

May 23, 2022

Sent via email

Administrator Michael Regan
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460
Regan.Michael@epa.gov

Dear Administrator Regan,

In February of 2022 Gary Keller, Pediatrician - James Lubischer, MD, David Barnes and Miki Barnes initiated a two-pronged signature campaign in support of both an endangerment finding for leaded aviation gasoline (avgas) as well as a complete ban on avgas. We are now sending you the names of the organizations and individuals who signed the Letter of Support with a request that EPA expedite the elimination of leaded aviation fuel at the earliest possible opportunity. A copy of the original Letter of Support is included at the end of this document. Signatories include 16 organizations and 146 individuals.

The following signatures are organized by state and name (with zip code). If the organization or individual included a comment, it follows their name. Those who signed on behalf of organizations are listed first.

California – 9 organizations and 33 individuals

Organizations

Maria Reyes (95122) - *Cassell Neighborhood Association, Vice President*

"In August of 2021, our communities were finally able to get lead testing. Yes, we have lead and yes, we want Reid Hillview Airport immediately closed. We have lead and noise pollution as a result of reckless pilots who continue to pollute our communities. We want this airport closed as soon as possible."

Mayra Pelagio (95122) - *Latinos United for a New America*

Riley Gilbertson (92120) - *San Diego Pediatricians for Clean Air (SDPCA) - Premed Intern*

Darlene Yaplee (94301) - *Aviation-Impacted Communities Alliance and Concerned Residents of Palo Alto, CA: Co-Founder (Note: Cindy Christianson is also a Co-Founder of Aviation-Impacted Communities Alliance and supports signing the petition). "AICA is a national organization."*

Suellen Wagner (91604) - *Cofounder, Studio City for Quiet Skies*

Kimberly Turner (91604) - *Cofounder, Studio City for Quiet Skies*

SAVE OUR SKIES LA (91403)

SAVE OUR SKIES LA (91423)

Gary Keller (32123) - *Citizens Against Gillespie Expansion and Low Flying Aircraft*, San Diego County

Robert Germann (92040) - *Citizens Against Gillespie's Expansion Low Flying Aircraft*, San Diego County

"BAN THE GAS"

Individuals

Cheryl Shapiro (91403)

Chloe King (91423)

"We are with you in this fight. We live next to the Van Nuys airport...the seventh largest lead abuser in the nation. Activists unite!"

Penny Alpert (91436)

"Van Nuys airport which is within 10 miles of my home has expanded into a commercial airport under the auspices of remaining a general aviation airport. We are being pounded non-stop by leaded fuel from prop planes and benzene from Jets. Currently VNY is the 7th worst lead polluting airport in the US. Begging the FAA to ban leaded aviation fuel and protect our homes and school yards."

Susan Blitz (92103)

Clara Roberts (92064)

Suzanne Hedges (91406)

"I am part of a very active neighborhood that is located right next to the Van Nuys Airport."

Victoria Miller (91436)

Kimberly Turner (91604)

Anne D (91423)

"We must urgently stop using leaded aircraft fuel to halt its harmful impact on humans and the environment."

Marykate Harris (91604)

Victoria Miller (91436)

Carolynne Drori (90210)

Cynthia Galsor (91403)

Tanja Freeman (92081)

Alan Levenson (90405)

Anonymous (92020)

“Do SOMETHING! As a rare and genuine Native San Diegan, I am shocked that such a high level of toxicity exists.”

Ed Blitz (92103-6648)

Susan Blitz (92103)

Cheryl Shapiro (91403)

Jay Gruska (91423)

David Johnson (92064)

Margaret Cronshaw (93035)

“Please, protect our health by banning lead aviation gasoline from our neighborhood.”

Susan Nickell (93035) - resident of Oxnard Shores - working from home

“Toxic environment on two levels. Extreme toxic fuel and extreme noise pollution all producing anxiety, stress under what should be avoidable issues. Also, loss of productivity from work to having to shut down zoom meetings and recording every 4-5 minutes as planes shatter our peace!”

Colorado – 2 organizations and 30 individuals

Organizations

Tracy Koller (80027) – *Physicians for Social Responsibility*

“As a nonprofit that focuses on the environmental health and welfare of residents, we at PSR Colorado recognize the hazards of leaded fuel in airplanes. In particular, the repeated flights made over focused communities by planes, often by flight schools, using leaded fuel disproportionately affects the residents living below, exposing them to concerning levels of lead. No exposure to lead is safe as it may cause adverse health effects, especially to young children and fetuses. Aviation use of leaded fuel allows deposits in our air, water, and soil and, in the Denver metro, this occurs in densely populated areas, over schools, parks, and homes.

Board Members of PSR Colorado support this petition in effort to ban leaded gasoline in all aviation use."

Kelly Giddens (80525) - *Citizens for a Healthy Fort Collins*

Individuals

Anne Wilson (80303)

"Over 25 years ago, leaded automotive gasoline was banned. Even though the danger of lead has been clear for decades (actually, centuries), the FAA failed to act. So, the EPA was tasked with managing this issue about 10 years ago. Yet, it also failed to act. It is beyond comprehension why general aviation is allowed to spew lead, carbon, particulates, and noise into our air in this day and age of undeniable climate change and environmental inequities. Now general aviation is booming, and the combustion-engine polluting, mainly recreational desires of a few supersede the needs of everyone and everything else. The situation is a disgrace. The FAA and the EPA should be ashamed."

Mary R Urban (80112)

Donna Urban (80112)

"Lead poisoning is a concern in Centennial, Colorado as we live near the 2nd busiest general aviation airport in the country."

Bri Lehman (80026)

Charlene Willey (80021) *"This is URGENT!!!!"*

James Willey (80021)

Elizabeth Heidl (80021)

"A complete ban on unleaded fuel is decades overdue. The lobbying dollars of the 400 aviation associations in the US, as well as the protection that the FAA provides to the aviation industry, are the reasons that it took 25 years after the ban on unleaded gas for automobiles to develop a suitable unleaded fuel option for piston aircraft. It will take decades more for widespread use unless it is made mandatory."

Kim Gustafson (80027)

"Constant low flying air traffic over my neighborhood from before dawn until well after dark. Very concerning!"

Joe Keenan (80027)

Maxine Most (80027)

Sheila Liewald (80301)

"Please put this as a front burner concern!! GA has morphed with unfettered growth, vitally impacting my home every day with noise, air and lead pollution."

mkjaross@gmail.com (80027)

Betsy Ellis (80026)

"Lead pollution from aviation fuel is an increasing problem from Rocky Mountain Municipal Airport. They have greatly expanded the number of flights in the past two years with plans to continue expanding. There are numerous schools in the area and many families with young children who are being exposed to lead borne pollution on a regular basis. Lead is also a source of serious health effects on birds especially eagles which have nesting spots in the area. Lead free fuel is available and should be mandated to avoid serious health effects."

Tracy Koller (80027)

Tal Kitron (80027)

Harv Teitelbaum (80439)

GRUMPY OLEMAN (80021)

Deborah Atchison (80027)

Evan Solida (80027)

"This is a very real problem. Dangerous to health. How can we protect ourselves from being carpet-bombed by lead?"

Roger Wehrheim (80021)

Eve Rose (80027)

"This is a case of the FEW seriously endangering the many. PRECISELY why we have the rule of law. Small planes need to be made far quieter, we need to ban unleaded gas, and we need rules about when and where they can fly."

Judi B Friedson (80027)

Tamar Y Krantz (80027)

Ani Liggett (80026)

"I live under non-stop, low-flying, noisy single engine aircraft traffic that spews lead on my community. Rocky Mountain Metro Airport is the responsible culprit with its excessive training

traffic. We no longer use leaded gasoline in cars because of its polluting effects, so let's go the next step and protect humans from documented dangerous effects of avgas."

Jolie C Lehman (80210-4916) - [L&L Consulting](#)

Scott Lehman (80210)

Amber Dennis (80007)

"Lead is dangerous. It should not be sprayed from the sky on communities neighboring airports."

Barbara Donachy (80205)

Sophia Dunbar (80301)

"BDU (Boulder municipal airport) has grown exponentially in the last few years. All of it is for flight training and tow plane touring with GA spending hours (in season collectively 14 hours a day) circling low over our parks, backyards, and even congested areas. The FAA in this region always finds justification for planes flying below 1,000 feet over the city. Boulder County sees thousands of flights training a month with FIVE "small" muni's in a 20 mile or less radius. The Valley cannot withstand the level of pollution. Everyone thinks Boulder is a mecca of health meanwhile thousands upon thousands of pounds of leaded gas are flown overhead. Action on this is LONG overdue!"

Florida – 1 individual

Peggy Keller (32162)

"Stop the Lead NOW."

Georgia – 1 individual

Elizabeth Griner (31324)

Iowa – 1 individual

Fran Levine (52001)

Maryland – 2 individuals

Christy B. Bumanis (20876)

Russ (20879)

Massachusetts – 1 individual

Amy McCoy (01432)

Michigan – 5 individuals

Michael Timothy Keller (49519)

Charlie Schlinger (49686)

Laura Petrie (49855)

Matthew A. Grisius (48187-5702) <https://close1d2.org> (*informal web site owner*).

"I'm afraid to share my address & phone number, but please let me know how I can help!"

George Sarkisian (48357)

Montana – 1 individual

Robert Struckman (59102)

New Jersey – 1 individual

Jean Public (08822)

"lead kills us all - all of life. lived near an airport for 30 years. it's a dirty neighbor in terms of lead gas. it's a dirty neighbor in terms of defrosting of airplanes. it's a nasty neighbor having very noisy flights at all times of day. not a decent neighbor at all."

New York – 1 individual

James Best (11935)

Oregon – 5 organizations and 52 individuals

Organizations

Jamie Pang (97035) - *Oregon Environmental Council*

Letter in Support of Endangerment Finding for Leaded Aviation Gasoline and Ban on Leaded Aviation Gasoline at U.S. Airports

Mary Peveto (97209) - Neighbors for Clean Air

Robert Bailey (97124) - Save Helvetia Secretary, Helvetia, Oregon

Jeff Lewis - Founder of Aviation Impact Reform

"The vast majority of leaded aviation fuel is consumed for recreational flying, at great health cost to communities, especially to children. Long overdue to end this insane subsidy of general aviation."

David Barnes (97106) - Oregon Aviation Watch Webmaster and Miki Barnes (97106) - Oregon Aviation Watch President

Individuals

Clara Barnes (97201)

"Begone, lead!"

Katie Riley (97124)

"It is way past time to ban the use of lead in aviation gasoline!"

Joan Schroeder (97365)

"I fully support a ban on all leaded fuel in all aircraft immediately."

Linda Huttzell (97124)

Charlotte Diane Lehan (97070)

Chris & Dan McFarling (97078)

Teresa Tse (97124) - Oregon Aviation Watch - member

Penelope Lichatowich (97034)

Ellen L. Saunders (97125)

"Our rural community has been advocating for clean air and less noise for 20 years. The low flying pilot training program out of Hillsboro Airport in Oregon has poisoned our orchards, farms and gardens with lead and other chemicals and very low circling flight training noise."

Mel & Wendy Mortensen (97133)

"We endorse this letter."

Anne Goldfeld, MSW, MPH (97006)

Robert Crawford (97206)

Julie A Rohrer (97124)

Chris Robuck (97031)

“This is one positive step for the future. The objection, of course, will be from the boys with toys. The FAA has a policy of a general aviation airport every 20 miles, an absurd infrastructure designed to enable recreational traffic. The FAA collects far more than it needs in fees from jet airport cargo/passenger fees and uses it to subsidize this destructive hobby. The small plane recreational traffic that relies on unleaded gas has no need to exist. To deflect, they’ll cry that these airports have some public purpose. That is infinitesimal, and the tiny proportion of flights by firefighting could be exempted from the ban. (Ironically, we’d have fewer, less intense fires if the boys with noisy toys weren’t burning thousands of gallons of fuel each month....)”

Jeff Holmes (97106)

Susan Mates (97229)

Leslie Weigand (97741)

Blaine Ackley (97124-6572)

“We have to quit letting lead infiltrate our farm land and our lives.”

Alyssa McGhghy (97214)

Ed Maurina (97124)

James Lubischer, MD (97124) - *Pediatrician*

“...risk is not distributed equally. It is often the least advantaged in our society that suffer the most from environmental chemical exposures such as lead. Whether we elect to protect those who are the most vulnerable to lead, and in many respects the least able to protect themselves, reflects, for better or for worse, our societal values.” Per Dr. David C. Bellinger and Dr. Andrew M. Bellinger <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1421365/>

Frances Beebe (97124)

Robert Marshall (97106)

Marilyn (97229)

Kent helm (97116)

Wayne Richards (97070)

Rachel Leo (97002)

Nita Moore (97034)

Leslie Leeper (97070)

Pat Hickman (97070)

"Besides poisoning our local aged, retired citizens in our community to this lead pollution, we are subjected to RUDE pilots who fly very noisily over our retired citizens, no regards for quality of life."

Gerritt Rosenthal (97062)

"Since we have modern alternatives, there would seem to be no real need to use leaded fuel, and of course many smaller airports are surrounded by residential areas."

Kathy Miller (97070)

Alan Von Stein (97756)

Jenny Holmes (97213)

Marilyn Robinson (97229) – *"It is way past time to get the lead out!!!"*

Whitney Freya (97846)

"Lead is highly toxic and has long been proven to lead to disastrous health issues for adults and children. No one, no machine, should be allowed to emit or in any way introduce lead into our lives."

Christfriede Larson (97232)

Dorinne Tye (97701)

"Please treat this with expedited urgency for our children, families, communities, landscapes, wildlife & environments!"

Arnold Rochlin (97296) *"I agree with the substance of this letter."*

Elizabeth Weigand (97701)

Jessica Hussmann (97109)

Joanna Heren (97225)

Julie A Rohrer (97124)

Wayne Richards (97070)

Denise Gruska (97520)

Carol Elena Weigand (97405)

Washington – 2 individuals

Michele Whittaker (98569)

“Why is this still an issue when it has been known for years how bad leaded fuel? Do the right thing now!”

Debi Wagner (98166)

“EPA has known the dangers of airborne lead especially on children's health for decades. Time to end the industry partnership and prioritize the only important mandate of environmental protection. No studies are needed, no further analysis is needed. Banning leaded fuel is no less critical today than decades ago and failing to do so from aviation for so long looks worse than incompetent. Stop feet dragging which only causes more unnecessary human suffering. Stop bowing to industry whining. They should bear the cost as all other industry did decades ago. Time to end false profit perception of the aviation industry gained only by externalizing of tremendous impact onto innocent people.”

Wisconsin

Individuals (14)

Eric Engen (53562)

Gary Keyes (53562)

Kathryn Wolf (53562)

Kathryn Wolf (53563)

Jeanette Wheat (53528)

“We MUST stop poisoning the earth, our soils and water, the animals that live on them and mostly our children!!!”

Pam Krill (53562)

Robert Bartholomew (53562)

Nancy Brown-Joyce (53562)

Sandy Beckwith (53562)

Jennifer Pavlovic (53593)

Elizabeth Neary, MD (53712)

Patricia Squires (53528)

Jerome Joyce (53562)

Jed (John) Downs (53528)

“Yes, unleaded Avgas is more expensive. The people who can afford to fly private planes typically do not live in the flight paths and their kids are not unwillingly being exposed to lead fume/particulates. It’s clear which side justice should be sitting on.”

Marilyn Sharrow (53528)

Letter in Support of Endangerment Finding for Leaded Aviation Gasoline and Ban on Leaded Aviation Gasoline at U.S. Airports

The undersigned support the Earthjustice petition urging the Environmental Protection Agency (EPA) to issue an endangerment finding for leaded aviation gasoline (avgas). The signatories on this letter also support a ban on the use of leaded aviation fuel at all U.S. airports.

According to a report by the U.S. Department of Health and Human Services Agency for Toxic Substances and Disease Registry, “The toxicity of Pb [lead] to humans has been known for 2000 years, and is not disputed...The literature evaluating the health effects of Pb is enormous and includes an extensive database.” The research reveals that “Toxic effects of Pb occur in every organ system that has ever been tested” and further determined that a threshold level for adverse neurocognitive effects has not been identified in young children.[1][2]

The Environmental Protection Agency (EPA) confirms these findings,

“A great deal of information on the health effects of lead has been obtained through decades of medical observation and scientific research...By comparison to most other environmental toxicants, the degree of uncertainty about the health effects of lead is quite low. It appears that some of these effects, particularly changes in the levels of certain blood enzymes and in aspects of children’s neurobehavioral development, may occur at blood lead levels so low as to be essentially without a threshold.”[3]

Per the Centers for Disease Control (CDC), “It does not matter if a person breathes in, swallows, or absorbs lead particles, the health effects are the same; however, the body absorbs higher levels of lead when it is breathed-in.”[4]

On August 24, 2021, Earthjustice on behalf of Alaska Community Action on Toxics, Center for Environmental Health, Friends of the Earth, Montgomery-Gibbs Environmental Coalition, Oregon Aviation Watch, and the County of Santa Clara, petitioned the EPA to make an endangerment finding under section 231 of the Clean Air Act that leaded aviation gasoline contributes to air pollution that harms public health. Thirty-nine additional organizations and individuals signed onto a separate letter in support of this action.

As stated in the Earthjustice press release,

“Though the use of leaded gasoline in most motor vehicles was banned 25 years ago, leaded aviation fuel is still used in nearly 170,000 piston-engine aircraft across 20,000 airports. EPA has failed to regulate this significant source of lead exposure, even though emissions from these aircraft account for about 70% of lead released into the atmosphere...”

“EPA’s own analysis estimates that there are over five million people—including more than 360,000 children aged five or younger—living in very close proximity to at least one of the airports where piston-engine aircraft operate across the United States. Over 160,000 children attend schools near these airports... research shows that children who live in close

proximity to airports where piston-engine aircraft operate have higher blood lead levels relative to those who do not, putting them at a greater risk of harm from the adverse health effects associated with lead exposure..."[5]

An updated version of the petition was sent to EPA on October 12, 2021. One of the primary changes was the decision by the Wisconsin Town of Middleton in Dane County to sign on as a petitioner. As explained in the revised document,

"Consistent with its duties to protect the public health and safety, the Town of Middleton has a significant interest in protecting all its residents, especially children, from the airborne lead exposure from general aviation operations. The Town of Middleton is investing significant resources in investigating the extent of airport-related lead emissions there."[6]

Together with the updated petition, the support letter was updated with a total of "57 organizations and 146 medical professionals, professors, advocates, and other individuals" in support of the endangerment finding.[7]

On 1/12/2022, in response to the petition, the EPA announced "...it will evaluate whether emissions from piston-engine aircraft operating on leaded fuel contribute to air pollution that endangers public health and welfare. The agency plans to issue a proposal for public review and comment in 2022 and take final action in 2023."[8]

The endangerment finding is a necessary step in regulating leaded aviation gasoline throughout the country; however, the timeline is uncertain. Resistance from the Federal Aviation Administration (FAA), piston-engine aircraft users, aircraft manufacturers, pilots, and the aviation industry remains an ongoing threat to addressing this issue.

Instituting a ban on avgas is very much in keeping with the CDC's primary prevention approach of removing the toxin at its source, in this case airports that service piston-engine aircraft.

Following the release of a lead study revealing elevated blood lead levels in children living near Reid-Hillview Airport (RHV), the Santa Clara County Board of Supervisors unanimously voted to ban leaded aviation fuel at RHV and San Martin Airports effective January 1, 2022. UL94 octane, an unleaded fuel alternative, is now available at these airports. County Supervisor Cindy Chavez voiced her concern for those impacted by general aviation airports that service piston-engine aircraft,

"Children living near these smaller airports, all over the nation, are unconscionably being harmed by leaded fuel. The County of Santa Clara is doing everything in its power to eliminate the health and equity crisis here at home, as we press for change at the federal level."[9]

The City of Santa Monica has also taken action to address aviation lead pollution. At their 11/23/2021 meeting, City Council members unanimously voted to "direct the City Manager to cease all storage, distribution, and sale of leaded fuel from equipment and storage tanks owned and operated by the City of Santa Monica at the Santa Monica Airport on or before 4/1/2022."[8](#)

Unleaded aviation fuel, UL94, is now available at 26 U.S. airports including facilities in California, Minnesota, Wisconsin, Ohio, Texas, Florida, Indiana, Illinois, Michigan, Massachusetts and Pennsylvania. In addition, 39 private users nationwide are using UL94.[11]

For the reasons discussed above, we ask you to sign this letter supporting both the Earthjustice petition urging the EPA to issue an endangerment finding for leaded aviation fuel as well as a ban on the sale and use of leaded fuel at U.S. airports.

Supplementary Documents

The following documents provide additional information:

- [Background History on Avgas Endangerment Finding Petition](#)
- [Lead: An Environmental Justice Issue](#)
- [Health and Environmental Impacts of Lead](#)
- [Airport Studies on the Effects of Leaded Avgas on Children's Blood Lead Levels](#)

Acknowledgements

This Letter of Support was developed by:

- Gary Keller, Environmental Director of Citizens Against Gillespie's Expansion (CAGE), Retired Firefighter and Vietnam Veteran
- James Lubischer, MD, Pediatrician
- Miki Barnes, LCSW and President of Oregon Aviation Watch
- David Barnes, OAW Webmaster

Sources

[1] Summary of Health Effects. Toxicological Profile for Lead. Agency for Toxic Substances and Disease Registry. US Department of Health and Human Services. (August 2020). Pgs. 3-5. Last accessed online on 02/03/2022 at [Toxicological Profile for Lead \(cdc.gov\)](#).

[2] Integrated Science Assessment (ISA) for Lead. EPA. (Final Report July 2013). Pg. 1-73. Last accessed on-line on 01/30/2022 at <https://cfpub.epa.gov/ncea/isa/recordisplay.cfm?deid=255721>.

[3] Lead and Compounds (inorganic); CASRN 7439-92-1. Integrated Risk Information System (IRIS). EPA. (Pg. 2). Last accessed online on 01-30-2022 at https://iris.epa.gov/static/pdfs/0277_summary.pdf.

[4] Health Problems Caused by Lead. CDC. (Page last reviewed 12/08/2021). Last accessed online on 02/03/2022 at [Lead: Health Problems Caused by Lead | NIOSH | CDC](#).

[5] Groups Ask EPA to Regulate Lead Around Nation's Airports. (08/24/2021). Pg. 5. Last accessed online on 01/30/2022 at [Groups Ask EPA to Regulate Lead Pollution Around Nation's Airports | Earthjustice](#).

[6] Letter to EPA Administrator Michael Regan from Earthjustice. (10/12/2021). Pg. 3. Last accessed online on 1/30/2022 at [2021.10.12_leadedavgaspetition.pdf \(earthjustice.org\)](#).

[7] Letter to EPA Administrator Michael Regan from Earthjustice. (10/12/2021). Pg. 1. Last accessed online on 01/30/2022 at [2021.10.12_leadedavgas_signonletter.pdf \(earthjustice.org\)](https://www.earthjustice.org/files/2021.10.12_leadedavgas_signonletter.pdf).

[8] EPA to Evaluate Whether Lead Emissions from Piston-Engine Aircraft Endanger Human Health and Welfare. EPA News Release. (01-12-2022). Last accessed online on 01-22-2022 at [EPA to Evaluate Whether Lead Emissions from Piston-Engine Aircraft Endanger Human Health and Welfare | US EPA](https://www.epa.gov/newsroom/epa-to-evaluate-whether-lead-emissions-from-piston-engine-aircraft-endanger-human-health-and-welfare).

[9] Sale of Leaded Aviation Fuel Ends at Reid-Hillview and San Martin Airports. (01/06/2022). Santa Clara County Office of Communications and Public Affairs. Last accessed online on 01/31/2022 at [Sale of Leaded Aviation Fuel Ends at Reid-Hillview and San Martin Airports - Office of Communications and Public Affairs - County of Santa Clara \(sccgov.org\)](https://www.sccgov.org/newsroom/press-releases/sale-of-leaded-aviation-fuel-ends-at-reid-hillview-and-san-martin-airports).

[10] Santa Monica City Council Meeting (11/23/2021). Discussion on this motion begins at 4:48 in the [video recording of the 11/23/2021 city council meeting](https://www.santamonica.gov/DocumentCenter/View/11111/11-23-2021-City-Council-Meeting).

[11] U.S. Maps. Swift Fuels website. Last accessed online on 02/01/2022 at https://www.google.com/maps/d/u/0/viewer?mid=1fNC9vcS4U3u15y5FxBZ_d6Mjqvw&ll=37.5189239503418%2C-113.97823060625002&z=6.