

Board of County Commissioners Tracy Kraft-Tharp, District 1 Andy Kerr, District No. 2 Lesley Dahlkemper, District No. 3

May 10, 2023

Town of Superior Mayor and Board of Trustees 124 E. Coal Creek Drive Superior, CO 80027

Via email: townboard@superiorcolorado.gov

Dear Mayor and Trustees,

Thank you for your support in the transition to unleaded aviation gasoline ("avgas") at Rocky Mountain Metropolitan Airport (RMMA). The Jefferson County Commission also supports the phase out of leaded avgas as soon as practical across the whole aviation industry.

As you may know, aviation gasoline is regulated at the Federal level through both the Federal Aviation Administration (FAA) and the Environmental Protection Agency (EPA). Just as with the elimination of leaded gasoline in automobiles in the 1970s, the effort to phase out leaded avgas must be coordinated nationally to ensure a safe and consistent transition. The FAA, along with aviation and petroleum partners, have set a target of 2030 for the full elimination of leaded gasoline in the industry through the Eliminate Aviation Gasoline Lead Emissions (EAGLE) initiative.

The promising news is that the FAA has already approved the use of two unleaded fuels through their Supplemental Type Certificate (STC) process: Swift "UL94" and GAMI "G100UL." The Swift Fuels 94UL product is available for distribution in small quantities but is unfortunately only approved for use in approximately 66 percent of the existing piston-engine aviation fleet.

Fortunately, the GAMI G100UL fuel was approved for use in the entire piston engine aviation fleet by the FAA in September of 2022. In early 2023, GAMI began offering STCs for purchase by aircraft owners that will allow the use of G100UL in each individual aircraft. Swift Fuels is also pursuing certification of a higher-octane "100R" unleaded avgas version intended to be compatible with all aviation piston-engine aircraft.

The last remaining hurdle towards the complete transition to unleaded avgas is the aviation and petroleum industries' ability to scale the production of these alternative fuels to achieve a market-ready and price-competitive supply. Both Swift Fuels, GAMI, and fuel distributor AvFuel have indicated that they anticipate a national rollout of unleaded fuels in the next few years.

While there may be some costs incurred by the aviation industry in the transition to unleaded avgas, Jefferson County and RMMA stand ready to assist by offering financial assistance to impacted airport tenants. RMMA is working to secure FAA grant funding to assist both on-field fixed-base operations (FBOs) with the purchase of unleaded fuel tanks. Furthermore, the airport will provide rent incentives to the based flight schools in order to offset the cost of applying for the STCs necessary for each aircraft to operate on an approved unleaded fuel. These STCs are estimated to cost between \$200 - \$1,500 per aircraft, for a cost to each flight school of potentially \$10,000 - \$15,000.

We again thank you for your support in the transition towards the use of unleaded avgas at RMMA. We also thank you for jointly directing your letter to the Administrator of the FAA. We look forward to working with the FAA and the aviation industry to eliminate leaded avgas at not just RMMA but nationwide.

Sincerely,

**BOARD OF COUNTY COMMISSIONERS** 

Andy Kerr

Chair

Tracy Kraft-Tharp

Lesley Dahlkemper

BCC/dc