

**UNITED STATES DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION  
WASHINGTON, D.C.**

Aircraft Owners and Pilots  
Association, *et al.*  
Complainants,

v.

FAA Docket No. 16-22-08

County of Santa Clara,  
California,  
Respondent.

**COMPLAINANTS' OPPOSITION TO  
RESPONDENT COUNTY OF SANTA CLARA'S  
MOTION TO FURTHER SUPPLEMENT THE RECORD**

Complainants oppose Respondent Santa Clara County's Motion to "Further Supplement the Record". While the availability of a 100 octane unleaded fuel at Reid Hillview Airport (RHV) and a 94 octane fuel at San Martin Airport (E16) are incremental steps forward in the unleaded fuel transition, they are not a comprehensive solution. The entire industry is working to speed a safe and coordinated transition, and we are not yet at the finish line. If the transition was easy, it would already be done. The transition to high octane unleaded fuels, in Santa Clara County and at the 3,300 other public use airports in the National Plan of Integrated Airport Systems (NPIAS), must preserve NPIAS safety and efficiency. It is dangerous to create fragmented fuel availability for the piston fleet.

**BACKGROUND**

"Nearly three years after the County of Santa Clara implemented an unprecedented fuel ban"<sup>1</sup> on 100LL effective January 1, 2022, there has been one documented aircraft accident with serious injuries due to "fuel starvation"<sup>2</sup> and two documented misfuelings.

This is a matter that has always demanded speedy resolution. The Complainant-Initiated proceedings timeline overview shows 120 days from Complaint to Director's Determination,<sup>3</sup> and as of today, it has been 770 days since the Complaint in this Part 16 was filed. Reasonable access to federally funded airports should not be denied for any meaningful period of time. Complainants'

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<sup>1</sup> See Attachment 1, press release dated October 31, 2024, in which Santa Clara County admits it banned 100LL and mistakenly states 100 octane unleaded fuel "is available and usable by all piston-powered aircraft."

<sup>2</sup> NTSB Aviation Investigation Final Report on the July 22, 2022, accident number WPR22LA271.

<sup>3</sup> See Attachment 2.

Part 16 was filed on October 14, 2022. Santa Clara County has filed a variety of motions seeking to delay the decisional timeline, and the FAA has issued itself eight extensions of time delaying issuance of its decision by approximately 10 months so far:

- 1) U.S. DOT/FAA - Notice of Extension of Time Dated February 9, 2024
- 2) U.S. DOT/FAA - Notice of Extension of Time Dated May 7, 2024
- 3) U.S. DOT/FAA - Notice of Extension of Time Dated June 7, 2024
- 4) U.S. DOT/FAA - Notice of Extension of Time Dated July 3, 2024
- 5) U.S. DOT/FAA - Notice of Extension of Time Dated August 7, 2024
- 6) U.S. DOT/FAA - Notice of Extension of Time Dated September 10, 2024
- 7) U.S. DOT/FAA - Notice of Extension of Time Dated October 7, 2024
- 8) U.S. DOT/FAA - Notice of Extension of Time Dated November 4, 2024

FAA Docket No. 16-22-08, available at <https://www.regulations.gov/docket/FAA-2022-1385>.

### **REASONS A DETERMINATION IS NECESSARY WITHOUT FURTHER DELAY.**

In the interest of public safety, after multiple documented aviation safety impacts and for the additional reasons below, the FAA should deny the Motion to Further Supplement the Record as improper and issue its Director’s Determination without further delay.

- 1. The FAA is required to deny Respondent’s Motion to Further Supplement the Record, to extent it seeks dismissal of the Complaint.** In its misleadingly captioned document, Respondent makes a motion for dismissal of the Complaint, which must be denied as untimely as Respondent has already filed an Answer in this case. Under 14 CFR § 16.26(a) a respondent may file, in lieu of an answer to a complaint, a motion to dismiss. Respondent filed its Answer on March 31, 2023. Respondent’s present motion to dismiss, made almost a year and eight months after its Answer has been filed, is untimely and must be denied.

This marks Respondent’s third attempt to dismiss this Complaint and avoid a decision on the merits. Like Respondent’s previous unsuccessful attempts, this effort must fail because it is untimely and fails to meet the burden required to support any request for dismissal of this proceeding.

- 2. The FAA should deny Respondent’s Motion to “Further Supplement the Record”, to the extent it seeks to amend its Answer or Supplement the Record.** Amendments or supplements to the pleadings described in this section will not be allowed without showing good cause through a motion and supporting documents. 14 CFR 16.23(j). Respondent has failed to comply with procedural requirements and meet its burden of proof to show good cause.

Respondent’s admitted “unprecedented ban” was enacted in direct violation of FAA Grant Assurance obligations, as established by the filings in this case and as has been the stated

position of the FAA in similarly situated airports in Santa Monica, California (see Attachment 3) and Superior, Colorado (see Attachment 4). This is yet another example of Respondent stating a falsity in this proceeding that is exposed by a press release by Respondent about its true conduct. Respondent now seems to be taking the position that its recent purchase of a limited quantity of G100UL that is currently available at one airport and authorized for use in certain piston aircraft resolves the past and ongoing grant assurance violations resulting from Respondent's "unprecedented ban" at both its airports of 100LL fuel that is authorized for use in the entire piston fleet. It most assuredly does not. The general aviation community looks forward to effecting a safe and coordinated transition to unleaded fuels, and substantive progress is being made. However, it's premature for Respondent or the general aviation community to posit that such a transition is complete, or even nearly complete.

Currently, no FAA unleaded fuels are authorized for use in all piston aircraft. Two unleaded 100 octane fuels have FAA authorization for use in certain aircraft makes and models. Those unleaded 100 octane fuels cannot be mixed with each other, but each can be safely mixed with 100LL. This is why its continued availability of 100LL while 100 octane unleaded fuels become available is vital for safety, efficiency and airport access.

- a. GAMI's G100UL STC is not available to piston rotorcraft, light sport aircraft, experimental aircraft, and even some type certificated aircraft based at RHV (see Attachment 5). Cirrus Aircraft, the largest global manufacturer of piston aircraft, issued a Service Advisory on June 18, 2024, disapproving the use of G100UL in SR series aircraft (see Attachment 6). G100UL cannot be mixed with Swift 100R.
- b. Swift's 100R STC, granted just two months ago, only authorizes the fuel's use in Cessna 172 R/S models at this time, and does not allow mixing 100R with G100UL. Swift's 94UL is not authorized for use in aircraft with high compression engines, and therefore cannot meet the needs of aircraft with high compression engines that purchase 70% of the annual volume of AvGas sold in the nation.

At this time, it is unclear whether there will be any 100 octane unleaded fuel with fleetwide approval. It is unclear when existing authorized fuels will be legally authorized for use by the broader piston fleet. It is unclear when any fuel that meets the demands of the diverse piston fleet will become available on a consistent and sustained basis, in quantities and at times sufficient to meet the piston fleet demands.

- 3. Reasonable access to necessary, and previously available before the "unprecedented ban", fuel is still being denied at RHV and E16.** It remains unreasonable for a portion of the industry to be denied reasonable, and previously available, amenities that effectively

limit and deny fair use of the airport. G100UL is not currently approved for use in all piston aircraft, as detailed in Section 2 above, despite Respondent's press release claims to the contrary. Additionally, light sport and experimental aircraft cannot use the STC process for G100UL, 100R, or any other fuel. The fleet of training aircraft at San Carlos Airport (SQL), just 23nm away from RHV, with Swift's 100R STC cannot legally use G100UL (see Attachment 7). There are based aircraft at RHV without a Swift STC that legally cannot install a GAMI STC. For example, Complainants Michael and Chris Luvara own a Cessna 182 powered by a P. Ponk Aviation O-470-50 Engine that requires 100/130 minimum grade aviation gasoline, and this engine is not listed on the FAA Approved Model List for the GAMI STC (see Attachment 5). These aircraft need the reasonable access they had before the "unprecedented ban" was implemented.

4. **There is no evidence of 100LL, G100UL, or Swift 100R at San Martin Airport (E16).** 100LL was previously available at E16 before Respondent's "unprecedented fuel ban" and remains unavailable. Even if Respondent made G100UL or Swift 100R available at E16, neither are approved for use in all piston aircraft as detailed in Section 2. Respondent replaced E16's 100LL with Swift 94UL, which cannot be used in the aircraft with high compression engines that purchase approximately 70% of the annual AvGas volumes in the nation.
5. **There is still a lot to learn and to be done to demonstrate reasonable access, and dismissal would be premature without a full and fair experience.** At the time Respondent filed its Motion to "Further Supplement the Record", it only offered G100UL for 14 days with no evidence of safe and sustained availability. This does not justify its ban on the sale or use of 100LL. The Affidavit relied upon by Complainant only says, "County has offered...G100UL for purchase..." and "...intends to continue selling both fuels." Upon information and belief, Respondent has purchased only 7,500 gallons (approximately one tanker truck) of G100UL (see Attachment 8).<sup>4</sup> There is no evidence in the record to indicate future supply. Upon information and belief, there is no longer any fuel available for self-service although self-service fuel was available at Respondent's airports prior to the "unprecedented ban."

Currently, the world's largest producer of piston-powered aircraft "does not approve the use of GAMI G00UL fuel in Cirrus SR Series airplanes" (see Attachment 6). Currently, the two leading general aviation aircraft engine manufacturers, Continental and Lycoming, have not authorized use of G100UL in their engines and Lycoming has confirmed that its engine warranty does not cover damage due to use of non-approved fuels including

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<sup>4</sup> "Santa Clara County provided a photo of a fuel tanker truck from Texas-based Lessley And Sons making the first delivery to RHV, which received a 7,500-gal. quantity on Oct. 28."

G100UL (see Attachment 9). Each of these companies has cited lack of sufficient data, at this early stage, to approve G100UL use.

It is notable that Respondent raises the 2024 FAA Reauthorization Act<sup>5</sup> in an attempt to argue that it is not subject to the new grant assurance and, even if it was, that the new grant assurance would exempt it from Grant Assurance 22 compliance obligations. However, Section C.1.a of the Assurances<sup>6</sup> contains a statement that the Airport Sponsor will comply with a variety of legal authorities, specifically including “49 U.S.C. subtitle VII, as amended.” Section 770 of the 2024 FAA Reauthorization Act amended 49 U.S.C. subtitle VII by adding “(22) the airport owner or operator may not restrict or prohibit the sale or self-fueling of any 100-octane low load aviation gasoline for purchase or use by operators of general aviation aircraft if such aviation gasoline was available at such airport at any time during calendar year 2022.” Santa Clara County publicized in its own press release and local news media also wrote that 100LL was available in the County controlled tanks and in use at RHV and E16 after January 1, 2022 (see Attachments 10 and 11). This is yet another example of Respondent stating a falsity in this proceeding that is exposed by a press release by Respondent about its true conduct.

## **CONCLUSION**

Not all piston aircraft are legally authorized to use G100UL. Consistent fuel production and distribution for unleaded fuels to supply the NPIAS needs to be developed, as does stakeholder confidence. Progress is occurring, but much more is needed to effect a safe and coordinated national transition to an unleaded future.

This Part 16 is not a complicated matter. Respondent has admitted to its “unprecedented ban” of 100LL, although it voluntarily agreed to comply with grant assurances in exchange for millions of dollars of federal grant monies. The FAA’s Office for the Associate Administrator for Airports has already stated that:

a ban or restriction on the sale or use of 100LL (Avgas) at a federally obligated airport is inconsistent with Grant Assurance 22, Economic Nondiscrimination (49 United States Code Section 47107(a)(1)).

Further delay in issuance of a Director’s Determination is contrary to safety, to the just administration of compliance with grant assurances, to safeguard the public’s investment in Santa Clara County’s public use airports, and to a safe and coordinated transition to unleaded fuels across the NPIAS.

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<sup>5</sup>FAA Reauthorization Act of 2024, Pub. L. No. 118-63 (2024) <https://www.govinfo.gov/content/pkg/BILLS-118hr3935enr/pdf/BILLS-118hr3935enr.pdf>

<sup>6</sup> AIP Grant Assurances [https://www.faa.gov/sites/faa.gov/files/airports/new\\_england/airport\\_compliance/assurances--airport-sponsors-2022-05.pdf](https://www.faa.gov/sites/faa.gov/files/airports/new_england/airport_compliance/assurances--airport-sponsors-2022-05.pdf)

Respectfully submitted,

Dated: November 22, 2024

A handwritten signature in black ink that reads "Justine A. Harrison". The signature is written in a cursive style with a horizontal line underneath the name.

Justine A. Harrison  
General Counsel

Aircraft Owners and Pilots Association  
421 Aviation Way  
Frederick, MD 21701

(301) 695-2000

[Justine.Harrison@aopa.org](mailto:Justine.Harrison@aopa.org)

# **ATTACHMENT 1**

October 31, 2024

Santa Clara County Press Release

PUBLIC HEALTH

# First in the Nation: Reid-Hillview Airport Now Offers 100 Octane Unleaded Aviation Fuel for Retail Sale

The high-octane alternative to hazardous leaded gas is available and usable by all piston-powered aircraft



The new fuel was delivered to Reid-Hillview Airport on Oct. 28, 2024, and full-service truck-to-airplane fueling began on Oct. 30, 2024. With the addition of G100UL, the County now offers aircraft operators two choices in unleaded avgas: G100UL and UL94.



October 31, 2024

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**SANTA CLARA COUNTY, Calif.** – Nearly three years after the County of Santa Clara implemented an unprecedented ban on the sale of toxic leaded aviation fuel at County airports in January 2022, County-run Reid-Hillview Airport set a new benchmark as the first in the nation to offer a lead-free alternative that works in all piston-powered general aviation aircraft: GAMI 100 Octane Unleaded Avgas.

The County began selling the fuel this week, signifying the start of what will be an inevitable national migration to the unleaded formula, as was done in the automotive sector decades ago. The County's actions to remove lead from fuel at its facilities and provide an alternative as soon as possible began after a County-commissioned study found elevated lead exposure in 13,000 children living near the airport.

"This is a victory for the children and families on the East Side who have been historically marginalized and whose voices, and legitimate health concerns, have been disregarded for too long," said Supervisor Cindy Chavez, whose district includes the East Side neighborhood of San José where the airport is located. "My deepest hope is that leaded aviation fuel is phased out of every general aviation airport in the U.S."

Santa Clara County replaced the typical leaded avgas, 100 Low Lead or 100LL, in January 2022 with Swift UL94, a 94-octane unleaded avgas. UL94 is FAA-certified for use in approximately 68 percent of the piston-powered aircraft of the type that use Reid-Hillview and San Martin airports. G100UL provides an alternative to 100LL for the general aviation fleets that could not utilize UL94, including high-performance aircraft.

"With the availability of this unleaded aviation fuel, there's clearly no reason to continue using a product that is the single greatest source of airborne lead pollution," said County Executive James R. Williams. "We know that there's no safe level of lead exposure, and we know that neighborhoods surrounding airports are usually low-income with large minority populations. Removing this health risk is a matter of environmental justice, and we hope to see other airports across the nation embrace this new alternative."

GAMI is offering an incentive for Bay Area pilots to purchase the required Supplemental Type Certificate (STC) by November 1, 2024. More information can be found at <https://airports.santaclaracounty.gov/g100ul-roll-out-incentive-program>.

The new fuel was delivered to Reid-Hillview Airport on Monday, and full-service truck-to-airplane fueling began on Wednesday. With the addition of G100UL, the County now offers aircraft operators two choices in unleaded avgas: G100UL and UL94.

“Offering G100UL to our airport users has been years in the making,” said Eric Peterson, Director of County Airports. “This fueling alternative positions RHV as the first airport in the nation to offer unleaded aviation fuel for the entire general aviation community and we are pretty excited about that.”

The price for full-service fuel delivery is \$6.99 per gallon. Reid-Hillview fueling hours are seven days a week from 9 a.m. to 5 p.m.

###

**MEDIA CONTACTS:** María Leticia Gómez / Eric Kurhi, Office of Communications and Public Affairs, 408-299-5119, [sccpublicaffairs@ceo.sccgov.org](mailto:sccpublicaffairs@ceo.sccgov.org)

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## **ATTACHMENT 2**

FAA Overview of Complainant-Initiated Proceedings



# Federal Aviation Administration

- [14 CFR Part 16 Rules & Administrative Decisions \(/Index.aspx?menuSel=InavMain\)](#)
  - [Rules & Timetables \(/Index.aspx?page=RulesAndTimetables&menuSel=InavRAT\)](#)
    - [Complainant-Initiated Proceedings \(/Index.aspx?page=ComplainantInitiated&menuSel=InavRATCI\)](#)
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  - [Delegation of Authority \(/Index.aspx?page=Delegation&menuSel=InavDA\)](#)
  - [Publications \(/Index.aspx?page=Publications&menuSel=InavPub\)](#)
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- [Complaints about Airport Compliance \(http://www.faa.gov/airports/airport\\_compliance/complaints/\)](http://www.faa.gov/airports/airport_compliance/complaints/)
- [Govinfo - Part16 \(https://www.govinfo.gov/app/details/CFR-2014-title14-vol1/CFR-2014-title14-vol1-part16?menuSel=InavGovInfo\)](https://www.govinfo.gov/app/details/CFR-2014-title14-vol1/CFR-2014-title14-vol1-part16?menuSel=InavGovInfo)
- [ACRP WebResources \(https://crp.trb.org/acrp/rd21?menuSel=InavACRPWR\)](https://crp.trb.org/acrp/rd21?menuSel=InavACRPWR)
- [AOPA Compliance Guide \(http://aopa.org/-/media/files/aopa/home/news/all-news/2012/june/airport-land-swap-talks-to-include-ga/120112asn-faa-airport-compliance.pdf?la=en&hash=ABCD4EA81FC4D72886525D9CDF57CA676BBCA381\)](http://aopa.org/-/media/files/aopa/home/news/all-news/2012/june/airport-land-swap-talks-to-include-ga/120112asn-faa-airport-compliance.pdf?la=en&hash=ABCD4EA81FC4D72886525D9CDF57CA676BBCA381)

## 14 CFR PART 16 -- RULES AND ADMINISTRATIVE DECISIONS

The following is a brief overview of the procedural timeframes for the FAA's Part 16 administrative complaint process. This is **NOT** intended to be used in place of the official Rules of Practice for Federally-Assisted Airport Enforcement Proceedings, 14 CFR Part 16.

### Complainant-Initiated Proceedings Timelines - Time Period in Days<sup>1</sup>

#### I. Timeline for Director's Determination

<b>Complaint<sup>2</sup></b>	<b>Answer</b>	<b>Reply</b>	<b>Rebuttal</b>	<b>Director's Determination<sup>3</sup></b>
20	10	10	10	120

## II. Timeline for Final Agency Decision

### Without a hearing:

#### Appeal to ARP- Reply Final Decision by ARP-

<b>1</b>		<b>1<sup>4</sup></b>
30	20	60

### With a hearing:

<b>Request for Hearing<sup>5</sup></b>	<b>Hearing Notice Order</b>	<b>Hearing Officer Initial Decision<sup>6</sup></b>	<b>Appeal to ARP-1</b>	<b>Reply Final Decision by ARP-1<sup>7</sup></b>
20	10	110	15	10 30

### Notes:

- Time periods may be increased by the 3 day "mail rule," §16.17(c).
- Served by complainant on all parties and FAA, and docketed by FAA, §16.23(b) and (c). or FAA dismissal with prejudice under §16.25, or dismissal without prejudice under §16.27.
- 120 days after the date that the last pleading was due, §16.31(a).
- 60 days after the due date of the reply, §16.33(d).
- 20 days after the Director's determination, §16.109(c)(1).
- 110 days after the Director's determination, §16.241(a).
- 30 days from the due date of the reply, §16.241(c).

**Page Last Modified: 05/18/2022**

**v 1.0.12**

# **ATTACHMENT 3**

September 1, 2022

FAA Letter to Santa Monica





U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Office of Airport Compliance  
and Management Analysis

800 Independence Ave., SW.  
Washington, DC 20591

September 1, 2022

Mr. Stelios Makrides  
Chief Operations Officer/Airport Director  
Department of Public Works, Airport Division  
3223 Donald Douglas Loop South  
Santa Monica, CA 90405-3213

Dear Mr. Makrides:

We received your letter of February 14, 2022, to the FAA's Los Angeles District Office advising that the City of Santa Monica (City) intends to convert its city-owned and operated self-service fuel station at the Santa Monica Municipal Airport (SMO) from 100 Low Lead fuel (100LL) to Swift UL 94 on or before April 1, 2022.

Your letter confirms that the FBO tenant will continue to offer 100LL and asks FAA to consider the change to be a "demonstration project" under Section VII of the Settlement Agreement and Consent Decree between the City and the FAA (Settlement Agreement, February 1, 2017).

As a preliminary matter, such a change to the self-service fuel station is not a "demonstration project" as discussed in the Settlement Agreement. Any demonstration project proposal would need to be provided to the FAA for thorough review and concurrence before implementation.

Beyond that, we have been made aware of the Airport Commission's June 27, 2022, Motion to the Santa Monica City Council recommending that the city stop and prevent the sale or storage of leaded fuel in all City-owned equipment.

An outright ban or restriction on the sale or use of 100LL would be contrary to both the Settlement Agreement and Grant Assurance 22, *Economic Non-Discrimination* (49 U.S.C. § 47107(a)(1)). Section VII "Unleaded Fuel" of the Settlement Agreement provides: "Nothing in this Agreement shall allow the city to restrict the sale of leaded aviation fuel for as long as the FAA authorizes use of such fuels within the United States."

Aside from the Settlement Agreement, a ban or restriction on the sale or use of 100LL at a federally obligated airport is also inconsistent with Grant Assurance 22, *Economic Non-Discrimination* (49 U.S.C. § 47107(a)(1)) and conflicts with the self-service provision

therein. Any restriction on the sale or dispensing of any type of fuel, when there is demand/need or a fuel provider willing to provide the fuel, must be approved in advance by the FAA. Any such proposed restriction must be supported by a valid, FAA-approved justification. Such a justification cannot be unreasonable or unjustly discriminatory.

At this time, converting the City owned and operated self-service fuel station to a self-service UL 94 tank, when the ability to self-service aircraft with 100LL is not restricted and 100LL continues to be offered by one or more FBOs, does not create a violation of Grant Assurance 22. Any future restriction on 100LL self-service or action preventing an FBO from providing 100LL would violate both the Settlement Agreement and Grant Assurance 22.

Nonetheless, the fuel tank conversion is a major change for your tenants, from whom we have received letters and emails of concern. Accordingly, we encourage you to work closely with them to implement this change in a pro-active, fair, and reasonable manner and to do so by taking the appropriate safety marking and notification steps concerning aircraft certification fuel requirements.

The FAA continues to be committed to transitioning to unleaded fuel, which is why it recently created the Eliminate Aviation Gasoline Lead Emissions (EAGLE) initiative achieve this result by 2030 year-end. We are grateful for your support of this objective.

Sincerely,

**KEVIN WILLIS**  
Digitally signed by KEVIN  
WILLIS  
Date: 2022.09.01 13:39:56  
-04'00'

Kevin C. Willis  
Director, Office of Airport Compliance  
and Management Analysis

# **ATTACHMENT 4**

May 18, 2023

FAA Letter to Superior



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Office of the Associate Administrator  
for Airports

800 Independence Ave, SW.  
Washington, DC 20591

May 18, 2023

The Honorable Mark Lacis  
Mayor  
124 East Coal Creek Drive  
Superior, CO 80027

Dear Mayor Lacis:

Thank you for your April 18 letter to Acting Administrator Nolen and the Jefferson County Commissioners requesting that Rocky Mountain Metropolitan Airport (BJC) make unleaded aviation gasoline (“avgas”) available and phase out leaded avgas from BJC as expeditiously as possible.

Jefferson County is the owner and operator of BJC, which opened in 1960. BJC is currently classified as a national general aviation (GA) airport and holds a Part 139 operating certificate. Since 1982, BJC has received over \$99.9 million from the Federal Aviation Administration’s (FAA) Airport Improvement Program for airport development projects and land acquisition. With the acceptance of these funds, Jefferson County, as the airport sponsor, has agreed to specific Federal obligations known as grant assurances.

As the airport sponsor, Jefferson County is ultimately responsible for the operation of BJC. As such, they are the decision makers that control when unleaded avgas will be available at BJC. Currently, the FAA cannot dictate the timing or availability of unleaded avgas at airports. However, a ban or restriction on the sale or use of 100LL (Avgas) at a federally obligated airport is inconsistent with Grant Assurance 22, Economic Nondiscrimination (49 United States Code Section 47107(a)(1)).


The FAA, together with government and industry stakeholders, have formed a coalition known as the EAGLE initiative (Eliminate Aviation Gasoline Lead Emissions). EAGLE’s goal is to eliminate the use of leaded aviation fuels for piston-engine aircraft in the United States by the end of 2030 without impacting the safe and efficient operation of the existing GA fleet. Airport owners/operators, service providers, and users can implement certain mitigation measures today while the aviation industry safely transitions away from leaded fuel. These mitigations may include offering additional fuel types to help facilitate transition, promoting airport and pilot awareness, minimizing engine idle time and run-up time, and increasing distance between pre-flight/maintenance run-up locations and people on/off airport by relocating run-up locations or distributing run-ups to multiple locations.

The FAA's Denver Airports District Office has been involved in discussions with BJC regarding leaded fuel and will continue to actively engage in this conversation as the aviation industry safely transitions to unleaded fuel.

If you or your staff need further assistance, please contact Lauren R. Dudley, Assistant Administrator for Government and Industry Affairs, at (202) 267-3277.

Sincerely,

SHANNETTA R  
GRIFFIN

 Digitally signed by SHANNETTA R  
GRIFFIN  
Date: 2023.05.18 09:08:09 -04'00'

Shannetta R. Griffin, P.E.  
Associate Administrator  
for Airports

# **ATTACHMENT 5**

November 22, 2024

Third Affidavit of Michael Luvara

UNITED STATES DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION  
WASHINGTON, DC

AIRCRAFT OWNERS AND PILOTS \*  
ASSOCIATION, *et al*, \*

Complainants, \*  
v. \*

COUNTY OF SANTA CLARA, \* FAA Docket No. 16-22-08  
CALIFORNIA \*

Respondent.

\* \* \* \* \*

**THIRD AFFIDAVIT OF MICHAEL S. LUVARA**

I, Michael S. Luvara, being over 18 years of age and otherwise fully competent to testify state that:

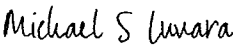
1. I have personal knowledge of the facts stated herein.
2. I make this affidavit in support of the Part 16 complaint against the County of Santa Clara relating to violations of Grant Assurances at Reid-Hillview Airport (KRHV).
3. I am a member of the Aircraft Owners and Pilots Association.
4. I am an owner of N1824, a Cessna 182 (the "aircraft"), operating from its home base at KRHV.
5. I operate the aircraft for personal and business use.
6. The aircraft is powered by a P. Ponk Aviation O-470-50 Engine installed under Supplemental Type Certificate ("STC") SE4988NM and SA5664M. Per the STC, the aircraft is required to utilize 100/130 Minimum Grade Aviation Gasoline.
7. The aircraft is unable to safely and legally use 94UL. The aircraft is not covered by any STC for use of 94UL, as would be required for safe and legal operation.
8. The FAA Approved Model List No. SA01967WI for STC SA01967WI issued to General Aviation Modifications, Inc. states that "When there are multiple engines listed in the TCDS for the same make/model of aircraft, verify that the engine installed in your aircraft is also listed in the correspond [sic] G100UL Avgas Engine AML." See

Attachment 3 to Complainants' Reply to Respondent County of Santa Clara's Answer, Statement of Facts, and Affirmative Defenses, FAA Docket No. 16-22-08.

9. The P. Ponk Aviation O-470-50 Engine is not listed on the FAA Approved Model List No. SE01966WI for STC SE01966WI issued to General Aviation Modifications, Inc. and the Cessna 182 with the P. Ponk Aviation O-470-50 Engine is not listed on the FAA Approved Model List No. SA01967WI for STC SA01967WI issued to General Aviation Modifications, Inc. *See* Attachment 3 to Complainants' Reply to Respondent County of Santa Clara's Answer, Statement of Facts, and Affirmative Defenses, FAA Docket No. 16-22-08.

**I AFFIRM** under penalty of perjury that the foregoing is true and correct to the best of my personal knowledge.

Executed this 22nd day of November, 2024.

Signed by:  
  
D5124GAAF954441  
Michael S. Luvara



# **ATTACHMENT 6**

June 18, 2024

Cirrus Service Advisory 24-14



# SR2X Service Advisory

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**Number:** SA24-14  
**Issued:** 18 Jun 2024

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**SUBJECT:** Transition to Unleaded Fuel and Use of Non-Cirrus Approved Fuel in SR Series Aircraft

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Cirrus is dedicated to proactively addressing the evolving landscape of sustainability regulations, particularly the shift away from leaded aviation fuels. We continue to actively support industry efforts to develop, evaluate, and advance new fuels while supporting a safe industry transition to a future unleaded fuel environment.

These efforts include working directly with industry associations and all stakeholders including AOPA, GAMA, the FAA, and the FAA-Industry EAGLE program through the PAFI certification program. As of June 2024, EAGLE is actively pursuing three potentially viable alternatives/replacements for 100LL: GAMI G100UL, LyondellBasell/VP Racing UL100E, and Swift 100R. Cirrus is dedicated to supporting all major fuel companies in their pursuit to bring alternative high-octane fuels to market.

**As part of our proactive participation in the unleaded fuel initiative, Cirrus has been collaborating with potential fuel producers conducting materials compatibility and on-aircraft fuel performance testing for over a decade.**

Cirrus is engaged in a comprehensive testing and evaluation program of the GAMI G100UL fuel. Working in coordination with GAMI, our key powerplant partners (Continental and Lycoming), and the FAA during this process, the goal is to ensure operational safety of both the powerplant and airframe fuel systems.

**While some aspects of the initial Cirrus testing of the GAMI G100UL fuel are encouraging, other areas, including materials compatibility, remain inconclusive. At this time, Cirrus does not approve the use of GAMI G100UL fuel in Cirrus SR Series airplanes.** Additionally, Cirrus currently does not warrant or represent in any way an operator's use of the GAMI G100UL fuel in SR Series airplanes.

Per Continental and Lycoming, only approved fuels may be used for an engine to be covered by warranty. **As the GAMI G100UL fuel is a non-approved fuel per Continental and Lycoming, engines known to have run this fuel may not be covered by the current OEM engine warranty.** For specific details, please refer to the respective Continental and Lycoming engine warranty documents.

Shell recently announced that 100VLL will be shipping to airports in Europe beginning in April 2024. Cirrus confirms this fuel can be used in all Cirrus SR Series airplanes as it complies with the ASTM D910 standard specification for leaded aviation gasoline. Please refer to FAA SAIB NE-11-55 "Grade 100VLL Aviation Gasoline," for additional details.

The continued safe operation of all Cirrus aircraft around the world remains our top priority. As progress continues, we will provide updates as soon as they are available. We look forward to ensuring a safe and smooth transition to unleaded fuel for all Cirrus SR Series owners.

# **ATTACHMENT 7**

November 7, 2024

San Carlos Flight Center Adopts Unleaded Swift 100R

## ENVIRONMENT

# San Carlos Flight Center Adopts Unleaded Swift 100R

High-octane unleaded avgas is becoming more available in California



*Rabbit Aviation is delivering Swift Fuels' high-octane unleaded 100R gas to San Carlos Flight Center Cessna 172s.*

By **MATT THURBER** • Editor-in-Chief

November 7, 2024

San Carlos Flight Center (SCFC) has switched its Cessna 172 fleet to Swift Fuels' 100R unleaded 100-octane aviation gas. While 100R isn't yet available for retail purchase at California's San Carlos Airport, SCFC arranged with Swift Fuels to purchase the 100R for its airplanes, which have been running exclusively on Swift's unleaded UL94 fuel since 2021.

The new 100R fuel received an FAA supplemental type certificate (STC) on September 6 for Cessna 172R and S models equipped with Lycoming IO-360-L2A engines. Swift is planning to obtain STCs to cover many more aircraft and engines and also to meet ASTM International standards.



Certain Lycoming engines in Cessna 172R and S models are approved for the new Swift Fuels high-octane unleaded 100R aviation gas.

SCFC owner Alessandro Franco praised San Carlos fuel provider Rabbit Aviation Services CEO Dan DeMeo and airport manager Gretchen Kelly “for their invaluable collaboration during this transition.”

“We are thrilled to adopt 100R fuel for our fleet,” he said. “Not only does it align with our commitment to sustainability, but it also enhances aircraft performance and extends engine life—benefits that directly impact our pilots and maintenance team.”

Rabbit Aviation offers conventional leaded 100LL and Swift UL94 for retail customers and plans to transition to 100R when it becomes more available and more aircraft obtain the STCs. “This is a demonstration process,” said DeMeo. “Early next year, we will start sunsetting UL94 and converting to 100R.”

Price of the 94UL and 100R fuel is slightly more than 100LL, according to Franco, but the maintenance benefits somewhat offset the increased fuel expense. Not only is SCFC experiencing less spark plug fouling but oil analysis results show less wear metal. “We’ve been very happy with [the unleaded fuel],” he told AIN.



San Carlos Flight Center Cessna 172 refueling with Swift 100R.



New stickers show that Swift 100R is approved for this airplane.

“We’re very aware and conscious of our impact, be it from an emissions standpoint or noise standpoint,” Franco said, “and we’re very happy with this product from an operations perspective and the community and sustainability and keeping general aviation in good graces with our neighbors. That’s been a huge talking point, and that’s why we were ready to jump in. It’s definitely time to move forward.”

# **ATTACHMENT 8**

November 5, 2024

Aviation Week: California Airport Offers GAMI's Unleaded Gas



This article is published in *Aviation Week & Space Technology* and is free to read until Dec 08, 2024. If you want to read more articles from this publication, please click the [link](#) to subscribe.

## California Airport Offers GAMI's Unleaded Avgas

Bill Carey November 05, 2024



Reid-Hillview Airport started offering G100UL unleaded avgas by refueling truck on Oct. 30.

Credit: Santa Clara County

The California airport that unilaterally banned the sale of leaded aviation fuel in 2022 has become the first U.S. airport to offer a 100-octane unleaded alternative.

Reid-Hillview Airport (RHV) in San Jose started pumping GAMI G100UL unleaded avgas via fuel truck on Oct. 30. The Santa Clara County-owned airport stopped selling 100 Low Lead (100LL) avgas nearly three years ago after a study revealed elevated blood-lead levels in children living in nearby neighborhoods.

“This is a victory for the children and families on the East Side who have been historically marginalized and whose voices and legitimate health concerns have been disregarded for too long,” said Santa Clara County Supervisor Cindy Chavez, whose district includes the neighborhood where RHV is located.

“My deepest hope is that leaded aviation fuel is phased out of every general aviation airport in the U.S.”

## EAGLE Initiative



Santa Clara County stopped 100LL sales at RHV in 2022. Credit: Bill Carey

The county's action to ban 100LL in contravention of FAA grant assurances led to the formation of the industry-government Eliminate Aviation Gasoline Lead Emissions (EAGLE) initiative, which has a stated goal of moving the U.S. piston-engine aircraft fleet to unleaded avgas by 2030 or sooner. FAA reauthorization legislation signed into law earlier this year allows Alaska until 2032 to supply 100-octane leaded fuel, which is required by aircraft with high-compression engines.

Developed by General Aviation Modifications Inc. (GAMI), a small engineering company in Ada, Oklahoma, G100UL received supplemental type certification (STC) from the FAA in September 2022 for use in all spark-ignition piston aircraft engines. But its adoption by the general aviation industry has lagged due to the fuel's lack of an ASTM product specification and questions over its compatibility with materials in the fuel distribution network.

GAMI announced at the Sun 'n Fun Aerospace Expo in April that jet-fuel supplier Vitol Aviation had produced 1 million gal. of G100UL that was stored in Baton Rouge, Louisiana, and available for sale. Santa Clara County provided a photo of a fuel tanker truck from Texas-based Lessley And Sons making the first delivery to RHV, which received a 7,500-gal. quantity on Oct. 28.

## Price Differential



Aerial view of Reid-Hillview Airport, which lies within the Santa Clara Valley. Credit: Bill Carey

G100UL was made available by refueler truck for \$6.99 per gallon at RHV, about 25-to-30 cents per gallon more than full-service avgas sold at nearby airports, according to the Aircraft Owners and Pilots Association. Aircraft owners must purchase an STC for their engine and airframe to use the new fuel.

RHV now offers G100UL and lower-octane Swift UL94 unleaded avgas for sale to pilots.

“GAMI’s partnership with Reid-Hillview Airport represents another step in the transition to an unleaded future for general aviation by offering an opportunity to demonstrate the performance and reliability of G100UL,” said National Air Transportation Association (NATA) President and CEO Curt Castagna, who serves as the EAGLE initiative co-chair.

“NATA looks forward to continued collaboration with our EAGLE partners to safely deploy unleaded fuels that meet the needs and standards of the entire general aviation industry,” Castagna added.

NATA, which represents fixed-base operators that sell avgas, offers training for aircraft refuelers to address risks of misfuelling associated with the introduction of an additional grade of fuel at airports. “It is critical that anyone who handles or uses emerging fuels reviews these resources, as well as any specific STC or OEM requirements,” the association said.

In September, [the FAA approved the use of Swift’s 100R unleaded fuel by STC](#) in Cessna 172 Skyhawks powered by Lycoming IO-360-L2A piston engines. Developer Swift Fuels has said that it plans to expand the approved model list of piston aircraft and engines that can burn the new 100-octane unleaded fuel, for which it is also pursuing an ASTM product specification.

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# **ATTACHMENT 9**

October 31, 2024

Aviation News: Lycoming Clarifies G100UL Warranty Impact



Home / Aviation News

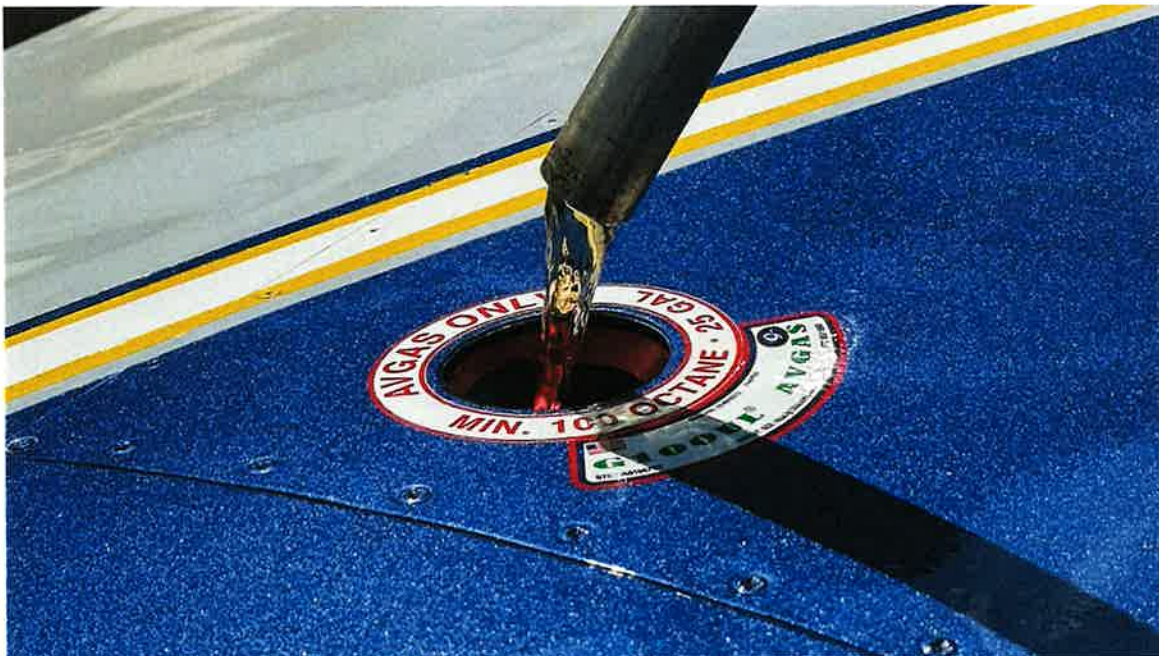
AVIATION NEWS

# Lycoming Clarifies G100UL Warranty Impact

The world's largest piston aircraft engine manufacturer has confirmed it may not honor warranty claims on engines that have been run on GAMI G100UL unleaded fuel. In a statement to...



**RUSS NILES** Updated Jun 26, 2024 5:41 AM EDT



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The world's largest piston aircraft engine manufacturer has confirmed it may not honor warranty claims on engines that have been run on GAMI G100UL unleaded fuel. In a statement to *AVweb*, Lycoming said that G100UL is not on its list of approved fuels and while warranty claims are assessed individually, the warranty "does not cover damage caused by operation outside of Lycoming's published specifications or the use of non-approved fuels or lubricants."

The full statement is copied below. The company did not say what is required to make that list but it includes leaded and unleaded aviation fuels and some unleaded automotive fuels. Its highest performance engines are generally restricted to 100LL in North America.

Lycoming was responding to a [legal opinion](#) offered by an *AVweb* reader who is a lawyer and high-performance single owner who disputes that claim. He said that since G100UL is approved by the FAA through an STC, engine manufacturers can't reject warranty claims based on use of the fuel. Lycoming's full unedited statement follows.

*WILLIAMSPORT, PA – Lycoming Engines provides a Limited Warranty against defects in material or workmanship. Lycoming's Limited Warranty does not cover damage caused by operation outside of Lycoming's published specifications or the use of non-approved fuels or lubricants.*

*Lycoming publishes specifications for approved fuels in Service Instruction 1070. G100UL is not listed as an approved fuel in Service Instruction 1070.*

*Lycoming evaluates warranty claims on a case-by-case bases in accordance with the terms of its Limited Warranty. However, customers should be aware that use*

*of fuels not approved in Service Instruction 1070 would constitute operation outside of Lycoming's published specifications.*

SHARE THIS STORY 



**Russ Niles**

EDITOR

Russ Niles is Editor-in-Chief of AVweb. He has been a pilot for 30 years and joined AVweb 22 years ago. He and his wife Marni live in southern British Columbia where they also operate a small winery.



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## **ATTACHMENT 10**

Santa Clara County Press Release:

Sale of Leaded Aviation Fuel Ends at Reid-Hillview and San  
Martin Airports





County News Center | Office of Communications and Public Affairs

SOCIAL JUSTICE

# Sale of Leaded Aviation Fuel Ends at Reid-Hillview and San Martin Airports

Following a peer-reviewed Study that found elevated levels of lead attributable to aircraft activity at Reid-Hillview Airport in children living nearby, the Board of Supervisors voted unanimously to halt the sale of leaded aviation gas at County airports

March 21, 2023



THE COUNTY OF SANTA CLARA, CALIF.— Leaded aviation fuel is no longer available for purchase at Reid-Hillview Airport in East San José and San Martin Airport, and only unleaded fuel will be sold at both airfields. The County Board of Supervisors voted to stop leaded fuel sales in August, following the release of a peer-reviewed study that statistically linked ongoing use of leaded aviation gas with elevated lead exposure for the 13,000 children living near Reid-Hillview Airport

The adverse health effects of lead – particularly in children – are well-known, significant and concerning. The County-commissioned Study found that if leaded emissions (and the related

adverse impact on IQ and cognition) ended, children living near the Airport would realize a gain of \$11 million to \$25 million in lifetime earnings.

“The County made a commitment to end leaded fuel sales at our airports on January 1, and that has been done,” said County Executive Jeffrey V. Smith, M.D., J.D. “We are committed to the health of Santa Clara County residents and that includes taking the necessary steps to protect the communities around County airports from continued aviation lead exposure.”

The move makes the Reid-Hillview and San Martin facilities likely the first airports in the nation to stop carrying 100 octane leaded avgas – commonly known as 100 low lead (100LL) – used by many piston-powered airplanes. Pollution from such aircraft collectively amount to the single largest source of airborne lead emissions in the nation, representing 70 percent of lead released into the environment.

The County-commissioned study on lead exposure risks for children found that leaded aviation fuel contributed to significantly increased blood lead levels for those within a half-mile of the facility. For context, the lead levels during peak hours were double the levels seen during the height of the Flint Water Crisis in Michigan.

Health organizations agree that there is no known safe level of lead in a child’s blood, and exposure to even a small amount of lead has a negative effect on cognitive ability, particularly in developing children who absorb lead more efficiently than older children and adults.

The August vote by County supervisors aimed to immediately take all available actions to prevent continued lead exposure from Reid-Hillview. A petition was also submitted by the County and a nationwide coalition of community groups to the U.S. Environmental Protection Agency (EPA), urging it to take action to eliminate lead pollution from aircraft throughout the United States.

“Children living near these smaller airports, all over the nation, are unconscionably being harmed by leaded fuel,” said Supervisor Cindy Chavez, who represents the area where Reid-Hillview is located. “The County of Santa Clara is doing everything in its power to eliminate this health and equity crisis here at home, as we press for a change at the federal level.”

Nationwide, more than 360,000 children aged 5 or younger live near an airport where piston-engine aircraft operate. Multiple studies have shown that children who live near airports have higher levels of lead in their blood.

“We are thrilled to be a vanguard for the move to unleaded aviation fuel,” said County Board of Supervisors President Mike Wasserman, whose supervisorial district includes San Martin Airport. “The future of general aviation airports will not be tainted by toxic lead fumes, and we look forward to seeing more and more airfields across the nation make the switch to unleaded aviation gas.”

Unleaded aviation fuel has been championed by pilots to address community concerns about atmospheric lead emissions. However, the prohibition of leaded fuel for sale at County facilities does not prevent aircraft that have filled up elsewhere with leaded gasoline from flying into Reid-Hillview and San Martin.

Four airfield operators that provide services to pilots at Reid-Hillview have entered into contracts with the County – effective January 1, 2022 – that restrict fuel sales to unleaded only. A limited amount of leaded fuel that remains in one of the fuel tanks at Reid-Hillview will be used by the flight school aircraft until it is depleted later this month, and it will not be replenished.

The County issued a Notice to Air Missions (NOTAM) in December to ensure pilots nationwide are notified of the change in fuel availability at Reid-Hillview and San Martin Airports. The notification is provided to pilots during their pre-flight planning and will remain in the FAA NOTAM system for the next year.

To use the unleaded fuel, an aircraft must be certified that it can do so safely and will be outfitted with a decal indicating this status. Aircraft that cannot use unleaded gas will need to obtain aviation fuel from other facilities.

The unleaded fuel available at Reid-Hillview and San Martin is 94 octane and is FAA-certified as safe for use in approximately 68% of the piston-powered aircraft of the type that use the Reid-Hillview and San Martin airports. Larger jet aircraft, such as those operating out of Mineta San José International Airport, use a Kerosene-based fuel that does not contain lead.

# **ATTACHMENT 11**

January 10, 2022

General Aviation News: 100LL Sales End at Reid-Hillview and  
San Martin Airports in California



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## 100LL sales end at Reid-Hillview and San Martin airports in California

By General Aviation News Staff · January 10, 2022 ·

SANTA CLARA COUNTY, California — Leaded aviation fuel is no longer available at Reid-Hillview Airport in East San José and San Martin Airport.

A Jan. 6, 2022, press release from the county noted that only unleaded fuel will be sold at the airfields.

The [County Board of Supervisors](#) voted to stop leaded fuel sales in August, following the release of a study that linked ongoing use of leaded aviation gas with elevated lead exposure for the 13,000 children living near Reid-Hillview Airport, the press release noted.

“The county-commissioned study found that if leaded emissions (and the related adverse impact on IQ and cognition) ended, children living near the airport would realize a gain of \$11 million to \$25 million in lifetime earnings,” country officials said in the press release.

The move makes Reid-Hillview and San Martin likely the first airports in the nation to stop carrying 100LL, county officials added.

“We are thrilled to be a vanguard for the move to unleaded aviation fuel,” said County Board of Supervisors President Mike Wasserman. “The future of general aviation airports will not be tainted by toxic lead fumes, and we look forward to seeing more and more airfields across the nation make the switch to unleaded aviation gas.”

County officials add that while 100LL fuel sales have been banned at the two airports, pilots who are still flying with leaded fuel can continue to fly into the airports.

Four airfield operators that provide services to pilots at Reid-Hillview have entered into contracts with the county that restrict fuel sales to unleaded only. A limited amount of leaded fuel that remains in one of the fuel tanks at Reid-Hillview will be used by flight school aircraft until it is depleted later this month, and it will not be replenished, county officials said.

The county issued a Notice to Air Missions (NOTAM) in December to ensure pilots nationwide are notified of the change in fuel availability at Reid-Hillview and San Martin Airports. The notification will remain in the FAA NOTAM system for the next year.

The unleaded fuel available at Reid-Hillview and San Martin is 94 octane and is FAA-certified as safe for use in approximately 68% of the piston-powered aircraft that use

the Reid-Hillview and San Martin airports, county officials added.



In late December 2021, the FAA advised the county that it has begun an [investigation](#) into the ban of 100LL, as well as other “ongoing safety issues” at the airports.

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## Comments