Order 2021-7-13 Served: July 27, 2021



UNITED STATES OF AMERICA DEPARTMENT OF TRANSPORTATION OFFICE OF THE SECRETARY WASHINGTON, D.C.

Issued by the Department of Transportation on the 27th day of July, 2021

In the Matter of the

SMALL COMMUNITY AIR SERVICE DEVELOPMENT PROGRAM

DOCKET DOT-OST-2020-0231

under 49 U.S.C. § 41743 et seq.

ORDER AWARDING GRANTS

Summary

By this Order, the U.S. Department of Transportation (the Department) awards 22 grants under the Small Community Air Service Development Program ("Small Community Program" or "SCASDP") benefitting communities in 22 states to assist with the implementation of the air service initiatives proposed in their grant applications. The communities, the amount of funding awarded to the communities, and brief descriptions of the projects are listed in the Appendix to this Order. Award recipients must affirm their grant awards by entering into grant agreements, obligating the funds, with the Department. Award recipients may not seek to be reimbursed funds under the Small Community Program until they affirm their grant awards.

Background

The Small Community Program was established by the Wendell H. Ford Aviation Investment and Reform Act for the 21st Century (Pub. L. No. 106-181), reauthorized by the Vision 100-Century of Aviation Reauthorization Act (Pub. L. No. 108-176), and subsequently reauthorized by the FAA Modernization and Reform Act of 2012 (Pub. L. No. 112-95), as amended, the Disaster Tax Relief and Airport and Airway Extension Act of 2017 (Pub. L. No. 115-63), and the FAA Reauthorization Act of 2018 (Pub. L. No. 115-254) (FAA 2018).¹ Authorization for this program is codified at 49 U.S.C. § 41743.

¹ FAA 2018 made a number of structural and technical changes to the program that apply to grants beginning in FY 2018 and that are reflected in this Order.

The Small Community Program is authorized to receive appropriations under 49 U.S.C. § 41743(e)(2). Appropriations are provided for this program for award selection in FY 2019 pursuant to the Consolidated Appropriations Act, 2019 (Pub. L. No. 116-6). See footnote 9 below for a breakdown of the sourcing of monies for this FY 2019 selection.

When selecting applicants to participate in the Small Community Program, the Department is statutorily required to apply the following criteria for participation:

1. The airport serving the community or consortium is not larger than a small hub airport, as determined using the FAA's most recently published classification effective on the date that the community or consortium files an application;

2. The airport has insufficient air carrier service or unreasonably high air fares;

3. The airport presents characteristics, such as geographic diversity or unique circumstances, that demonstrate the need for, and feasibility of, the Small Community Program;

4. An applicant may not receive an additional grant to support the same project more than once in a 10-year period, except in certain circumstances;² and

5. An applicant may not receive an additional grant prior to the completion of its previous grant.³

The statute further provides that no more than four communities or consortia of communities, or a combination thereof, from the same state may be selected to participate in the program in any fiscal year, and no more than 40 communities or consortia of communities, or a combination thereof, may be selected to participate in the program in each year for which the funds are appropriated.

In addition, the statute directs the Department to give priority to those communities or consortia of communities⁴ where: (a) air fares are higher than the average air fares for all communities; (b) a portion of the cost of the activity contemplated by the community is provided from local, non-airport revenue sources; (c) a public-private partnership has been or will be established to facilitate air carrier service to the public; (d) improved service will bring the material benefits of scheduled air transportation to a broad section of the traveling public, including businesses, educational institutions, and other enterprises whose access to the national air transportation system is limited; (e) the assistance will be used to help restore scheduled passenger air service that has been terminated; ⁵ (f) the funds will be used in a timely manner; ⁶ and (g) multiple communities cooperate to submit a regional or multistate application to consolidate air service into one regional airport.

² As provided under 49 U.S.C. § 41743(c)(4)(C), the Department may waive the same project limitation.

³ 49 U.S.C. § 41743(c)(1)-(4).

⁴ A consortium of communities is defined as a single entity. 49 U.S.C. § 41743.

^{5 49} U.S.C. § 41743(c)(5)(E).

⁶ 49 U.S.C. § 41743(c)(5)(F).

The Department is authorized to award grants to communities that seek to provide assistance to:

- An air carrier to subsidize service to and from an underserved airport for a period not to exceed three years;
- An underserved airport to obtain service to and from the underserved airport; and/or
- An underserved airport to implement such other measures to improve air service both in terms of the cost of such service to consumers and the availability of such service, including improving air service through marketing and promotion of air service and enhanced utilization of airport facilities.⁷

On November 24, 2020, the Department issued Order 2020-11-5 in this Docket, soliciting grant proposals from communities interested in receiving grant funding for FY 2019.

On December 27, 2020, the President signed into law the Coronavirus Response and Relief Supplemental Appropriations Act, 2021 (Pub. L. No. 116-260). The law included a new appropriation of up to \$5 million for SCASDP, and required the Department "to give priority to communities or consortia of communities that have had air carrier service reduced or suspended as a result of the coronavirus pandemic" for this funding and for funding for FYs 2019, 2020, and 2021. It also required that the Department publish procedures to allocate this funding no later than 60 days after enactment of the law and award the funds to grantees as soon as practicable.⁸

On January 19, 2021, the Department issued Order 2021-1-4 in this Docket, amending Order 2020-11-5 to incorporate the relevant changes set forth in Pub. L. No. 116-260, and to set a new due date for applications filed in this proceeding. Specifically, that Order:

- raised the total funding for FY 2019 grant awards from up to \$13 million to up to \$18 million;⁹
- added a new Priority Selection Criterion to read as follows: "The assistance will be used to help restore scheduled passenger air service that has been reduced or suspended as a result of the 2020 Coronavirus pandemic;¹⁰
- changed the due date for applications for grant awards from January 26, 2021 to March 1, 2021; and

⁷ 49 U.S.C. § 41743(d).

⁸ See Pub. L. No. 116-260, Division M, "Coronavirus Response and Relief Supplemental Appropriation Act, 2021," Title IV, Section 4.

⁹ These monies are sourced as follows: \$10 million in FY 2019 funding (Pub. L. No. 116-6), up to \$5 million in Coronavirus Response and Relief funding (Pub. L. No. 116-260), and up to \$4 million in FY 2020 funding (Pub. L. No. 116-94). The exact amount available in this proceeding, not to exceed \$18 million, is dependent on the Department's final allocation of a portion of the Coronavirus Response and Relief funds among various programs.

¹⁰ See Order 2021-1-4 for a further explanation of this new Priority Selection Criterion. The other Priority, and Secondary Selection Criteria applicable to this proceeding are described in Order 2020-11-5, pages 9 - 12.

• increased the maximum number of pages that an application may contain from 20 to 21, to allow applicants extra space to include, where relevant, information related to the new priority selection criterion.

Order 2020-11-5, as amended by Order 2021-1-4, will be referred to as the "Solicitation Order" in the context of this proceeding.

The Solicitation Order required each applicant to submit a completed Standard Form 424 and a Summary Information schedule to <u>www.grants.gov</u>. Communities were requested to provide information that would help in the consideration of their grant requests, including details about their existing air services, historical air services, current air service needs and deficiencies, a full description of the community's proposal, plans for implementation, funding requirements, and plans for monitoring the success of the project, including modifying or discontinuing funding if the project is not meeting expectations.

Drawing on the Department's learnings and experience from previous years, the Solicitation Order discussed various issues relating to project types and the grant application process, including the sources of local funding, the consideration of in-kind contribution, the use of grant funds, and the eligibility to participate by past grant recipients. The Solicitation Order further emphasized that communities would be expected to meet the financial-contribution commitments that they include in their proposals.

Grant Applications

In response to the Solicitation Order, the Department received 78 grant applications from communities in 38 states. Collectively, these communities sought more than \$58 million in Federal assistance to support new and ongoing air service development projects. Seven of the 78 applications did not meet the basic eligibility criteria for participation outlined above and were determined ineligible for consideration.

As in previous years, this year's eligible applications included proposals for feasibility studies, new or expanded service initiatives, marketing, and assorted combinations thereof. These applicants provided information on historical and current air service and air fare issues facing their communities, the economic benefits of air service, proposed initiatives to remedy air service or air fare problems, and arguments in support of their proposals. Nearly all the communities pledged local cash and/or in-kind contributions from local, state, airport, or private sources to complement their requests for Federal assistance.

The large majority of applicants specified the need to attract new and/or additional air services to their communities. Nearly all of the applications discussed the impacts of the COVID-19 pandemic on air services at applicant airports and communities. Similar to previous years, a majority of applicants also proposed to implement their projects using revenue guarantees or subsidies, together with a variety of marketing and promotional initiatives. A critical component of most proposals was funding to support community-based marketing and promotional initiatives to stimulate demand and community awareness of local airport services. These efforts are directed at publicizing not only the availability of air services, but also the convenience of using the local airport compared to more congested air service hubs or other larger airports in the

region. Almost all applicants cited reductions and/or suspensions of service due to the coronavirus pandemic, arguing that this factor, in particular, combined with ongoing industry issues they have been facing, prompted the need for Federal assistance in order to help communities in these unique circumstances.

Grant Awards

The Small Community Program is unique in that it encourages and affords communities the opportunity to develop their own solutions to their air service problems based on their particular needs and circumstances. By providing communities the opportunity to develop and implement air service projects tailored to their individual needs, the program aims to maximize the potential for success in the communities' endeavors. Since the program's inception, the Department has sought to maximize the number of participating communities, promote geographic diversity of the selections, and support a variety of solutions to the problems identified by applicants in order to provide a wide range of approaches for dealing with the challenges faced by similarly-situated communities.

With these considerations in mind, we are selecting 22 grant proposals with the objective of entering into grant agreements with the communities identified in the Appendix to this Order. Award recipients must enter into grant agreements with the Department before the recipients may seek to be reimbursed expenses under their Small Community Program projects. In addition, grant recipients are subject to all grant conditions and assurances required by Federal law, regulations, and executive orders.¹¹ The Department's grant agreements will be transmitted to the selected communities subsequent to the issuance of this Order.¹²

The proposals we selected meet the purpose of the statute and provide opportunities to test a variety of approaches to improving small community air service in many regions of the country. The attached Appendix provides a brief description of each project and the amount of funding each community requested. As an overview, all of the awards are being made to communities proposing revenue guarantees or marketing, or revenue guarantees with marketing, as a means to attract new service, to support existing service, or to restore lost service.

The selected communities are: Mobile, AL; Texarkana, AR; Redding, CA; Gunnison, CO; St. Augustine, FL; Georgia Department of Transportation, GA; Baton Rouge, LA; Kalamazoo, MI; Duluth, MN; Springfield-Branson, MO; Helena, MT; Jacksonville, NC; Manchester, NH; Hobbs, NM; Binghamton, NY; Akron-Canton, OH; Redmond, OR; Williamsport, PA; Killeen, TX, Newport News, VA; Appleton, WI; and Huntington, WV.

All of the selected communities are contributing financial resources to their respective grant projects. The local resources reflect a commitment that is important to the potential success of

¹¹ See <u>http://www.transportation.gov/policy/aviation-policy/small-community-rural-air-service/SCASDP</u> for applicable conditions and assurances.

¹² As in previous years, the Department's staff will, at the request of any non-selected applicant community, conduct a debriefing with representatives of that community to review and provide feedback on its application in this proceeding. Any affected community wishing to avail itself of a debriefing should contact the Associate Director, Brooke Chapman, at <u>Brooke.Chapman@dot.gov</u>.

the proposed initiatives. Moreover, nearly all of the communities have (1) established robust public-private partnerships to enhance community participation and facilitate access to air services, (2) provided a specific plan and timetable for using their grant funds in a timely manner, and (3) have provided a letter of support from an interested air carrier.

Air Service Development Zone

The statute directs the Department to designate an airport in one community awarded a grant under this program as an "Air Service Development Zone" (ASDZ), and to work with the community or consortium on means to attract business to the area surrounding the airport, to develop land-use options for the area, and to provide data, working with the Department of Commerce and other Federal agencies.¹³ Only one SCASDP grant recipient may hold an ASDZ designation at any one time. As we noted in Order 2020-11-5, an FY 2018 SCASDP grant recipient, Grand Junction Regional Airport, Grand Junction, CO, is a current ASDZ designee, and the Department therefore did not solicit a new ASDZ designee in this proceeding.

Grant Agreements

As noted above, the Department will execute grant agreements with each recipient. The Department stated in the Solicitation Order that communities must establish milestones to monitor the progress of the proposed projects to determine whether amendments are necessary or whether the grant agreement should be terminated. As done in the past, milestones and progress reporting requirements (modified as discussed below) will be included in the grant agreements. Federal funds under this grant program are disbursed on a reimbursable basis, with the communities expending funds for the grant project and then seeking reimbursement. Expenditures incurred by third parties are not directly reimbursable to such third parties under this grant program.¹⁴ In seeking reimbursements, grant recipients must provide invoices or other evidence of the expenditure, details about the expenditure and how it relates to the grant project, and evidence of payment. In addition, the legal sponsor is required to certify that each invoice is relevant to the authorized grant project and has been paid. Communities will be required to comply fully with the terms of their proposals and the grant agreements.

We will issue Small Community Program grants for three different durations: three years for grants involving studies, four years for those involving marketing, and five years for those including revenue guarantees.¹⁵

¹³ 49 U.S.C. § 41743(h).

¹⁴ The legal sponsor must have paid all costs associated with eligible invoices, including costs incurred by third parties, <u>prior</u> to seeking reimbursement from the Department.

¹⁵ See Order 2018-7-10, p. 6, and Order 2020-2-14, p. 5. Title 49 U.S.C.§ 41743(d)(1) states that the Secretary may issue grants "to provide assistance to an air carrier to subsidize service to and from an underserved airport for a period not to exceed 3 years...." The three-year limitation applies only to the duration of the revenue guarantee itself, beginning when the subsided service actually commences. Our five-year grant duration recognizes that significant time is often spent by communities in arranging for a revenue guarantee with an air carrier before such service can begin, and it gives additional time for communities and air carriers to complete this preliminary process.

As we did for the FY 2017 and FY 2018 grants, we will provide for a community to seek and obtain a first grant extension (if it deems such an extension necessary) by allowing it to obtain a self-initiated one-year extension of its grant if it files with the Department, no later than 60 days prior to the expiration date of its grant agreement, a written request for such extension.¹⁶

Reporting Requirements

Unless otherwise noted, each grantee must submit semi-annual reports on the progress made during the previous period in implementing its grant project. In addition, each community will be required to submit a final report on its project to the Department, and 10 percent of the grant funds will not be reimbursed to the community until such a final report is received. Additional information on award administration for selected communities will be provided in their grant agreements.

ACCORDINGLY,

1. We select the communities listed in the Appendix to receive grant awards under the Small Community Air Service Development Program as described in this Order;

2. Grant recipients shall be subject to all grant conditions and assurances that will be attached to and incorporated in the grant agreements (also available at

http://www.transportation.gov/policy/aviation-policy/small-community-rural-airservice/SCASDP). In addition, to the extent that the grant agreement permits expenditure of the awarded Small Community Program funds in any manner that would not be permitted for funds received as part of Federal Aviation Administration's Airport Improvement Program (AIP), such permission is strictly limited to the expenditure of the Small Community Program funds awarded under the grant agreement. Nothing in the grant agreement negates the recipient's obligations to fully comply with FAA Order 5100.38D and all applicable federal law;

3. Each award recipient must affirm this award by entering into a grant agreement with the Department. Award recipients may not seek to be reimbursed under the Small Community Program until they affirm their grant awards;

4. Each award recipient whose grant agreement has not yet reached its initial termination date may obtain a self-initiated one-year extension of its grant if it files with the Department (Office of Aviation Analysis, X-55), no later than 60 days prior to the expiration date of its grant agreement, a written request for such extension; and

¹⁶ See Order 2018-7-10, p. 6, and Order 2020-2-13, p. 6.

5. A copy of this Order will be served on the legal sponsor for each applicant in this proceeding.

By:

Carol A. (Annie) Petsonk Deputy Assistant Secretary for Aviation and International Affairs

(SEAL)

An electronic version of this document is available at <u>http://www.regulations.gov</u>

Appendix

Appendix	Order	2021-7-13	
State	Community	Federal Amount Awarded	Project Description
AL	Mobile	\$1,000,000	The funding will be used for a revenue guarantee, marketing program and start-up cost offsets for new nonstop service to Washington-Dulles International Airport (IAD), using United Airlines. The community states that its existing service has been drastically reduced due to the pandemic, making it difficult for passengers to find availability. The community believes that service to IAD will add needed capacity. The community will provide significant local funding for the proposal and the airport has committed support for the new route after the grant ends.
AR	Texarkana	\$884,722	The funding will be used for a revenue guarantee, marketing, and start-up cost offsets for new daily regional jet service between Texarkana and Houston, TX by SkyWest Airlines/United Express. The community states that this service would open a second route to a second hub, with a new airline. It further states that it would help Texarkana retain service, as many potential passengers currently use other airports. SkyWest has filed in support. The community is isolated from hub air services.
CA	Redding	\$760,000	The funding will be used for a revenue guarantee for new nonstop service to Denver, CO, using United Airlines/SkyWest. The community believes that its proposal would provide strong eastbound connecting opportunities. United and SkyWest provided letters of support. The community has arranged for a large amount of local funding, demonstrating strong community support for the proposal.
СО	Gunnison	\$600,000	The funding will be used for a revenue guarantee and marketing to expand American Airlines services from Dallas/Ft. Worth International Airport to include daily summer service. The community states that its proposal would address high airfares, and year-round access to American's Dallas/Ft. Worth hub would provide travelers with one-stop service to many of Gunnison's other high-demand destinations. American supplied a letter in support. The community will provide significant local funding for the proposal and the airport has high air fares.
FL	St. Augustine	\$700,000	The funding will be used for a revenue guarantee and marketing for nonstop service to Charlotte, NC, on American Airlines. The community states that the proposal will re- introduce scheduled service to the community. American Airlines has provided a letter of support for this application. The community will provide significant local funding for the proposal.

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State	Community	Federal Amount Awarded	Project Description
GA	Georgia DOT	\$650,000	The funding will be used for a marketing program to support several small-hub and non-hub airports. The consortium states that it seeks to provide an educational program that describes airport efforts to reduce the potential spread of COVID, and also institute a "Fly Local/Fly Georgia" marketing program to retain local passengers and reduce leakage to airports in surrounding states. The State is providing significant local funding for the project.
LA	Baton Rouge	\$1,000,000	The funding will be used for a revenue guarantee, marketing, start-up cost offsets and ground handling fee waivers to provide new air service to the Washington D.C. area, including all three major D.Carea airports. The community states that service has been reduced significantly during COVID pandemic. The proposal will provide service to the Northeast portion of the US. American Airlines has provided a letter of support. The community is providing significant local funding and it is somewhat isolated.
MI	Kalamazoo	\$1,000,000	The funding will be used for a revenue guarantee for service to Charlotte, NC. The community seeks to gain service to Charlotte, as a potentially robust connecting point. American Airlines provided a letter of support. Current fares at the community are higher than the national average.
MN	Duluth	\$750,000	The funding will be used for a revenue guarantee for new nonstop service to Denver, CO. The community states that adding Denver service would not only serve the estimated large Denver demand in the region, but would also improve connectivity to other destinations. SkyWest Airlines filed in support. The community has arranged for a large amount of local funding, demonstrating strong community support for the proposal and it is isolated from other airports.

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State	Community	Federal Amount Awarded	Project Description
МО	Springfield-Branson	\$750,000	The funding will be used for a revenue guarantee and marketing to initiate new service to Washington Reagan National Airport on American Airlines. The community states that the new service would benefit both the business community and the tourism sector. The community further states that the service would help to attract more leisure traffic to the tourism-centric area. American Airlines has provided a letter of support for the proposal. The community notes that the proposal would introduce service to the northeast and provide numerous connection opportunities to a part of the country that is currently deficient. The community has arranged for a large amount of local funding and it is isolated from larger hub airports.
MT	Helena	\$1,004,743	The funding will be used for a revenue guarantee, marketing, and start-up support for new daily regional jet service to Phoenix Sky Harbor with American Airlines. The community notes that the region has experienced a large increase in tourists and people relocating to the area since the COVID pandemic began. It believes that Phoenix, its second largest hub destination without direct air service, will make for a popular route. American Airlines supports the request. The community is remote.
NC	Jacksonville	\$700,000	The funding will be used for a revenue guarantee, marketing, and fee waivers for new nonstop service to Dallas/Ft. Worth International Airport (DFW). The community states that while air service levels have been resilient throughout the COVID pandemic, service to DFW would complement existing service on the east coast by improving access to western United States and international markets. American Airlines has provided a letter of support. The community will provide significant local funding for the proposal.
NH	Manchester	\$425,000	The funding will be used for a marketing program to support an ultra-low-cost carrier (ULCC). The community believes that the presence of an ULCC would help retain passengers. Spirit Airlines has filed a letter of support. The community has arranged for a large amount of local funding, demonstrating strong community support for the proposal and the airport has higher air fares.

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State	Community	Federal Amount Awarded	Project Description
NM	Hobbs	\$800,000	The funding will be used for a revenue guarantee and marketing to attract United Airlines to re-start service to Denver, CO, which it cancelled during the COVID pandemic. Hobbs is relatively isolated, with the nearest small hub airport roughly 100 miles away. The community states that United began Denver service in October 2019, and that it had good load factors until its cancellation in April 2020. United Airlines provided a support letter. The project satisfies the new COVID air service restoration priority, the community is contributing significant local funding, and the airport has high air fares.
NY	Binghamton	\$1,000,000	The funding will be used for a revenue guarantee for nonstop service to a Washington, DC area airport. The community states that, at present, it only has service to one destination on one air carrier. It states that service to a Washington, DC airport, with strong connecting opportunities, will allow the community to regain a significant portion of the passengers lost, due to service reductions. SkyWest Airlines has provided a letter of support. Fares at the community are higher than the national average.
ОН	Akron-Canton	\$850,000	The funding will be used for a revenue guarantee to assist with the restoration of service between Akron and Houston, TX. The community states that service to Houston was suspended in March 2020 due to the COVID pandemic, and that new and/or restored air service would benefit a significant segment of its population. United Airlines has provided a letter of support. The proposal satisfies the COVID air service restoration priority and the community has high air fares.
OR	Redmond	\$800,000	The funding will be used for a revenue guarantee for service to Dallas-Ft. Worth International Airport (DFW). The community believes that fares from Redmond to DFW and top connecting markets are higher than at nearby regional airports, and states that its proposed service will help reduce fares and benefit multiple businesses in the region, from tourism to tech to manufacturing, given DFW's connectivity to additional markets. American Airlines filed a letter in support. The community will provide significant local funding for the proposal.

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State	Community	Federal Amount Awarded	Project Description
РА	Williamsport	\$950,000	The funding will be used for a revenue guarantee for new network-branded regional jet service from Williamsport to Washington, DC, and Chicago, IL. The community states that, at present it has service to only one destination on one carrier, and it is concerned about its continued viability given the effects of the COVID pandemic. SkyWest Airlines provided a support letter and would operate under the United Express brand to both airports. The community has arranged for a large amount of local funding, demonstrating strong community support for the project.
TX	Killeen	\$1,000,000	The funding will be used for a revenue guarantee, marketing, and startup cost offset for nonstop service to Denver, CO. The community states that obtaining service to Denver will provide great benefit to the community, including the United States military due to its proximity to Fort Hood. New flights to Denver would create service and connections to the west, which is currently deficient at the community. SkyWest Airlines provided a letter of support and the community has air fares higher than the national average.
VA	Newport News	\$847,646	The funding will be used for a revenue guarantee for service to Washington Dulles International Airport (IAD) on United Airlines. The community states that nonstop access to IAD will, in addition to benefitting the general public, provide connectivity to government and military agencies that have ties to the DC region. United Airlines filed a letter in support. The community will provide significant local funding for the proposal and it has air fares higher than the national average.
WI	Appleton	\$750,000	The funding will be used for a revenue guarantee, marketing, start-up cost offsets, and fee waivers for service to Dallas/Fort Worth International Airport (DFW) on American Airlines. The community states that United's non-stop service to Denver was cancelled and Delta reduced flights to Minneapolis St. Paul in April 2020 due to the COVID pandemic. It further states that the proposed new nonstop service to DFW would replace the directional hub service lost. American Airlines has filed a letter in support. The community will provide significant local funding for the proposal.

Appendix	Order 2021-7	/-13	
State	Community	Federal Amount	Project Description
		Awarded	
WV	Huntington	\$750,000	The funding would be used for a revenue guarantee, marketing, and fee waivers for nonstop service to Washington, DC and Chicago, IL. The community states that it currently has service to only one hub destination, but it is concerned that the service may be permanently reduced or suspended, as service was reduced significantly during the COVID-19 pandemic. SkyWest Airlines provided a letter of support. The community has arranged for a large amount of local funding, demonstrating strong community support for the proposal.