

July XX, 2023

The Honorable Maria Cantwell
Chair, Senate Commerce, Science, and
Technology Committee
254 Russell Senate Office Building
Washington, DC, 20510

The Honorable Sam Graves
Chair, House Transportation and Infrastructure
Committee
2165 Rayburn House Office Building
Washington, DC, 20515

The Honorable Ted Cruz
Ranking Member, Senate Commerce, Science,
and Technology Committee
254 Russell Senate Office Building
Washington, DC, 20510

The Honorable Rick Larsen
Ranking Member, House Transportation and
Infrastructure Committee
2165 Rayburn House Office Building
Washington, DC, 20515

Dear Chairwoman Cantwell and Ranking Member Larsen,

The undersigned organizations and entities write to you today in opposition of Section 620 of the Senate Federal Aviation Administration (FAA) Reauthorization bill and Section 431 of the House FAA Reauthorization bill, which would hamper the long overdue transition towards lead-free aviation fuels. We ask that these provisions be struck from the FAA Reauthorization bill in support of communities nationwide who continue to be exposed to unsafe levels of lead due to leaded aviation gasoline..

Lead exposure from general aviation emissions is causing serious and irreversible harm to children across the nation. The U.S. Environmental Protection Agency (EPA) has recognized for decades that exposure to lead is a threat to human health,¹ which led EPA to ban the use of lead in motor vehicle fuel over 25 years ago. The adverse health of lead exposure are particularly pronounced in children and can lead to decreased cognition even at very low blood lead levels.² However, single piston aircraft are still allowed to rely on leaded aviation fuel. In fact, lead emissions from piston-engine aircrafts remain the largest unregulated source of lead emissions in this country and account for approximately 70 percent of our airborne lead emissions.³ Today, there are approximately 167,000 aircraft across the United States that rely on leaded avgas to fuel their engines. According to EPA, more than five million people, including more than 360,000 children aged five and under, live very close to an airport where these aircraft operate. Multiple studies have found elevated blood lead levels of children living near such

¹ See EPA, EPA-600/8-77-017, *Air Quality Criteria for Lead 1-6 to -7* (Dec. 1977) (“Air Quality Criteria”).

² Mark Dwortzan, *Unfriendly skies: Piston engine aircraft pose a significant health threat*, MIT News (August 26, 2016), <https://news.mit.edu/2016/unfriendly-skies-piston-engine-aircraft-pose-significant-health-threat-0826>

³ Transp. Rsch. Bd., Nat’l Acads. of Scis., Eng’g, & Med. et al., *Options for Reducing Lead Emissions from Piston-Engine Aircraft* 46 (2021), <https://www.nap.edu/read/26050/chapter/5>.

airports.⁴ People living near general aviation airports are also more likely to be people of color, low-income, and have lower levels of education.⁵

The EPA, FAA, and aviation industry agree that the piston engine fleet needs to transition away from leaded avgas. After more than a decade of delay, EPA put out a draft endangerment finding at the beginning of this year that proposes to find that lead emissions from aircraft engines operating on leaded fuel endanger public health and welfare. Once the EPA finalizes this finding, it will issue emission standards that will begin to phase out the use of leaded avgas. This is the first regulatory step for EPA to take in order for the agency to begin regulating lead emissions from aircraft engines operating on leaded avgas. New safer, unleaded aviation fuels are already available for most of the piston engine fleet, with additional fuels usable by the entire fleet anticipated to be approved by the FAA and commercially available before the end of 2023.

Section 620 of the Senate FAA Reauthorization bill and Section 431 of the House FAA Reauthorization threaten to reverse this momentum by further entrenching leaded avgas at our airports and making the transition to safer, unleaded aviation fuels harder. These provisions would require airports seeking to qualify for funding through the Airport Improvement Program – a program utilized by most public use airports – to continue selling any fuel that they provided on a date in the past; the House version specifies October 5, 2018, the Senate version specifies 2022. This means virtually all airports receiving federal capital improvement funds would be forced to continue providing leaded fuels. While there is a sunset provision in Section 620, Section 431's mandate continues indefinitely. Smaller airports that only have one fuel tank would not be able to transition to unleaded fuels at all. The language in these provisions would restrict both airport administrators' ability to transition to unleaded fuels and the EPA's and FAA's ability to safely transition the piston engine fleet away from leaded avgas.

Lead pollution from aircrafts continues to threaten the millions of people and future generations living near airports where leaded avgas is used. We urge your committees to remove Section 431 and Section 620 from the House and Senate FAA Reauthorization bill, respectively, and to work with us to safely accelerate the transition to unleaded fuel. Thank you for your consideration.

Sincerely,
[Organizations]

⁴ See Marie Lynn Miranda et al., *A Geospatial Analysis of the Effects of Aviation Gasoline on Childhood Blood Lead Levels*, 119 *Env't Health Persp.* 1513, 1516 (2011), <https://doi.org/10.1289/ehp.1003231> (

⁵ Adam Theising, *What Information Makes Airborne Lead Pollution Salient to Homeowners and Who Does It Cost? Evidence from US Airports 3* (July 2021) (unpublished paper), https://adamtheising.github.io/Papers/theising_avgas_7-21.pdf.

Also see the disparity analysis of the top 100 lead polluting airports: https://earthjustice.org/sites/default/files/files/top100leadpollutingairports_2021-08-23.pdf.