



April 18, 2023

Honorable Billy Nolen
Administrator
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

Jefferson County Commissioners
100 Jefferson County Parkway
Golden, CO 80419

Dear Mr. Nolen and Commissioners Dahlkemper, Kerr and Kraft-Tharp:

We, the Superior Board of Trustees, write to formally request that you make unleaded aviation gasoline (“avgas”) available and phase out leaded avgas from Rocky Mountain Metropolitan Airport (RMMA) as expeditiously as possible.

The Superior Town Board is concerned about the continuing and irreversible damage that lead air pollution from avgas inflicts on our community – particularly to the health and development of exposed children. In 2020, RMMA had 189,512 aircraft operations for an average of 519 operations per day. In 2022, the number of operations increased to 262,348, for an average of 718 operations per day. A significant portion of Superior’s population lives in Rock Creek, which is located along the extended centerline of Runway 30L and 30R (and 12R and 12L), the “Airport Critical” zone needed for takeoffs and landings. Due to this proximity to the airport, closed traffic operations (i.e. touch-and-goes) frequently result in overflight of Rock Creek. Approximately 80% of lead emissions are released during the departure phases of the landing-takeoff cycle. According to the Environmental Protection Agency (EPA), 95% of the lead in avgas is emitted in exhaust. RMMA has continued to maintain that they cannot alter the flight paths of general aviation aircraft, resulting in our community’s daily exposure to lead from airport operations.

Recently, nine members of the Superior community had their homes tested for lead and all 18 samples, two per household, have come back positive.

The EPA has known for decades that lead air pollution and its impacts on communities constitute a public health crisis. Almost fifty years ago, the EPA recognized lead as a known toxic substance and found that airborne lead was contributing to excessive lead exposures among children.

Lead exposure can harm the nervous, cardiovascular, immune, and reproductive systems, damage the kidneys, and cause anemia and increased blood pressure, according to the U.S. Centers for Disease Control and Prevention. Children are particularly vulnerable to lead; even at the lowest detectable levels, childhood exposure to lead may cause intellectual and cognitive impairment, harm academic performance, and increase risk for behavioral and attention disorders. The EPA’s

2013 Integrated Science Assessment for Lead found “no evidence of a threshold below which there are no harmful effects on cognition from lead exposure.”

In September 2022, the Federal Aviation Administration formally approved a 100-octane unleaded fuel, invented by General Aviation Modifications, Inc. (GAMI) for use in the entire existing fleet of spark-ignition piston-powered engines and each of the aircraft that use those engines. Additionally, there is already a 94-octane unleaded fuel by Swift Fuels that has been approved for use by two-thirds of covered aircraft. Other fully unleaded fuel options are likely to be available for use by the entire piston-engine fleet within the next several years. Swift Fuels expects that its 100-octane unleaded fuel will be ready for fleetwide approval in 2023 and available for use by the end of 2025.

Once 100-octane unleaded fuel is available, airports are not expected to need any new infrastructure to begin providing fuel. The unleaded 100-octane fuels from GAMI and Swift can be stored in the same airport fuel tanks as the 100-octane low lead fuel that is universally used in general aviation operations. Given the significant recent advances in unleaded fuels, removing leaded fuel from RMMA and replacing it with unleaded avgas by 2025 is technologically feasible and appropriate.

We demand that unleaded avgas be made available at RMMA and leaded avgas be phased out from RMMA as soon as possible. Removing the largest lead air pollution source is essential to the health and well-being of our community. We request your response, including a timeline of your plan to phase out leaded aviation gasoline, by May 18, 2023.

Thank you for your time and attention to this matter.


Sincerely,

Mark Lacin, Mayor


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Jenn Kaaoush, Trustee

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Jason Serbu, Trustee

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CC: Senator Bennet


Senator Hickenlooper
Representative Neguse
Representative Pettersen

Neal Shah, Mayor Pro-tem

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Bob McCool, Trustee

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Sandie Hammerly, Trustee

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Stephanie Miller, Trustee

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