Sent via Email

Administrator Michael Regan
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460
Regan.Michael@epa.gov

Dear Administrator Regan:

The undersigned 57 organizations and 146 medical professionals, professors, advocates, and other individuals submit this letter in support of the October 12, 2021 updated petition, originally submitted on August 24, 2021, of Alaska Community Action on Toxics, Center for Environmental Health, Friends of the Earth, Montgomery-Gibbs Environmental Coalition, and Oregon Aviation Watch, and by the County of Santa Clara, California and the Town of Middleton, Wisconsin, petitioning the U.S. Environmental Protection Agency (“EPA”) to make an endangerment finding under section 231 of the Clean Air Act that leaded aviation gasoline (“avgas”) contributes to air pollution that harms public health and welfare.1

Emissions from leaded avgas, used by many piston-engine aircraft, make up over 70% of the lead that is released domestically into the atmosphere. These lead emissions put the millions of people, including hundreds of thousands of young children, that live near general aviation airports at an increased risk of harm from lead. Indeed, multiple studies have shown that children who live near general aviation airports where lead is used have blood lead levels that are significantly higher than children who do not. This is particularly troubling because there is no safe level of lead, and childhood exposures to lead can lead to a host of adverse health effects, including interference with brain development. Leaded avgas emissions also exacerbate environmental injustice: most of the fifty general aviation airports with the highest lead emissions are located in communities of color, and children of color are already disproportionately burdened by chemical exposures, including by exposures to lead.

Even though EPA has known for years that the use of leaded avgas by piston-engine aircraft increases the blood lead levels of children who live near general aviation airports, increasing their risk of learning disabilities and neurodevelopmental disorders, EPA has thus far declined to regulate this largest remaining source of lead in the air. The undersigned organizations and individuals ask EPA to grant the petition, make a long-overdue endangerment finding for leaded avgas, and begin the process of regulating this source of harmful lead

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1 42 U.S.C. § 7571(a)(2) (“The Administrator [of the EPA] shall . . . issue proposed emission standards applicable to the emission of any air pollutant from any class or classes of aircraft engines which in his judgment causes, or contributes to, air pollution which may reasonably be anticipated to endanger public health or welfare.”).
emissions. Doing so is an important step in fulfilling the Biden-Harris Administration’s commitments to protect children’s health and promote environmental justice.

Sincerely,

Organizational Signatories:

Cindy Christiansen  Rev Edward Pinkney
Anne Hollander  Benton Harbor Community Water Council
Darlene Yaplee  Aviation-Impacted Communities Alliance

Lisa Arkin  Cindy Christiansen
Beyond Toxics  Judith Gundersen
BOS Fair Skies

Jayla Burton, MPH, MS  Nancy Buermeyer
Breast Cancer Action  Breast Cancer Prevention Partners

Jane Williams  Jose Barrera
California Communities Against Toxics  California League of United Latin American Citizens (LULAC)

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California Safe Schools  Capitol Park Goss Dobern NA

Bonnie Bick  Kristie Trousdale
Chapman Forest Foundation  Children’s Environmental Health Network

Robert Germann  Citizens for Airpark Safety
Gary Keller  Citizens for Airpark Safety – Montgomery
Citizens Against Gillespie’s Expansion and Low Flying Aircraft  County Airpark

Kimberly Gibbs  Rebecca Overmyer-Velázquez
Citizens for Quiet Skies  Clean Air Coalition of North Whittier and Avocado Heights

Bobbi Willding  Andria Ventura
Clean and Healthy New York  Clean Water Action

Amit Rosner  Deidre Nelms
Clearya  Maya Nye
Coming Clean
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Comite Civico Del Valle, Inc.

Taylor Thomas
East Yard Communities for Environmental Justice

Nayyirah Shariff
Flint Rising

Laura Weinberg
Great Neck Breast Cancer Coalition

Todd Larsen
Green America

Juan Estrada, Advocacy Associate and Organizer
Green Foothills

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GrotonAyerBuzz

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Healthy Schools Network

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Hoosier Environmental Council

Jose T. Bravo
Just Transition Alliance

Darcie Green
Latinas Contra Cancer

Tracy Gregoire
Learning Disabilities Association of America

Jared Opsal
Missouri Coalition for the Environment

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Moms for a Nontoxic New York

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Natural Resources Defense Council

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New Jersey Citizen Action

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Plane Sense 4 Long Island

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Plata Arroyo Neighborhood Association and Eastgate N.A.C.

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PODER

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Patricia Currie
Say NO to KHTO

Martin Wolf
Seventh Generation

Martha Camacho Rodriguez
Social Eco Education

James Lawson
Southern Maryland Fair Skies Coalition

M. Beth Butler
Southern United Neighborhoods

Tony Verreos
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Suellen Wagner
Studio City For Quiet Skies
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The Salvador E. Alvarez Institute for Non-Violence

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Town of Middleton, WI

Town of Springfield, Dane County, WI

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Until Justice Data Partners

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Washington County Citizen Action Network

Melissa Mays  
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Stephen Knight  
Worksafe

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Amy McCoy

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Labake Adeaga

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<td>Landon Hilliard</td>
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<td>Maya Bentz</td>
<td>Megan Cavallari</td>
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<td>Morri Markowitz, MD</td>
<td>Nadia Ahmad</td>
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<td>Pediatrician, Lead Expert</td>
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<td>Nadia Nouri</td>
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P. Ziegler  

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Patricia D’Amore  Retired  

Patricia E. McKinley  Retired Zoologist  
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<tr>
<td>Trisha Lamb</td>
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<td>Trujillo Miguel Angel Vazquez</td>
<td>Poet, Song Writer, Music Creator, Activist, Community Leader</td>
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<td>Vanessa Kranz</td>
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<td>Veronique Mead</td>
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cc: Steve Dickson, Administrator, Federal Aviation Administration

Joseph Goffman, Acting Assistant Administrator, Office of Air and Radiation, Environmental Protection Agency

Alejandra Nunez, Deputy Assistant Administrator for Mobile Sources, Office of Air and Radiation, Environmental Protection Agency

Marion Hoyer, Office of Transportation and Air Quality, Environmental Protection Agency