

**QUESTIONS AND ANSWERS FROM BUREAU WEBINAR  
MARCH 6, 2025**

**Are Low-Interest, Federal Loans Right for Your Airport Project?  
Webinar Questions and Answers**

1. What is the TIFIA special requirement that the project be included in regional or state transportation plans?
  - a. Projects seeking a TIFIA loan must be included in your regional Transportation Improvement Plan, or TIP, as well as your State Transportation Improvement Plan or STIP, prior to loan closing. We encourage borrowers to reach out to their local and state agencies to start that process as each regional and state agency has their own process and timeline.
2. How do you know which STIP you should be in?
  - a. It will depend on your state. Each state has its own agencies with its own processes to produce its own planning documents with different reviews. We recommend you contact your regional MPO, your state DOT, and/or your regional FHWA office to find out which STIP you should be in.
3. How did Sacramento International (SMF) get their project on the STIP as non-competitive?
  - a. Early in the process, SMF asked if the MPO could add the SMF project to the STIP at the same time they do the rest of their administrative changes to the STIP when projects are not reprioritized or re-ranked or funding is not being moved. This was essentially accomplished through the same process used to correct spelling, grammar, or punctuation in the STIP. SMF had the MPO add the project as a non-ranked entity as an administrative edit to one of the several California STIPs. All STIPs in California are managed by the California Transportation Commission, which had its own process and agenda deadlines that SMF worked within. This could be a different process in other states. SMF was fortunate to have partners at their MPO, who they engaged early to help navigate the amendment process, which was not a standard process. The MPO and SMF had to think creatively and invent steps along the way to make this happen.
4. If a project is receiving 75% funding from the FAA, does that mean a TIFIA loan can only cover the other 5% up to the 80% federal max?
  - a. The total federal assistance for your project cannot exceed 80%. That means the sum of any FAA AIP, Discretionary, ATP, and AIG grants that you have received or will receive to fund your project, in addition to a TIFIA loan, cannot exceed 80% of the total cost of your project.
5. Besides PFCs, what revenue sources are acceptable to pledge to repay an airport TIFIA loan?
  - a. Borrowers can decide what source(s) of revenue to pledge to repay a TIFIA loan. Most of the airports we are working with have pledged general airport revenues, while others have chosen PFCs, Customer Facility Charges (CFCs), sales tax, etc.

6. What is the prospect for continued airport eligibility beyond September 2025?
  - a. The IIJA states that airports seeking a TIFIA loan must submit a Letter of Interest (LOI) by September 30, 2025. As of today, there are no proposals to extend that deadline. Any LOIs submitted prior to the deadline can still work through the TIFIA process and be considered for a loan.
7. Does the project need to be one project type, or can it be a combination of projects?
  - a. Multiple project types can be submitted in one LOI but there must be a nexus or connection between the projects i.e., new terminal building, associated apron, taxiway connector, etc. The projects must have similar construction timelines and be supported by the same pledged revenue source.
8. Can a project be in the design phase and still be eligible?
  - a. Yes, projects in the design phase are eligible for a TIFIA loan. Depending on which benefits an airport is seeking consideration for, such as the Rural Project Initiative or waiving of advisor fees for projects under \$75 million, total project cost certainty may be required to qualify.
9. Considering the Federal procurement rules, is the whole project that is being TIFIA funded subject to the procurement rules, or just the portion of the project being paid for with loan proceeds?
  - a. It comes down to how the sponsor defines the TIFIA project. The entire project as the sponsor defines it in the LOI will have to be properly procured. You will have to meet all FAA AIP Grant assurances. You will need to treat your TIFIA loan backed project as if it is an FAA AIP Grant funded project. So, even if there are ineligible portions of your project, the entire project would be treated as a Federal project.
10. Public agencies may use PFC revenue to meet the non-federal share of the cost of projects funded under the Federal Airport Grant program. Is it true that TIFIA funds can be used for the non-federal share as well?
  - a. Yes, TIFIA funds can be used as your non-federal share of a federal grant funded project. Keep in mind that grant funds plus TIFIA proceeds cannot exceed the federal assistance cap of 80% of total project costs.
11. Are baggage handling system (BHS) projects eligible?
  - a. Yes, since BHS projects are PFC eligible, they are TIFIA eligible.
12. Is there any way to submit an LOI for a project that is not intended to start for another five years?
  - a. Even though five years is far in the future, it would not hurt to submit an LOI before the deadline, especially since we do not know if that deadline will get extended. You could submit an LOI with a high-level cost estimate. The LOI is a simple exercise and wouldn't take much time. Unfortunately, there's no guarantee that the Bureau would be able to work on that project five years from now.
13. Even though they do not collect PFCs, are General Aviation (GA) airports eligible for TIFIA loans?
  - a. Yes, GA airports are eligible for TIFIA loans. The PFC requirement doesn't mean that a sponsor needs to be an airport that collects PFCs. It means a sponsor needs to have a project that is PFC eligible. If a GA airport has a project that is AIP eligible, then it's PFC eligible, and if it's PFC eligible, then it's TIFIA eligible. So, if you're a GA

Airport that has a terminal project, a runway project, an apron or entrance road project, or anything a sponsor could get an AIP grant for, it would be eligible for a TIFIA loan.

14. Could a Block Grant State apply for essentially a line of credit that they could then extend among several projects at several smaller general aviation that collectively meet the \$10 million project cost minimum? If a state DOT wanted to bundle several projects at several rural airports together and do an LOI, could they do something like that?
  - a. Yes, it's possible, but a sponsor would have to identify one borrower. You could not submit one LOI for 10 different airports seeking financing for 10 projects with 10 different revenue sources. You should propose one borrower with a common defined source of revenue to back the loan. So, it may get a little complicated, but not impossible. It's something that the Bureau could explore with the credit team and see what that process would look like to meet the requirements for TIFIA.
15. Is the TIFIA Handbook, or the Credit Programs Guide, being updated? And will it include the airport TIFIA program requirements?
  - a. The Bureau has drafted an updated Credit Programs Guide. It went out for comments a little while ago, and the Bureau is working on addressing the comments and updating the Guide. It will not have the airport TIFIA program requirements in it since the airport eligibility has a sunset provision under IIJA. However, the Bureau has developed an airport TIFIA FAQs document that answers questions about how the airport program is being implemented. These FAQs are on the airport page of the Bureau's website now.
16. Could an airport within a half-mile of an Amtrak or commuter rail station borrow with RRIF terms to finance an airport project?
  - a. RRIF stands for the Railroad Rehabilitation and Improvement Financing program. Yes, an airport could apply for a RRIF loan if it meets the requirements for the RRIF program, which include a project being an intermodal facility or close to a passenger, freight, or commuter rail facility. Under the RRIF program, the financing amount is up to 100% of total project costs instead of the 33% or 49% you could get with TIFIA. This program is not subject to the IIJA deadline of September 30, 2025, which is specifically for airport project TIFIA eligibility.
17. Would a hangar construction project be eligible for a TIFIA loan?
  - a. To determine the TIFIA eligibility of a hangar, the Bureau and FAA would consider AIP Grant requirements such as exclusive use, which would not be eligible, and whether an airport has met all its airside needs. If a sponsor is interested in TIFIA financing for a hangar, it would be valuable to contact the Bureau to discuss the specifics of the project and allow us to coordinate with the FAA to make a project-specific determination.
18. Are TIFIA LOIs due each year by Sep 30th?
  - a. No. A sponsor can submit an LOI anytime during the year. The September 30, 2025 deadline was established in IIJA as the date by which airport sponsors must apply for the airport TIFIA program.

## QUESTIONS VIA EMAIL POST WEBINAR

1. Would adding a parking garage be eligible for TIFIA?
  - a. Parking garages are revenue producing and are not PFC/TIFIA eligible.
2. During the webinar, there was a reference made to an A rating requirement. Does this apply to loans over \$750 million or to projects over \$750 million?
  - a. The reference to an A rating requirement is for airports seeking a springing lien waiver. TIFIA loans only need to be investment grade rated (B category), but if an airport needs a springing lien waiver, they will need to be rated in the A category.
3. Do you know if FAA has granted any Buy America waivers under the current administration?
  - a. The FAA has a Buy American Preference Requirement website ([https://www.faa.gov/airports/aip/buy\\_american](https://www.faa.gov/airports/aip/buy_american)) where they post issued waivers. The latest report is dated 1/22/25 ([https://www.faa.gov/airports/aip/buy\\_american/project\\_specific\\_waivers\\_issued\\_report\\_pdf](https://www.faa.gov/airports/aip/buy_american/project_specific_waivers_issued_report_pdf)) with the last one approved on 1/21/25. There may be projects that are in the queue that are within the comment period before being granted a waiver. FAA is the best source of information on waivers.
4. Is the TIFIA program available for refinancing of existing debt?
  - a. The TIFIA program is available for refinancing long term capital debt but in very specific situations. The requirements are defined in 23 U.S.C. Chapter 6, Section 603(a)(1)(D). As described in this reference, TIFIA proceeds can be used to refinance long term debt if it provides additional funding capacity for the completion, enhancement, or expansion of any project that is selected under section 602; or otherwise meets the requirements of section 602 (23 U.S.C. Chapter 6, Section 602(a)). The project sponsors will need to do an analysis to demonstrate that refinancing with TIFIA would provide additional capital that can be used for a capital project.