



## AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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November 28, 2007

Ms. Katy Coba, Director  
Oregon Department of Agriculture  
635 Capitol St. NE  
Salem, Oregon 97301-2532

Fax: 503-986-4747

Dear Ms. Coba:

The Aircraft Owners and Pilots Association (AOPA) represents the general aviation interests of more than 414,000 pilots nationwide –including 6,844 in Oregon – and I am writing to express our concerns about recent Oregon law which requires the Department of Agriculture to promulgate rules that mandates all gasoline sold or offered for sale in Oregon include at least 10% ethanol.

As the Department considers how to implement regulations from HB2210, specifically Section 18, I hope you take into consideration the needs of the aviation community. It is important to note that most general aviation aircraft are not able to burn fuel that is blended with ethanol. Studies done by the Federal Aviation Administration (FAA) and other entities have shown that blending ethanol can cause incompatibility with aircraft fuels systems including electric fuel pumps, inaccurate indications on fuel gauges, and the attraction of moisture into the fuel system –leading to possible engine failure with disastrous results.

- Some aircraft receive a supplemental type certification to burn automobile gasoline. Requiring a certain percentage of ethanol, or any alternative fuel, to be added to auto gas would cause serious problems for these specific aircraft. Most airports only supply jet fuel and Avgas –aircraft owners who use regular auto gas usually purchase it at a regular gasoline station. Out of the 97 public-use airports in Oregon, we know of only one that supplies auto fuel. Due to this, we recommend that your regulations provide some exemption for premium-grade gasoline with an antiknock index number of 91 or greater from all blending requirements. This will protect the supply of automotive gasoline for aviation and other users that require non-blended fuels.
- For the most part, general aviation aircraft use avgas, and while the legislation does not apply to fuels in this category, we encourage you to make a specific exemption for this as well in your regulations.

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I appreciate your support for general aviation as well as for promoting a cleaner environment, and respectfully hope that you will give these concerns your careful and favorable consideration. Should you have any questions or require additional information, please do not hesitate to contact me, or our Northwest Regional Representative, Mike Ferguson, who can be reached at 406-266-3912.

Sincerely,



Gregory Pecoraro  
Vice President  
Regional Affairs

cc: Daniel E. Clem, Director, Oregon Department of Aviation  
Mike Ferguson, AOPA Northwest Regional Representative