



U.S. Department
of Transportation
**Federal Aviation
Administration**

New England Region

1200 District Avenue
Burlington, MA 01803

February 23, 2024

Iftikhar Ahmad
Chief Executive Officer
Rhode Island Airport Corporation
2000 Post Rd
Warwick, RI. 02886

Via Email

Dear Mr. Ahmad:

On September 18-19, 2023, the Federal Aviation Administration (FAA) conducted a land use inspection at North Central State Airport in Smithfield, RI. We would like to thank you and your employees for the time you committed to our visit. The inspection is attached.

The purpose of the inspection was to determine whether the airport sponsor, the Rhode Island Airport Corporation (RIAC) is in compliance with the terms of its Federal obligations dealing with airport property use, lease agreements and property releases. The inspection included a review of airport property use in accordance with the current Exhibit-A and approved Airport Layout Plan (ALP).

We are providing you with a Land Use Inspection Report documenting our observations during the inspection. The compliance action items noted require the airport sponsor to submit a corrective action plan to this office 30 days from the date of this letter and an enforcement mechanism to this office 60 days from the date of this letter. Please provide a completion date for each corrective action.

Should you have any questions please contact Luke Garrison, Manager, Safety and Standards or me.

Sincerely,

Amy E Quam, C.M.
Airport Compliance Specialist

CC: Luke Garrison – FAA
John Carli – FAA
John Kirkendall – FAA
Nikolas Persson - RIAC

LAND USE INSPECTION REPORT

North Central State Airport (SFZ) Smithfield Rhode Island – September 18-19, 2023

Federal Aviation Administration, New England Region, Airports Division

Inspection Site Location:

North Central State Airport (SFZ) Smithfield, Rhode Island

Date of Inspection:

September 18-19, 2023

Purpose:

This inspection is part of the FAA’s compliance oversight of federally obligated Commercial Service and General Aviation Airports to assess if airport land uses comply with Federal requirements. The inspection was conducted as per Senate Report No. 106-55, dated May 1999, and per Compliance Guidance Letter 2002-01, dated May 15, 2002, *Regional Land Use Inspections*.

Individuals Conducting Inspection:

- Jorge Panteli, Regional Compliance and Land Use Specialist, New England Regional Office, ANE-600
- Samantha Smithies, Civil Engineer, New England Regional Office, ANE-620

Airport Owner/Operator:

- Owner/Operator – Rhode Island Airport Corporation
- Airport Manager – Iftikhar Ahmad

Airport Master Record:

Based Aircraft: 34	Operations:
Single Engine – 32	Air Carrier 0
Multi Engine – 1	Air Taxi 471
Jet – 0	GA Local 7,339
Helicopter – 0	GA Itinerant 4,141
	Military 91
	Total 12,042

As of 07/31/2023

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Airport Federal Obligations:

- National Plan of Integrated Airports System (NPIAS)
- Grant Agreements under Airport Improvement Program (AIP), Federal-Aid Airport Program (FAAP), and Airport Development Aid Program (ADAP)
- Assurance pursuant to Title VI, Civil Rights Act of 1964



Background and History:

SFZ is a full service airport located about 10 miles north of Providence, Rhode Island off Interstate 295. The airport, owned and operated by the Rhode Island Airport Corporation, (RIAC) is located in the City of Smithfield. RIAC is a subsidiary of the Rhode Island Commerce Corporation, a public corporation, and is a governmental agency and public instrumentality of the State of Rhode Island.

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Specifically, through a certain Lease and Operating Agreement with the State of Rhode Island dated June 25, 1993, as amended, RIAC maintains and operates SFZ. RIAC is identified by the Federal Aviation Administration (FAA) as the designated Sponsor of the airport and accepts federal grants and the associated grant assurances. The airport is identified in the National Plan of Integrated Airports System (NPIAS) with a service level of Regional and a role as Local.

The airport has two runways. Runway 05-23 is 5,000' by 100' and is the primary runway. The runway has a non-precision instrument approach to Runway 05-23. Runway 15-33, which is 3,211' by 75', is the crosswind runway. This runway has visual approaches to either runway end.

Airport Sponsor's Compliance History with Federal Obligations:

Historical records show very little compliance history related to SFZ.

Inspection Findings:

A. Airport Land Use Analysis & ALP Review

The current Airport Layout Plan (ALP) and Exhibit A are both dated 2010.

The ALP and the Exhibit A meet the following Grant Assurances:

4. Good Title

a. It, a public agency or the Federal government, holds good title, satisfactory to the Secretary, to the landing area of the airport or site thereof, or will give assurance satisfactory to the Secretary that good title will be acquired.

b. For noise compatibility program projects to be carried out on the property of the sponsor, it holds good title satisfactory to the Secretary to that portion of the property upon which Federal funds will be expended or will give assurance to the Secretary that good title will be obtained.

29. Airport Layout Plan

a. It will keep up to date at all times an airport layout plan of the airport showing

1) boundaries of the airport and all proposed additions thereto, together with the boundaries of all offsite areas owned or controlled by the sponsor for airport purposes and proposed additions thereto;

2) the location and nature of all existing and proposed airport facilities and structures (such as runways, taxiways, aprons, terminal buildings, hangars and

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roads), including all proposed extensions and reductions of existing airport facilities;

3) the location of all existing and proposed nonaviation areas and of all existing improvements thereon; and

4) all proposed and existing access points used to taxi aircraft across the airport's property boundary. Such airport layout plans and each amendment, revision, or modification thereof, shall be subject to the approval of the Secretary which approval shall be evidenced by the signature of a duly authorized representative of the Secretary on the face of the airport layout plan. The sponsor will not make or permit any changes or alterations in the airport or any of its facilities which are not in conformity with the airport layout plan as approved by the Secretary and which might, in the opinion of the Secretary, adversely affect the safety, utility or efficiency of the airport.

b. If a change or alteration in the airport or the facilities is made which the Secretary determines adversely affects the safety, utility, or efficiency of any federally owned, leased, or funded property on or off the airport and which is not in conformity with the airport layout plan as approved by the Secretary, the owner or operator will, if requested, by the Secretary (1) eliminate such adverse effect in a manner approved by the Secretary; or (2) bear all costs of relocating such property (or replacement thereof) to a site acceptable to the Secretary and all costs of restoring such property (or replacement thereof) to the level of safety, utility, efficiency, and cost of operation existing before the unapproved change in the airport or its facilities except in the case of a relocation or replacement of an existing airport facility due to a change in the Secretary's design standards beyond the control of the airport sponsor.

Action:

No action at this time.

B. Airside and Landside Inspection Findings

There were a number of discrepancies found as part of the airside and landside inspection. A summary is provided below:

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1. Site Inspection

Pavements

The apron pavement is in poor condition, with extreme cracking and grass growing through the pavement in many locations. The runways and taxiways were in good condition.

There is a steep hill outside of the safety area on RWY 15 which is identified by two sets of obstruction lights. The RWY designation markers on RWY 33 need to be repainted.

The surface painted hold position sign (SPHPS) on TWY B leading to RWY 05 needs to be remarked. The TWY B edge light base can at RWY 5 threshold has a lip exceeding 3 inches with cracks leading from this crack to each threshold can. There is a wide crack spanning the pavement width where TWY B meets RWY 05.

On RWY 23, there is ponding at the threshold lights after a rain event two days prior to the inspection.

A review of the Airside Pavement Management Plan (APMP) compiled in 2019 shows that the 60% of SFZ's pavement is in Fair Condition, with 22% in good condition and the remaining 8% in Poor condition. Only 3% of the total runway pavement is in Satisfactory condition, with the remaining 97% in Fair condition.

There was \$1.1M in discretionary funding allocated to constructing a small portion of the apron in 2023. Costs to reconstruct the entire apron exceed the allocated funding.

RIAC's Capital Improvement Plan dated 01/12/2024 does not show any planned maintenance projects specifically for SFZ in the next five (5) years, however the Request for Qualifications for Capital Improvement Projects for Fiscal Years 2024-2029 dated September 21, 2023 lists an SFZ Apron Reconstruction project for about 7.4 acres of the existing apron which is anticipated to start in 2027. The pavements are generally in good shape and the pavement management plan provides a realistic assessment over the next 5-10 years.

Of all the GA airports inspected, SFZ's pavements were in the best shape.

Action:

The airport should review the pavement items noted above and correct those findings. Some of those findings can be done in the short term while others can be incorporated into current pavement maintenance plans or future pavement rehabilitation or reconstruction. RIAC is requested to provide a plan to address the pavement findings above.

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A program needs to be developed to ensure airfield markings are maintained on an annual basis. RIAC has the marking painting machines to refresh all airfield markings. This program is to be submitted to ANE compliance on an annual basis.

RIAC should clarify if the SFZ apron is anticipated to be rehabbed in the next five years.

The condition of airside facilities is directly related to Grant Assurance 19 Operation and Maintenance.

a. The airport and all facilities which are necessary to serve the aeronautical users of the airport, other than facilities owned or controlled by the United States, shall be operated at all times in a safe and serviceable condition and in accordance with the minimum standards as may be required or prescribed by applicable Federal, state, and local agencies for maintenance and operation. It will not cause or permit any activity or action thereon which would interfere with its use for airport purposes. It will suitably operate and maintain the airport and all facilities thereon or connected therewith, with due regard to climatic and flood conditions. Any proposal to temporarily close the airport for non-aeronautical purposes must first be approved by the Secretary. In furtherance of this assurance, the sponsor will have in effect arrangements for:

1. Operating the airport's aeronautical facilities whenever required;

2. Promptly marking and lighting hazards resulting from airport conditions, including temporary conditions; and

3. Promptly notifying pilots of any condition affecting aeronautical use of the airport. Nothing contained herein shall be construed to require that the airport be operated for aeronautical use during temporary periods when snow, flood, or other climatic conditions interfere with such operation and maintenance. Further, nothing herein shall be construed as requiring the maintenance, repair, restoration, or replacement of any structure or facility which is substantially damaged or destroyed due to an act of God or other condition or circumstance beyond the control of the sponsor.

b. It will suitably operate and maintain noise compatibility program items that it owns or controls upon which Federal funds have been expended.

Approach Obstructions

Maintaining existing approaches and ensuring they are clear is outlined in Grant Assurance 20. Hazard Removal and Mitigation.

It will take appropriate action to assure that such terminal airspace as is required to protect instrument and visual operations to the airport (including established minimum flight altitudes) will be adequately cleared and protected by removing, lowering, relocating, marking, or lighting or otherwise mitigating existing airport hazards and by preventing the establishment or creation of future airport hazards.

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Action:

RIAC is in the process of identifying and addressing easements to be acquired as well as removing those obstructions. RIAC is requested to provide an update for SFZ noting the schedule to acquire easements as well as when obstructions will be removed.

RIAC will provide and update a memorandum outlining the actions to identify and acquire easements necessary to maintain the approaches to all airports under RIAC control and a schedule to remove the temporary displacements. This analysis will be updated and submitted to ANE Compliance biannually until the easements have been acquired and displacements removed.

Hangar Inspections

Hangars at SFZ are under Flightlevel. The two conventional hangars were inspected with no discrepancies found. However, as with UUU and WST, Flightlevel did not have keys to the T-hangars they manage. As a result, the hangars were not inspected at the site visit. RIAC was asked to obtain keys and to inspect the hangars and provide findings to ANE compliance. RIAC completed the process (12/29/2023) and provided ANE compliance with a full report and pictures of hangar contents.

Action

RIAC will develop a hangar inspection program that includes RIAC and non-RIAC hangars. Keys will be collected and be available at any time to properly inspect all hangars to ensure they are used according to the FAA hangar policy. RIAC will provide letters and a recheck for hangars found in non-compliance during the hangar inspections. RIAC will be required to submit an annual report to ANE compliance once the program has been reviewed and approved by ANE compliance.

2. Management Structure

The airport is owned by the State of Rhode Island and operated by the Rhode Island Airport Corporation. RIAC is a subsidiary of the Rhode Island Commerce Corporation, a public corporation, and is a governmental agency and public instrumentality of the State of Rhode Island. Specifically, through a certain Lease and Operating Agreement with the State of Rhode Island dated June 25, 1993, as amended, RIAC maintains and operates SFZ as well as the other four General Aviation (GA) airports in Rhode Island.

FlightLevel Rhode Island LLC serves as the Fixed Base Operator (FBO) and provides parking, hangar storage and fuel to the public. With the current wording of the Fixed Based Operator agreement, dated 7.1.18, Exhibit B, it is unclear if FlightLevel is also providing airport management services to RIAC for SFZ.

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Action:

RIAC needs to provide clarification on who is performing airport management services for SFZ and a new standalone management agreement developed if FlightLevel Rhode Island will be providing those services. This needs to be submitted to ANE compliance for review.

Leases

All of the leases were provided for review. The FAA does not approve leases, but when requested, will review leases for a variety of clauses. The clauses that are reviewed are outlined in FAA Order 5190.6B. Chapter 12, Section 12.3.

As part of the land use inspection, leases are reviewed to determine if they meet the recommendations of FAA Order 5190.6B. The following leases were reviewed:

Lease	Premises	Term	CPI Adjustments	Reversion	Subordination	Assignment
1. Boston Sky Dive Center	gravel “pea-pit” landing zone	Six month seasonal basis for 3 year period (ending 10/31/25)	NO - (annual adjustments but CPI not referenced)	Yes	Yes	With prior written consent of RIAC
2. New England Aviation Svc	Skylanes Hanagar (includes 21 tie downs) Additional 37 tie downs (Tiedown Premises)	5 years (expiring 2018) 5 year extension option	Yes	Yes	Yes	With prior written consent of RIAC through airport manager
3. Rhode Island Aviation, Inc.	Parcel A Parcel B option	Initial 20 years Option to extend for 5 additional years	Yes	Yes	Yes	With prior written consent of RIAC
4. FlightLevel Rhode	OQU(building and	Initial 5 year	Yes	Yes	No	With prior written

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Island	ground) SFZ (building, cold storage and ground) UUU (Building and ground) WST (Building and ground)	period -option for additional 5 years (through 2028)				consent of RIAC
5. AT&T Cell Site	279 Jenckes Hill Rd Smithfield, RI	5 years – option of 3 additional 5 year periods extension upon agreement of both parties (unless terminated)	No	Tenant property removed and land restored to previous condition	Yes	RIAC must consent to an entity with a net worth of at least \$20M
6. New England Airlines	Skylanes Hangar / Tiedown premises	Initial 5 year / option for one additional 5 year term	Yes	Improvements – yes Personal property – yes (Lessee allowed to remove and if not done, reverts to RIAC)	Yes	RIAC is required to be notified of a change in control and must agree in writing
7. Verizon 2.26.14		5 years – automatic renewal for each of the three additional 5 year periods	Annual adjustments but CPI not referenced	Tenant property removed and land restored to previous condition	Yes	Allowed as long as new entity assumes all of tenant obligations / otherwise

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		(unless terminated)				RIAC needs to give written consent
8. Ameresco - two solar leases	300 Jenckes Hill Rd/48 Albion Rd Smithfield, RI (area was released from Federal Obligations)	One year(\$20K paid) / additional year upon a payment of \$30k (\$49,256/M WAC) for 2.23 MWAC (\$109,771 in Year 1 Notwithstanding the foregoing, Optionee must compensate RIAC in the amount of \$109,771 for Year One	No – 2% escalator	No	No – parcel released from obligations	No notification required to affiliate of Optionee/ to a third party only upon written consent of RIAC

Generally, the leases were in good shape. RIAC has a leasing policy that was approved October 08, 2020. The leasing policy requires lessees to adhere to the minimum standards, and specifically calls out the prohibition of violating Grant Assurances 22 and 23. The leasing policy also requires any lease assignment, or subletting be approved by RIAC, includes a reversion clause and includes the FAA required lease provisions including subordination.

In reviewing the leases, there are a number of grant assurances that are considered in the review. They include Grant Assurance 5 - Rights and Powers, Grant Assurance 22 -

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Economic Nondiscrimination, Grant Assurance 23 - Exclusive Rights, Grant Assurance 24 - Fee and Rental Structure, and Grant Assurance 25 - Airport Revenues.

As discussed in FAA Order 5190.6B, Chapter 6, Section 6.6, a sponsor may place “...a “subordination clause” in all of its tenant leases and agreements that subordinates the terms of the lease or agreement to the federal grant assurances and/or surplus property obligations. A subordination clause may assist the sponsor in amending a tenant lease or agreement that otherwise deprives the sponsor of its rights and powers. A typical subordination clause will state that if there is a conflict between the terms of a lease and the federal grant assurances, the grant assurances will take precedence and govern.”

As presented in the above table, there are 8 leases. In the review, the FAA looks at several aspects of the leases as presented in FAA Order 5190.6B, Chapter 12, Section 12.3 and include the purpose of the lease, the term, the rates, reversion at lease end, subordination, fee adjustments and assignment.

For the most part, the leases include most elements noted in Section 12.3 as noted in the table.

There were two leases in particular that require additional clarification to the FAA.

NE Aviation Lease

The NE Aviation lease was originally entered into on July 01, 2013 with New England Aviation. On September 09, 2017 an assignment, assumption and extension of the lease agreement was signed. This transferred the rights and obligations of the agreement from New England Aviation to New England Aviation Services, LLC (“NE Aviation”).

In March 2023, an amendment to the agreement was entered into. The agreement referenced a ramp improvement project at the airport that was eligible for Federal Funding. The agreement specifically stated, “RIAC desires to amend the Facility Lease Agreement to enable the receipt of FAA funding for the ramp improvement project”.

The amendment references that Section 3.2, Lease of Tiedown Premises was being amended according to Exhibit B. However, there is no Exhibit B attached to the document showing what portion of the leased premises was being amended. The amendment also included Exhibit C “Federal Contract Provisions” which are required upon receipt of Federal Funding.

Our records show an American Rescue Plan Act (ARPA) Grant issued in 2023 to RIAC to reconstruct Terminal Apron at SFZ (approx.. 5,700 SY of Tie-Down Apron.)

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With the absence of Exhibit B on the lease amendment, it is not clear if Federal Funds were used to reconstruct a portion of the apron that was leased to New England Aviation Services, LLC at the same time.

FlightLevel Rhode Island LLC

A Full-Service Fixed Base Operator Agreement was entered into with FlightLevel Rhode Island LLC (“FlightLevel”) on July 01, 2018.

Article 3 – Premises

Section 3.1 Discusses the Lease of Premises and states, “RIAC hereby leases to Company, for Company’s exclusive use, with certain exceptions, for the purposes described in this Agreement, the following premises located at the Airports and more particularly identified in Exhibit A.”

Article 5 – Permitted Uses

Section 5.1 discusses the Company’s ability to provide full and complete FBO service. This section goes on to state: “In furtherance of the foregoing, RIAC and Company have entered into an assignment and assumption of contract rights...”

Exhibit B – Assignment and Assumption of Contract Rights

Section 3 states: “RIAC does hereby assign, transfer and convey to Company all of RIAC’s right and interest in, and does hereby delegate to Company each of its duties of performance under, each of the agreements (and subject to stipulations) identified at Exhibit A...(collectively the contracts), except that RIAC shall not transfer or convey to Company its rights to collect any fees due and owing to RIAC under said Contracts prior to July 01, 2018.”

Attached to the FlightLevel FBO agreement is the First amendment of the agreement, which stipulates that FlightLevel will provide “aviation related services” at Block Island (BID). Exhibit A to the amendment, Section 1.7 states that RIAC will pay FlightLevel a management fee monthly.

This lease is the only lease reviewed that did not have a subordination clause. Consideration of including a subordination clause into a lease template would strengthen the lease.

Action:

RIAC needs to clarify the rights and responsibilities of FlightLevel under the FBO agreement. It is not clear what rights and obligations Flightlevel has in terms of

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managing RIAC's General Aviation Airports. In addition, the management contract for BID needs to be broken out from the FBO agreement and become a stand alone document.

RIAC also needs to clarify if the portion of ramp space that was reconstructed in 2023 with Federal Funding was part of the leasehold of NE Aviation at the time. RIAC also needs to develop a plan to ensure they notify the FAA if any future Federally Funded Project will be taking place on a leased area and if so, RIAC will need to properly amend the lease to eliminate the leasehold from the area receiving the funds.

A request for concurrence for non-aeronautical land use for the current parcels of land under the Ameresco lease needs to be submitted to FAA.

Additionally, all leases should be reviewed and any references to 5190.6B updated to ensure the most recent copy of the document is being referenced.

3. Minimum Standards

The airport has both Minimum Standards as well as Rules and Regulations. Both documents were reviewed.

Minimum Standards

Although minimum standards are optional, the FAA highly recommends their use and implementation as a means to minimize the potential for violations of Federal obligations at federally obligated airports. The Minimum Standards for Commercial Operations outlines the requirements for aeronautical services provided on the airport. It outlines the facilities required to offer the services, licenses, staffing, and insurance requirements among others.

FlightLevel Rhode Island does not provide Jet A at WST as required by the minimum standards. In addition, the minimum standards required 100% of General Aviation landing fees to be paid to RIAC, while the FlightLevel lease only requires 90% to be paid.

RIAC has a minimum standards document that became effective on July 01, 2021. A portion of the document states, "All existing Operators shall become subject to the then-current Minimum Standards upon the modification, amendment, extension, or renewal of an existing agreement."

Attached to the FlightLevel agreement dated July 01, 2018 is Exhibit C, "Minimum Required Standards of Service Full Service Fixed Based Operators". These minimum standards differ from the minimum standards document dated July 01, 2018. As the FlightLevel agreement has been amended since the July 01, 2021 date of the most

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recent minimum standards, it is assumed that FlightLevel is now required to adhere to the most recent minimum standards document, however the previous standards have not been removed from their lease.

Rules and Regulations

Advisory Circular 5190.6B Airport Compliance Handbook provides guidance on the development of Rules and Regulations in Chapter 11, Section 11.6. Reasonable Rules and Regulations. Rules and Regulations are developed to ensure safe operations, preservation of facilities, and the protection of the public interest.

The review of the Rules and Regulations did not find any issues.

Action:

The clause referring to existing operators to be subject to then-current minimum standards is confusing. Under what circumstances would updated minimum standards be applied. Please provide clarification regarding the application of then-current and current minimum standards.

Financial Review

The financial records were reviewed for the past five years. A review of the data did not find any discrepancies.

The airport meets the following Grant Assurance in regard to maintaining a separate account and detailed documentation of revenues and expenses specific to the airport:

25. Airport Revenues

a. All revenues generated by the airport and any local taxes on aviation fuel established after December 30, 1987, will be expended by it for the capital or operating costs of the airport; the local airport system; or other local facilities which are owned or operated by the owner or operator of the airport, and which are directly and substantially related to the actual air transportation of passengers or property; or for noise mitigation purposes on or off the airport. The following exceptions apply to this paragraph:

- 1) If covenants or assurances in debt obligations issued before September 3, 1982, by the owner or operator of the airport, or provisions enacted before September 3, 1982, in governing statutes controlling the owner or operator's financing, provide for the use of the revenues from any of the airport owner or operator's facilities, including the airport, to support not only the airport but also the airport owner or operator's general debt obligations or other facilities, then this*

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limitation on the use of all revenues generated by the airport (and, in the case of a public airport, local taxes on aviation fuel) shall not apply.

- 2) *If the Secretary approves the sale of a privately owned airport to a public sponsor and provides funding for any portion of the public sponsor's acquisition of land, this limitation on the use of all revenues generated by the sale shall not apply to certain proceeds from the sale. This is conditioned on repayment to the Secretary by the private owner of an amount equal to the remaining unamortized portion (amortized over a 20-year period) of any airport improvement grant made to the private owner for any purpose other than land acquisition on or after October 1, 1996, plus an amount equal to the federal share of the current fair market value of any land acquired with an airport improvement grant made to that airport on or after October 1, 1996.*
 - 3) *Certain revenue derived from or generated by mineral extraction, production, 3) lease, or other means at a general aviation airport (as defined at Section 47102 of title 49 United States Code), if the FAA determines the airport sponsor meets the requirements set forth in Sec. 813 of Public Law 112-95.*
- b. *As part of the annual audit required under the Single Audit Act of 1984, the sponsor will direct that the audit will review, and the resulting audit report will provide an opinion concerning, the use of airport revenue and taxes in paragraph (a), and indicating whether funds paid or transferred to the owner or operator are paid or transferred in a manner consistent with Title 49, United States Code and any other applicable provision of law, including any regulation promulgated by the Secretary or Administrator.*
 - c. *Any civil penalties or other sanctions will be imposed for violation of this assurance in accordance with the provisions of Section 47107 of Title 49, United States Code.*

Action:

No action at this time.

Conclusion:

The summary of the Land Use Inspection is the airport and sponsor meet grant obligations. While the leases are in good shape, RIAC has no enforcement mechanisms in place to ensure problems and safety issues are documented and addressed. There were several items noted in this land use inspection that require further follow-up with the FAA. As such, the Sponsor is requested to provide a Corrective Action Plan that details actions and schedules to address FAA's findings. The Sponsor is asked to provide the Corrective Action Plan within 30 days of the transmittal letter date. As part of the Correction Action Plan, the Sponsor must also develop an enforcement mechanism with which it will ensure any safety issues are documented and addressed. This document must be provided to the FAA within 60 days of the transmittal letter date.