

March 13, 2026

Docket No. FAA-2026-00296

Submitted via email to: 9-AVS-AIR670-AVGAS@faa.gov



Re: Comments on the Draft Transition Plan to Unleaded Aviation Gasoline

Dear Ms. Locke, Administrator and FAA Staff:

Save Our Skies Alliance (SOS Alliance) submits these comments in support of the Federal Aviation Administration's Draft Transition Plan to Unleaded Aviation Gasoline (the "Plan"), published in the Federal Register on January 12, 2026, pursuant to Section 827 of the 2024 FAA Reauthorization Act. We commend the FAA for developing a structured national framework to eliminate lead from aviation gasoline by 2030 and we write today to offer Colorado's fuel transition experience as a concrete, replicable model that we believe can meaningfully inform and strengthen the final Plan.

Colorado stands as the only state in the nation to have enacted a statewide legislative mandate and comprehensive multi-agency framework to facilitate the transition to unleaded fuel ahead of the national 2030 deadline. This result was not accidental. It was the product of years of persistent community advocacy, the courage of state legislators willing to act, the leadership of early-adopter airports, and the constructive implementation work of the Colorado Department of Transportation's (CDOT) Division of Aeronautics. We believe Colorado's early adoption period holds lessons directly applicable to the FAA's national transition planning, and we urge the FAA to incorporate such state-led models in the final Plan.

I. Background: The Community Origins of Colorado's Transition

The transition to unleaded aviation fuel in Colorado did not begin in the legislative chamber. It began in the neighborhoods surrounding general aviation airports — particularly Rocky Mountain Metropolitan Airport (KBJC) in Broomfield, Boulder Municipal Airport (KBDU), and Centennial Airport (KAPA) in Englewood — where residents, parents, and medical professionals had spent years raising alarms about childhood lead exposure from aircraft emissions.

Community advocates documented what peer-reviewed science has confirmed: aircraft operating on 100LL avgas are the dominant source of lead air emissions in the United States, and children living near high-traffic general aviation airports bear a disproportionate share of that burden. These advocates — organized through groups including Save Our Skies Alliance and other residents' coalitions in Jefferson, Boulder, and Arapahoe counties — brought their concerns to airport advisory boards, county commissioners, state legislators, and the press. They were met, at times, with institutional resistance and delay. But they persisted.

Citizens' testimony before the Colorado legislature was instrumental in the passage of House Bill 24-1235. Colorado Attorney General Phil Weiser, who championed the bill before the legislature, acknowledged directly that the bill "was brought to you in response to outcry from

Coloradans that live adjacent to general aviation airports and flight paths in our State," and that his office had been "hearing regularly from Boulder, Jefferson, and Arapahoe County residents alarmed and distraught at the impacts of aviation on their homes, their health, their children's schools, and their quality of life."¹ Community pressure did not merely inspire the legislation — it shaped its specific provisions, including the requirement that airports adjacent to densely populated residential areas be named and held to enforceable fuel transition deadlines.

We cite this origin because the FAA's Plan, in its current draft form, centers primarily on fuel developers, manufacturers, and airport infrastructure. We urge the FAA to formally recognize the role of community advocates and affected residents as legitimate and essential stakeholders in the national transition process — not only as recipients of public health protections, but as active participants whose engagement is both appropriate and necessary². Incorporating the U.S. EPA as a specifically-named stakeholder would further cement the important public health implications of this necessary transition.

II. House Bill 24-1235: A Legislative Model for State-Level Action

In May 2024, Colorado Governor Jared Polis signed HB 24-1235, "Reduce Aviation Impacts on Communities," into law³, making Colorado the first — and as of this writing, the only — state in the United States to enact a comprehensive statewide framework mandating and incentivizing the transition from leaded to unleaded aviation fuel. The bill was sponsored by Representatives Kyle Brown and Shannon Bird, and passed with broad bipartisan support after productive engagement with aviation industry stakeholders that resulted in amendments addressing their concerns without weakening the bill's core public health commitments.

Key Provisions of HB 24-1235

The law designates a combination of incentives, conditions, planning mandates, and governance reforms⁴:

- **Grant Funding Set-Aside:** The bill directs CDOT's Division of Aeronautics to designate the lesser of 10 percent of annual discretionary grant awards, or \$1.5 million per year, specifically for projects that facilitate the transition from leaded to unleaded aviation fuel, with priority given to airports in urban and suburban areas where surrounding communities may be disproportionately impacted.
- **Planning Deadlines:** From criteria set forth in the bill, specific airports identified by the Division of Aeronautics had to adopt a written plan by January 1, 2026, to phase out the sale of leaded aviation fuel by January 1, 2030 in alignment with the FAA's national goal.
- **Five Named Airports Subject to Requirements:** CDOT's Division of Aeronautics identified five high-activity airports subject to the enhanced planning requirements: Centennial Airport (KAPA), Rocky Mountain Metropolitan Airport (KBJC), Erie

¹ <https://coag.gov/blog-post/ag-weiser-hb24-1235-aviation-impacts/>

² <https://stateaviationjournal.com/index.php/state-news/colorado/governor-polis-signs-bill-to-reduce-aviation-impacts-on-colorado-communities>

³ <https://governorsoffice.colorado.gov/governor/news/governor-polis-takes-action-bills>

⁴ <https://www.codot.gov/programs/aeronautics/unleaded-avgas-transition-hb1235-implementation>

Municipal Airport (KEIK), Boulder Municipal Airport (KBDU), and Longmont/Vance Brand Airport (KLMO).

- Aircraft Owner Tax Credit: The law creates a refundable state income tax credit covering 50 percent of the cost of Supplemental Type Certificates (STCs) required to certify aircraft to operate on unleaded fuel — directly addressing one of the most frequently cited barriers to individual pilot adoption.
- Infrastructure Grants: The law explicitly authorizes state aviation grant funding for the design, engineering, construction, installation, acquisition, and inspection of infrastructure needed to sell unleaded aviation fuel at airports, as well as subsidies for the price differential between 100LL and unleaded alternatives.
- Community Representation on the Colorado Aeronautical Board: The bill expanded the board from seven to nine voting members by requiring the appointment of two members who are residents of communities affected by general aviation airport traffic — people who are not necessarily pilots, but who are directly impacted by aviation activity. The Colorado Department of Public Health and Environment (CDPHE) was also granted *ex officio*, nonvoting membership, ensuring public health expertise has a formal seat at the table.
- Health and Noise Technical Assistance: CDOT's Division of Aeronautics is now required to work with the CDPHE to evaluate, educate, and provide technical assistance to airports regarding the adverse health impacts of aircraft noise and lead emissions, with priority given to densely populated and heavily impacted communities.

Critically, as Attorney General Weiser noted in his legislative testimony, HB 24-1235 was "deliberately crafted not to regulate, but rather to deploy our State's tools to incentivize and disincentivize certain behaviors and operations" — a design philosophy that successfully neutralized preemption challenges while achieving meaningful public health progress. This approach may offer useful guidance to the FAA as it considers how to encourage state and local action in the final Plan.

III. Centennial Airport and Its Partners: Proof That Early Adoption Works

Colorado's legislative achievement did not occur in a vacuum. It was preceded and enabled by concrete proof of concept: Centennial Airport's voluntary, market-driven transition to unleaded fuel beginning in 2023, which demonstrated that the practical barriers cited by skeptics — cost, infrastructure, aircraft certification — were surmountable with the right combination of leadership, partnership, and incentives.

In May 2023, Centennial Airport became the first airport in the State of Colorado⁵ to offer unleaded aviation fuel. The milestone was made possible through a partnership between the airport, its largest fixed base operator, jetCenters of Colorado, and two large flight schools based on the field: Aspen Flying Club and Centennial Flyers. Rather than using small totes to store the unleaded fuel, jetCenters of Colorado committed a full dedicated unleaded fuel tank, dramatically reducing the per-gallon cost differential. The airport simultaneously launched an

⁵<https://www.globalair.com/articles/centennial-airport-becomes-first-in-colorado-to-offer-unleaded-avgas?id=5875>

STC assistance program so aircraft owners can receive a full reimbursement on the cost of obtaining the certifications required to use the new unleaded fuel.

The results were meaningful. Within the first 8 months of the launch, over 100 aircraft — roughly 20 percent of the eligible fleet — had obtained STCs. By 2024, one year after introduction, Swift UL94 unleaded fuel accounted for nearly 22 percent of all avgas sold at Centennial Airport⁶. And critically, 50 percent of flight school aircraft operating at the airport were certified and fueling with unleaded fuel — demonstrating that transition of the training fleet, often cited as particularly challenging, is entirely achievable.

Centennial Airport Executive Director Mike Fronapfel credited surrounding communities with driving the fuel transition: the Arapahoe County Public Airport Authority Board of Commissioners voted unanimously in March 2023 to authorize financial incentives⁷ for the transition, responding to community input and acknowledging that being a good neighbor required being proactive. The airport also received two CDOT grants totaling \$650,000 to subsidize the cost difference between 100LL and unleaded fuel for its customers — an early example of the grant mechanism that HB 24-1235 subsequently codified into law.

Centennial's experience directly refutes the most common institutional objection to transition: that it cannot happen safely or economically until a universal high-octane replacement for 100LL is available. UL94 does not serve all aircraft but Centennial demonstrated that an incremental, fleet-aware transition — starting with aircraft that can already use lower-octane unleaded fuel, while working toward broader solutions — is possible and effective.

IV. CDOT Division of Aeronautics: A Model for State Agency Implementation

The state's Division of Aeronautics has played an essential role in translating HB 24-1235's legislative mandates into operational reality. Its implementation work offers a practical template for how state aeronautics agencies can serve as effective intermediaries between national policy and local airport action.

Following enactment of HB 24-1235, the Division moved quickly to fulfill its statutory responsibilities⁸. It identified the five airports subject to the law's enhanced planning requirements and published clear, detailed guidance on how each airport must prepare and submit its unleaded fuel transition plan. The Division's Unleaded Avgas Transition Plan Preparation Guide set out specific requirements for each airport's submission, including: a summary of community outreach and tenant engagement; an inventory of existing fuel storage infrastructure that could be converted; a proposed timeline for infrastructure changes; and a description of local financial incentives being offered to aircraft owners and fixed-base operators.

The Division also fully implemented the law's grant funding provisions, establishing a dedicated grant set-aside within the State Aviation System Grant Program for unleaded transition projects and approving grants to airports making the transition. CDOT grants have directly funded price subsidy programs at Centennial and Rocky Mountain Metropolitan Airport, making

⁶<https://avweb.com/aviation-news/colorados-centennial-airport-leads-unleaded-aviation-fuel-initiative-with-300000-grant-approval/>

⁷<https://castlerocknewspress.net/stories/centennial-airport-becomes-first-in-colorado-to-offer-unleaded-aviation-gas,432746>

⁸ <https://www.codot.gov/programs/aeronautics/unleaded-avgas-transition-hb1235-implementation>

the cost differential between leaded and unleaded fuel a non-issue in the immediate term for pilots — overcoming the single most significant barrier to voluntary adoption.

The Division has also taken a broader coordination role, sharing technical information and best practices across Colorado's airport system, and working with the Colorado Department of Public Health and Environment as required by the law. This interagency collaboration — connecting aviation expertise with public health expertise — is a model the FAA's Plan should encourage.

We note that, rather than allowing implementation to stall, the Division has fully implemented its provisions of HB 24-1235, with speed and sincerity, and continues to share information with airports about the transition.

V. Recommendations to the FAA

Save Our Skies Alliance strongly supports the FAA's Draft Transition Plan and its commitment to eliminating lead from aviation gasoline by 2030. We offer the following specific recommendations to strengthen the final Plan, informed by Colorado's experience:

- Explicitly recognize state-led transition models. The final Plan should acknowledge that states like Colorado have already enacted comprehensive legislative and administrative frameworks that advance the national 2030 goal, and should encourage and facilitate other states to follow suit. The FAA should provide clear guidance to states on how state-level incentive programs can complement federal transition efforts without running afoul of federal preemption.
- Center community advocates as stakeholders. The Plan's stakeholder engagement framework should explicitly include residents, community health advocates, and airport-adjacent communities — not just the aviation industry. The Colorado model shows that community pressure is not an obstacle to transition; it is a catalyst. The FAA should design engagement processes that capture and respond to community voices.
- Highlight the incremental transition model. The Centennial Airport experience demonstrates that airports need not wait for a universal 100-octane unleaded replacement to begin meaningful transition. The FAA should explicitly endorse and encourage airports to begin with UL94 for eligible aircraft and flight schools while broader solutions are developed — and should provide guidance on how to manage dual-fuel environments safely and effectively.
- Support state grant program infrastructure. HB 24-1235's price subsidy mechanism — using state grant funds to close the cost gap between 100LL and unleaded alternatives — has proven effective at driving voluntary adoption. The FAA should consider how federal AIP funding or other mechanisms can support similar subsidy programs at the national level, particularly for airports in lower-income communities or rural areas where the cost differential is a greater barrier.
- Require community representation in airport transition planning. Just as HB 24-1235 expanded Colorado's aeronautical board to include community members affected by general aviation, the FAA should consider requiring that airports seeking federal transition funding demonstrate community engagement and incorporate affected residents into their transition planning processes.

- Acknowledge the public health urgency. The draft Plan is appropriately detailed on technical and operational dimensions of the transition. We urge the FAA to ensure the final Plan equally emphasizes the public health imperative — particularly the well-documented harm to children from lead exposure — as the foundational rationale for the 2030 deadline. A transition plan that is perceived as primarily industry-facing will not have the public trust it needs to succeed.

VI. Conclusion

Colorado did not wait for the national transition to happen to it. Through years of sustained community advocacy, responsive legislative action, early airport adoption, and diligent state agency implementation, Colorado has built the only statewide framework in the country that treats the phase-out of leaded aviation fuel as an urgent public health matter requiring real deadlines, accountability, and funding.

We recognize that the FAA's challenge is vastly more complex — with nearly 222,000 piston aircraft, hundreds of fuel types and engine configurations, thousands of airports, and a transition that must be accomplished without compromising aviation safety. We do not minimize that complexity. But Colorado's experience demonstrates that when community voices are heard, when leaders act with genuine urgency, and when practical incentives are put in place, transition is achievable ahead of schedule and without the disruptions that skeptics predict.

We urge the FAA to use Colorado as a case study, proving that the 2030 goal is not aspirational but achievable, and that the path to it runs through communities, not around them.

Save Our Skies Alliance thanks the FAA for this opportunity to comment and stands ready to provide additional information, connect FAA staff with Colorado stakeholders, or otherwise assist in the development of the final Plan.

VII. Alignment with Related Submissions

Save Our Skies Alliance recognizes the contributions of other organizations and stakeholders in addressing complementary aspects of the transition. These comments are submitted in addition to, and do not replace, any prior comments submitted to this docket by Save Our Skies Alliance or organizations supporting this submission.

It is remarkable that multiple commenters, spanning environmental advocates, community organizations, airports, and state agencies, converge on several shared concerns about the Draft Plan's weaknesses. SOS shares the concerns submitted by Oregon Aviation Watch (OAW), Aviation Impacted Communities Alliance (AICA), and Earthjustice about the FAA's over-reliance on a market-driven transition and share the call instead for a defined regulatory framework with concrete rulemaking timelines, as voluntary market forces have already failed to eliminate leaded avgas over three decades and cannot be trusted to meet the 2030 deadline. There is a shared broad agreement that the 2030 target must be treated as a firm deadline rather than an aspirational goal, backed by enforceable standards. There is also widespread agreement among these commenters that the Plan inadequately addresses the serious public health consequences of lead exposure, particularly for children living near airports, and that the EPA's 2023 endangerment finding should be more centrally integrated into the transition framework rather than mentioned only in passing. These submitters and comments also share

with SOS the specific recommendation that affected community groups be formally added as stakeholders with a meaningful collaborative role in implementation.

Save our Skies also endorses the comments from Centennial Airport and the Colorado Division of Aeronautics emphasizing the need for clear AIP funding guidance and infrastructure support, particularly for smaller airports that lack the financial capacity to navigate the transition without explicit federal direction.

Respectfully submitted,

Save Our Skies Alliance

Colorado