

December 13, 2023 Comments to the Port of Portland Commission

Madam President Cupril-Comas
Mr. Vice-President Alexander & Commissioners

In many cases, if a public elected official calls or writes to the Port about using unleaded aviation fuels at HIO, the official will receive a letter from the Port accompanied by a 2 page Frequently Asked Questions (FAQ) response to their inquiry.

The problem with this response is that the response is only half true and only presents one side of the picture.

For example, the form says that “operators need to obtain additional certification, a STC (Supplemental Type Certificate) before they can use it in their aircraft.” The Port does not mention that obtaining this certificate is not a difficult task and costs approximately \$200. In other words, the Port’s response is not complete making it look more difficult than it is in fact. The second assertion made is that the Port “can’t require that an operator use an unleaded fuel nor can we prohibit the sale of leaded fuel while it is FAA approved.” Meanwhile, what the actual language the FAA uses is as follows: “Any such proposed restriction must be supported by valid, FAA approved justification.” With the new EPA findings about the leaded avgas being a danger to public health, this should be easy to obtain.

Then at the end of the FAQ sheet, the Port says that unleaded fuels need “to be approved by the FAA”. When in fact two unleaded fuels have already been approved by the FAA and the aircraft and engine manufacturers.

The Port then concludes that it is a supply chain issue that “means commercializing production so it can be distributed at scale and at a reasonable cost.”

This is a chicken and the egg issue. If the Port doesn't request the fuel or even make contact with the supplier, then the supplier (GAMI) cannot develop the production or the supply chain to supply the fuel to HIO. If the Port doesn't contact GAMI and express an interest in the G100UL fuel, then it is difficult for GAMI to begin working out the supply chain to guarantee a supply for HIO.

In short, the Port should be more transparent and complete with their responses to the public and elected officials, and they should put their money where their mouth is. Therefore, when you hear from Mr. Peppinger later in this meeting, please be sure that his responses to you are complete, transparent, and supported by all the facts.