March 13, 2026

Caitlin Locke
Executive Director, Aircraft Certification Service
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

via email to 9-AVS-AIR670-AVGAS@faa.gov

Re: Comments on the Draft Transition Plan to Unleaded Aviation Gasoline

Dear Ms. Locke,

The undersigned organizations submit these comments on the Draft Transition Plan to Unleaded Aviation Gasoline ("Draft Plan").[1]

The federal government has long recognized that any amount of lead in people's bodies is linked to serious, often irreversible, health effects. And yet, some 175,000 piston-engine aircraft across the country are still permitted to use leaded aviation gasoline ("avgas") even though there are approved unleaded alternatives for use in nearly all piston-engine aircraft. For far too long, millions of people living, working, and going to school near general aviation airports have been exposed to toxic lead emissions from these aircraft. It is past time to make a change.

The Draft Plan falls short in creating an actionable framework to facilitate the transition away from leaded avgas. Rather than exercise its regulatory authority to ensure piston-engine aircraft transition to unleaded alternatives by 2030, the Federal Aviation Administration ("FAA") relies on a passive market-driven approach and leaves open the possibility that the fleet will not transition until after that date. The Draft Plan also misrepresents the legal obligations of airport owners and operators under the FAA Reauthorization Act. And it fails to recognize the critical role that communities most affected by the continued use of leaded avgas must play in the transition. FAA should correct its approach and take all available measures to ensure that piston-engine aircraft stop using leaded avgas by no later than the end of 2030.

I. FAA Must Use its Regulatory Authority to Ensure that Leaded Avgas is Phased Out by 2030 at the Latest

The 2024 FAA Reauthorization Act directs FAA to "take such actions as may be necessary" under its authority to facilitate "the safe elimination of the use of leaded avgas by the end of 2030 without adversely affecting the safe and efficient operation of the piston-engine

[1] These comments are being provided in both narrative format in this letter as well as in the requested Draft Document Comment Matrix format.

aircraft fleet."[2] We are concerned that the Draft Plan treats the 2030 timeline to transition to unleaded avgas only as an aspirational goal rather than a firm deadline. In multiple places, the Draft Plan refers to this date as a "target"[3] or "goal"[4] and asserts that the transition timeline may be updated based on disruptions in a "market-driven transition."[5] FAA should revise the Draft Plan to ensure that the 2030 date is a deadline backed up by regulatory standards. In doing so, FAA must recognize the severe health effects associated with even low levels of lead exposure that underscore the importance of a swift transition.

FAA also appears to treat the 2032 transition timeline for Alaska as a best-case-scenario. While FAA cites unique considerations specific to Alaska that it asserts will make a transition take longer,[6] FAA does not explain why Alaska needs two full additional years to stop using leaded avgas. Here, too, we are concerned that FAA is accepting a longer-than-necessary transition timeline, including, for example, by contemplating that fuel deliveries to Alaska would not begin until 2030.[7] We encourage FAA to revise the Draft Plan to make clear that the 2032 deadline for Alaska is an absolute final date to complete the transition and to outline how it will support a faster transition in that state.

a. Allowing the continued use of leaded avgas puts communities around airports at risk of harm

The Draft Plan omits any meaningful discussion of the significant health consequences from the continued use of leaded avgas that underscore the necessity of a quick transition away from unleaded avgas. Instead, it vaguely references "public health considerations," along with "evolving market factors," as a reason to transition from 100LL.[8] This obscures the real harm associated with lead emissions from piston-engine aircraft, which the Environmental Protection Agency ("EPA") has found poses a danger to public health,[9] and it ignores the real-world effects of any delay to the 2030 timeline.

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[2] FAA Reauthorization Act of 2024, Pub. L. No. 118-63, § 827(a)(2)(a), 138 Stat. 1025 (2024) ("2024 FAA Reauthorization Act").
[3] FAA, *Draft Transition Plan to Unleaded Aviation Gasoline – For Public Comment*, at 64 (Jan. 2026) ("Draft Plan").
[4] *See, e.g.*, *id.* at 25.
[5] *Id.* at 45; *see also id.* at 44–45.
[6] *Id.* at 26.
[7] *See id.* at 42 (setting out a two-phase approach for delivery of fuel to Alaska, where the "first phase would be to distribute as much fuel as possible 18–24 months prior to 2032"); *id.* at 43 (stating that Alaska will "begin[] its broad transition in the 2030 timeframe.").
[8] *Id.* at 7.
[9] *See* EPA, Finding That Lead Emissions from Aircraft Engines That Operate on Leaded Fuel Cause or Contribute to Air Pollution That May Reasonably Be Anticipated to Endanger Public Health and Welfare, 88 Fed. Reg. 72,372, 72,374 (Oct. 20, 2023) ("[T]he Administrator finds that emissions of lead from [piston-engine] aircraft engines cause or contribute to lead air pollution that may reasonably be anticipated to endanger public health and welfare.").

Indeed, every year that aircraft can continue to use leaded avgas is another year that communities around general aviation airports are exposed to a toxic chemical for which there is no safe level.[10] Lead exposure is associated with a range of serious health effects, including an increased risk of cancer; increased blood pressure; lower cognitive function; harm to the nervous, cardiovascular, immune, and reproductive systems; and anxiety and depression.[11] Even low exposures can cause life-altering harms, including irreversible harm to children's brain development and increased risks of cardiovascular disease in adults.[12] A recent large-scale study found that 400,000 deaths per year—including hundreds of thousands of cardiovascular disease-related deaths—in the U.S. are attributable to adult lead exposure.[13]

There is also substantial research supporting a causal link between lead emissions from piston-engine aircraft and increased blood lead levels in individuals living around general aviation airports. Monitoring and modeling studies have found elevated lead concentrations in the air from piston-engine aircraft at and downwind of general aviation airports.[14] Multiple studies have shown that children living in close proximity to airports where leaded avgas is used have higher blood lead levels than children who do not.[15] Exposures affect those who work at

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[10] *Id.* at 72,373 ("[A]s the EPA has previously noted 'there is no evidence of a threshold below which there are no harmful effects on cognition from lead exposure.'" (citation modified)); EPA, *Integrated Science Assessment for Lead*, at ES-10 (Jan. 2024) ("2024 Lead ISA") ("[T]here is clear and consistent evidence that [lead] exposure leads to negative health effects in children; further, recently available evidence does not provide evidence of a threshold for the observed neurodevelopmental effects across the range of BLLs examined.").

[11] 2024 Lead ISA at ES-8–10.

[12] EPA, *Integrated Science Assessment for Lead,* at xciii, 1-68, 1-76 (2013); 2024 Lead ISA at IS-59–-60; *cf.* 2024 Lead ISA at 9-63–9-68.

[13] *See* Bruce P. Lanphear et al., *Low-level Lead Exposure and Mortality in US Adults: A Population-based Cohort Study*, 3 Lancet Pub. Health e177 (2018), https://doi.org/10.1016/S2468-2667(18)30025-2; *see also* Lauren Brown et al., *Developing a Health Impact Model for Adult Lead Exposure and Cardiovascular Disease Mortality*, 128 Env't Health Persps. 097005-1 (2020), https://doi.org/10.1289/EHP6552.

[14] *See* 88 Fed. Reg. at 72,379–80 (citing studies, including a modeling and monitoring study from signatory Town of Middleton, Wisconsin).

[15] *See* Marie Lynn Miranda et al., *A Geospatial Analysis of the Effects of Aviation Gasoline on Childhood Blood Lead Levels*, 119 Env't Health Persps. 1513, 1516 (2011), https://doi.org/10.1289/ehp.1003231 (finding that "children living within 500 m, 1,000 m, or 1,500 m of an airport had average blood lead levels that were 4.4, 3.8, or 2.1% higher, respectively, than other children"); Sammy Zahran et al., *The Effect of Leaded Aviation Gasoline on Blood Lead in Children*, 4 J. Ass'n Env't & Res. Economists 575 (2017), https://doi.org/10.1086/691686 (examining the blood lead levels of children living within two kilometers of airports in Michigan and finding that "the odds that a child's [blood lead levels] will eclipse CDC thresholds for concern increases dose-responsively in proximity to airports, declines measurably in neighborhoods proximate to airports in the months following 9/11" when there was less air traffic, and "increases dose-responsively in the flow of [piston-engine aircraft] traffic"); Mountain Data Grp., *Leaded Aviation Gasoline Exposure Risk at Reid-Hillview Airport*

general aviation airports as well.[16] This lead exposure puts people living and working near airports at risk of irreversible health harms. Indeed, as EPA recognized in 2023, research has found "higher mortality rates in adults living near single-runway airports in years with more piston-engine air traffic."[17]

Researchers have quantitatively estimated the cost of just some of the adverse health effects from the use of leaded avgas. One study calculated the nationwide annual costs of IQ losses from aircraft lead emissions and found that such emissions contributed an estimated $1.06 billion in 2006 USD from lifetime earnings reductions alone.[18] Similar research evaluating the effects of piston-engine aircraft traffic in Michigan conservatively estimated that reducing such traffic from the 50th percentile to the 10th percentile of operations would generate a benefit of about $120 million (measured as the net present value of future earnings).[19]

Despite the extensive research showing that lead exposure from piston-engine aircraft flying on leaded avgas puts people across the country at serious risk of harm, FAA merely nods at unspecified "health considerations" and "health concerns" as one of multiple motivators for the transition from leaded avgas.[20] This cursory reference to "health considerations" disregards

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in Santa Clara County, California, at 37–45 (Aug. 2021) ("RHV Lead Study") (explaining that "children proximate to [the general aviation airport] Reid-Hillview Airport present with systematically higher [blood lead levels], net of other measured sources of lead exposure risk, child demographic characteristics, and observed and unobserved neighborhood conditions," that children who live downwind of the airport had higher blood lead levels than those who did not, and that the blood lead levels "of sampled children increase with exposure to piston-engine aircraft operations at [the airport], net of all other factors" and ultimately "suggesting that child [blood lead levels] increase dose-responsively with [piston-engine aircraft] traffic"); Sammy Zahran et al. *Leaded Aviation Gasoline Exposure Risk and Child Blood Lead Levels*, 2 PNAS Nexus Art. No. pgac285 (2022), https://doi.org/10.1093/pnasnexus/pgac285 (analyzing RHV Lead Study data and finding "consistent evidence that exposure to avgas increases child BLLs"); *see also* 88 Fed. Reg. at 72,375 (EPA explaining that "there have been studies reporting positive associations of children's blood lead levels with proximity to airports and activity by covered airport.").

[16] Won-Ju Park et al., *Blood Lead Level and Types of Aviation Fuel in Aircraft Maintenance Crew*, 84 Aviation, Space, & Env't Med. 1087, 1089 (2013), https://doi.org/10.3357/ASEM.3647.2013 (2013 study of aircraft-maintenance workers in the Republic of Korea finding higher blood lead levels of maintenance workers based in airports that service propeller-driven aircraft and use leaded avgas than those of maintenance workers that are based in airports that service jets, which do not use leaded avgas).

[17] 88 Fed. Reg. at 72,375 (citing Klemick et al., *Cardiovascular Mortality and Leaded Aviation Fuel: Evidence from Piston-Engine Air Traffic in North Carolina*, 19 Int'l J. Env't Rsch. & Pub. Health 5941 (2022), https://doi.org/10.3390/ijerph19105941).

[18] *See* Philip J. Wolfe et al., *Costs of IQ Loss from Leaded Aviation Gasoline Emissions*, 50 Env't Sci. Tech. 9026 (2016), https://doi.org/10.1021/acs.est.6b02910.

[19] *See* Zahran et al. (2017).

[20] Draft Plan at 7.

the significant harms associated with the continued use of leaded avgas and untethers FAA's Draft Plan from the lived experiences of communities on the ground. As a result, absent from the Draft Plan is any recognition of the effect that a delayed transition has on human health. In its revised Plan, FAA should incorporate a more detailed explanation of the health harms associated with the continued use of leaded avgas and strengthen its commitment to a transition no later than 2030 to address these harms.

b. FAA must include regulatory standards in its transition plan

Though FAA's Draft Plan recognizes that "[f]ederal regulations will be necessary to eliminate the use of 100LL,"[21] the approach outlined there makes clear that FAA has no concrete plan to use its regulatory authority to ensure there is a swift and complete transition to unleaded avgas by no later than 2030. This approach is unacceptable given that FAA is currently under an unfulfilled legal obligation to promulgate standards for leaded avgas[22] and to "take such actions as shall be necessary" under its authority to safely "eliminat[e] … the use of leaded aviation gasoline by piston-engine aircraft by the end of 2030."[23]

As a result of EPA finalizing an endangerment finding for leaded avgas in 2023, both EPA and FAA are required by statute to set standards to address lead emissions from piston-engine aircraft.[24] Despite this obligation, neither EPA nor FAA has released any regulatory proposals or outlined next steps with any specificity. In the Draft Plan, FAA nods at its duty to set fuel standards,[25] but it identifies no concrete plans for doing so. Indeed, it suggests that it might not even set the standards it is required by law to set and that it recognizes elsewhere will be "necessary" to eliminate the use of 100LL:[26] FAA states that it "will continue to evaluate whether any new regulations[or] amendments to existing regulations . . . are needed to address new fuel standard requirements."[27]

Instead of using its regulatory authority to set fuel standards for avgas to "control or eliminate" lead emissions,[28] FAA takes a passive approach to the transition from unleaded avgas,

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[21] *Id.* at 20.
[22] 49 U.S.C. § 44714.
[23] 2024 FAA Reauthorization Act § 827(a)(2)(A).
[24] *See* 42 U.S.C. § 7571(2)(A), (B)(i) (requiring EPA to issue emissions standards for "any air pollutant from any class or classes of aircraft engines which in [EPA's] judgment causes, or contributes to, air pollution which may reasonably be anticipated to endanger public health or welfare" and to consult with FAA on aircraft engine emissions standards); 49 U.S.C. § 44714 (requiring FAA to issue fuel standards "to control or eliminate aircraft emissions the [EPA] decides under [42 U.S.C. § 7571] endanger the public health or welfare").
[25] *See* Draft Plan at 14, 46.
[26] *Id.* at 20.
[27] *Id.* at 46.
[28] *See* 49 U.S.C. § 44714.

repeatedly asserting that the market will drive the timing of the transition.[29] To the extent FAA points to the possibility of taking regulatory action, it suggests that any regulation would come on the heels of an already far-along, market-driven transition, rather than as a tool to drive the transition.[30] It "anticipate[s]" that any rulemaking process would start at some undefined point in Phase 2 of the transition—which is expected to continue through 2028—and asserts that "[e]xact timing of rulemaking activities cannot be determined until the transition has progressed."[31] Given the typical years-long timeline for administrative rulemaking—a process that FAA recognizes includes initiation, proposing a rule, receiving public comment on the proposal, responding to those comments, and then finalizing a rule[32]—it is difficult to see how a rulemaking process initiated in 2028 would do anything to spur faster adoption of unleaded alternatives, rather than just codify an uncertain market-driven status quo on the timeline the market dictates.

This approach is unacceptable. As FAA recognizes elsewhere in the Draft Plan, federal regulatory actions can encourage airports to offer unleaded fuel for sale and therefore expedite the transition.[33] Indeed, it has long been recognized that regulation plays a vital role in spurring innovation and moving a market away from the use of harmful substances.[34] For example, the federal government and courts alike have recognized that chemical regulations and prohibitions can spur the development and deployment of safer alternatives.[35] And where, as here, there are available alternatives already approved for use, regulations can "create a climate in which existing technologies, known to produce the desired environmental results, will be adopted or diffused on a large scale."[36]

FAA must take seriously its role as regulator and revise the Draft Plan to outline how it will fulfill its obligation to "control or eliminate" lead emissions from piston-engine aircraft on a

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[29] Draft Plan at 45.
[30] *See id.* at 64 ("It is anticipated that the FAA rulemaking would initiate during Phase 2 of the transition and continue to progress through most of the transition period, ultimately culminating in a final rule to support the end of 2030 target date (2032 for Alaska) to transition to unleaded AvGas.").
[31] *Id.* at 64, 46.
[32] *Id.* at 64.
[33] *See id.* at 35.
[34] *See* Nicholas A. Ashford et al., *Using Regulation to Change the Market for Innovation*, 9 Harv. Env't L. Rev. 419, 434 (1985).
[35] *See, e.g.*, *Lab. Council for Latin Am. Advancement v. EPA*, 12 F.4th 234, 250 (2d Cir. 2021) (explaining that it was reasonable for EPA to conclude that a prohibition on consumer uses of methylene chloride paint strippers was likely to spur the "growth of a new marketspace for commercial-only distribution and sales of alternative products"); EPA, Fully Halogenated Chlorofluoroalkanes, 42 Fed. Reg. 24,542, 24,544 (proposed May 13, 1977); EPA, Fully Halogenated Chlorofluoroalkanes, 43 Fed. Reg. 11,318 (Mar. 17, 1978).
[36] Ashford et al. at 420.

timeline that ensures the National Transition completes by 2030 at the very latest.[37] FAA should initiate a rulemaking expeditiously so that it finalizes any such rulemaking by the end of 2028. While, if necessary, FAA can set the compliance date for any such rule to 2030 (but no later),[38] finalizing regulations well in advance of 2030 will give the general aviation network certainty about their obligations and encourage early adoption nationwide, while still providing sufficient time for those airports that need until 2030 to fully implement their transition.

II. The 2024 FAA Reauthorization Act Allows Airports to Transition to Unleaded Avgas Sooner than 2030

The Draft Plan misrepresents the obligations of airport owners and operators under the 2024 FAA Reauthorization Act (the "2024 Act"). The Plan states that Section 770 of the 2024 Act "provides that 100LL shall remain available until the earlier of December 31, 2030, or on the date on which the airport or any retail fuel seller makes available an unleaded AvGas that meets the criteria outlined in the Act."[39] The sole company still producing tetraethyl lead in the United States, Innospec, has cited this construction as a rationale for why it must continue to provide leaded avgas until 2030.[40] But this articulation misrepresents airport owners' and operators' obligations under the 2024 Act. Properly understood, the 2024 Act allows owners and operators to voluntarily cease selling leaded avgas so long as they do not adopt restrictions that would disallow its sale or use by another entity. FAA must correct its explanation of Section 770 in the Plan in order to provide certainty to airport owners and operators about how they can quickly transition to providing unleaded avgas.

Section 770 of the 2024 Act adds a grant assurance related to leaded avgas for airport development project grants. It provides that an "airport owner or operator may not restrict or prohibit the sale or self-fueling of any 100-octane low lead aviation gasoline for purchase or use by operators of general aviation aircraft" if that 100LL gasoline was available at the airport during 2022.[41] This "prohibition on a prohibition" lasts until the earlier of December 31, 2030,

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[37] The "National Transition" in the Draft Plan refers to the transition of the entire United States except for Alaska. While Section 771 of the 2024 FAA Reauthorization Act prohibits the FAA Administrator from taking action to restrict 100LL until the earlier of December 31, 2032 or when certain conditions are met, FAA must similarly exercise its regulatory obligations to ensure that the transition for Alaska is complete by the earlier of 2032 or when those conditions are met.
[38] FAA should set the deadline for Alaska at the earliest date permitted by Section 771 of the 2024 Act.
[39] Draft Plan at 57; *see also id.* At 33.
[40] *See* Mark Phelps, *Innospec Wants to Discontinue Producing Tetraethyl Lead (TEL) by 2030* (Apr. 3, 2025), https://avweb.com/air-shows-events/at-some-point-producing-the-lead-in-leaded-avgas-can-become-too-expensive-to-be-worth-it/ (reporting that Innospec explained that it "will continue to make TEL at least until the congressionally mandated end date for 100LL availability of 2030").
[41] 49 U.S.C. § 47107(a)(22).

or the date on which the airport or a fuel seller there makes available an unleaded avgas that meets certain conditions.[42]

The best reading of this provision is not that an airport has an affirmative obligation to continue to provide leaded avgas until the end of 2030 or when the conditions are met, but that an airport cannot expressly restrict the sale or use of unleaded avgas, including sale by a third party. That is because the statute does not require an airport owner or operator to directly provide any particular type of fuel, and an airport that voluntarily switches the fuel supply it is offering for sale to unleaded avgas is not "restrict[ing]" or "prohibit[ing]" the sale of 100LL within any ordinary understanding of those words. The plain meaning of "restrict" is to "confine within bounds" or "to place under restrictions as to use or distribution."[43] Similarly, "prohibit" means "to forbid by authority" or "to prevent from doing something."[44] In each case, the language does not mandate the provision of 100LL but rather limits the circumstances under which airport owners and operators may adopt policies or rules to prohibit the sale or use of that fuel. So, while Section 770 may prevent an airport from adopting a policy, for example, disallowing the sale of 100LL, it does not prevent the owner or operator from voluntarily switching its single fuel tank to an unleaded fuel, in which case a third party could always sell 100LL on the premises using its own infrastructure.

This understanding is further supported by the legislative history of the 2024 Act. As initially introduced, the House bill provided both that (1) FAA must "ensure that any of such varieties of aviation gasoline as may be necessary to fuel any model of piston-engine aircraft remain available for purchase" at each NPIAS-listed airport if avgas was available for purchase at the airport "as of October 5, 2018"; and (2) "a prohibition or restriction on the sale of such varieties" would violate an airport's grant assurance.[45] The final 2024 Act, however, omitted the first requirement to ensure that certain fuels remained available for purchase, instead utilizing the latter "prohibition on prohibitions" approach.[46] This change in language from proposed to finalized legislation confirms that Congress did not require airports to continue to make 100LL available against their will.[47]

Therefore, FAA's suggestion in the Draft Plan that the initial "expansion of unleaded fuels" will only be at airports with the infrastructure available to supply more than one avgas

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[42] *Id.*
[43] Merriam-Webster, Restrict, https://www.merriam-webster.com/dictionary/restrict (last updated Mar. 10, 2026).
[44] Merriam-Webster, Prohibit, https://www.merriam-webster.com/dictionary/prohibit (last updated Mar. 9, 2026).
[45] *See* H.R. 3935, 118th Cong. § 431(a)–(b) (as introduced June 9, 2023).
[46] 2024 FAA Reauthorization Act § 770.
[47] *See Jazz Pharms., Inc. v. Kennedy*, 141 F. 4th 254, 262 (D.C. Cir. 2025) (explaining that "when Congress amends legislation, courts must presume it intends the change to have real and substantial effect" (quotation omitted)).

rests on a misinterpretation of airport obligations under the 2024 Act.[48] Nevertheless, since some airports with one fuel tank may not choose to voluntarily switch their entire supply to unleaded avgas, FAA should support those airports that seek to provide both unleaded and leaded fuel early in the transition. This includes airports in Alaska, which should begin transitioning as early as possible given the extensive use of piston-engine aircraft there. Indeed, the Draft Plan recognizes that FAA grant programs can "support transition-enabling infrastructure" and that airports that have only one tank may be able to offer both unleaded and leaded fuels early in the transition by utilizing temporary storage and fueling solutions like fuel trucks and trailers.[49] We encourage FAA to prioritize funding for temporary fueling stations that can enable airports with a single fuel tank offering 100LL to offer a second, unleaded fuel and to outline how it will do so in the Plan. This will further FAA's obligation to facilitate efforts to make approved unleaded aviation gasoline "widely available for purchase and use,"[50] as well as satisfy the call to assess the "development of necessary airport infrastructure, including fuel storage and dispensing facilities, to support the distribution and storage of unleaded aviation gasoline."[51]

FAA also suggests that airport owners or operators must continue selling leaded avgas until an unleaded alternative is "competitive" or "widely available."[52] FAA should make clear that neither of these requirements exists in Section 770, which not only does not obligate airports to sell 100LL but also allows airport owners and operators to restrict or prohibit the sale of leaded avgas as soon as it makes available an unleaded alternative that is: (1) approved by FAA for use as a 100LL alternative in nearly all piston-engine aircraft, and (2) meets either an industry consensus standard or other standard that FAA deems appropriate.[53] Neither of these conditions requires the unleaded alternative to be "competitive" or "widely available."

III. FAA Must Include Affected Communities as Key Stakeholders

The Draft Plan provides a list of "key stakeholders" in the transition to unleaded avgas and provides a short description of the "role" of each stakeholder.[54] Missing from the list of stakeholders are community groups representing individuals living near general aviation airports. As explained above, communities around general aviation airports are disproportionately exposed to lead emissions and are therefore uniquely affected by the continued use of leaded

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[48] Draft Plan at 22.
[49] *Id.* at 35.
[50] 2024 FAA Reauthorization Act § 827(a)(2)(D).
[51] *Id.* § 827(b)(1)(B).
[52] *See* Draft Plan at 24 ("Airports, FBOs, and the supply chain will sell 100LL until there a competitive unleaded alternative or federal regulations prohibit it."); *id.* at 40 ("[A] recommended transition schedule would result in airports ceasing to offer 100LL the earlier of December 2030 (2032 in Alaska) or when the unleaded fuels that meet the predefined criteria become widely available.").
[53] 49 U.S.C. § 47107(a)(22).
[54] Draft Plan at 54, tbl. 14.

avgas. Indeed, affected communities have been instrumental in the fight for an unleaded future, successfully petitioning the EPA for its 2023 endangerment finding.[55] FAA's failure to recognize them as key stakeholders in a transition away from unleaded avgas disregards their lived experiences and their valuable role as partners in helping to prioritize the transition in a way that maximizes the protection of public health.

FAA should revise the Draft Plan to include affected communities as key stakeholders with a collaborative role in the transition. As set forth in comments from the Aviation-Impacted Communities Alliance, FAA should add "Affected Community Groups" to the table of key stakeholders and outline their role as one of proactive collaboration, including collaborating with FAA on implementation planning and airport prioritization for the transition, as well as participating in the development and review of education and public-health materials. This collaboration is vital to ensuring that any transition plan is responsive to the concerns of communities on the ground who are most affected by the continued use of leaded avgas.

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The Draft Plan does little to ensure that the nation's piston-engine fleet will transition to unleaded avgas by 2030 and that individuals around the country will be protected from ongoing exposures to harmful lead emissions. FAA should revise the Draft Plan as stated above. Specifically, FAA should:

- Expand its discussion of the adverse health effects from exposure to lead emissions from piston-engine aircraft operating on leaded avgas, which underscores the need for a swift transition.
- Outline how it will use its regulatory authority to drive the transition to unleaded avgas by no later than 2030, instead of relying on a market-driven approach.
- Clarify that airport owners and operators are not required to continue providing leaded avgas and may voluntarily switch their fuel supply to unleaded avgas, so long as they do not prohibit the sale of 100LL by a third party.
- Add "Affected Community Groups" as a key stakeholder and outline how FAA will collaborate with these groups during the transition.

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[55] *See* Petition from Earthjustice on behalf of Alaska Cmty. Action on Toxics et al., to EPA Re: Endangerment Finding (Oct. 12, 2021), https://www.epa.gov/system/files/documents/2022-01/aviation-leaded-avgas-petition-exhibits-final-2021-10-12.pdf (petitioners included Alaska Community Action on Toxics, Montgomery-Gibbs Environmental Coalition, and Oregon Aviation Watch, in addition to the local governments of the County of Santa Clara, California and the Town of Middleton, Wisconsin).

If you have any questions regarding these comments, please contact Kelly Lester at klester@earthjustice.org.

Sincerely,

Alaska Community Action on Toxics

Amigos de Guadalupe Center for Justice and Empowerment

Boulder County

Bruce Lanphear, MD, MPH
Little Things Matter

California Communities Against Toxics

Cassell Community

Center for Environmental Health

CleanEarth4Kids.org

Duwamish River Community Coalition

Get the Lead out of Long Beach

Groton Ayer Buzz

Earthjustice

Friends of the Earth

King County International Airport Community Coalition

League of United Latin American Citizens (LULAC) National

The Salvador E. Alvarez Institute for Non-Violence

Town Board of the Town of Middleton, Wisconsin

Oregon Aviation Watch

Quiet Skies, AL

Save Our Cape

Save Our Skies Alliance

UnleadLVK

Wisconsin Ecolatinos

350 Seattle