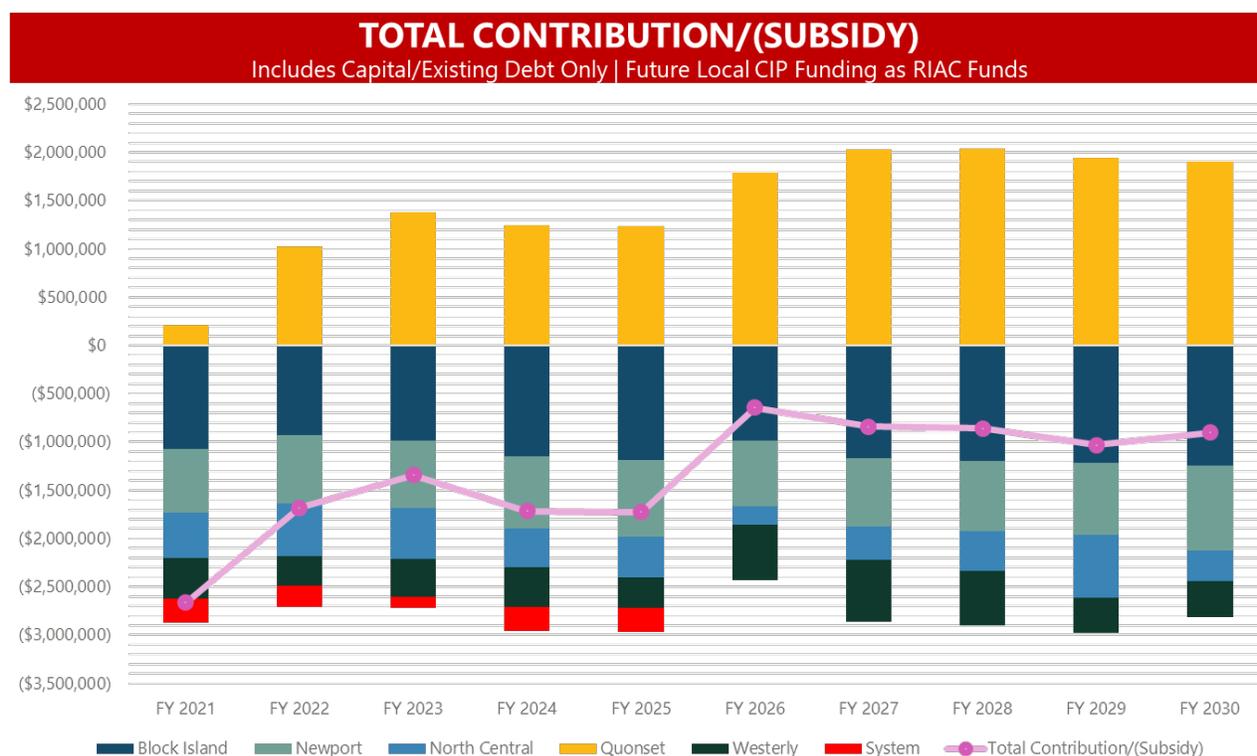
SOURCES: Rhode Island Airport Corporation, January 2021 (existing debt service); Ricondo & Associates, Inc., February 2021 (future debt service).

Figure 4-9: Contribution/Subsidy Projection (No Capital/Debt)



SOURCE: RICONDO & ASSOCIATES, INC., JULY 2021, BASED ON INFORMATION PROVIDED BY THE RHODE ISLAND AIRPORT CORPORATION.

Figure 4-10: Total Contribution/(Subsidy)



SOURCE: Ricondo & Associates, Inc., September 2021, based on information provided by the Rhode Island Airport Corporation.

Analyses of aviation fuel projections and aviation fuel tax projections based on Av gas and Jet-A gas were performed to develop five different aviation fuel tax revenue projection scenarios (see **Figure 4-11 and Table 4-4**):

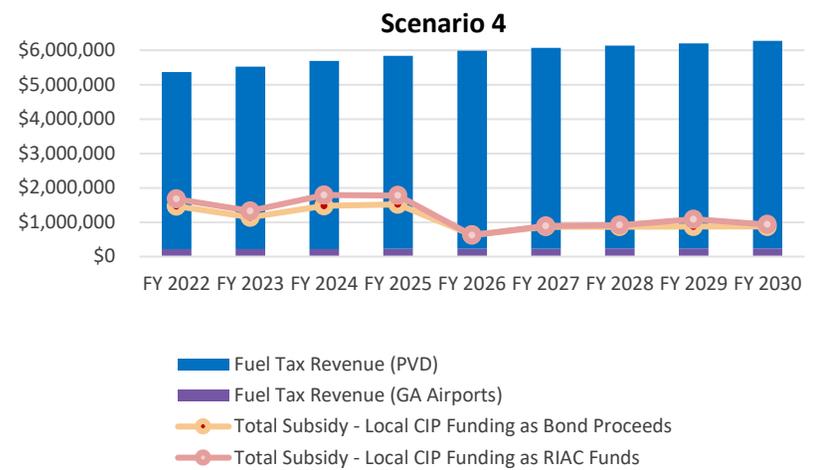
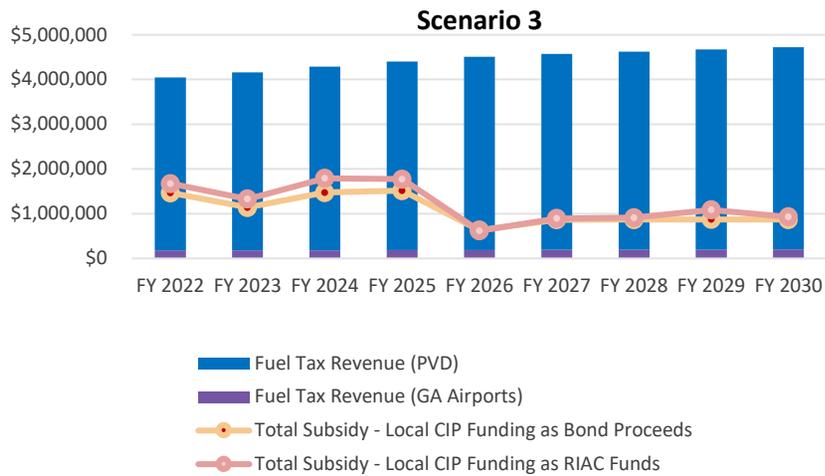
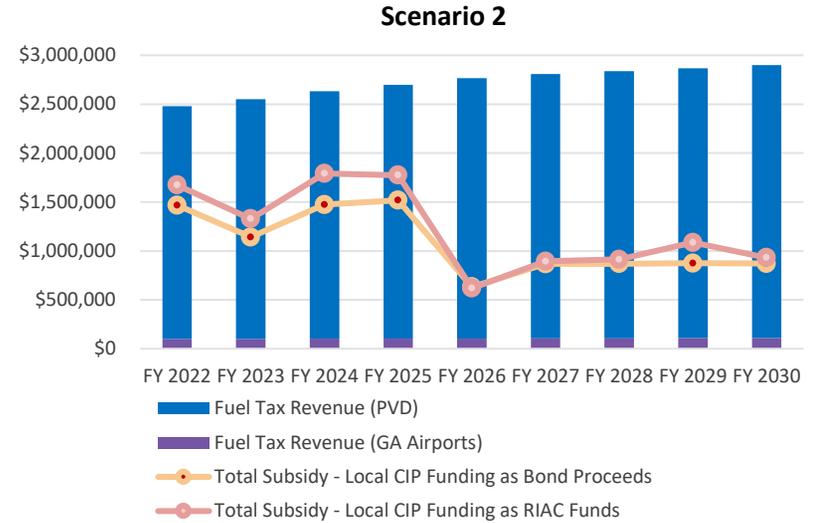
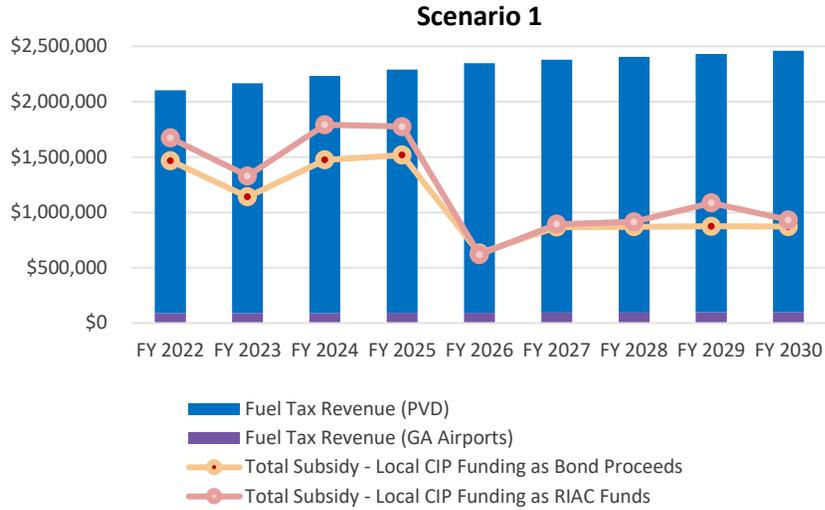
- Scenario 1:
 - U.S. average Avgas tax: \$0.100/gallon
 - U.S. average Jet-A tax: \$0.074/gallon
- Scenario 2:
 - U.S. average tax (all fuel types): \$0.088/gallon
- Scenario 3:
 - New England region average Avgas tax: \$0.231/gallon
 - New England region average Jet-A tax: \$0.140/gallon
- Scenario 4:
 - New England region average tax (all fuel types): \$0.190/gallon
- Scenario 5:
 - Utilizes CAA fuel flowage fee, and fuel tax rates (all fuel types) to calculate base year total tax projections of \$7.8M for an increase of \$6.8M over the current year.

Scenario 5 uses the fuel flowage fees and fuel tax rates from CT and applies them to the 2019 gallons sold at the RI airports. The first year calculation (Table 14.14) shows that RIAC would receive an additional \$7.8M in revenue, by adopting and implementing CAA rates as shown. This scenario provides RIAC with the best option to consider, for the purpose of fully offsetting the need for PVD airport to provide operational subsidies to the GA airports.

Considerations for increasing revenues through current fees fixed through the FBO agreement should be examined as RIAC's current FBO agreement expires on June 30, 2023. Additionally, reducing subsidies through an increase in fuel revenue can be accomplished by two methods:

- Increase fuel flowage fee at GA airports (Jet-A and Avgas); and,
- Institute fuel tax.

Figure 4-11: 1 of 2 Aviation Fuel Tax Revenue Projections by Scenario



General Aviation Airport Strategic Business Plan

Table 4-4: Scenario 5 Explained – RIAC Charges Same Fuel Flowage Fee and Fuel Tax as Connecticut

AIRPORT	GALLONS (FISCAL YEAR END 2019)	CURRENT RHODE ISLAND RATE	CURRENT FUEL FLOWAGE FEE REVENUE	PROPOSED FUEL FLOWAGE FEE (SAME AS CONNECTICUT)	WHOLESALE PRICE PER GALLON	WHOLESALE COST	FUEL TAX RATE	PROPOSED FUEL TAX REVENUE	TOTAL PROPOSED FUEL TAX AND FUEL FLOWAGE FEE REVENUE	INCREASED FUEL TAX AND FUEL FLOWAGE FEE REVENUE
JET FUEL (JET A)										
Newport	14,841	\$0.08	\$1,187	\$1,929	\$2.02	\$29,979	8.1%	\$2,428	\$4,358	\$3,170
North Central	62,063	\$0.13	\$8,068	\$8,068	\$2.02	\$125,367	8.1%	\$10,155	\$18,223	\$10,155
Quonset	847,435	\$0.13	\$110,167	\$110,167	\$2.02	\$1,711,819	8.1%	\$138,657	\$248,824	\$138,657
Westerly	196,368		\$14,924	\$25,528	\$2.02	\$396,664	8.10%	\$32,130	\$57,658	\$42,734
RI T.F. Green Int'l	30,664,010	\$0.02	\$810,968	\$2,431,974	\$2.02	\$60,517,378	8.10%	\$4,901,908	\$7,333,881	\$6,522,913
Total	31,784,717		\$945,314	\$2,577,665		\$62,781,207		\$5,085,278	\$7,662,943	\$6,717,629
AVGAS (100LL)										
Newport	54,384	\$0.08	\$4,276	\$6,949	\$3.69	\$197,238	8.1%	\$15,976	\$22,925	\$18,649
North Central	48,698	\$0.13	\$7,102	\$7,102	\$3.69	\$201,588	8.1%	\$16,329	\$23,431	\$16,329
Quonset	32,227	\$0.13	\$4,256	\$4,256	\$3.69	\$120,807	8.1%	\$9,785	\$14,041	\$9,785
Westerly	51,928	\$0.08	\$6,551	\$10,646	\$3.69	\$302,174	8.1%	\$24,476	\$35,122	\$28,571
RI T.F. Green Int'l	75,428		\$16,427	\$6,361	\$3.69	\$180,563	8.1%	\$14,626	\$20,987	\$4,560
Total	262,665		\$38,612	\$35,314		\$1,002,370		\$81,192	\$116,506	\$77,893
Total Increase			\$983,926	\$2,612,979		\$63,783,577		\$5,166,470	\$7,779,449	\$6,795,523

4.6 Financial Recommendations

Ricondo recommends that RIAC consider evaluating an aviation fuel tax or increased fuel flowage fees for all aviation fuel sales within the state of Rhode Island. Based on the financial analysis, this recommendation resulted in an elimination of the subsidy to the GA airports in all five of the scenarios modeled. An aviation fuel tax would minimize the competitive imbalance between Rhode Island airports and neighboring states that do have an aviation fuel tax. Ricondo realizes the RIAC has previously attempted to implement a fuel tax, without success; however, the analysis of the data points to the fuel tax as the most viable path forward towards achieving financial self-sufficiency for the GA Airports in Rhode Island.

Understanding it may take some time before an aviation fuel tax could be implemented, RIAC should focus on maintaining a fair, reasonable, and not unjustly discriminatory rate and charges policy that attains financial self-sufficiency to the greatest extent possible. The following options should be considered:

- Increasing fuel flowage fees throughout the RI system of airports, to comparable levels at benchmarked airports;
- Increasing landing fees, aircraft registration fees, tie-down / RON fees and implementing landing fees for RIAC based aircraft, to comparable levels at benchmarked airports;
- Continuing to actively pursue leasing and development of the economic development parcels at each of the airports;
- Seeking alternative funding for capital projects; and,
- Pursuing measures to reduce operating expenses and costs throughout the RIAC system. This may include re-negotiating contracts for more favorable terms and reducing or eliminating amenities that are not profitable or generating revenue.

Ricondo concludes that RIAC should consider evaluating the aviation fuel tax, and/or increased fuel flowage fees, while also focusing efforts on the leasing and development of economic revenue parcels at each of the five GA airports as a sustainable and long-term revenue source. Additionally, it is recommended that RIAC consider increasing the landing, tie-down / RON fees to be competitive with the fees imposed within the surrounding New England states and to increase aircraft registration fees to be more closely aligned with those of New Hampshire and Connecticut.

CHAPTER 5 – STRATEGIC ACTION PLANS, IMPLEMENTATION, & SUMMARY

5.1 Introduction

Previous sections have explored the GASBP purpose, situational analysis, development opportunities, and financials. As part of that process, several goals were developed to meet the demands of the future and improve upon communication with stakeholders. Logical next steps call for the development and execution of specific action plans for each of the stated goals to move the GASBP forward on its infrastructure improvements and parcel development track. This section addresses those previously developed goals and outlines the required actions necessary for proper implementation of each. Responsibility for execution of specific action plans is also identified.

5.2 Strategic Action Plans

A total of four primary goals were developed for the GASBP. It is important to note that the goals, identified in Table 2-5, be pursued simultaneously in order to seek the benefit of this substantial effort. Responsibility for taking required actions to meet these future goals will be established. A summary of each goal and associated action plan is as follows:

- **Goal # 1:** Through strong leadership and a focused marketing plan, develop the 15 parcels to increase revenue at the GA airports.

Action Plan: As this goal is currently under way with an active marketing program, continue to track and explore viable leads for development. An understanding of infrastructure and environmental hurdles need to be explored to determine the level of effort and cost to get the 15 parcels “pad ready”.

- **Goal # 2:** Improve communication by meeting with stakeholders and host towns quarterly to discuss issues and opportunities.

Action Plan: Set up dedicated meetings with airport stakeholder and host town officials on a quarterly basis. These meeting should have an agenda to identify topics to be discussed, and a record of any action items coming from meetings. The first quarterly meetings have already occurred during the week of September 13, 2021.

- **Goal # 3:** Leverage FAA AIP, available stimulus funding, and potential other funding sources to complete the assessment projects on 10 year CIP.

Action Plan: On a monthly basis, meetings with the Federal Aviation Administration (FAA) Regional Office will be conducted to discuss projects, with a focus on those projects identified in the three assessment – Obstructions, Pavements, and Facilities. Additionally,

alternative sources of funding will be explored, particularly those that have been identified as not eligible for FAA AIP funding.

- **Goal # 4:** Explore alternative sources of revenue and opportunities to reduce expenses in order to reduce or eliminate the subsidy.

Action Plan: Utilizing the recommendations contained within the financial analysis, additional coordination and exploration is required to determine which of the potential reduction strategies are viable. If any are determined to be viable and a path forward will need to be established along with anticipated timeframes.

5.3 Implementation

The GASBP serves as a roadmap to provide direction for obtaining the goals. Additionally, many people will play an active role in the implementation of the GASBP, and will require a collaborative effort. RIAC may do much of the heavy lifting, but there are roles to play for many others that have a vested interest in the continued success of each GA airport.

RIAC will evaluate its progress in the future by measuring its performance against several different types of metrics. Comparisons can be made between current and past financial performance data. Likewise, physical comparisons that evaluate capital improvements, and when they are completed against existing infrastructure today. Operational indicators that include data on based aircraft numbers and types, fuel sales, and annual operations data will be charted and evaluated against corresponding goals for growth.

Some of the major performance indicators to be monitored and tracked include the following:

- Quarterly fuel sales;
- Based aircraft;
- Annual airport revenues;
- Annual airport expenses;
- Number and type of airport lease agreements;
- Capital Improvement Programs;
- Annual airport operations (takeoffs and landings); and,
- Infrastructure improvements.

5.4 Summary

RIAC has evaluated the existing business environment and constructed future goals to assist in the development of the GA airports into the future. Action plans were developed. RIAC is poised to execute the guidelines set forth in the GASBP, and move forward with its infrastructure improvements and parcel development efforts within the 10-year planning period.

Appendix A

List of Public Comments & Responses

General Aviation Strategic Business Plan

Comments and Responses

Rhode Island Pilots Association (RIPA) – Bill Weedon, President			
The Rhode Island Pilots Association (RIPA), representing approximately 600 general aviation (GA) pilots in Rhode Island through our association with the Aircraft Owners and Pilots Association (AOPA), would like to comment publicly on the proposed RIAC General Aviation Strategic Business Plan. This draft document, dated October, 2021, was apparently circulated for public comment on November 2, 2021. Given the scope of the document and the obvious future impact on the RI State Airports, 60 days is likely not enough time for a comprehensive response, encompassing input from all or most of our constituent pilots and GA business owners. However, we would like to take this opportunity to provide some high-level comments on the document.			
	Comment	Response	Responder
1	We take issue with the “overarching goal” of the strategic plan, listed at the top of Page 5, to “progressively reduce and ultimately eliminate the annual financial subsidy from PVD”. While we agree with the goal of making each airport as self-sustaining as possible, nowhere do we see any legislation or guidance that requires or allows RIAC to split off one or more airports.	<p>The fiduciary and requirements for self-sustainability relate to RIAC and each airport individually. The goal as stated in the General Aviation Strategic Business Plan (GASBP) is consistent with RIAC’s fiduciary responsibility and with FAA rules and regulations (i.e. Grant Assurance #24 and Compliance Manual 5190.6B Chapter 17, Self-Sustainability). The following links are made available here to direct you to these documents:</p> <ul style="list-style-type: none"> • https://www.faa.gov/airports/aip/grant_assurances/ • https://www.faa.gov/airports/resources/publications/orders/compliance_5190_6/ 	Brian Schattle, Senior Vice President and CFO
2	We also dispute the method of accounting in the financial numbers that have been presented. This has been pointed out at several of the public meetings last year. For example, both Block Island (BID) and Westerly (WST) generate \$1M each in Airport Improvement Funds (AIP), not listed on the income statement, which are used at the other airports, including Providence (PVD). In addition, the overhead assessed by RIAC at each of the GA airports has nearly doubled in recent years, despite massive cutbacks in services, including snowplow and airport management (through a contractor), and capital improvement projects. There has also been tens of millions in COVID Stimulus from the Federal CARES ACT attributed directly to these GA airports, as well as State funding to RIAC which is not reflected in the financial data.	RIAC has annual independent audits to ensure that the method of accounting is accurate and appropriate. The characterization of both the AIP funds and “tens of millions” of CARES Act funding, as framed here, is inaccurate. Both BID and WST are eligible to receive (they do not generate) primary entitlement funds from the FAA, to be awarded by the FAA to the Sponsor (RIAC), for projects approved by the FAA under the AIP guidelines. Airport sponsors (RIAC) work cooperatively with the FAA and submit grant applications for eligible projects, which are prioritized for funding by the FAA. Additionally, RIAC did not receive “tens of millions in COVID Stimulus from the Federal CARES Act attributable to BID and WST.” Approximately \$1.07M was awarded to RIAC (the sponsor) based on BID and WST, each, under the CARES Act and following FAA guidelines RIAC has not received State funding for the operations of BID or WST. RIAC has also not had a “massive cutback in services”. In fact, RIAC incurs significant expenditures at BID (approximately \$200,000) to provide aeronautical services through FlightLevel and has a dedicated employee at each airport.	Brian Schattle, Senior Vice President and CFO
3	Aeronautical-related businesses based at our Rhode Island GA airports such as flight schools, aircraft maintenance facilities, restaurants, on-demand charter operations, scheduled flight operations, and banner-tow operations generate millions of dollars in tax revenue to the State financial coffers. There is additional indirect revenue generated in Rhode Island from businesses owners who base their aircraft at RI aircraft, transient aircraft who fly their personal or corporate aircraft into our GA airports for business meetings, and contractors and who service businesses and residences on Block Island. None of this tax revenue or economic impact is shown on the high-level financial statements provided by RIAC as justification for reducing capital expenditures at the GA airports. RIAC was formed as a quasi-public agency to manage the aeronautical transportation infrastructure at ALL of the RI airports, and to promote aeronautics and economic development. The RI State Airport System, similar to our State Highway system, are there to promote commerce, and the economic benefits are not directly measured with simple financial statements.	<p>RIAC recognizes the importance of the airports financial impact on the state and surrounding community. For example, the estimated \$98M in capital improvements over the next 10 years will add to the economic impact to the airports. While there is great economic benefit from civil aviation in Rhode Island, it is not a component of the financial statements of the particular airport. For this reason RIAC has not included those benefits in the financial projections or cash flows of the GASBP.</p> <p>RIAC would direct readers to the FAA Economic Impact Study at: https://www.faa.gov/sites/faa.gov/files/about/plans_reports/2020_nov_economic_impact_report.pdf which details the economic impact to the State of Rhode Island. As shown on page 70 of the report civil aviation in Rhode Island provides Rhode Island with more than \$2.6 billion of economic activity and 19,100 jobs.</p>	Brian Schattle, Senior Vice President and CFO

General Aviation Strategic Business Plan

Comments and Responses

4	<p>We believe the overall goal should be to focus on enabling transportation, business growth, and community impact. Instead, what we have is a “tail wagging the dog” approach, where development is haphazard, burdened by administrative overheads at PVD, with an overall cost-cutting approach, rather than a forward-looking approach of developing aeronautical business opportunities and providing the most efficient and effective transportation infrastructure for the future. Basically, the GA airports are currently looked at through the lens of maximizing opportunities at PVD, and not maximizing the potential of the GA airports.</p>	<p>This GASBP takes a 10 year “forward looking” approach, with a focus on reducing cost and increasing revenues where possible. Its whole purpose is to maximize the potential at the GA airports. This is evident in the multiple infrastructure assessments conducted totaling \$1.24M, and the identification and professional marketing of 17 parcels for development, and strategizing with stakeholders to potentially provide new or increased services to include restaurants and additional hangar capacity.</p>	<p>Dennis Greco, Senior Vice President of Operations</p>
5	<p>Most of the Airport Master Plans (AMP) and Airport Layout Plans (ALP) as listed in Table 1-2 are terribly outdated. The AMP for Quonset is 7 years old, and the ALP is 6.5 years old, yet it is listed as “current”, while the AMP and ALP for all the other GA airports are even older. Clearly there have been some significant changes at Quonset since these documents were last updated, such as the Quonset Air Museum which is now a parking lot leased for non-aviation use. Essentially, all of the Airport Master Plans are way overdue for an update, and this GA Strategic Plan is no substitute for the needed AMP/ALP studies and updates.</p>	<p>Airport master planning is a requirement under the Federal Aviation Administration (FAA), who provides specific guidance under Advisory Circular 150/5070-6B. We agree, the GA Strategic Business Plan does not and will not substitute the individual master plans for each airport. The timing for updates for each master plan going forward will be closely coordinated with the FAA, and based upon any new changes occurring to infrastructure and/or operational activity for each airport from the last update.</p>	<p>Dan Porter, Vice President of Planning</p>
6	<p>The SWOT analysis, a useful business tool, lists its Strengths starting off with a self-assessment of a strong leadership team at RIAC. It also lists the “newly approved Minimum Standards” as a strength. The GA pilot and business community objected fairly strongly to the Minimum Standards document last year, which we see as creating a “barrier to entry” to businesses, and in essence establishes a monopoly for the single FBO at all of the RI GA airports. While RIAC leadership may see this document as a strength, as it reduces their management burden at the GA airports by promoting a single strong FBO, the pilot and business community see this as a weakness.</p>	<p>RIAC’s minimum standards document was developed with an industry expert, Ricondo & Associates, is consistent with FAA and industry standards, and is not considered a barrier to business entry. Rather, the document serves to establish acceptable business practices that are fair and equitable based on the unique conditions and requirements of each airport within Rhode Island’s general aviation system, while preventing the opportunity for the “cherry picking” of potential revenue sources by opportunistic entities without making commensurate airport investment or providing associated levels of services to the aviation community.</p>	<p>Yil Surehan, Vice President of Properties and Business Development</p>
7	<p>We question whether RIAC is doing enough to provide prime parcels available for aeronautical development at the GA airports, specifically “hangar-ready pads” for T-hangars, and a RIAC-owned light GA maintenance and flight school building at Quonset, similar to those at Newport and North Central. Strangely, all of the parcels listed for development at Quonset are currently unusable. Two of the three parcels at Quonset are on the opposite side of 16-34 with no easy access. Yet, RIAC leased a prime parcel on the approach end of Runway 16 at Quonset for non-aeronautical windmill laydown. We have heard similar complaints from our constituents at North Central, Westerly and Newport about the lack of available shovel-ready hangar pads.</p>	<p>RIAC has made all available parcels at each general aviation airport within Rhode Island’s system publically accessible for lease through a brokerage relationship with Hayes & Sherry. RIAC’s mission is to become as financially self-sustainable as possible on an airport-to-airport basis, while reducing the need to continually subsidize general aviation airport expenses and operating losses using revenue generated by commercial air carrier service operations at Rhode Island T.F. Green International Airport (PVD).</p> <p>Accordingly, the concept of RIAC taking on development costs typically associated with construction of facilities by third parties that represent additional sunk costs that may not be recoverable by RIAC in charging fair market value ground rental rates is tantamount to a continuation of general aviation subsidies, and therefore not conducive to reducing current general aviation subsidies.</p>	<p>Yil Surehan, Vice President of Properties and Business Development</p>

General Aviation Strategic Business Plan

Comments and Responses

		The parcel to the east of RWY 16-34 was approved for lease as a non-aeronautical use parcel by the FAA given the available aeronautical use parcels at Quonset (OQU) being deemed sufficient in meeting future (20 year) aeronautical needs.	
8	Fuel prices continue to be an issue. This has caused many GA pilots to cut back on their non-essential travel, or reduce the size of their aircraft. Some thought needs to be put into a second fuel supplier, such as a low-cost self-service fuel terminal from a competing fuel provider such as World Fuel (sold under the Phillips66 brand). Unfortunately, the recent RIAC “minimum standards” document makes it difficult to impossible to attract a second competitive fuel supplier.	<p>Proposals from fueling entities that meet the requirements of RIAC’s minimum standards are welcome. RIAC does not set fuel prices. Fuel pricing is established the FBO, with the goal to be competitive with neighboring airports.</p> <p>RIAC’s minimum standards document was developed with an industry expert, Ricondo & Associates, is consistent with FAA and industry standards, and is not considered a barrier to business entry. Rather, the document serves to establish acceptable business practices that are fair and equitable based on the unique conditions and requirements of each airport within Rhode Island’s general aviation system, while preventing the opportunity for the “cherry picking” of potential revenue sources by opportunistic entities without making commensurate airport investment or providing associated levels of services to the aviation community.</p>	Yil Surehan, Vice President of Properties and Business Development
9	The airport benchmark comparisons on Pages 31, 32 compared the RI GA airports to Chatham, Biddeford, Taunton and Mansfield. We suggest that you please also include Plymouth, MA in the comparison. As discussed at numerous previous GA meetings, we see Plymouth as a role model for GA airport development.	<p>Seven GA airports in the New England region were identified as benchmark or comparative airports for the RIAC GA Airport Analysis. As noted in Section 1.2 of the Executive Summary, three airports were selected to specifically compare to OQU because OQU accommodates the greatest share of corporate jet traffic than the other four RIAC GA Airports. The remaining four benchmark airports were selected to compare to WST, UUU, SFZ and BID airports. Additionally, all seven of the airports identified in the benchmark analysis were reviewed and vetted by FlightLevel to confirm their similarity to the RIAC airports.</p> <p>The Plymouth Municipal Airport (PYM) consists of 758 acres of land, and maintains 2 runways (15/33 and 6/24) which are 4,350’ x 75’ with runway 15/33 having declared distances. According to the latest data from the FAA, PYM recorded 65,200 annual aircraft operations and 104 based aircraft (80-single engine; 15-multi-engine; 5-jet; and 4 helicopter). While several RIAC operated general aviation airports (OQU -runways & land area; WST-runway; and SFZ -runway) have similar land areas or airfield characteristics, none have the level of aircraft activity and based aircraft; therefore, PYM was not considered as a benchmarked/comparable airport.</p>	Brian Schattle, Senior Vice President and CFO
10	The GA Strategic Plan mentions the possibility of a Fuel Tax in several places. The GA community has overwhelmingly lobbied AGAINST such a fuel tax, and proposed legislation was shot down in the RI State Legislature. We request that you please remove the recommendation of a fuel tax from the document.	The purpose of completing the GASBP and utilizing a professional airport consultant for the financial portion of the GASBP was to provide recommendations from a third party perspective. One of the many recommendations was to consider implementing an aviation fuel tax. As noted in the GASBP, Rhode Island is one of only three states that does not have an aviation fuel tax. Specifically neighboring states, Massachusetts and Connecticut both have aviation fuel taxes in place. While implementation of a fuel tax is not currently being contemplated, we feel it should not be specifically excluded, and all the recommendations provided by the consultant should be presented in the GASBP for future consideration.	Brian Schattle, Senior Vice President and CFO
Aircraft Owners and Pilots Association (AOPA) – Sean Collins, Regional Manager			
The Aircraft Owners & Pilots Association (AOPA) submits the following comments in consideration of the draft General Aviation Strategic Business Plan (GASBP).			
11	The GASBP does not adequately connect its stated goals to the vision and mission with an actionable road map for achieving progress. Rather, the document seems to rest on periodic adjustments of rates and charges; positing the notion of establishing an aviation fuel tax; and finally, acknowledgement of the availability of developable land.	RIAC began the development of the GASBP in 2019. Since that time we have hired a number industry experts and consultants. These experts have provided RIAC with Infrastructure Plans, Financial Plans as well as other reports. The results from these studies have been incorporated into the GASBP, which includes the goal to reduce the subsidy to the GA Airports. To accomplish this goal the GASBP identifies several options and recommendation, including 17 parcels of property	Brian Schattle, Senior Vice President and CFO

General Aviation Strategic Business Plan

Comments and Responses

	<p>Unfortunately the GASBP lacks creativity and a clear illustration of how to tactically accomplish the goal of reducing the “subsidy”.</p>	<p>that have been identified for future lease. Also, Minimum Standards have been developed to provide a framework for new leases. Additionally, potential new/adjusted fees or taxes are components of potential strategies to reach self-sustainability. The plans presented here will invest \$98M in infrastructure in the next 10 years and develop parcels that would boost self-sustainability which is in line with our overall strategic business plan.</p>	
12	<p>AIRPORT MASTER PLANNING Airport Master Plans (AMPs) provide a road map for efficiently meeting aviation demand through the foreseeable future while preserving the flexibility necessary to respond to changing industry conditions. Table 1-2: Airport Master Plan Status notes ‘Update Recommended’ for four of the five airports. Finalizing business planning before the required AMPs are completed suggests the GASBP gives insufficient consideration to the infrastructure needs of each individual airport. Given that a reduction in subsidy is at the core of RIAC efforts to devise a useful GASBP, how can RIAC effectively plan for the financial needs of the system without a relevant description of the necessary airport safety and sustainability projects? AOPA recommends initiating the master planning process for each of the four airports before the GASBP is finalized.</p>	<p>Contained within the GASBP scope were thorough assessments of the infrastructure needs and issues for each airport, to include pavements, facilities, and obstructions. The overall outcome of the GASBP will provide a good financial assessment for each airport, with a focus on business development and self-sustainability, and act as a good resource for future master planning. Airport master planning is a requirement under the Federal Aviation Administration (FAA), who provides specific guidance under Advisory Circular 150/5070-6B. The GASBP will not substitute the individual master plans for each airport. The timing for updates for each master plan going forward will be closely coordinated with the FAA, and based upon and new changes occurring to infrastructure and/or operational activity from the last update.</p>	<p>Dan Porter, Vice President of Planning</p>
13	<p>EXISTING REVENUE SOURCES The periodic adjustment of rates for existing revenue sources (ground leases, buildings, fuel flowage fees, access fees, hangar / tie-down rates, etc.) should be a given that is incorporated into all standardized leases. AOPA recommends the use of qualified aviation consultants to ascertain fair market rates for all aeronautical and non-aeronautical uses; services, and operations as appropriate. All rates and fees are required to be ‘fair and reasonable’ as stipulated by federal grant assurances.</p>	<p>RIAC does consider and address increases over time. Within many leases it is common for annual increases to be the higher of 3% or the change in CPI. Also, RIAC has utilized consultants to determine market rates for land and property, as well as the fees for the various services provided. RIAC also works closely with the FAA to ensure we are in compliance with Federal Grant Assurances.</p>	<p>Yil Surehan, Vice President of Properties and Business Development</p>
14	<p>AVIATION FUEL TAXES The GASBP references comparison data for airports from Connecticut, Maine, and Massachusetts. While Connecticut is most similar to Rhode Island in the given assessment, neither Maine nor Massachusetts operate the referenced airports. Therefore, the fuel flowage fees already procured by RIAC at each of the general aviation airports is tantamount to an ‘aviation fuel tax’ in those states. Unlike state based taxes that necessitate legislative action, RIAC has full autonomy over its fuel flowage rates when establishing lease provisions with fuel retailers. The GASBP fails to illustrate how increasing the cost of fuel at RIAC airports— which is already substantially higher than regional competitors—will serve to generate the purported funding. Given the disparity in pricing, driving the cost higher is likely to result in decreasing the quantity of fuel sold in RI. Such a result would not only be bad for RIAC’s projected long term revenue but also for those commercial tenants dependent on transient aircraft operations and fuel sales. AOPA recommends that the GASBP place more emphasis on</p>	<p>RIAC does recognize that fuel flowage fees are a source of revenue and can be used to achieve a similar result as a fuel tax in some instances. An analysis of fuel flowage fees and fuel taxes with neighboring states shows that Rhode Island is the lowest. Please refer to Figures 4-4 and Table 4-4 in the GASBP for more detailed information. RIAC appreciates this comment and will continue to review fuel pricing and fees with its FBO operators.</p>	<p>Brian Schattle, Senior Vice President and CFO</p>

General Aviation Strategic Business Plan

Comments and Responses

	<p>identifying structural hurdles that prevent competitive fuel pricing at RIAC’s airports and working with its partner-retailers to lower the cost of fuel across the state. Improving competition with regional neighbors will yield greater fuel sales and improved revenue from established streams.</p>		
15	<p>ECONOMIC DEVELOPMENT The Block Island Airport (BID) island community, a popular summer tourism destination, has expressed interest in the expansion of on-airport parking areas. Improved parking and a 24-hour self-service fuel station may prove fruitful in generating on-airport revenue. An alternative option might be to install a tanker-truck, continuously staffed during times of elevated aircraft operations. The local aviation community has advocated for a review of business related incentives to entice additional private investment in the state’s airports. Among those was an effort to extend the maximum lease term available for new, on-airport development. AOPA recommends that RIAC support industry efforts to enhance the aeronautical climate to further entice public and private investment. The relationship between RIAC and its aeronautical-users can be characterized as tenuous at best. Ironically, AOPA believes through instituting proactive engagement measures – with the aviation community specifically – and tweaked messaging, RIAC may find a willing army of aviation supporters that seek to advance similar initiatives and desires as RIAC proposes for its airports. These individuals, many of whom are entrepreneurs and business owners themselves, could serve RIAC as an essential resource for building new synergies and a healthier system.</p>	<p>RIAC has taken actions to reduce the utilization of the Block Island State Airport (BID) parking areas as an area to (i) abandon vehicles, and; (ii) be used as a seasonal storage area for summer residents who leave the island in the winter. RIAC and FlightLevel Aviation will be implementing a managed parking program that addresses these issues, and makes more parking available by reducing use of the existing lot for long term parking.</p> <p>The issue of fuel sales has been a longstanding topic of discussion. Several factors are in play in not currently offering fuel at BID. Among them are: (i) the island having a sole-source aquifer that services the wells of those homes and businesses that are not connected to the public water supply, which could be negatively impacted in the event of a fuel spill. (ii) the contributing factor that a very short runway length at BID has on the quantity of fuel that can be reasonably uploaded and still ensure safe take-offs in hot, humid summer weather conditions. (iii) the cost impacts of ferrying small quantities of aviation fuel to the island from the Port of Galilee on the end-user price of fuel; and (iv) the majority of aircraft using BID originate at other airports, purchasing fuel at these originating airports. The combinations of low volumes of fuel sales at prices that would be markedly higher due to shipping costs, along with the investment required to install a fuel facility, makes this an economically challenging proposition. Federal grant funding from the Federal Aviation Administration for the construction of a fuel farm is considered ineligible for BID, as the airport is categorized as a Primary Non-Hub airport. Additionally, there is no funding from the state for this purpose.</p> <p>RIAC is open to reviewing proposed legislation from AOPA to extend the current statutorily-limited lease term of thirty (30) years to enhance the ability of potential developers to recover their investment costs and return a profit on certain types of developments, namely higher end (non-T-hangar) facilities. We have developers on the standby to build hangars and we have connected them with prospective future tenants.</p> <p>RIAC has begun a quarterly meeting process with its general aviation airport tenants and pilots with the goal of keeping communication lines open and ensuring that information within the tenant and pilot community is accurately presented and exchanged.</p>	<p>John Goodman, Assistant Vice President of Media & Public Relations</p>
Richard Langseth			
16	<p>I was under the impression that interested parties would be notified when the General Aviation Strategic Business Plan was posted for review by the public. That did not happen. I am asking that the people who expressed interest in this plan be notified and that the comment period be extended to allow them to comment. This falls under the R.I. Administrative Procedures Act and I expect compliance with that statute. Here are some initial comments rapidly done to meet the current deadline. Please do not consider this a waiver of my request for additional time.</p>	<p>The RI GA Airport Strategic Business Planning process has been conducted in an open and transparent process that includes multiple public meetings, appearances before town councils and numerous communications with airport stakeholders. Although this planning process does not fall under the R.I. Administrative Procedures Act, RIAC has consistently engaged in this open and public planning process, which includes this request for public review of the plan as well as the submission and publication of public comment in the publication of the General Aviation Strategic Business Plan.</p>	<p>John Goodman, Assistant Vice President of Media & Public Relations</p>

General Aviation Strategic Business Plan

Comments and Responses

<p>Summary:</p> <ol style="list-style-type: none"> 1. Fuel Tax is indicated. 2. FAA funds for passenger operations at Westerly and Block Island should stay at those airports. 3. Block Island should have a fuel dock. 4. That would bring them close to self-sufficiency if ridiculous off-loading of PVD overhead were not allocated to Block Island. 5. I suspect Newport can also get to self-sustainability with management that cares about businesses at the airport etc. 6. North Central is a reliever for PVD. PVD should subsidize to recognize that relief. 	<p>RIAC has received a total of 45 public comments from individuals, organizations, and the aviation community generated through our public outreach efforts which will be reflected in the published strategic business plan. Be assured, RIAC will continue to welcome public comment at any time, on this or other matters related to Rhode Island’s aviation system.</p> <p>On the matter of the additional comments:</p> <p><i>1. Fuel Tax is indicated</i></p> <p>As part of the GASBP, Rhode Island has been identified as only one of three states that does not have an aviation fuel tax, as well as an outlier to neighboring states. While there is strong support among these parties for additional investment of general taxpayer funds in local airports, there appears to be very little individual support among pilots to contribute towards such investments. However, RIAC will remain open to suggestions of taxes or other reasonable user fees to help fund investments into general aviation airports should they be proposed.</p> <p><i>2. FAA funds for passenger operations at Westerly and Block Island should stay at those airports.</i></p> <p>While all GA airports receive allocations of funding from the FAA, ultimately it is the FAA that decides what priorities are to be funded by appropriated federal dollars. Federal priorities for those appropriations are determined by the FAA’s priority ranking metric, with input from RIAC on project eligibility and justification. It is expected that the FAA will continue current policies that direct the appropriations of federal dollars to areas of highest need within Rhode Island’s GA Airport system.</p> <p><i>3. Block Island should have a fuel dock</i></p> <p>While RIAC recognizes the support among the pilot community for a fuel dock at the airport, feedback received from fixed based operators suggest that the high cost of developing and maintaining fuel availability at BID undermines the feasibility of such an initiative. As with other projects on Block Island, expenses related to the cost of construction and delivery of fuel can be expected to result in a significantly reduced return on investment or result in fuel prices significantly higher than those available at other GA Airports, such as Westerly State Airport, which is a 12 minute flight from BID. Federal grant funding from the Federal Aviation Administration for the construction of a fuel farm is considered ineligible for BID, as the airport is categorized as a Primary Non-Hub airport. Additionally, there is no funding from the state for this purpose.</p> <p>The issue of fuel sales has been a longstanding topic of discussion. Several factors are in play in not currently offering fuel at BID. Among them are: (i) the island having a sole-source aquifer that services the wells of those homes and businesses that are not connected to the public water supply, which could be negatively impacted in the event of a fuel spill. (ii) the contributing factor that a very short runway length at BID has on the quantity of fuel that can be reasonably uploaded and still ensure safe take-offs in hot, humid summer weather conditions. (iii) the cost impacts of ferrying small quantities of aviation fuel to the island from the Port of Galilee on the end-user price of fuel; and (iv) the majority of aircraft using BID originate at other airports, purchasing fuel at</p>	
---	--	--

General Aviation Strategic Business Plan

Comments and Responses

		<p>these originating airports. The combinations of low volumes of fuel sales at prices that would be markedly higher due to shipping costs, along with the investment required to install a fuel facility, makes this an economically challenging proposition. Federal grant funding from the Federal Aviation Administration for the construction of a fuel farm is considered ineligible for BID, as the airport is categorized as a Primary Non-Hub airport. Additionally, there is no funding from the state for this purpose. Additional challenges may include the potential lack of local support for such a project given the concerns related to Block Island’s sole source aquifer.</p> <p>RIAC will remain open to proposals from fuel farm developers who believe the project is financially feasible, however to date we have received no such proposals, likely given the aforementioned concerns.</p> <p><i>4. That would bring them close to self-sufficiency if ridiculous off-loading of PVD overhead were not allocated to Block Island.</i></p> <p>RIAC assigns operating expenses to the respective cost centers/airports. Over the years RIAC has improved the assignment of expenses to cost centers including the General Aviation Airports to properly reflect the results for each airport. In fact, as referenced in the GASBP the operations of PVD subsidize the GA airports.</p> <p><i>5. I suspect Newport can also get to self-sustainability with management that cares about businesses at the airport etc.</i></p> <p>As demonstrated through the completion of this GASBP, RIAC recognizes the value of the GA airport system, including Newport. A goal of the GASBP is in line with our strategy which is to have all GA airports be self-sustaining, while investing nearly \$100M in infrastructure improvements over the next 10 years.</p> <p><i>6. North Central is a reliever for PVD. PVD should subsidize to recognize that relief.</i></p> <p>As noted in a previous response, activities at PVD are currently subsidizing operations at North Central State Airport and other GA Airports throughout the state, however, each airport including North Central should head towards financial self-sustainment which is RIAC’s responsibility</p>	
17	<p>In the 1.6 GASBP Overview the following claim is made: Approximately 1,800 pages of assessments have been posted to the RIAC website. These assessments are the basis for the 10- year Capital Improvement Plan (CIP) that RIAC will invest \$98M with a projected economic impact of \$193M across Rhode Island. In conjunction with the assessments, RIAC reached out to the town councils of the surrounding ten communities that abut the GA airports notifying them of RIAC’s intentions of developing a 10-year GASBP and requesting their participation in future meetings. During the last three years, RIAC has posted 20 notices for public meetings, held 28 meetings with 18 elected officials and 41 stakeholders, and spent approximately 9,000 staff hours on the plan.</p>	<p>In addition to the numerous noted public meetings, RIAC has also provided updates on the General Aviation Strategic Business plan at nearly every open and public RIAC Board Meeting for the past three years. Elected officials appointed by the voting public to represent them, have been also active participants in the GA Strategic Business Planning process from the very start. RIAC was also pleased to participate the Rhode Island Senate’s Oversight Committee Hearings in 2021, providing an update on the state airport system amid the COVID-19 pandemic.</p> <p>In addition to the public’s welcome attendance at public in-person meetings in 2019, and public zoom meetings in 2020 and 2021, there have been additional communications regarding these matters in numerous Town Council meetings throughout the state. These meetings have resulted in a significant public input, much of which can even be viewed online as recorded town council</p>	<p>John Goodman, Assistant Vice President of Media & Public Relations</p>

General Aviation Strategic Business Plan

Comments and Responses

	<p>What about the public? Following FAA guidelines and the Administrative Procedures Act, RIAC, a state agency, needs to focus on real input from the public - the wheels of commerce etc. That aspect is missing. Also hardly anything about alternative energy.</p>	<p>meetings. Agendas and meeting minutes have been openly posted on the RIAC website and the Secretary of State's website for the review of the public as well.</p> <p>Finally, in unveiling the GA Strategic Business Plan, RIAC issued an advisory to the media which resulted in several earned media placements in local publications resulting in articles affirming that RIAC is continuing to seek public comment through the sharing of the draft Strategic Business Plan.</p> <p>We appreciate public and stakeholder comments and will continue to accept and respond to suggestions made regarding General Aviation airports moving forward. Although this planning process is not subject to the RI Administrative Procedures Act RIAC has actively worked to engage with all airport stakeholders, including the public, over the past several years to develop this draft proposal.</p> <p>Additionally, alternative energy (i.e. solar) is being considered within the plan, specifically parcels located at North Central Airport.</p>	
18	<p>Section 2.4 Infrastructure Assessment Results - does not break down by airport. 9,000 staff hours and no breakdown by airport. This plan is worthless without airport breakdowns.</p>	<p>The pavement analysis, facility condition assessments, and airspace obstruction analysis (i.e., Infrastructure Assessment Results) were conducted for each airport. Subsequently, a report was produced for each airport containing the results and provided on RIAC's webpage at: https://www.pvdairport.com/corporate/infrastructure-assessments.</p>	<p>Dennis Greco, Senior Vice President of Operations</p>
19	<p>Page 18: Weaknesses No aviation fuel tax as compared to surrounding states (easy to fix)</p>	<p>Rhode Island is one of the only three states in the country that does not levy an aviation fuel tax, and is therefore recognized as a financial weakness. In addition, neighboring states Massachusetts and Connecticut both have aviation fuel tax. While it is identified as a weakness within the GASBP, there is not a current plan to implement a tax based upon lack of support from the aviation community.</p>	<p>Brian Schattle, Senior Vice President and CFO</p>
20	<p>Page 18: Weaknesses Financial position of 3 out of 5 airports requires subsidy (highways need subsidies too... FAA funds for passenger operations at Westerly and Block Island should stay at those airports. I suspect Newport can also get to self-sustainability with management that cares about businesses at the airport etc. North Central is a reliever for PVD. PVD should subsidize to recognize that relief.</p>	<p>The goal as stated in the General Aviation Strategic Business Plan (GASBP) is consistent with RIAC's fiduciary responsibility and with FAA rules and regulations (i.e. Grant Assurance #24 and Compliance Manual 5190.6B Chapter 17, Self-Sustainability). State highways are not an appropriate comparison, as they rely on state funding for operations, which RIAC does not as a self-sustaining quasi state agency.</p>	<p>Brian Schattle, Senior Vice President and CFO</p>
21	<p>Page 18: Weaknesses Use of eminent domain for obstruction removal currently challenged in court system (I thought legislation and negotiation spearheaded by liability carrier fixes this minor problem. RIAC will never have eminent domain powers. This needs clarification)</p>	<p>The Rhode Island Department of Transportation's (RIDOT) ability to condemn aviation easements on RIAC's behalf is currently challenged in the court system. While the Safe Airspace Legislation passed in 2021 aids in the condemnation efforts moving forward, it does not resolve the ongoing litigation. Plaintiffs argue that the aviation easements were taken for "economic development" and thus, the Home and Business Protection Act applies. This issue is currently slated for trial in 2022 as RIAC disputes these easements were taken for economic development—they were taken for safety reasons to maintain the current runway lengths. Further, Plaintiffs indicated they will be appealing the Superior Court ruling affirming RIDOT's authority to condemn aviation easements in runway approaches. Thus, the litigation will likely remain ongoing for 1-2 years as the trial and appeal progress during which time RIDOT/RIAC is prohibited from removing the obstructions.</p>	<p>Brittany Morgan, Esq. AVP HR & Internal Legal Affairs</p>
22	<p>Page 18: Weaknesses Lack of "pad ready" sites for development (well, make them ready!)</p>	<p>As this is shown as a weakness, it then may present itself as an opportunity to strategize with stakeholders and developers to understand specific individual site constraints (i.e., topography,</p>	<p>Yil Surehan, Vice President of Properties and Business Development</p>

General Aviation Strategic Business Plan

Comments and Responses

		environmental, etc.) and work together to overcome them based upon return on investment and available funding.	
23	Page 18: Weaknesses Heavy environmental regulations (That's never going to change. Where are the environmental hang ups?)	This was identified as a weakness in that some of the sites do contain some environmental challenges, to include storm water permitting. As the cost to develop the sites must include compliance with environmental regulations, it can be challenging to develop and have a positive return on investment.	Dennis Greco, Senior Vice President of Operations
24	Page 18: Weaknesses Backlog of pavement repair vs. available funding (This clashes with subsidy observation above)	. Beyond the allotted entitlement funds received by the FAA each year, a limited amount of discretionary funds are available to RIAC (typically \$5M-\$10M per year on average). This SWOT just acknowledges the challenge to maintain the airfield pavements at an acceptable level with limited resources annually on funding. This is why the Pavement Management Program put into place under this effort is critical in planning pavement repair over time.	Dennis Greco, Senior Vice President of Operations
25	Page 18: Weaknesses Lack of state funding (Make a decent case for the same rather than trashing the GA Airports all the time!)	The GASBP outlines recommendations and supporting analysis to help the GA Airports become more self-sustainable. The lack of state funding is one of the weaknesses identified when compared to other states aviation systems. Through the GASBP RIAC is identifying opportunities for the General Aviation airports to be more self-sustainable. State funding is not being considered as part of this.	Brian Schattle, Senior Vice President and CFO
26	I noticed on Table 2-6 regarding neighbors that "Most do not support additional development." There is no basis for this observation. Which airport? What kind of developments? How are neighbors defined?	It has been RIAC's experience in the past and throughout this GASBP process, that residential neighbors do not support increased aviation development at airports due to the real or perceived increase in aircraft activity. This was apparent at the public meeting conducted in Middletown for Newport State Airport, where the majority of attendees were residents surrounding UUU, and voiced their concern over existing and increased aviation activity. The meeting minutes for the public meeting can be reviewed at: https://www.pvdairport.com/corporate/general-aviation-strategic-business-plan	Dennis Greco, Senior Vice President of Operations
27	Regarding zoning in that chart, the statement is made: "Where zoning is in place enforcement can be a challenge." This makes no sense to me. Zoning is always enforceable at some level. If zoning is not enforceable why does the strategic plan even bring it up?	RIAC does not have the statutory authority to enforce zoning ordinances—this must be done by the host cities/towns. Airport zoning overlays are the first line of defense to obstructions which cities and towns are required to implement by State law. Despite this requirement, only three (3) towns have implemented the zoning overlay and seven (7) have not. Those that have the zoning overlays have thus far refused to enforce them.	Brittany Morgan, Esq. AVP HR & Internal Legal Affairs
28	I was under the impression that the legal action at Westerly has been settled or very close to it. Why is that not reflected in this table 2-6?	The Rhode Island Department of Transportation's (RIDOT) ability to condemn aviation easements on RIAC's behalf is currently challenged in the court system. While the Safe Airspace Legislation passed in 2021 aids in the condemnation efforts moving forward, it does not resolve the ongoing litigation. Plaintiffs argue that the aviation easements were taken for "economic development" and thus, the Home and Business Protection Act applies. This issue is currently slated for trial in 2022 as RIAC disputes these easements were taken for economic development—they were taken for safety reasons to maintain the current runway lengths. Further, Plaintiffs indicated they will be appealing the Superior Court ruling affirming RIDOT's authority to condemn aviation easements in runway approaches. Thus, the litigation will likely remain ongoing for 1-2 years as the trial and appeal progress during which time RIDOT/RIAC is prohibited from removing the obstructions.	Brittany Morgan, Esq. AVP HR & Internal Legal Affairs
29	It is stated that Pilots/Stakeholders "did not respond to airport request to join lawsuit." Is there any documentation to that effect? If so, it should be made a part of the record. Is this information in the case file at Superior Court?	RIAC did ask the Town of Westerly to join but they decided against it. It is a fact that while that was being publicly discussed, other parties did not join the lawsuit to support the preservation of air space around our airports. The lawsuits are still active and RIAC welcomes other parties to assist in making our airports safer.	Brittany Morgan, Esq. AVP HR & Internal Legal Affairs
30	On Page 22 the following comment is made regarding Block Island Airport: "Noise of aircraft – no respect for residential areas, bad quality	This was a comment received by RIAC early on in the GASBP process, and received through the GASBP email portal. As we have experienced, there are different points of view with regard to	Dan Porter, Vice President of Planning

General Aviation Strategic Business Plan

Comments and Responses

	of life, impact on home values." How does one respect residential areas? I am not aware of a "bad quality of life" on Block Island. And the impact on home values knocks me off my chair! I can assure you that people flying into BID to purchase a home on the island would not bat an eye at the appraisal based on aircraft operations! "	airport operations. This particular comment voices concern of airport operations and residential land use compatibility. This reflects the views of the commenter, not RIAC.	
31	What exactly is meant by "No development, airport is an environmentally sensitive area"? I can say the same thing for PVD.	This was a comment by RIAC received early on in the GASBP process, and received through the GASBP email portal. As with any project at all airports, RIAC conducts environmental due diligence with regard to the National Environmental Protection Act (NEPA) and RI storm water permitting compliance. This reflects the views of the commenter, not RIAC.	Dan Porter, Vice President of Planning
32	I thought the plan would consider the sale of fuel at BID. What the heck happened to that?	The issue of fuel sales has been a longstanding topic of discussion. Several factors are in play in not currently offering fuel at BID. Among them are: (i) the island having a sole-source aquifer that services the wells of those homes and businesses that are not connected to the public water supply, which could be negatively impacted in the event of a fuel spill. (ii) the contributing factor that a very short runway length at BID has on the quantity of fuel that can be reasonably uploaded and still ensure safe take-offs in hot, humid summer weather conditions. (iii) the cost impacts of ferrying small quantities of aviation fuel to the island from the Port of Galilee on the end-user price of fuel; and (iv) the majority of aircraft using BID originate at other airports, purchasing fuel at these originating airports. The combinations of low volumes of fuel sales at prices that would be markedly higher due to shipping costs, along with the investment required to install a fuel facility, makes this an economically challenging proposition. Federal grant funding from the Federal Aviation Administration for the construction of a fuel farm is considered ineligible for BID, as the airport is categorized as a Primary Non-Hub airport. Additionally, there is no funding from the state for this purpose.	Yil Surehan, Vice President of Properties and Business Development
33	The operating expenses shown on Page 39 are a joke. What happened between 2019 and 2021 to cause expenses to go from \$2.4 million to 3.6 million? And then for expenses to go up by \$100,000 per year. This is not credible and is interesting considering the 2019 to 2021 period is the period of the study. We need to look at the consultant's model to see where the obvious error is.	RIAC assigns operating expenses to the respective cost centers/airports. Over the years RIAC has improved the assignment of expenses to cost centers including the General Aviation Airports to properly reflect the results for each airport. The primary categories of expenses include, payroll and benefits, utilities, repairs and maintenance, supplies and equipment, professional services, and other. Most of these expenses were higher in 2021 than 2019 and result in a total increase between the two periods of approximately \$1.2 million. Actual operating expenses are shown for 2019 and 2020, and budgeted expenses are included for 2021 and 2022. As in any financial model, assumptions need to be made to project future results. Future projections are based off of the base year of 2022 which was budgeted at \$3.7M of expenses. Many of the expenses were assumed to increase by approximately 3%, and therefore total expenses were projected to increase by approximately \$100,000 annually.	Brian Schattle, Senior Vice President and CFO
34	I don't get Table 4-3 Projections of Additional Revenue. How does the OQU additional revenue go from \$275,500 in FY 2022 to \$900,000 in FY 2029? Are you planning a regional freight hub? This must be a joke....	RIAC had identified and is currently marketing six parcels of land at OQU ranging in size from 4.35 acres to 77.0 acres. In fact, one of the parcels of 19.09 acres is currently being leased at \$207,888 annually. The six parcels are estimated to bring in an additional \$900,000 annually by 2029. RIAC has no current plans for a regional freight hub at OQU.	Yil Surehan, Vice President of Properties and Business Development
35	The 10 year CIP is interesting. How does Westerly get \$1,900,000 in "Other" capital funds while Block Island get \$0. What don't we know about?	The \$1.9M is considered private funding for the demolition of a RIAC facility and reconstruction of a hangar at Westerly Airport. "Other" funding is typically dependent on the nature of the project (in this case a tenant-developed hangar).	Brian Schattle, Senior Vice President and CFO

General Aviation Strategic Business Plan

Comments and Responses

36	<p>The biggest gap I see in this plan is the total disregard of the potential for fuel sales at BID. This makes no sense at all.</p>	<p>The issue of fuel sales has been a longstanding topic of discussion. Several factors are in play in not currently offering fuel at BID. Among them are: (i) the island having a sole-source aquifer that services the wells of those homes and businesses that are not connected to the public water supply, which could be negatively impacted in the event of a fuel spill. (ii) the contributing factor that a very short runway length at BID has on the quantity of fuel that can be reasonably uploaded and still ensure safe take-offs in hot, humid summer weather conditions. (iii) the cost impacts of ferrying small quantities of aviation fuel to the island from the Port of Galilee on the end-user price of fuel; and (iv) the majority of aircraft using BID originate at other airports, purchasing fuel at these originating airports. The combinations of low volumes of fuel sales at prices that would be markedly higher due to shipping costs, along with the investment required to install a fuel facility, makes this an economically challenging proposition. Federal grant funding from the Federal Aviation Administration for the construction of a fuel farm is considered ineligible for BID, as the airport is categorized as a Primary Non-Hub airport. Additionally, there is no funding from the state for this purpose.</p>	<p>Yil Surehan, Vice President of Properties and Business Development</p>
<p>Ed Trautman – Newport State Airport</p>			
37	<p>How might the goals, vision, and mission be connected? One way would be to assert that the goal is to make the RI GA airports safe, convenient aviation gateways for New England in a fashion that provides safe, secure, efficient, and convenient air transportation, and stimulates the region’s economic growth while assuring solid fiscal approaches. However, it is difficult to understand the leap to reducing the financial subsidy without first laying out the spectrum of financial considerations. This was done well in the 2007 master plan that included capital investment options and sources of that investment along with forecasts for operations and activities. The RIAC financial report (2021) provides a high-level airports snapshot including TF Green showing \$53M operating expenses against \$35M revenues and \$12M federal stimulus – a \$6M loss covered through state investment. This report further outlines \$20M in capital improvements including \$11M for TF Green runways and \$2M for Newport ramp. The source of funds includes the FAA. This illustrates how current deficits must be placed in the context of the broader investment and operations context to be understood. A suggestion is to include an updated list of past airport improvement projects and the recommended investments from the 2007 Newport master plan, provide an update on what has occurred in the last 14 years, what remains and might be needed given current circumstances, and how the funds might flow particularly as the FAA typically contributes eighty percent. The same should be done for the other GA airports included in the GASBP. Details around needs are addressed in the section below on safe and convenient gateways.</p>	<p>We appreciate your review of the Newport State Airport Master Plan. As part of the GASBP effort however, specific assessments were conducted to include a pavement management, facility infrastructure assessments, airspace obstruction analysis, and a financial assessment. Each of these efforts played a significant role in shaping the 10-year plan. The GASBP will not substitute the individual master plans for each airport. Your suggestions here are typically conducted within the framework of an inventory effort under the master plan, along with a detailed financial section related to Newport. The timing for updates for each master plan going forward will be closely coordinated with the FAA, and based upon changes occurring to infrastructure and/or operational activity from the last update.</p>	<p>Dan Porter, Vice President of Planning</p>
38	<p>Regional Economic Development – This element of the RIAC mission is nicely put: ... developing, promoting and managing the</p>	<p>We appreciate your comments and suggestions and are pleased to have them reflected in the GASBP. As you note, there are many organizations and communities that all play vital roles in fostering economic development of towns, cities and states, including on Aquidneck Island.</p>	<p>John Goodman, Assistant Vice President of Media & Public Relations</p>

General Aviation Strategic Business Plan

Comments and Responses

<p>airport system to stimulate the region’s economic growth ...</p> <p>The airport system is, after all, a regional asset to be promoted as part of the regional economic development. The GASBP could merely cite the GNCC <i>Ten-Year Strategy to Secure A Stronger Economy</i>, although a much stronger argument could be made for supporting aviation and RIAC by aligning the benchmark regions and adding the economic imperatives. Additionally, examples of local economy benefit from the MassDOT aviation impact study could be cited as evidence of positive community effect, as well as the benefit from the RIAC airports economic impact analysis. Of course, connecting these studies together would create the most impactful economic argument.</p> <p>The benchmark regions in the GNCC ten-year strategy were selected to be as greater Newport: popular tourist destinations, having a robust military presence, located on the East Coast, and being relatively close to a major city. The authors chose Cape May NJ (WWD), Charleston SC, (CHS, JZI), Pensacola FL (PNS), Myrtle Beach SC (MYR), Portsmouth NH (PSM), Sarasota FL (SRQ, VNC), York ME (SFM), Essex MA (BVY), and Savannah GA (SAV). The local GA airports are noted in parentheses. These airports have good facilities and instrument approaches and are better marketed than the RI airports. In some cases, there are nearby large commercial airports, like TF Green, but the local GA airports are still instrumental to the local economies. For instance, busy Beverly airport (BVY) in Essex MA is just 14 miles from Logan.</p> <p>A key point in the GNCC ten-year strategy is that the Northeast is losing ground in population as well as business and we need to learn from these other regions. Portsmouth NH is noted as an exception. The kinds of aviation facilities and practices are part of this learning and could be added to the GASBP.</p> <p>Many of us are engaged in national and local aviation associations that provide contrasting perspectives on aviation and related businesses. RI is considered a difficult place to do business, something that could also be addressed in the GASBP.</p>	<p>Although the GASBP does include elements related to potential economic development opportunities at general aviation airports, we appreciate collaborative efforts such as that of the Greater Newport Chamber of Commerce to seek community-wide consensus for economic development opportunities which can potentially include airport related initiatives such as the GNCC’s recently released 10 Year Strategy to Secure a Stronger Economy.</p> <p>RIAC values the roles that cities, towns, chambers of commerce, tourism councils, and other entities play in destination marketing, tourism promotion and economic development given federal restrictions on airport revenue diversion for such purposes. We further appreciate the role that aviation associations can play in the promotion of such community assets and opportunities. RIAC has will continue to participate in and build upon collaborative community efforts that recognize general aviation airports as a community asset.</p>	
<p>39 Safe and convenient aviation gateways</p> <p>Two major points should be addressed in the GASBP:</p> <ol style="list-style-type: none"> 1. Marketing of the airports as truly convenient gateways to the region for both business and pleasure, and 2. The status and plans for the airports to assure safety and appropriateness for the GA and business mission, much as was addressed in the 2007 master plan. <p>The RI GA airports are not marketed well, which should be a tie-in to the regional economic development and could also be cited in the context of setting goals. A simple search for</p>	<p>We appreciate your suggestion on marketing Newport State Airport (UUU) and our other general aviation airports to potential business and leisure customers, and we will review for possible inclusion and enhancements to our website.</p> <p>With regard to the approaches into Newport specifically, we understand the current constraints as it relates to the VASI on Runway 4. As mentioned, this relates to the ongoing obstruction issue, and will be addressed upon removal of off airport obstructions, which are currently pending due to the unresolved lawsuit in Westerly. The current runway landing length for Runway 4, at 2,500, although not ideal, does accommodate the majority of the fleet mix utilizing Newport. The PC-12 aircraft can utilize Newport, as none of the runway lengths were shortened for take-off. Extending the runways for take-off was analyzed within the master plan, and was deemed not feasible due to the land use constraints surrounding the airport.</p>	<p>Yil Surehan, Vice President of Properties and Business Development</p> <p>Dan Porter, Vice President of Planning</p>

General Aviation Strategic Business Plan

Comments and Responses

<p>“Newport RI airport” lists Newport State Airport (UUU) along with a button for website. That just leads to a page on the TF Green web site – https://www.pvdairport.com/corporate/general-aviation/newport-uuu – with three sentences: Newport State Airport is used by visitors to the area as well as local aviation enthusiasts and the Army National Guard. It serves the corporate community and visitors to the year-round festivals at Newport. The airport provides quick access for boat owners who harbor vessels in the nearby marinas.</p> <p>In contrast, doing the same search for one of the selected benchmark airports, “Taunton MA airport”, takes you to a multiple page web site proclaiming “A world of opportunity” for businesses and aviation enthusiasts – https://www.tauntonairport.com/</p> <p>Better marketing would yield greater business, much as with TF Green, and should be part of the GASBP goals, to help promote the regional economy as well as help reduce budget gaps.</p> <p>Regarding the airports themselves, Newport does not currently meet the FAA runway length requirements for 95% of small airplanes that should be using the airport. This is partly related to the as-yet-not-addressed obstructions that led to the threshold displacements at Newport and Westerly. Fortunately, the RI legislature passed the <i>Safe Airspace</i> bill supported by RIAC which should help RIAC ameliorate this. Note that the PC12 charter planes can’t be heavily loaded – and thus can’t purchase fuel – with the shortened runways.</p> <p>The flight approaches into Newport are also limiting. Night landing into runway 4 is made difficult without the visual light guidance (VASI) removed several years ago as trees grew into the approach. Moreover, the instrument approaches do not have vertical guidance. The FAA has requirements for such approaches, which runway 22 might meet with a length waiver and perhaps minor improvements. Runway 16 is the usual bad-weather runway, but it would need a parallel taxiway. Improving the approaches would both be safer and make the airport more accessible in the poor weather, thus making the airport more useful and appealing.</p> <p>As noted in the 2007 master plan the ramp and hangar capacity is limited at Newport. Since then, a 10 T-hangar was privately built; a second T-hangar was recommended for one of the development parcels. Unfortunately, this first T hangar is the subject of a dispute which detracts from the value proposition of the second. Acknowledging and addressing this dispute in the plan would improve the argument for further development.</p> <p>There is interest from a restaurant group to build a simple business at Newport airport, something many other airports have found extremely</p>	<p>The Rhode Island Department of Transportation’s (RIDOT) ability to condemn avigation easements on RIAC’ behalf is currently challenged in the court system. While the Safe Airspace Legislation passed in 2021 aids in the condemnation efforts moving forward, it does not resolve the ongoing litigation. Plaintiffs argue that the avigation easements were taken for “economic development” and thus, the Home and Business Protection Act applies. This issue is currently slated for trial in 2022 as RIAC disputes these easements were taken for economic development—they were taken for safety reasons to maintain the current runway lengths.</p>	
--	---	--

General Aviation Strategic Business Plan

Comments and Responses

	<p>beneficial. This brings in aviators who buy both food and fuel as well as tourists and locals who like to watch airplanes. This could be added to business propositions in the GASBP. The local restaurateur interested in locating at the airport was discouraged.</p> <p>Having a streamlined airport economic development process that incentivizes and promotes private investment would greatly expand the business and revenue base around the airports.</p>		
40	<p>Strengths, Weaknesses, Opportunities, Threats and Goals The SWOT analysis should be augmented given the additional information in the cited documents. Some suggestions include the following. The goals should then be redone to better align with the vision and mission and the insights from the SWOT.</p> <p>Strengths</p> <ul style="list-style-type: none"> • Airports well located near attractive, business, residential and recreational assets • Vibrant aviation community • Regional economic planning efforts • Significant regional economy in leisure, defense, education and coastal (blue) economy • Supportive FAA airport improvement capital program • Supportive FAA obstruction management program • Safe Airspace bill • Solid regional benchmarks with investments in neighboring states • Significant efforts in regional airport master planning <p>Weaknesses</p> <ul style="list-style-type: none"> • RI airports are not as attractive to business as those in neighboring states • Difficulty with addressing airspace safety (obstructions) • Lagging capital investment relative to master plans • Poor marketing of existing and potential aviation assets • Nearby airports, e.g., in southern MA and on Cape Cod, have better fuel prices, amenities, approaches and runways, that draw in pilots and passengers as well as businesses • Lack and cost of hangar space that shifts traffic and business elsewhere. New Bedford and Plymouth MA successfully built out the airports and attracted new businesses. <p>Opportunities</p> <ul style="list-style-type: none"> • Land available to attract new business • Land available to improve airport attractiveness • Streamlined airport economic development process that incentivizes and promotes private investment in growing the airport as an asset to the flying and local community 	<p>We appreciate your suggestions on enhancing the SWOT analysis conducted as part of the GASBP process, and will review for possible inclusion. As it relates to Opportunities and economic development, airport sponsors (i.e., RIAC) must follow strict federal regulations which restricts the use of airport revenues for economic development.</p>	<p>Dennis Greco, Senior Vice President of Operations</p>

General Aviation Strategic Business Plan

Comments and Responses

<ul style="list-style-type: none"> • Interest in building restaurant and other businesses • Tie -in to local economies such as tourism, innovation, and small business • Coordination with regional economic plans • State and local capital supplements to FAA funding • Stimulus and infrastructure funding • Greatly increased visibility and a chance to communicate positive impact to localcommunities <p>Threats</p> <ul style="list-style-type: none"> • Vocal minority opposed to airports <p>Lack of public education on operation and value of airports for emergencies and economic impact</p> <ul style="list-style-type: none"> • Reduced utility of airports due to runway displacement caused by obstructions • Economic volatility causing fuel price increases and decreased operations • Lack of Airport Overlay Zoning from 7 out of 10 host communities • Lawsuits on noise and obstruction removal <p>The four goals might be re-stated as:</p> <ol style="list-style-type: none"> 1. Improve marketing of aviation assets: the airports, airport businesses, and the tie-ins to the local and regional economies. This necessarily includes community outreach in tandem with regional planners that go beyond aviation to the broader economic development. 2. Complete the assessment and improvement projects on 10-year CIP by leveraging FAA AIP, available stimulus funding, and potential other funding sources. The projects should tie in with the master plans and address the current shortcomings in the airport facilities, aviation approaches, and airspace obstructions. 3. Explore alternative sources of operational funding. New businesses might be attracted to the airports with better amenities and aviation capabilities, increasing fuel sales as well as taxes and land leases. 4. Coordinate planning with the regional economic development organizations, to assure aviation and airports play the most impactful parts and gain recognition and funding for the parts they play. 		
<p>Henry DuPont – Block Island Airport</p>		
<p>41</p> <p>The Draft GSSBP (“The Plan”) in its present form does not reflect The Rhode Island Airport Corporation’s charge in its enabling legislation which is to foster aeronautics not only at TF Green State Airport but at all the five outlying GA airports in the state. Instead of referring to the GA airports as being an integrated part of a state transportation network, it refers to the five outlying airports as being a financial drag</p>	<p>In order to maintain and enhance the state’s general aviation system it is important that all airports move towards self-sustainability to every extent possible. While improved airport revenues are important to continued airport sustainability, the purpose of this public comment period is to seek insight into the proposed investment of nearly \$100 million in general aviation</p>	<p>John Goodman, Assistant Vice President of Media & Public Relations</p>

General Aviation Strategic Business Plan

Comments and Responses

	<p>on TF Green State Airport requiring a “subsidy”. The apparent primary goal of The Plan is to reduce, this “subsidy” at the expense of supplying the needed capital improvement funds, and airport services, which the five outlying airports need to flourish and be competitive with other General Aviation airports in our region.</p> <p>In fact, the entire premise of commissioning a study of the infrastructure needs and possible revenue enhancement opportunities at the five State General Aviation Airports (The Plan) only came after airport advocates started complaining that in 2018, RIAC had cut \$31 million out of the FY 2015-FY 2020 RIAC Capital Improvement Program Budget which included a number of airport improvement projects totaling some \$48 million at the five outlying General Aviation Airports. These funds were diverted to improvements like the Runway 5 expansion and rest room renovations at the TF Green State Airport. Over a dozen important GA Airport improvement projects which had been identified in as critical airport infrastructure improvements back in 2015, were delayed while RIAC commissioned a “multi-year, multi-disciplinary study” which now coincidentally identifies all the canceled GA Airport improvement projects as being necessary for the safe operation of those airports. Long planned airport improvements like the demolition of the abandoned air terminal building at Quonset were abandoned while a new \$9 million Customs and Border Facility was built instead at T F Green, presumably to attract international flights, but sadly, now goes unused.</p>	<p>airport infrastructure over the next decade, with priorities determined in part by an investment of \$75.1 million into general aviation airport pavement repairs.</p> <p>The Rhode Island Airport Corporation adheres to all federal and state regulation with its financial records made public and overseen by multiple agencies including (list state and federal auditors and perhaps even bond rating agencies.) Despite the belief among some that general aviation airports are subsidizing the airlines, RIAC stands by the accuracy of federally and independently audited budgets.</p> <p>Municipalities that believe they can safely and profitably operate and expand general aviation airport activity while complying with federal grant obligations and enact airport improvements referenced in the GA SBP have always been welcome to reach out to RIAC to discuss the option to transition to a self-supporting municipal airport. RIAC has yet to receive any such official inquiries of this nature from municipalities.</p> <p>While we recognize that there is often a lack of understanding regarding the difference between federal allocation formulas for Rhode Island’s General Aviation Airport System and decisions made by the Federal Aviation Administration regarding project approval and appropriations based on the need of the airport system as a whole, the focus of this proposed plan is an investment of nearly \$100 million into the general aviation system over the next decade.</p> <p>While the intent is to look forward and not backwards, we do recognize that past comments have clearly indicated public misperceptions that documents such as Master Plans and even Strategic Business Plans are aspirational in nature, and that discussions of projects in documents such as this should not be confused by the public as approved and guaranteed funding for projects.</p>	
42	<p>Aside from The Study being an effective device to delay long planned projects at the GA Airports, it is deficient in several other areas.</p> <p>General Aviation’s “Drag” on the State Airport Transportation System: The idea that the five outlying GA Airports are a financial burden to air transportation in Rhode Island is relatively new. Previous DOT and RIAC State Airport Administrators understood the importance of General Aviation to the State’s air transportation network and worked hard to advocate for and foster General Aviation. The current Administration separates TF Green State Airport’s operations and finances from the five outlying GA airports with an “us versus them” attitude and now for the first time in the State’s history, identifies the operating costs of the outlying Airports as a “subsidy”. The primary goal of “The Plan” instead of fostering aviation at all the state airports is to identify these costs and devise ways of reducing them. Sadly, instead in investing in the GA airports to make them more competitive in our region, there is a RIAC preference on finding non-aviation sources of revenue as a “solution” to the subsidy including leasing airport land for non-aviation uses. RIAC Management has been “piling on” by raising the administrative costs of operating the GA Airports by over 300% between 2018 and 2020. At the Block Island State Airport, for example the “administrative overhead”</p>	<p>RIAC recognizes and appreciates the importance of each of the six airports in Rhode Island. The GASBP’s purpose is the opposite of this comment and is intended to properly plan for future development of the airports in a financially prudent manner. Over the years RIAC has improved the assignment of expenses to cost centers including the General Aviation Airports to properly reflect the results for each airport. A goal of the GASBP is to make the GA airport more self-sufficient and reduce the subsidy for the GA system that is provided from the operations at Rhode Island T.F. Green International Airport, including additional aeronautical and non-aeronautical revenue streams. In regards to investments, the GASBP identifies nearly \$100M in capital investment over a 10 year period, which is estimated at approximately 300% of prior investment levels.</p>	<p>Brian Schattle, Senior Vice President and CFO</p>

General Aviation Strategic Business Plan

Comments and Responses

	budget line inexplicably went from \$174,000 in FY 2018 to over \$700,000 in FY 2020 raising the “subsidy” at the Block Island State Airport to over \$1 million.		
43	<p>RIAC is proposing non-aviation uses for revenue enhancement at the GA airports: Instead of proposing investment in facility and service improvements at the GA Airports, RIAC is proposing leasing valuable airport property for non-aviation use. At Block Island State Airport, for example, RIAC advertised two parcels for commercial storage or office use, in Block Island’s “Residential A” zone which prohibits these uses. The Block Island State Airport is the only airport in the state which does not offer essential aviation services like a self-serve fuel dispenser, a pilot briefing / trip planning / pilot rest room, aircraft engine heating, or a start cart for an aircraft with a dead battery. RIAC should invest in these essential services before leasing airport property for non-aviation use.</p>	RIAC’s available property is classified for either aeronautical use or non-aeronautical use. Any potential use of aeronautical property for a non-aeronautical purpose would require FAA approval. All lease revenues benefit the airports and help with the goal of heading toward self-sustainability.	John Goodman, Assistant Vice President of Media & Public Relations
44	<p>RIAC does not take advantage of airport advocacy resources: As pointed out by others, RIAC management does not take advantage of the numerous airport advocates in the state as a resource to help plan, permit, and promote the General Aviation Airport Transportation System. Airport advocates have been characterized as “disgruntled pilots” at in public meetings instead of the airport boosters they are. A change in tone and tenor would go a long way toward RIAC’s relationship with the GA Community.</p>	As demonstrated through this GASBP effort, RIAC welcomes the advocacy of pilots and the aviation community. However, we note that pilots are frequently silent in public meetings when their advocacy could be most beneficial. RIAC is in full compliance with state and federal obligations to listen to expressed concerns of all stakeholders, including pilots, aviation related businesses, and the community in general. RIAC’s role is not simply to advocate on behalf of pilots and strongly recommend that pilots advocate for themselves when the opportunity arises on local, state or federal matters.	John Goodman, Assistant Vice President of Media & Public Relations
45	<p>RIAC does not Advocate for the General Aviation System: RIAC Management in public meetings, and in the press, does little to defend the very airports that any other state airport commission would be busy advocating for. At the GASBP plan public meetings, RIAC Management never defended the General Aviation airports from the false statements and myths espoused by airport opposition groups at these meetings. RIAC Management rarely pointed out the economic benefit of aviation to the community and when they did, they significantly understated the economic benefit value which can be found in their own studies. Instead of defending the value of the GA Airports, RIAC Management publicly states that “Airport Closure” is an option if the surrounding community is not in favor of airport operations in that community as stated by RIAC PR Vice President John Goodman in the Westerly Sun, March 26, 2020. “Ultimately, communities do have the right to decide whether or not they want to continue to host general aviation airports. If local leaders decide that airport closures are in their best interests, RIAC will respect that decision.” If RIAC does not want to follow their enabling legislative charge to foster aviation at all the state airports, the General Aviation Airports should be “spun off” from RIAC’s charge and be put in a separate Department under Commerce or DOT so that the essential investments</p>	RIAC takes issue with this comment. As you may know this matter was raised in a complaint to the FAA, which found the assertion to be “without merit.” This GASBP process, through the 28 documented meetings, \$1.24M investment in infrastructure assessments, \$98M is proposed capital investment over the next 10 years demonstrates RIAC’s commitment to the GA airport system. Additionally, RIAC has engaged professional marketing brokers of 17 parcels for potential development, and is actively strategizing with stakeholders on a quarterly basis to provide updates and garner input on providing new and/or increased services to include restaurants and additional hangar capacity.	John Goodman, Assistant Vice President of Media & Public Relations

General Aviation Strategic Business Plan

Comments and Responses

in facilities and services can be made to bring our GA Airport Network up to the levels needed to be competitive with the other airports in the region.		
---	--	--