



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 non-compliance 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.



Honorable Pete Buttigieg
Billy Nolen, Acting Administrator
Page 2

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 life-saving 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 (Ill.)
Boeing Field Tenants Association
Brookhaven-Lincoln County Airport
Brookway Aviation



Honorable Pete Buttigieg
Billy Nolen, Acting Administrator
Page 3

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



Honorable Pete Buttigieg
Billy Nolen, Acting Administrator
Page 4

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)



Honorable Pete Buttigieg
Billy Nolen, Acting Administrator
Page 5

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.)