

May 6, 2022

Honorable Pete Buttigieg, Secretary U.S. Department of Transportation 1200 New Jersey Avenue, SE Washington, DC 20590 Billy Nolen, Acting Administrator Federal Aviation Administration 800 Independence Avenue, SW Washington, DC 20591

Dear Secretary Buttigieg and Acting Administrator Nolen,

We write today to express our collective concerns regarding the unilateral decision by the sponsor of Reid-Hillview Airport in Santa Clara County, California, to prevent the sale of 100LL fuel for users of our national public-use airport system.

It is our understanding the Department of Transportation, in coordination with the Federal Aviation Administration, is currently in discussions with Santa Clara County officials to resolve longstanding noncompliance issues by the airport. We appreciate these efforts and respectfully request that any agreement include the availability of 100LL fuel at Reid-Hillview during a transition to unleaded fuel. In addition, we ask that the FAA look to expand the list of eligible aircraft approved to use unleaded avgas alternatives currently available at Reid-Hillview.

Allowing the County's unilateral action to unfairly discriminate against certain users of our public-use airport system is wrong, and if not addressed could exacerbate the situation by causing a domino effect at airports across the nation.

As you know, the entire industry, including refiners, producers, distributors, engine manufacturers, pilots, airports, and FBOs are working hand-in-hand with the Biden Administration, through the Eliminate Aviation Gasoline Lead Emissions (EAGLE) program, to find a fleet-wide unleaded replacement fuel no later than 2030. The FAA has also provided technical approval of 100UL fuel through the supplemental type certificate (STC) process for certain aircraft engines, but commercial fuel production and distribution have not yet occurred.

Many of the 200,000 aircraft in the current General Aviation piston fleet require higher-octane fuel to fly safely. Not having 100LL available can lead to the grounding of nearly 30 percent of the entire fleet, which accounts for 70 percent of all General Aviation fuel sales in the United States. Moreover, misfuelling can cause detonation and engine malfunction resulting in catastrophic engine failure, which typically occurs soon after takeoff. For these safety reasons alone, the FAA should apply the full force of its current authority to ensure that Reid-Hillview, and all of our nation's public-use airports, operate in a non-discriminatory manner while we work together to transition away from lead.

It is our belief that should an obligated airport cease offering fuel that had been available, as is the case at Reid-Hillview, this action could pose a violation of federal grant obligations by creating an access restriction to that airport and unjust discrimination. Aircraft that need 100LL will be unable to obtain it and therefore denied access to the airport.



Our industry supports 1.2 million jobs and brings an economic impact of \$247 billion to our communities across the country. Through a network of 5,200 public-use community airports and more than 13,000 privately owned landing facilities nationwide, General Aviation is a uniquely efficient means of moving people and goods between thousands of communities nationwide. Only about 10 percent of the nation's airports have commercial service, making General Aviation an integral part of the transportation system that supports communities across the United States and provides essential air travel options to businesses and the public.

Many of the General Aviation piston aircraft that require the higher-octane fuel are performing lifesaving emergency, search and rescue, law enforcement, humanitarian aid, and relief missions. The lack of 100LL fuel at Reid-Hillview has already had a negative impact on humanitarian flights that are now unable to refuel their aircraft at the airport.

Moving as quickly as possible to an unleaded future is a top priority, but this transition needs to be done safely and smartly, and without political pressure. Again, as members of the Avgas Coalition, we respectfully request the Administration's support for ensuring the availability of high-octane fuels at Reid-Hillview, and all of our nation's public-use airports, while we work together to remove lead from all aviation gasoline.

Sincerely,

## **The Avgas Coalition**

Air Care Alliance **AirCorps Aviation** Aircraft Owners and Pilots Association Airport Farms LLC Airworld LLC Alaska Airmen's Association American Bonanza Society American Petroleum Institute **Army Aviation Heritage Foundation** Avenger Educators LLC Avfuel **Barton Aviation** Blackhawk Flying Club (III.) **Boeing Field Tenants Association Brookhaven-Lincoln County Airport Brookway Aviation** 



Caldwell Flying Service (Texas) Canadian Owners and Pilots Association Cape Cod Aero Club Cavanaugh Flight Museum **Chocks Away Aviation** Cincinnati Warbirds **Cirrus Owners & Pilots Association** Citation Jet Pilots Association **Classic Aviation LLC Commemorative Air Force Courtesy Aircraft Sales DJM Aviation Services Delaware Aviation Museum Foundation Denver Flyers** Downwind Flying Club (Wash.) **Experimental Aircraft Association** Flight Czech Florida Warbirds, LLC Flying 20 Club, Inc. (Conn.) Flying Texans And Mustangs Unlimited Flying Z Ranch Formation and Safety Team (FAST) Fort Myers Flying Club Freeflight Aviation (N.J.) Friends of Boeing Field Friends Of Sikorsky Airport (Conn.) General Aviation Manufacturers Association GAMI Grumman Owners & Pilots Association (Southern Reg.) Hangar 6 Aviation Helicopter Association International J&M Sales & Leasing Jet Air, Inc. Lanier Flight Center Legacy Warbirds Inc. Lewis Air Legends Maine Aeronautics Association Malibu M-Class Owners & Pilots Assoc. Midcoast Aviation Milco Flying Club (Wisc.) **Mile High Resources** 



Military Aviation Museum (Va.) Minnesota Pilots Association Moccasin Flying Club (Tenn.) Montana Pilots Association Museum of Flight Museum of Flight Tri-States N1708T Owners Association (Va.) National Air Transportation Association National Business Aviation Association National Warbird Operators Conference Navy Flight Trainer LLC New Bedford Pilots Association New Hampshire Pilots Association New Jersey Aviation Association New Mexico Pilots Association North American Trainer Association Palm Springs Air Museum Planes of Fame Air Museum **Planeview Aviation Services** Rag Wings/Radials Aircraft Leasing LLC Redlands Airport Association (Calif. Pilots Assoc.) Seaplane Adventures Seaplane Pilots Association **Sky Helicopters Smokehouse Pilots** SoCal Pilots Solberg Airport (N.J.) South Atlanta Helicopters South Dakota Pilots Association Southern Heritage Air Foundation Swift Fuels TFC Flying Club (Conn.) Taildragger Flyers, Inc. Tango 28 Group **Texas Legislative General Aviation Caucus** Topflight Aviation, Inc. **Tradewind Aviation Trojan Boys LLC Trojan Phlyers** Twin City Cloud 7 U.S. House of Representatives (Mo. Sixth district)



Veterans Airlift Command Warbirds, LLC Warbird Adventures, Inc. Warbird Operators Group Washington Pilots Association Washington Seaplane Pilots Association Westminster Aerobats Flying Club WingNuts Flying Circus Witham Warbirds Yankton Regional Aviation Association (S.D.)