

From: ott.irene@frontier.com
To: [HTP Exhibits](#)
Subject: House Bill 2109 public comments
Date: Thursday, February 16, 2017 7:51:42 PM

The following comments are made in opposition to House Bill 2109:

1. There is no currently available non leaded fuel to replace avgas. Banning this gas absent a replacement fuel places a hardship on cropdusters and others who make their living utilizing this fuel source.

2. According to Teledyne-Continental Motors current aircraft engines use the lead in avgas as a lubricant and coating between the valve, guide, and seat. Use of non leaded fuels can result in excessive exhaust valve wear with cylinder performance deteriorating to unacceptable levels in under 10 hrs. Absent a tested replacement fuel that does not compromise the safety of aircraft users, it is irresponsible to require this change

3. As of 2008, the use of avgas in the US represented only .14% of the motor gasoline fuel.

4. This law will create a hardship on Oregon retail outlets providing avgas as many users will have access to the gas outside the state, moving this retail trade to surrounding states.

5. It appears this rule may be against interstate commerce rules due to the use of small piston powered aircraft to transport people and products across state lines.

6. Data needs to be reviewed showing the amount of pollutants Oregon aircraft are responsible for that would be eliminated by this bill to determine the costs in relation to the impacts the bill would have.

If this bill is passed, it should contain the following conditions:

1. A limit on the increased cost of fuel that can result from the change based upon comparable fly time of avgas compared to non leaded fuel.
2. Research documenting that the change in fuel type will not create safety issues due to necessary increased maintenance and reduced engine life.
3. The replacement fuel must be commercially available.

Thank you for considering these comments.

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