

United States Senate

WASHINGTON, DC 20510

September 19, 2011

The Honorable Lisa Jackson
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

The Honorable J. Randolph Babbitt
Administrator
Federal Aviation Administration
800 Independence Avenue, S.W.
Washington, DC 20591

Dear Administrators Jackson and Babbitt:

We write to encourage the Environmental Protection Agency (EPA) and the Federal Aviation Administration (FAA) to work closely together with representatives from the aviation sector in any efforts to transition from leaded avgas used by General Aviation (GA) aircraft to an unleaded alternative. While we understand and share your desire to remove lead from avgas, especially in light of potential litigation, we also need to ensure the EPA does not ban lead used in avgas until we have a safe, viable, readily available, and cost-efficient alternative.

Currently, leaded avgas is used to fuel approximately 150,000 piston-engine aircraft in the United States. As you know, lead boosts the octane of the fuel used in these aircraft, protecting the engines against early detonation and preventing engine failure in flight. Despite ongoing research and testing, there currently is no safe or affordable alternative to leaded avgas to meet the needs of the GA aircraft fleet and FAA standards that ensure their flight safety.

Without avgas, most existing GA aircraft engines will have to be de-rated from their currently-certified power levels in order to maintain the FAA-required detonation margins at an incredible cost to aircraft owners, operators, and the consumers who rely on their service. Arbitrarily imposed changes would also result in a significant loss of power that will reduce the performance and cargo capacity of many existing GA aircraft, severely limiting their usefulness. These changes also pose a significant flight safety concern as a reduction in power results in reduced aircraft performance leading to longer takeoff distances and lower aircraft climb rates.

As you may be aware, GA contributes over \$150 billion annually to the national economy and supports approximately 1.2 million American jobs. However, GA is more than just revenue and jobs. GA serves medical providers, law enforcement, small businesses, and agricultural producers. Agricultural pilots treat more than 75 million acres of cropland each year. In addition, GA aircraft provide service to all of the 19,600 public and private

landing facilities in the United States. In our most rural communities GA aircraft are the only means of reliable, year-round transportation available. Therefore, the use of a new avgas that does not provide the same detonation protection as today's fuel would turn most single, twin-engine, and high-performance airplanes into non-airworthy aircraft drastically affecting the national economy.

The GA industry, including aircraft and engine manufacturers, fuel producers and developers, as well as groups representing pilots and aircraft owners, play a key role in the process for finding suitable unleaded replacements for avgas. Each brings a mix of technical knowledge, historical perspective and market understanding to the discussion that must be considered to ensure General Aviation remains viable well into the future.

For these reasons, we urge both the EPA and FAA to work closely together with representatives of the GA sector and the House and Senate GA Caucuses in finding an alternative to leaded avgas. Furthermore, we urge you to carefully consider these concerns before you move forward with any rulemaking that would stop the use of leaded avgas before the FAA has an opportunity to take appropriate measures needed to approve a new, safe, and affordable unleaded avgas that takes into account the safety of those aboard the affected aircraft.

Sincerely,

John D. ...

Paul ...

Mike ...

Joe ...

Michael B. ... Sayby ...

James M. Clarke

James M. Clarke

Pat Roberts

Jon Tester

Del Hower

Ray Blunt

Scott P. Brown

Lloyd Wickert

Richard B. Lugar

Dan Coats

Site

Jim DeMint

John Cornyn

Tim Wirth

Kay Bailey Hutchison

Clare Kim

Jacklyn

Wynne D.E.

My Bances

Jerry Moran

John Bances