

Q&As for the Airports Climate Challenge

December 29, 2022

Summary: Please review this Q&A document related to Airports Climate Challenge supporting projects that are eligible for Federal Aviation Administration (FAA) grants at specific, eligible airports. Generally, these project grants can assist airport sponsors to meet the Airports Climate Challenge at their airports. Specifically, this Q&A document can assist sponsors in the application of grants for Airport Improvement Program (AIP) eligible projects that support the Airports Climate Challenge as announced in FAA's Notice of Funding Opportunity (NOFO), FY 2022 Competitive Funding Opportunity: Airport Improvement Program Supplemental Discretionary, dated December 29, 2022 (87 FR 80248). In addition, the Office of Airports (ARP) website contains a slide deck with general introductory information on this initiative and a Table of Relevant FAA Funding Programs (see Q&A #2, below). See https://www.faa.gov/airports/environmental/airports_climate_challenge.

Q1: Given the eligibility restrictions in VALE regarding the need to be in non-attainment or maintenance area status under the Clean Air Act, is it possible to expand VALE-type projects to other projects under the Energy Efficiency program? For example, could you have a project involving solar photo voltaic (PV) paired with battery storage under the Energy Efficiency program?

A1: Under VALE, eligibility is triggered by activities leading to the achievement of compliance with the National Ambient Air Quality Standards (NAAQS). Solar energy systems that include battery storage are eligible as long as there are on airport emission reductions tied to both PV and battery components. More broadly, the Energy Efficiency program includes more flexible eligibility requirements and does not require an airport be located within a non-attainment or maintenance area for this project type. Also, a project such as those involving solar PV tied to battery storage, could also fall under the Energy Supply, Redundancy, and Microgrids Program, assuming program requirements were met for that program.

Q2: Can FAA provide a table showing programs and examples of project types with authorities, eligibility criteria, funding types time horizons, dollar limitations, program similarities, limitations and synergies?

A2: Yes. See Table of Relevant FAA Funding Programs posted on ARP website (see summary, above): While there is significant guidance for VALE, ZEV and the Sustainability Program, there is very little for the Energy Efficiency and the Energy Supply, Redundancy, and Microgrids Program. Yet there are similar project types that might be developed under these programs.

Q3: Does the Supplemental Discretionary AIP Notice of Funding Availability (NOFO) introduce different basic project eligibility requirements?

A3: No, the NOFO does not create special eligibility. The Supplemental Discretionary AIP NOFO includes basic criteria and application instructions, like any NOFO. The NOFO highlights this new

opportunity for funding in addition to regular AIP and other federal assistance, like the non-competitive, Bipartisan Infrastructure Law's (BIL's) Airport Infrastructure Grants Program (AIG). FAA has authority to fund eligible projects under all of these existing programs noted in the Table of Relevant FAA Funding Programs, thus sponsors may apply to use regular discretionary AIP and/or PFC funds.

Q4: How does climate resilience and adaptation to climate impacts and severe weather fit under the Sustainability Program?

A4: Resilience is a factor addressed under the Sustainability Program. Sustainability and resilience to climate change and severe weather can be addressed as stand-alone planning projects. In addition, resilience, including energy resilience, can be an element of a proposed project under the other eligible programs such as the Energy Supply, Redundancy and Microgrid Program, within various FAA funding programs. Please see the Table of Relevant FAA Funding Programs. Also, please see the Supplemental 2022 NOFO for how to feature resiliency and sustainability in project applications.

Q5: Can sponsors seek reimbursement for projects that have already started?

A5: No.

Q6: Will the Section 190 (Environmental Mitigation Pilot Program) be funded again?

A6: No. Congress made a one-time authorization. At this point there is no further authorization for this program.

Q7: Can airport sponsors apply for NOFO funding for projects to reduce GHGs through funding of backup power, battery storage facilities, EV charging, and general electrification?

A7: Yes, as noted in the Table of Relevant FAA Funding Programs, all these projects are potentially eligible for funding as long as they meet the appropriate program's criteria and the required information. Backup power and battery storage facilities, could be eligible under the Energy Efficiency, as well as the Energy Supply, Redundancy, and Microgrids Programs. Projects such as those involving battery storage systems coupled with solar PV are also eligible through the Energy Supply, Redundancy, and Microgrids Program. EV charging is eligible under the VALE and ZEV programs. Adding electrical capacity and general electrification through enhanced on-airport electricity infrastructure could be eligible if it could meet the requirements of these programs and reduce GHG emissions.

Q8: What tools and methodologies can be used to support GHG reduction calculations to be eligible for funding in the Supplemental 2022 NOFO? Can tools such as ACERT and methodologies related to ACRP #11 be utilized?

A8: Any tool or methodology can be used to apply for these calculations. We are aware that tools ranging from AEDT to ACERT to ACRP #11 are commonly used. However, regardless of the

tools used, the sponsor will need to identify the methodology or tool used to derive its calculations of the GHG emission reductions. It must also provide the calculations.

Q9: Are Scope I, II, and III emissions all eligible for funding under the existing programs?

A9: We realize that some emission sources are more under the control of airports than others. Also, some tools and their guidance describe the Scope categories differently. However, projects that meet program requirements would be eligible regardless of scope type.

Q10: Are emission reduction for each Scope category required to be individually calculated?

A10: It is not required to individually calculate Scope emission reductions, as noted in the question above. However, total emissions should be calculated and documented for each project.

Q11: Would projects specifically addressing embodied carbon emissions be eligible under the programs described in the Supplemental 2022 NOFO?

A11: No. Addressing embodied emissions is not eligible for AIP funding, and thus not eligible for the Supplemental 2022 NOFO AIP discretionary funding.

Q12: Does FAA require GHG emission calculations of only the technology being employed (e.g., a solar panels) or the modifications to a structure that support it (e.g., a building rooftop)?

A12: For all programs described in the Table of Relevant FAA Funding Programs, GHG reduction calculations are to be evaluated for the technology itself (e.g., solar panels), not structures or construction activities required to support or deploy it.

Q13: For all programs described in the Table of Relevant FAA Funding Programs, what types of emissions should be measured? Construction or operational emissions? And how about the various greenhouse gases? Should all of them be covered?

A13: Only the operational emission reductions associated with the operation of the project should be submitted. Construction emissions are not eligible and the GHGs must be expressed in Carbon Dioxide (CO₂) equivalents (CO_{2e}). As noted in the *FAA Aviation Emissions and Air Quality Handbook*, version 3, update 1 (January 2015) (AQ Handbook) Chapter 6, when there is reason to quantify GHG emissions, such inventories should be reported in metric tons of carbon dioxide equivalents (MT CO_{2e}). Due to the fact that CO₂, CH₄, and N₂O are by-products of fuel combustion, they are also the predominant GHGs associated with most airports. However, in all cases, the estimated GHGs should be converted to CO_{2e} values using Global Warming Potentials (GWPs).

Q14: What types of audits are acceptable for use in energy audits under the Energy Efficiency program?

A14: Audits conducted through an accredited program can be utilized. For example, either ASHRAE standard or the Airport Carbon Accreditation standard (Level 1 and Level 2) can be utilized for audits under the Energy Efficiency Program. In addition, the following elements must be addressed in the energy audit: heating and cooling; base load; back-up power; and power for on-road airport vehicles and ground support equipment.

Q15: Is sustainable aviation fuel (SAF) infrastructure eligible for federal assistance?

A15: If it is currently eligible under AIP, then it would be eligible for the Supplementary Discretionary funding under the 2022 NOFO. Also, if such infrastructure has utility, in that there is a market and need for such infrastructure, then it may be eligible under BIL's noncompetitive AIG program.