



Federal Aviation Administration

MEMORANDUM

Date: August 25, 2026

To: Regional Airports Division Directors, AXX-600
Regional Airport Planning and Programming Branch Managers, AXX-610
Airports District Office Managers, XXX-ADO

From: William, C. Garrison, Director, Office of Airport Planning and Programming, APP-1
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Date: 2026.08.25 10:44:15 -0400

Subject: Program Guidance Letter (PGL) 26-05: Eligibility for Exhibit 'A' Airport Property
Inventory Maps

Purpose

The purposes of this PGL are to:

- Describe the statutory basis for project eligibility for Exhibit 'A' Airport Property Inventory Maps (Exhibit A) through the FAA's airport financial assistance programs; and
- Support airport sponsor Exhibit A updates to ensure that all Exhibit As comply with relevant statutory requirements.

This PGL is not legally binding in its own right. The FAA will not rely upon this PGL as a separate basis for affirmative enforcement action or other administrative penalties.

Statutory Authority and Grant Assurances

- 49 U.S.C. § 47105(d): *Certification of compliance*
- 49 U.S.C. § 47106(b): *Airport development project grant application approval*
- 49 U.S.C. § 47107(g): *Ensuring compliance*
- 49 U.S.C. § 47108: *Project grant agreements*
- 49 U.S.C. § 47106(b)(1) and Grant Assurance 4: *Good Title*
- 49 U.S.C. § 47107(a)(16) and Grant Assurance 29: *Airport Layout Plan*

Background

In accordance with Title 49, United States Code (U.S.C.), Chapter 471, federally funded airport development projects must be on airport property. Airport property includes all parcels within the property boundary lines dedicated to the airport, whether the interests are federally acquired, fee simple, easement, and/or long-term lease conveyances.

Each grant agreement for airport financial assistance authorized under 49 U.S.C. § 47104(a), regardless of the specific program, includes assurances required by statute for airport development projects. The Exhibit 'A' Airport Property Inventory Map is the primary tool used by FAA

personnel to ensure compliance with certain grant assurances, particularly 49 U.S.C. § 47106(b)(1) and Grant Assurance 4, *Good Title*.¹

APP has identified the need for some airport sponsors to update their Exhibit As to comply with current FAA guidance and standards as required by 49 U.S.C. § 47107(a)(16). This need was highlighted when Congress modified FAA's Airport Layout Plan (ALP) approval authority through Section 163 of the FAA Reauthorization Act of 2018 (Pub. L. 115-254) and reinforced through Section 743 of the FAA Reauthorization Act of 2024 (Pub. L. 118-63). This legislation requires the FAA to understand how airport property was acquired to determine whether FAA retains ALP approval authority for proposed projects.

Exhibit 'A' Airport Property Inventory Maps depict numerous details about airport property. These include, but are not limited to:

- Parcels within airport boundary lines;
- Released parcels;
- Funding sources for acquired parcels; and
- Airport property interests, including parcels or easements, that may not be contiguous with the airport boundary.

Airport sponsors are required to continually update property interests on Airport Layout Plans (ALP) in accordance with 49 U.S.C. § 47107(a)(16) and Grant Assurance 29, *Airport Layout Plan*. Despite these requirements, the FAA has identified discrepancies between some airport property maps (an ALP component) and the required elements of an Exhibit A in [ARP Standard Operating Procedure \(SOP\) 3.00, FAA Review of Exhibit 'A' Airport Property Inventory Maps](#). To address these discrepancies, this PGL is directed to Office of Airports (ARP) personnel and state agencies participating in the FAA's State Block Grant Program (SBGP) for the dual purpose of clarifying the scope of existing eligibility and ensuring all Exhibit As accurately reflect airport sponsors' property interests at the time of each application for airport financial assistance.

Discussion

Eligibility of Exhibit 'A' Airport Property Inventory Maps

49 U.S.C. § 47102(5) defines airport planning as planning defined by requirements the FAA prescribes. The FAA has determined that the production and maintenance of accurate Exhibit 'A' Airport Property Maps qualify as airport planning projects. They demonstrate that the sponsor has adequate property rights to support future development at the airport. Therefore, Exhibit As can be developed and updated as a stand-alone project or included as an allowable cost through certain eligible projects.

Ensuring all Exhibit 'A' Airport Property Inventory Maps Accurately Reflect Airport Sponsors' Property Interests

To ensure all airport sponsors have accurate Exhibit 'A' Airport Property Inventory Maps, sponsors that do not have Exhibit A that meet SOP 3.00 requirements must update their ALP and

¹ 49 USC 47102(5) allows the FAA to establish requirements for "airport planning." The FAA has determined that an updated Exhibit A Airport Property Map qualifies as an eligible airport planning project based on the information they provide about property that would be affected by airport development projects.

Exhibit A to identify changes in accordance with Grant Assurance 29. To be eligible for funding, these updates must be included in the sponsors' next Capital Improvement Plan (CIP). This must be as a stand-alone project or allowable cost through one of the following projects:

- Exhibit 'A' Airport Property Inventory Map update (stand-alone);
- Airport land/easement acquisition for development or approaches;
- Airport land/easement acquisition for noise mitigation;
- Airport land acquisition necessary to complete an AIP project;
- Master plan update; or
- ALP update with narrative.

Exhibit 'A' Airport Property Inventory Map Requirements²

In accordance with Appendix A of ARP SOP 3.00, Exhibit As submitted to the FAA shall include:

- Checklist from Appendix B in the SOP;
- Plan sheet(s) including all items identified on the checklist ³; and
- If necessary, evidence or supporting documentation such as deeds of conveyance (including surplus property), property surveys, land descriptions, sponsor certifications, and title opinions.

Grant Programming: Work Codes for Stand-Alone Projects

ARP has created work codes, with associated standard descriptions and talking points, for stand-alone Exhibit 'A' Airport Property Inventory Map projects.⁴ These projects may be programmed for grants in multiple locations where the state manages similar types of work across various airports within the state:

- If the sponsor for which the funds are intended does not have an Exhibit 'A' Airport Property Inventory Map, use:

Work code	Standard Description	Talking Point
PL MA NP	Develop New Exhibit 'A' Airport Property Inventory Map	This project develops a new Exhibit 'A' Airport Property Inventory Map.

- If the sponsor for which the funds are intended has an outdated Exhibit A, use:

Work code	Standard Description	Talking Point
PL MA UP	Update Exhibit 'A' Airport Property Inventory Map	This project updates the existing Exhibit 'A' Airport Property Inventory Map.

Grant Agreements

The FAA's grant agreements for airport projects include two conditions pertaining to Exhibit As:

- Standard Condition 24, Exhibit 'A' Airport Property Inventory Map, which applies to all grant agreements; and

² If the existing Exhibit 'A' Airport Property Inventory Map is available, it can be used as base data.

³ Property parcel information is often presented in a table format. Any empty fields, "TBD," "N/A," or missing checklist items are unacceptable unless accompanied by supporting evidence. If there are no property or parcel records, the sponsor must decide how to ensure good title is obtained or assured. If noncompliance issues occur, the sponsor must work with their Region/ADO and present a corrective action plan.

⁴ No changes to work codes usage are required for projects that include an Exhibit 'A' Property Inventory Map as an allowable cost.

- A special grant condition applicable only to grants for projects impacting the airport's property boundaries and/or interests.

This PGL updates the standard grant condition for all development grants. The Region/ADO shall select one of the following first three bullets for non-SBGPs grant agreements, or the fourth bullet for multiple locations and SBGP grant agreements.

Exhibit 'A' Airport Property Inventory Map. The recipient understands a current Exhibit 'A' Airport Property Inventory Map is required to certify the project(s) funded by this grant are conducted on airport property. The recipient [insert selected bullet].

- [incorporated its current Exhibit 'A' Airport Property Inventory Map with its application for this project grant agreement in compliance with the terms and conditions.]⁵
- [will submit an updated Exhibit 'A' Airport Property Inventory Map prior to FAA notification of approval to submit final payment, in compliance with the terms and conditions of this grant agreement.].⁶
- [will submit a new Exhibit 'A' Airport Property Inventory Map prior to FAA notification of approval to submit final payment, in compliance with the terms and conditions of this grant agreement.].⁷
- [will ensure covered airports have current Exhibit 'A' Airport Property Inventory Maps or will submit new or updated Exhibit 'A' Airport Property Inventory Maps prior to FAA notification of approval to submit final payment, in compliance with the terms and conditions of this grant agreement.].⁸

Funding

Allowable funding includes all funds appropriated under the Airport Improvement Program (AIP) and Airport Infrastructure Grant (AIG) funding appropriated under the Infrastructure Investment and Jobs Act (IIJA).

Next Steps

FAA Order 5100.38D, AIP Handbook

The FAA will update the final draft version of the new AIP Handbook (currently in production) where applicable to incorporate the updates in this PGL.

⁵ Appropriate choice for any non-SBGP sponsor with a current Exhibit 'A' Airport Property Inventory Map, regardless of funding type.

⁶ Appropriate choice for any non-SBGP sponsor that will submit an updated Exhibit 'A' Airport Property Inventory Map prior to submitting the final payment request, regardless of funding type.

⁷ Appropriate choice for any non-SBGP sponsor that will submit a new Exhibit 'A' Airport Property Inventory Map prior to submitting the final payment request, regardless of funding type.

⁸ Appropriate choice for all multiple location and SBGP grants.