



September 15, 2023

Philip M. Fine  
Executive Officer/Air Pollution Control Officer  
Bay Area Air Quality Management District  
375 Beale Street Suite 600  
San Francisco, CA 94105

Dear Mr. Fine:

The City of Livermore (City) enthusiastically joins the Bay Area Air Quality Management District in supporting the phaseout of leaded aviation gas (avgas) from use at any airport in the United States. As you know, great progress has been made in this effort in the last few years, but we continue to advocate for more and faster progress.

Though there are several logistical and safety-related issues to resolve, the City is currently working on many efforts to bring the sale and use of unleaded fuel to the Livermore Municipal Airport (LVK), including:

- Modifying airport minimum standards to require the sale of unleaded fuel;
- Requiring our current fuel provider to develop and implement a plan to introduce the sale of unleaded fuel;
- Working with industry representatives to identify key steps necessary to bring unleaded fuel to LVK; and
- Closely monitoring the FAA's progress on transitioning the industry to unleaded fuel, including the Eliminate Aviation Gasoline Lead Emissions (EAGLE) program.

The City is encouraged by the Environmental Protection Agency's proposal to issue an endangerment finding regarding leaded avgas, an action that was prompted in large part by Santa Clara County. However, it is important to note that Santa Clara County's unilateral decision to ban leaded fuel at its Reid Hillview Airport has resulted in litigation, which is still unresolved. The City is closely following the experience at Reid Hillview while maintaining a commitment to phasing out leaded fuel.

Philip M. Fine  
September 15, 2023  
Page 2 of 2

We applaud efforts in Congress to accelerate the phaseout of leaded fuel and to give airport sponsors like the City more authority to mandate the use of unleaded fuel. The FAA has proposed to phase out leaded avgas by 2030 but has not yet announced a path to achieve this objective. The current draft of the FAA Reauthorization Bill explicitly spells out this requirement.

In summary, the City is initiating many efforts to take advantage of the current availability of unleaded fuel (UL94), including a process of updating airport minimum standards, which will require a provision of unleaded fuel at LVK. The City anticipates this effort will add UL94 to the airfield given its availability, while preparing the airport to receive other unleaded fuel options as they become available.

We appreciate your support for our efforts.

Sincerely,

A handwritten signature in blue ink that reads "Marianna Marysheva". The signature is fluid and cursive, with the first name and last name clearly legible.

Marianna Marysheva  
City of Livermore, City Manager