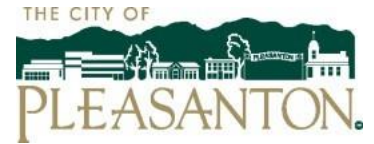




City of Dublin
100 Civic Plaza
Dublin, CA 94568



City of Livermore
1052 S. Livermore Ave.
Livermore, CA 94550



City of Pleasanton
P.O. Box 520
Pleasanton, CA 94566

May 30, 2024

Davina Hurt, Chair
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

Dear Chairperson Hurt,

On September 8, 2023, the Bay Area Air Quality Management District (BAAQMD) sent the City of Livermore a letter supporting the EPA’s finding that lead emissions from aircraft contribute to air pollution, which endangers public health and welfare. Additionally, the BAAQMD stated that “charged with protecting the public health, safety, and welfare of community members, we share a serious concern over the potential for continuing and irreversible damage that lead air pollution from leaded aviation gasoline (avgas) can inflict on Bay Area constituents – particularly to the health and development of exposed children, the safety of airport workers, and the welfare of airport-adjacent communities...We understand that the Livermore Municipal Airport is considering taking steps in this direction and we wholeheartedly support these efforts.”

In October 2023, the City of Livermore City Council directed staff to update the Minimum Standards for Commercial Aeronautical Activity to include provisions requiring all airport fuel providers to offer unleaded aviation fuel.

On December 11, 2023, the Livermore Airport (LVK) brought the requested changes to the Livermore City Council for consideration, and they subsequently approved the update.

Finally, on May 6, 2024, the Livermore City Council approved and codified the Municipal Code formally requiring the provision of Unleaded Aviation Fuel at LVK.

Since November of 2023, the City of Livermore, BAAQMD, and Five Rivers Aviation, the airport’s fuel supplier, have worked diligently together to obtain a *Permit to Construct* for a spare 1,000-gallon fuel tank, which will be used to dispense unleaded aviation fuel. On April 24, 2024, this permit was issued to Five Rivers Aviation, which has begun making the required arrangements for upgrades to the tank to be used for unleaded aviation fuel. Once the upgrades are complete, Five Rivers Aviation will reach out to BAAQMD to obtain the *Permit to Operate* as the

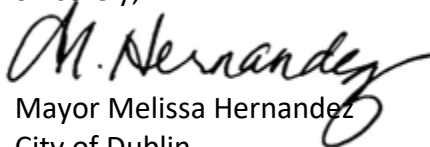
last step to be taken to accept deliveries of, and make available, unleaded aviation fuel at LVK. The City of Livermore expects unleaded aviation fuel to be available at LVK by this summer.

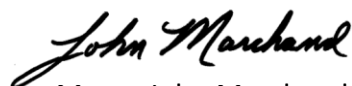
Now, the combined cities of Livermore, Pleasanton, and Dublin request the BAAQMD continue its support of adopting the use of unleaded aviation fuel in our region.


As you may be aware, commercially available unleaded aviation fuel is not currently approved under the American Society for Testing and Materials (ASTM) standard, which would allow an operator to safely utilize the fuel without taking any other action. Instead, the fuel was approved under the Supplemental Type Certificate (STC) certification. The result is that each individual aircraft owner must obtain a STC certificate for their aircraft and engine prior to utilizing unleaded fuel. The cost for this certification can range from a few hundred dollars to over a thousand dollars. Unfortunately, this is a barrier to the use of unleaded fuel that many pilots may not be willing to cover on their own, especially given that there is no regulatory requirement to use unleaded fuel which is often higher priced than its leaded counterpart.

Therefore, we are asking the BAAQMD to support the adoption of unleaded fuel use in the region and to further its commitment to “protecting the public health, safety, and welfare of community members,” through the development of a grant program incentivizing the acquisition of these important STC certifications by Bay Area pilots. This type of program could achieve significant benefits by accelerating the transition to unleaded fuels and furthering the Bay Area Air Quality Management District’s goals of ensuring cleaner air and healthier communities.

Sincerely,


Mayor Melissa Hernandez
City of Dublin


Mayor John Marchand
City of Livermore


Mayor Karla Brown
City of Pleasanton