

March 13, 2026

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Subject: California Air Resources Board comment on the draft FAA Transition Plan to Unleaded Aviation Gasoline\_9-AVS-AIR670-AVGAS

Dear Dr. Wrzesinski,

Thank you for the opportunity to comment on the draft Federal Aviation Administration (FAA) Transition Plan to Unleaded Aviation Gasoline, released between January 6-12, 2026. The California Air Resources Board (CARB) appreciates FAA's leadership in developing a comprehensive plan, as required under the 2024 FAA Reauthorization Act, to guide a nationwide, structured, safe, and coordinated transition to unleaded aviation gasoline while maintaining the operational efficiency of the general aviation fleet. CARB strongly supports the efforts invested in the development of this plan, which represents a critical step toward eliminating lead from aviation gasoline (avgas). However, with only about four years remaining and no clearly defined target deadlines for completing the goals and actions associated with Phases 1 through 3 of the Transition Plan to Unleaded Aviation Gasoline, more decisive action is necessary to achieve the elimination of lead from avgas by 2030.

CARB urges FAA to move beyond planning and establish regulatory requirements: specifically, a fuel standard to eliminate lead from aviation gasoline and to take regulatory action to ensure that leaded avgas is not used after 2030. With the EPA's Endangerment Finding related to lead emissions from aircraft engines, we understand that FAA must exercise its authority under 49 U.S.C § 44714 to prescribe standards for the composition or chemical or physical properties of a fuel or fuel additive.<sup>1</sup> Additionally, 49 U.S.C § 44711(a)(9) prohibits the manufacture, delivery, sale, or offer for sale of fuel that violates FAA fuel composition requirements once they are established. Given FAA's regulatory authority, CARB requests that FAA

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<sup>1</sup> U.S. Environmental Protection Agency. 2023. *Finding That Lead Emissions From Aircraft Engines That Operate on Leaded Fuel Cause or Contribute to Air Pollution That May Reasonably Be Anticipated to Endanger Public Health and Welfare*, Federal Register 88, no. 202 (October 20): 72372-.

initiate rulemaking activities immediately, to ensure timely and effective elimination of leaded avgas by 2030.

As acknowledged in the Transition Plan, California has enacted Senate Bill 1193 banning the sale of leaded aviation gasoline for small piston engine aircraft by January 1, 2031.<sup>2</sup> CARB strongly supports the removal of lead from aviation fuels to protect communities, especially those near general aviation airports, from harmful lead exposure.

In addition to the regulatory phase-out of leaded aviation gasoline by 2030, CARB strongly recommends that FAA streamline the authorization process for fuel developers seeking approval to produce unleaded aviation gasoline. CARB urges FAA to expedite and prioritize the approval and authorization of unleaded aviation fuels, without compromising safety or operational reliability, to ensure that the 2030 milestone can be met. By expediting the approval process, it would help to bring more new fuels into the market by 2030. Currently, Supplemental Type Certificate (STC) approvals involve lengthy, aircraft-specific procedures that can take anywhere from several years to more than a decade,<sup>3</sup> depending on the fuel and the range of aircraft and engine models involved. While the Fleet Authorization pathway under the Piston Aviation Fuel Initiative (PAFI)<sup>4</sup> typically moves more quickly, it still requires substantial time, often requiring multiple years because of testing from candidate selection to authorization.<sup>5</sup>

CARB understands that a variety of costs are involved with the transition to unleaded fuels, including the purchase of STCs and other aircraft modifications, airport infrastructure upgrades or additional storage tanks, and potential fuel price differentials. CARB recommends exploring cost mitigation strategies such as expanding the Airport Improvement Program (AIP) eligible users and criteria to allow these financial grants to support airport infrastructure needs for adopting unleaded aviation fuel, without pushing costs onto aircraft owners and pilots.

CARB is willing to work closely with FAA to ensure a safe, smooth, and coordinated transition to unleaded aviation gasoline in California.

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<sup>2</sup> *Bill Text - SB-1193 Airports: leaded aviation gasoline.*

<sup>3</sup> O'Connor, Kate. "Unleaded AvGas." *TorranceAirport.org*, Sept 1. 2022.

<sup>4</sup> Federal Aviation Administration. 2024. *Guidance on the Fleet Authorization Process for Incorporation of Unleaded Aviation Gasolines*, Policy Statement PS-AIR-600-20-01, March 20, 2023.

<sup>5</sup> Aero-News Network. 2019. "FAA Issues Update On Unleaded Avgas Replacement." July 16, 2019.

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If you have any questions or would like more information, please contact Mo Chen, Manager of the Aviation Technology and Modeling Section, at [mo.chen@arb.ca.gov](mailto:mo.chen@arb.ca.gov).

Sincerely,

Matthew Lakin, Chief, Air Quality Planning and Science Division

cc: Mo Chen, Manager, Aviation Technology and Modeling Section