

12-13-23

Good morning Commissioners

The transition to unleaded fuel at Hillsboro Airport is within reach...

The EPA has issued their Endangerment Finding for Lead Fuel and now the FAA will initiate rulemaking but while that happens the FAA, quote, “encourages the early adoption of alternate unleaded fuels.”

The only currently FAA certified alternate unleaded fuel which can be used in all fixed-wing airplane engines and their airframes is G100UL, which is also FAA certified for all helicopter piston engines. Certification for helicopter airframes is pending.

G100UL can be mixed with the currently used leaded fuel. That means no new infrastructure is needed. No new storage tanks, trucks, pumps... G100UL and current leaded avgas can even be mixed together in aircraft tanks...

G100UL production is ramping up and should be available early next year.

The EAGLE initiative, quote, “will identify at least one unleaded fuel acceptable for safe General Aviation fleet use...” Currently there is one unleaded fuel acceptable for safe General Aviation fleet use, that being G100UL.

As Mr. Pippenger has noted previously the FBOs that sell fuel will need to agree to do so. At Hillsboro Airport there are 2 FBOs that sell fuel but also the Aero Flight Training Academy is directly supplied with their fuel.

Mr. Pippenger also noted that it may be helpful for the Port to help with this switch financially.

In my submission I have listed possible incentives for the FBOs and flight school.

- The first incentive is ***Protecting children who live around HIO from brain damage.***
- The second is *financial help* to defray the slightly higher cost of *G100UL* and *financial help* for the STCs needed.
- Third incentive is *litigation.*

I would note that the Port can prohibit sale of leaded fuel at HIO after justifying such prohibition with the FAA.¹

In closing, I am sure that Mr. Braly, who developed G100UL would be very willing to answer any questions the commissioners may have at a future commission meeting.

Thank you,
James T. Lubischer, MD (Retired Pediatrician)

¹ “What authorities does the FAA have to ensure airports continue serving/offering leaded avgas? **Under what circumstances can airports decide to unilaterally stop selling leaded avgas?** The FAA ensures that airports continue offering avgas through Grant Assurance 22, *Economic Nondiscrimination*. A ban or restriction on the sale or use of 100LL avgas at a federally obligated airport is inconsistent with Grant Assurance 22, *Economic Nondiscrimination* (49 USC 47107(a)(1)) and conflicts with the self-service provision. **Any restriction on the sale or dispensing of any type of fuel, when there is demand/need or a fuel provider willing to provide the fuel, must be approved in advance by the FAA. Any such proposed restriction must be supported by a valid, FAA approved justification. Such justification cannot be unreasonable or unjustly discriminatory.**”
(See *FAA Unleaded Fuel Development FAQs* and Definitions, last paragraph @ https://www.faa.gov/sites/faa.gov/files/FAQs_FAA_UL_Fuel_Development.pdf)