

**COMMENT MATRIX FOR
DRAFT FAA TRANSITION PLAN TO UNLEADED AVIATION GASOLINE**

(FAA USE ONLY)

Reviewer	Company Name	Page#	Section #	C, E, or F	Comment/Rationale	Recommended Change/Proposed Rewrite	Resolution of Comment
John Doe	Company A	3	5a(1)	E	Order 1000.36, Ch 2, 1c Use Active Voice.	Restate as, "Clancy wrote The Hunt for Red October."	

The Reviewer is the person making the Comment and the Recommended Change.

Review must enter their company's name.

The Reviewer must enter the page number of the directive and the paragraph so we can easily identify the reference paragraph. Enter section page numbers as 1-2 (Section 1, page 2). List appendices page numbers as A-3 (Appendix A, page 3). **NO SPACES OR PERIODS BETWEEN NUMBERS**

NOTE: For comments covering the whole directive, please indicate "General."

Conceptual (C): If you disagree with the intent of what is stated or implied or, you believe the author omitted an important concept.
Editorial (E): You agree with the intent but believe the wording is unclear, ambiguous, or of the wrong tone.
Format (F): Comment on layout, organization, and other format issues that are solely the responsibility of the authors. There is no need to identify deviations from the standard order format, typos or common spelling errors. We will correct them during the review of this document.

Please make clear your recommended change and proposed rewrite. When suggesting new wording, use quotation marks and make sure it is clear what text you intend to replace. In this case, the ellipse implies the beginning of the original title is ok.

Please explain your disagreement and give a rationale. Authors often fail to see the ambiguities that lead to readers finding unintended meaning. Having a reason behind a suggestion is not only useful for understanding the intent of the change, but also for helping us determine if your issue can be resolved in other ways.

INTERNAL USE ONLY How did you resolve the Review's Comments and Recommendation?

If you are not FAA, do not make comments in this column.

NOTE: Complete all columns (Resolution of Comments is for the FAA only) or the Comments Matrix will be rejected.

The next worksheet is a blank form for your comments

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Darlene Yaplee	Aviation-Impacted Communities Alliance	20	4.1	C	<p>FINDING</p> <p>Section 4.1 of the draft Transition Plan states that “federal regulations will be necessary to eliminate the use of 100LL.” The Plan also identifies 2030 as the target for elimination of leaded aviation gasoline. However, the phased transition approach relies predominantly on voluntary market adoption during interim stages and does not integrate a defined regulatory pathway into the core structure of the transition framework.</p> <p>In the same section, the Transition Overview states that “the marketplace will select the fuel, or fuels, that replace 100LL.” This framing treats fuel selection and transition sequencing as market outcomes rather than components of a defined regulatory framework.</p> <p>GAP</p> <p>While the Plan recognizes that federal regulation is necessary to complete the transition, regulatory action is framed as following voluntary market progress rather than as the governing framework of the transition architecture. This sequencing creates a structural</p>	<p>Recommended Change:</p> <p>Integrate a defined rulemaking schedule into the Plan’s core architecture, consistent with Section 770 of the FAA Reauthorization Act of 2024, so that regulatory action governs the transition framework rather than appearing as a later or contingent phase.</p> <p>Align the Transition Plan’s structure with its stated recognition that federal regulation is necessary by establishing regulation as the central organizing mechanism of the transition framework.</p> <p>Clarify that voluntary market activity is intended to facilitate orderly implementation within a defined regulatory pathway, not to determine whether or when regulatory action will occur.</p>	

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					<p>disconnect between the acknowledged necessity of regulation and the operational design of the Plan.</p> <p>If elimination requires federal regulation, the transition framework must be organized around a defined regulatory pathway rather than contingent voluntary uptake.</p> <p>The FAA is currently under a statutory obligation, following EPA’s endangerment finding for lead emissions from piston-engine aircraft, to prescribe standards to control or eliminate those emissions pursuant to 49 U.S.C. §44714.</p> <p>Because the FAA is the only entity with the regulatory authority to eliminate leaded aviation gasoline, this statutory mandate carries a corresponding responsibility to provide clear regulatory direction sufficient to guide market behavior.</p> <p>Without such alignment with Congressional direction, the transition risks being structured around market sequencing rather than regulatory authority, creating uncertainty regarding</p>		

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					<p>the agency’s intended exercise of its statutory responsibilities.</p> <p>Continued uncertainty leaves airport proprietors to make infrastructure and operational planning decisions without clear federal regulatory direction.</p>		
Darlene Yaplee	Aviation-Impacted Communities Alliance	20	4.1	C	<p>FINDING</p> <p>Section 4.1 includes a core principle stating that airports should not be required to invest in additional tankage solely to accommodate the transition period.</p> <p>GAP</p> <p>While minimizing unnecessary infrastructure costs is an appropriate policy objective, the current wording may unintentionally imply that additional fuel storage capacity will never be required during the transition. In practice, some airports may require temporary or transitional tankage to support phased introduction of unleaded fuels while maintaining safe fuel availability for aircraft not yet compatible with replacement fuels.</p>	<p>Recommended Change:</p> <p>Revise the third bullet in Section 4.1 (Transition Overview) by replacing the following language:</p> <p>Current Language:</p> <p>“Airports should not be required to invest in additional tankage solely to accommodate the transition period.”</p> <p>Replace With:</p> <p>“Where temporary dual-fuel availability is necessary to support an orderly transition, infrastructure requirements should be structured to minimize unnecessary burden while supporting the safe and timely elimination of 100LL.”</p>	

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Darlene Yaplee	Aviation-Impacted Communities Alliance	20	4.1	C	<p>FINDING</p> <p>Section 4.1 states that federal regulations will be necessary to eliminate the use of 100LL.</p> <p>GAP</p> <p>However, the Plan does not establish a defined regulatory timeline or rulemaking pathway for implementing those regulations. Without a defined regulatory schedule, stakeholders lack clarity regarding the regulatory milestones that will govern the transition to unleaded aviation gasoline.</p>	<p>Recommended Change:</p> <p>Revise the first bullet in Section 4.1 (Transition Overview) by replacing the following language:</p> <p>Current Language:</p> <p>“Federal regulations will be necessary to eliminate the use of 100LL.”</p> <p>Replace With:</p> <p>“Federal regulations will be established on a defined timeline to eliminate the use of 100LL, consistent with FAA’s obligations under 49 U.S.C. §44714 and the transition framework established by Section 770 of the FAA Reauthorization Act of 2024.”</p>	
Darlene Yaplee	Aviation-Impacted Communities Alliance	20	4.1	C	<p>FINDING</p> <p>Section 4.1 states that “the marketplace will select the fuel, or fuels, that replace 100LL.”</p> <p>GAP</p> <p>As written, this language may imply that marketplace fuel selection precedes or determines regulatory action rather than</p>	<p>Recommended Change:</p> <p>Revise the second bullet in Section 4.1 (Transition Overview) by replacing the following language:</p> <p>Current Language:</p> <p>“The marketplace will select the fuel, or fuels, that replace 100LL.”</p>	

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					operating within a defined regulatory framework established by the FAA.	Replace With: “Within a defined regulatory framework, the marketplace may determine which FAA-approved unleaded fuel or fuels are deployed to meet compliance requirements.”	
Darlene Yaplee	Aviation-Impacted Communities Alliance	20–21	4.1	C	<p>FINDING</p> <p>The draft Transition Plan acknowledges that federal regulation will ultimately be required to eliminate leaded aviation gasoline but relies on voluntary market adoption during interim phases. The Plan does not establish a defined regulatory timeline or rulemaking schedule.</p> <p>GAP</p> <p>Without a defined regulatory timeline, the transition framework leaves the pace of progress largely dependent on voluntary market activity. This approach reduces predictability for infrastructure investment, fuel production scaling, and fleet planning.</p> <p>Regulatory uncertainty influences market behavior as strongly as regulatory mandates. Federal environmental phase-outs have historically relied on defined regulatory timelines, combined with</p>	<p>Recommended Change:</p> <p>Publish a defined rulemaking schedule establishing how the agency will structure the transition to eliminate leaded aviation gasoline, consistent with the statutory framework established in the FAA Reauthorization Act of 2024.</p>	

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					<p>phased compliance structures, to create the certainty necessary for infrastructure investment and orderly market adjustment.</p> <p>In the absence of such a defined timeline, market actors may defer capital commitments pending clearer regulatory signals.</p>		
Darlene Yaplee	Aviation-Impacted Communities Alliance	20–21	4.1	C	<p>FINDING</p> <p>The draft Transition Plan acknowledges that federal regulation will ultimately be required to eliminate leaded aviation gasoline.</p> <p>GAP</p> <p>However, the Plan does not describe how regulatory actions will be sequenced to achieve elimination of 100LL or how voluntary market activity will transition into mandatory compliance requirements.</p> <p>Without clarity regarding the regulatory pathway, stakeholders including airports, aircraft owners, fuel suppliers, and manufacturers lack certainty regarding the regulatory milestones that will govern the transition.</p>	<p>Recommended Change:</p> <p>Establish a defined regulatory framework and timeline for eliminating leaded aviation gasoline, including phased compliance provisions and transitional accommodations structured within that framework.</p> <p>Clarify that regulatory action will proceed on the established schedule independent of voluntary market uptake, while allowing phased implementation mechanisms to manage compatibility and infrastructure constraints.</p>	

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Darlene Yaplee	Aviation-Impacted Communities Alliance	20–21	4.1	C	<p>FINDING</p> <p>Section 4.1 (Transition Overview) does not explicitly state that elimination of leaded aviation gasoline will occur through regulatory action under a defined timeline.</p> <p>GAP</p> <p>Without explicit language confirming that elimination will occur through a defined regulatory schedule, the Plan may imply that the transition depends primarily on voluntary market adoption rather than regulatory implementation.</p>	<p>Recommended Change:</p> <p>Clarify within Section 4.1 (Transition Overview) that the elimination timeline will be established through regulatory action by adding the following language:</p> <p>“The FAA will establish a defined regulatory timeline to eliminate the use of 100LL through rulemaking, consistent with the statutory framework established under the FAA Reauthorization Act of 2024.”</p>	
Darlene Yaplee	Aviation-Impacted Communities Alliance	21	4.1	C	<p>FINDING</p> <p>Section 770 of the FAA Reauthorization Act of 2024 references the availability of unleaded aviation gasoline that is “approved and generally available.” The draft Transition Plan discusses fuel approval pathways, compatibility considerations, and phased transition concepts but does not define the criteria by which an approved unleaded fuel will be considered “generally available.”</p> <p>GAP</p>	<p>Recommended Change:</p> <p>Clarify within the Transition Plan how the term “generally available,” as referenced in Section 770 of the FAA Reauthorization Act of 2024, will be interpreted for purposes of transition implementation.</p>	

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					Without clarification, the term “generally available” may be interpreted inconsistently across airports, fuel suppliers, and aircraft operators. This ambiguity creates uncertainty regarding the conditions under which airports may transition away from 100LL and how regulatory compliance milestones will be determined.		
Darlene Yaplee	Aviation-Impacted Communities Alliance	21	4.1	C	<p>FINDING</p> <p>The draft Transition Plan identifies approval pathways for unleaded fuels but does not specify how fuel availability at the airport level will be evaluated for purposes of determining transition progress.</p> <p>GAP</p> <p>Without defined criteria for evaluating airport-level fuel availability, stakeholders lack clarity regarding when approved unleaded fuels are considered sufficiently available to support transition milestones.</p>	<p>Recommended Change:</p> <p>Define the operational criteria that will be used to determine when an FAA-approved unleaded aviation gasoline is considered sufficiently available to support transition milestones, including factors such as airport distribution, supply chain readiness, and aircraft compatibility.</p>	
Darlene Yaplee	Aviation-Impacted Communities Alliance	21	4.1	C	<p>FINDING</p> <p>The draft Transition Plan focuses primarily on fuel certification pathways and compatibility considerations but</p>	<p>Recommended Change:</p> <p>Clarify the relationship between fuel approval, airport distribution, and regulatory transition milestones to</p>	

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					<p>provides limited discussion of how fuel availability will scale from early market introduction to broader national distribution.</p> <p>GAP</p> <p>Without clarification of how fuel approval translates into measurable availability at airports, the Plan does not establish clear conditions for assessing transition progress or determining when implementation milestones can be achieved.</p>	<p>ensure that the concept of fuel availability is tied to measurable implementation conditions rather than undefined market adoption thresholds.</p>	
Darlene Yaplee	Aviation-Impacted Communities Alliance	21	3	C	<p>FINDING</p> <p>The draft Transition Plan references fuel approval pathways and compatibility considerations but does not clearly explain how FAA determines when an approved unleaded aviation gasoline is considered operationally available for purposes of implementing the transition framework.</p> <p>GAP</p> <p>Without clarification of how fuel approval translates into measurable availability conditions, the Plan does not establish clear criteria for determining</p>	<p>Recommended Change:</p> <p>Clarify within Section 3 (Fuel Approval and Availability Framework) the criteria used to determine when an approved unleaded aviation gasoline is considered operationally available, including how fuel approval status, commercial distribution, and airport availability are evaluated in determining when statutory availability conditions are satisfied.</p>	

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					when the statutory availability threshold has been satisfied.		
Darlene Yaplee	Aviation-Impacted Communities Alliance	23	4.2	C	<p>FINDING</p> <p>The draft Transition Plan references FAA engagement with the supplier of tetraethyl lead (TEL), the additive used in 100LL aviation gasoline, but does not clearly describe the purpose, scope, or expected duration of that engagement in relation to the stated objective of eliminating leaded aviation gasoline by 2030.</p> <p>GAP</p> <p>Absent clarification, the description of ongoing TEL supplier coordination may create uncertainty regarding whether such engagement is intended to manage an orderly wind-down of TEL supply or whether it could extend the continued availability of leaded aviation gasoline beyond the transition objective.</p>	<p>Recommended Change:</p> <p>Clarify the purpose and scope of FAA engagement with the TEL supplier and explain how that engagement supports an orderly wind-down of leaded aviation gasoline consistent with the 2030 elimination objective.</p> <ul style="list-style-type: none"> • Clarify whether TEL supplier engagement is structured as part of a managed supply wind-down. • Publish a statement explaining how TEL supplier coordination supports the phase-out of 100LL and does not extend its use beyond the transition objective. • Establish defined parameters under which TEL supply coordination will be reduced or terminated as unleaded transition readiness is achieved. • Ensure that TEL supply engagement does not operate in a manner that inadvertently delays the transition to unleaded aviation gasoline. 	
Darlene Yaplee	Aviation-Impacted	16-17	3.2	C	<p>FINDING</p>	<p>Recommended Change:</p>	

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	Communities Alliance				<p>The draft Transition Plan discusses compatibility pathways and phased transition concepts for unleaded aviation gasoline but does not translate fleet segmentation into a targeted operational implementation strategy. Fixed-wing single-engine aircraft represent approximately 89 percent of the U.S. piston fleet, and a substantial portion of this segment can already operate on currently available unleaded fuel pathways without aircraft-specific approvals.</p> <p>GAP</p> <p>Despite this compatibility potential, the Plan does not establish an implementation strategy to prioritize early operational conversion of the largest compatible fleet segment or to translate compatibility into scaled airport-level availability.</p>	Explicitly identify the largest immediately compatible fleet segment as an early operational conversion focus within the transition framework, with priority consideration for airports with significant flight training activity due to the disproportionate emissions associated with touch-and-go operations.	
Darlene Yaplee	Aviation-Impacted Communities Alliance	16-17	3.2	C	<p>FINDING</p> <p>The draft Transition Plan discusses compatibility pathways and phased transition concepts but does not identify an operational structure responsible for translating aircraft compatibility into</p>	<p>Recommended Change:</p> <p>Formally establish and publish a defined operational implementation mandate, distinct from fuel certification and policy oversight functions, focused specifically on scaling airport-level</p>	

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					<p>scaled airport-level deployment of unleaded aviation gasoline.</p> <p>GAP</p> <p>Without a defined implementation structure responsible for scaling adoption, early conversion activity may remain fragmented across individual airports rather than building cumulative momentum toward the stated transition objective.</p>	<p>adoption of approved unleaded aviation gasoline.</p>	
Darlene Yaplee	Aviation-Impacted Communities Alliance	16-17	3.2	C	<p>FINDING</p> <p>The draft Transition Plan discusses compatibility pathways and phased transition concepts but does not establish a structured mechanism for identifying and resolving airport-level barriers that may prevent compatible aircraft from transitioning to unleaded fuel.</p> <p>GAP</p> <p>Without a structured process for evaluating implementation barriers, including infrastructure constraints, capital costs, supply-chain limitations, business model risks, and regulatory or grant assurance considerations, the Plan does not translate fleet compatibility into a scalable implementation pathway</p>	<p>Recommended Change:</p> <p>Establish a structured operational pilot initiative, informed by approaches used in programs such as the FAA’s Advanced Air Mobility Integration Pilot Program, to partner with selected airports, state or local governments, and industry participants to accelerate the deployment of unleaded aviation gasoline.</p> <p>The initiative should identify infrastructure, operational, supply-chain, and market barriers at representative airports and generate implementation data that can inform scalable national transition guidance.</p>	

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					capable of accelerating airport-level adoption.		
Darlene Yaplee	Aviation-Impacted Communities Alliance	20	4.1	C	<p>FINDING</p> <p>Section 4.1 of the draft Transition Plan states that the National Transition Framework should be structured to be easily adapted as additional information becomes available and uncertainties related to the transition are reduced.</p> <p>GAP</p> <p>While adaptive implementation is appropriate for emerging technologies and operational transitions, the current wording frames the transition framework primarily as an adaptive strategy rather than establishing a defined operational implementation structure with assigned responsibilities and measurable objectives.</p> <p>Without a defined implementation structure, the framework may lack the operational accountability necessary to translate policy direction into coordinated national implementation.</p>	<p>Recommended Change:</p> <p>Revise the fourth bullet in Section 4.1 to ensure the Transition Framework reflects a defined operational implementation structure by replacing the following language:</p> <p>Current Language:</p> <p>“The National Transition Framework should be structured to be easily adapted as additional information that could impact the transition becomes available and uncertainties related to the transition are reduced.”</p> <p>Replace With:</p> <p>“The National Transition Framework will include a defined operational implementation structure with assigned responsibilities, measurable objectives, and reporting requirements, while incorporating adaptive mechanisms that remain consistent with the statutory elimination objective.”</p>	
Darlene Yaplee	Aviation-Impacted	24-25	5	C	<p>FINDING</p>	<p>Recommended Change:</p>	

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	Communities Alliance				<p>The draft Transition Plan discusses airport fuel infrastructure and distribution considerations associated with the transition to unleaded aviation gasoline. Certain approved unleaded fuels are intended to function as fully intermixable drop-in replacements for 100LL, potentially reducing the need for segregated fuel storage under some operating conditions.</p> <p>GAP</p> <p>Even where fuels are designed to be intermixable, airports must still manage fuel inventory, supply logistics, delivery timing, and operational transition sequencing. The Plan does not clearly address how these operational considerations may affect airport-level infrastructure planning during the transition period.</p>	Clarify within Section 5 that airport infrastructure planning during the transition period may require operational flexibility to manage fuel inventory, supply logistics, and delivery sequencing as unleaded fuels scale across the airport system.	
Darlene Yaplee	Aviation-Impacted Communities Alliance	23-24	5	C	<p>FINDING</p> <p>The Transition Plan identifies airport infrastructure considerations associated with fuel distribution but does not clearly describe how federal airport funding programs may support infrastructure adjustments required during the transition to unleaded aviation gasoline.</p>	<p>Recommended Change:</p> <p>Clarify how existing federal airport funding programs, including Airport Improvement Program (AIP) eligibility, may support infrastructure adjustments necessary to facilitate the transition to unleaded aviation gasoline.</p>	

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					<p>GAP</p> <p>Absent clarification regarding available federal funding mechanisms, airport operators may face uncertainty regarding how infrastructure modifications associated with the unleaded transition can be financed.</p>		
Darlene Yaplee	Aviation-Impacted Communities Alliance	24-25	5	C	<p>FINDING</p> <p>The Transition Plan acknowledges that airports may encounter infrastructure and operational challenges associated with the introduction of unleaded aviation gasoline.</p> <p>GAP</p> <p>The Plan does not establish a structured mechanism for identifying, documenting, and resolving airport-level barriers that may affect fuel storage, infrastructure financing, distribution logistics, or operational transition planning.</p>	<p>Recommended Change:</p> <p>Establish a structured process within the Transition Plan for identifying and documenting airport-level infrastructure and operational barriers affecting unleaded fuel deployment and for coordinating resolution of those barriers through federal, state, and industry partnerships.</p>	
Darlene Yaplee	Aviation-Impacted Communities Alliance	24-25	5	C	<p>FINDING</p> <p>The Transition Plan discusses infrastructure considerations related to the transition to unleaded aviation</p>	<p>Recommended Change:</p> <p>Clarify within Section 5 how airport infrastructure planning, operational transition considerations, and national deployment timelines will be coordinated to support scalable</p>	

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					<p>gasoline but primarily presents these considerations at the policy level.</p> <p>GAP</p> <p>Without an operational framework linking infrastructure planning, transition sequencing, and deployment timelines, airport operators may lack clear guidance for coordinating infrastructure adjustments with the broader national transition strategy.</p>	implementation of unleaded aviation gasoline across the airport system.	
Darlene Yaplee	Aviation-Impacted Communities Alliance	20-21	4.1	C	<p>FINDING</p> <p>The Transition Plan identifies the importance of stakeholder coordination in achieving the transition to unleaded aviation gasoline.</p> <p>GAP</p> <p>The Plan does not clearly describe how the FAA will communicate transition milestones, regulatory actions, and implementation progress to stakeholders responsible for operational, infrastructure, and investment decisions.</p>	<p>Recommended Change:</p> <p>Establish a transparent communication framework that provides regular updates on transition milestones, regulatory actions, fuel availability conditions, and implementation progress to support informed decision-making across the aviation system.</p>	
Darlene Yaplee	Aviation-Impacted Communities Alliance	26-27	6	C	<p>FINDING</p> <p>The Transition Plan recognizes that education and outreach will be necessary</p>	<p>Recommended Change:</p> <p>Designate and publish the FAA office responsible for implementing education</p>	

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					<p>to support the transition to unleaded aviation gasoline and references the need to provide information to aviation stakeholders regarding operational implications of the transition.</p> <p>GAP</p> <p>The Plan does not clearly identify which FAA office or organizational entity will be responsible for developing and implementing education and outreach activities related to the transition. Without a designated responsible office, the Plan does not establish clear accountability for ensuring that aviation stakeholders receive accurate and consistent information regarding fuel compatibility, operational considerations, and transition timelines.</p>	<p>and outreach activities associated with the transition to unleaded aviation gasoline.</p>	
Darlene Yaplee	Aviation-Impacted Communities Alliance	26-27	6	C	<p>FINDING</p> <p>The Transition Plan references education and outreach activities related to the transition to unleaded aviation gasoline.</p> <p>GAP</p> <p>However, the Plan does not establish defined timelines for development and publication of educational materials. Without defined timelines, aviation</p>	<p>Recommended Change:</p> <p>Establish defined timelines for development and publication of education and outreach materials related to the transition to unleaded aviation gasoline.</p>	

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					stakeholders may not receive necessary information in time to support operational planning and infrastructure decision-making.		
Darlene Yaplee	Aviation-Impacted Communities Alliance	27-28	7	C	<p>FINDING</p> <p>The Transition Plan references coordination with federal agencies, aviation stakeholders, and other entities involved in aircraft certification, fuel supply, and airport operations.</p> <p>GAP</p> <p>The Plan does not clearly describe the coordination structure through which the FAA will work with other federal agencies, including environmental and public health agencies, to support implementation of the transition to unleaded aviation gasoline.</p>	<p>Recommended Change:</p> <p>Establish a formal interagency coordination framework involving the FAA, EPA, and other relevant federal agencies to ensure alignment between aviation fuel policy, environmental regulation, and public health objectives associated with eliminating leaded aviation gasoline.</p>	