October 12, 2021

Sent via Email

Administrator Michael Regan
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460
Regan.Michael@epa.gov

Dear Administrator Regan:

The undersigned 57 organizations and 146 medical professionals, professors, advocates, and other individuals submit this letter in support of the October 12, 2021 updated petition, originally submitted on August 24, 2021, of Alaska Community Action on Toxics, Center for Environmental Health, Friends of the Earth, Montgomery-Gibbs Environmental Coalition, and Oregon Aviation Watch, and by the County of Santa Clara, California and the Town of Middleton, Wisconsin, petitioning the U.S. Environmental Protection Agency (“EPA”) to make an endangerment finding under section 231 of the Clean Air Act that leaded aviation gasoline (“avgas”) contributes to air pollution that harms public health and welfare.¹

Emissions from leaded avgas, used by many piston-engine aircraft, make up over 70% of the lead that is released domestically into the atmosphere. These lead emissions put the millions of people, including hundreds of thousands of young children, that live near general aviation airports at an increased risk of harm from lead. Indeed, multiple studies have shown that children who live near general aviation airports where lead is used have blood lead levels that are significantly higher than children who do not. This is particularly troubling because there is no safe level of lead, and childhood exposures to lead can lead to a host of adverse health effects, including interference with brain development. Leaded avgas emissions also exacerbate environmental injustice: most of the fifty general aviation airports with the highest lead emissions are located in communities of color, and children of color are already disproportionately burdened by chemical exposures, including by exposures to lead.

Even though EPA has known for years that the use of leaded avgas by piston-engine aircraft increases the blood lead levels of children who live near general aviation airports, increasing their risk of learning disabilities and neurodevelopmental disorders, EPA has thus far declined to regulate this largest remaining source of lead in the air. The undersigned organizations and individuals ask EPA to grant the petition, make a long-overdue endangerment finding for leaded avgas, and begin the process of regulating this source of harmful lead

¹ 42 U.S.C. § 7571(a)(2) (“The Administrator [of the EPA] shall . . . issue proposed emission standards applicable to the emission of any air pollutant from any class or classes of aircraft engines which in his judgment causes, or contributes to, air pollution which may reasonably be anticipated to endanger public health or welfare.”).
emissions. Doing so is an important step in fulfilling the Biden-Harris Administration’s commitments to protect children’s health and promote environmental justice.

Sincerely,

Organizational Signatories:

Cindy Christiansen
Anne Hollander
Darlene Yaplee
Aviation-Impacted Communities Alliance

Lisa Arkin
Beyond Toxics

Jayla Burton, MPH, MS
Breast Cancer Action

Jane Williams
California Communities Against Toxics

Robina Suwol
California Safe Schools

Bonnie Bick
Chapman Forest Foundation

Robert Germann
Gary Keller
Citizens Against Gillespie’s Expansion and Low Flying Aircraft

Kimberly Gibbs
Citizens for Quiet Skies

Bobbi Willding
Clean and Healthy New York

Amit Rosner
Clearya

Rev Edward Pinkney
Benton Harbor Community Water Council

Cindy Christiansen
Judith Gunderson
BOS Fair Skies

Nancy Buermeyer
Breast Cancer Prevention Partners

Jose Barrera
California League of United Latin American Citizens (LULAC)

Sandy Flores
Capitol Park Goss Dobern NA

Kristie Trousdale
Children’s Environmental Health Network

Citizens for Airpark Safety
Citizens for Airpark Safety – Montgomery
County Airpark

Rebecca Overmyer-Velázquez
Clean Air Coalition of North Whittier and Avocado Heights

Andria Ventura
Clean Water Action

Deidre Nelms
Maya Nye
Coming Clean
Luis Olmedo  
Comite Civico Del Valle, Inc.

Taylor Thomas  
East Yard Communities for Environmental Justice

Nayyirah Shariff  
Flint Rising

Laura Weinberg  
Great Neck Breast Cancer Coalition

Todd Larsen  
Green America

Juan Estrada, Advocacy Associate and Organizer  
Green Foothills

David McCoy  
GrotonAyerBuzz

Claire L. Barnett, MBA  
Healthy Schools Network

Indra N. Frank, MD, MPH  
Hoosier Environmental Council

Jose T. Bravo  
Just Transition Alliance

Darcie Green  
Latinas Contra Cancer

Tracy Gregoire  
Learning Disabilities Association of America

Jared Opsal  
Missouri Coalition for the Environment

Kathleen A. Curtis, LPN  
Moms for a Nontoxic New York

Miriam Rotkin-Ellman  
Natural Resources Defense Council

Mary Peveto  
Neighbors for Clean Air

Phyllis Salowe-Kaye  
New Jersey Citizen Action

Elaine Miller  
Plane Sense 4 Long Island

Danny Garza  
Plata Arroyo Neighborhood Association and Eastgate N.A.C.

Susana Almanza  
PODER

Michele Mashburn  
San Jose Peace and Justice Center

Patricia Currie  
Say NO to KHTO

Martin Wolf  
Seventh Generation

Martha Camacho Rodriguez  
Social Eco Education

James Lawson  
Southern Maryland Fair Skies Coalition

M. Beth Butler  
Southern United Neighborhoods

Tony Verreos  
STOP Jet Noise NOW! SFOAK North S.F. Bay Area

Kimberly Turner  
Suellen Wagner  
Studio City For Quiet Skies
Gina Cassetta
The 02152 Initiative

Elizabeth O’Brien
The Lead Education and Abatement Design (LEAD) Group Inc. Australia

Serena Alvarez, Esq.
The Salvador E. Alvarez Institute for Non-Violence

Town Board of Supervisors
Town of Middleton, WI

Town of Springfield, Dane County, WI

Monica E. Unseld, PhD, MPH
Until Justice Data Partners

Ellen Saunders
Washington County Citizen Action Network

Melissa Mays
Water You Fighting For

Stephen Knight
Worksafe

Individual Signatories:

Aaron H. Barnes
Restaurateur

Adil Ugur Kocataskin
Licensed Professional Counselor

Amy Christel
Retired

Amy McCoy

Amy Sinden
Professor of Law, Temple University

Ani Simonian
Banker

Anita Derry
Retired RN

Anne O’Neill Fitzgerald
Homemaker

Anne Wilson
Software Engineer

Arnold Rochlin
Retired

Barbara L. Wood
Psychologist

Bebe Kanter
Volunteer

Ben Schleifer
Food Program Coordinator

Bernedine Lund
Retired

Blaine Ackley
Retired

Blair Pershyn
Educator
Bob Eshback
Retired

Brian Beinlich
Retired

Brian Huynh
Engineer

Brooke Beloso
Mother

Carol Pittel
Homemaker

Carol Williams
Retired

Carole Sherritt
Retired

Catherine Wallenmeyer
Business Industry Consulting Manager

Christiane Pelmas
Psychotherapist, Professor

Christy Bumanis
Retired

Cynthia Allison
Retired

Cynthia Ro
Healthcare Worker/Owner

Dana Daniel
Teacher

Danielle Tellier
Teaching Assistant

David A. Kimball
Actor

David McCoy
STEAM Educator

David Segal
Food Manufacturer

David Wert
Retired

Dawud Shabaka
Environmental Justice Advocate

Debbie Thrall
MSPT

Debi Wagner
Quiet Skies Coalition

Deborah Atchison
Retired RN

Den Mark Wichar
Science Teacher

Dhar Meh
Engineer

Diane Winters
Self-Employed

Donna Urban
Instructional Designer

Ed Bennett
Retired

Edward Layo

Eleanor G. Lam
Retired

Elisa Bargetto
Development Coordinator
<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>Evan F. Gellar</td>
<td>Retired Attorney</td>
</tr>
<tr>
<td>Fateme Yousefi</td>
<td>Environmental Scientist</td>
</tr>
<tr>
<td>George Rindov</td>
<td>Business Analyst</td>
</tr>
<tr>
<td>Guido Garfunkel</td>
<td>Designer</td>
</tr>
<tr>
<td>Howard W. Mielke, PhD</td>
<td>Professor</td>
</tr>
<tr>
<td>Irene Svetel</td>
<td>Writer</td>
</tr>
<tr>
<td>Jan Mun</td>
<td>Artist</td>
</tr>
<tr>
<td>Jean Publicee</td>
<td>Retired</td>
</tr>
<tr>
<td>John Vitagliano</td>
<td>Engineer</td>
</tr>
<tr>
<td>Juan G. Diaz</td>
<td>Software Engineering Manager</td>
</tr>
<tr>
<td>Kannan Thiruvengadam</td>
<td>Urban Farmer</td>
</tr>
<tr>
<td>Karen Wegela</td>
<td>Psychologist, Professor</td>
</tr>
<tr>
<td>Katherine Riley</td>
<td>Retired</td>
</tr>
<tr>
<td>Kathryn Rifkin</td>
<td></td>
</tr>
<tr>
<td>Kent Helm</td>
<td>Engineering Director</td>
</tr>
<tr>
<td>Kurt Wiesenberger</td>
<td></td>
</tr>
<tr>
<td>Faithe J. Hooks</td>
<td>MSN, RN</td>
</tr>
<tr>
<td>Fred Kelly</td>
<td>Retired</td>
</tr>
<tr>
<td>Georgette Wolf</td>
<td></td>
</tr>
<tr>
<td>Henry Oberhelman</td>
<td>Engineer</td>
</tr>
<tr>
<td>Irene Covarrubias</td>
<td>LCSW</td>
</tr>
<tr>
<td>Jacob Tonkel</td>
<td>Medical Device Engineer, Activist</td>
</tr>
<tr>
<td>Janna Tyrer</td>
<td>Retired Office Ergonomist</td>
</tr>
<tr>
<td>Joan</td>
<td>Retired</td>
</tr>
<tr>
<td>Jonathan Skinner-Thompson</td>
<td>Associate Clinical Professor</td>
</tr>
<tr>
<td>Judy Levin, MSW</td>
<td>Pollution Prevention Director</td>
</tr>
<tr>
<td>Karen Church</td>
<td>Retired</td>
</tr>
<tr>
<td>Karina Gomez</td>
<td>Community Engagement Manager</td>
</tr>
<tr>
<td>Kathleen O’Connell</td>
<td>Retired</td>
</tr>
<tr>
<td>Kelly Peterson</td>
<td></td>
</tr>
<tr>
<td>Kiva Fecteau</td>
<td>Retired</td>
</tr>
<tr>
<td>Labake Adeaga</td>
<td>Realtor</td>
</tr>
<tr>
<td>Name</td>
<td>Title</td>
</tr>
<tr>
<td>-----------------------------</td>
<td>------------------------------------------</td>
</tr>
<tr>
<td>Landon Hilliard</td>
<td>Professor</td>
</tr>
<tr>
<td>Lawrence Robinson</td>
<td>Retired</td>
</tr>
<tr>
<td>Linda Huttsell</td>
<td>Retired Teacher</td>
</tr>
<tr>
<td>Lon Goldstein</td>
<td>Designer</td>
</tr>
<tr>
<td>Lyn Grotke</td>
<td>Retired</td>
</tr>
<tr>
<td>Madhukar Gurram</td>
<td>Software Engineer</td>
</tr>
<tr>
<td>Maria Kolick</td>
<td></td>
</tr>
<tr>
<td>Marilyn Madden</td>
<td>Health Advocate and Counselor</td>
</tr>
<tr>
<td>Marriam Hill</td>
<td>Sociologist</td>
</tr>
<tr>
<td>Mary Urban</td>
<td>Retired Office Administrator</td>
</tr>
<tr>
<td>Maya Bentz</td>
<td>Professor</td>
</tr>
<tr>
<td>Melissa Lound</td>
<td>Digital Communications and Fundraising</td>
</tr>
<tr>
<td>Morri Markowitz, MD</td>
<td>Pediatrician, Lead Expert</td>
</tr>
<tr>
<td>Nadia Nouri</td>
<td>Retired</td>
</tr>
<tr>
<td>Niels Schonbeck</td>
<td>Professor</td>
</tr>
<tr>
<td>Margaret A. Roberts</td>
<td>Retired</td>
</tr>
<tr>
<td>Mary A. Paterson, RN</td>
<td>Professor of Nursing</td>
</tr>
<tr>
<td>Mary Vierling</td>
<td>Retired</td>
</tr>
<tr>
<td>Megan Cavallari</td>
<td>Film and TV Composer</td>
</tr>
<tr>
<td>Melissa Ribner</td>
<td></td>
</tr>
<tr>
<td>Nadia Ahmad</td>
<td>Associate Professor of Law</td>
</tr>
<tr>
<td>Nassim Nouri</td>
<td>Retired Scientist, Community Organizer</td>
</tr>
<tr>
<td>Nila Brantley</td>
<td>Physician</td>
</tr>
</tbody>
</table>
Noel Amezquita
Healthcare Worker

P. Ziegler

Pamela Mayfield
Retired

Patricia D’Amore
Retired

Patricia E. McKinley
Retired Zoologist

Patrick Wojahn
Mayor, City of College Park, MD

Paula Eardley
Retired

Paula P. Gillette
Professional Engineer

Penelope J. Lichatowich
Retired Nurse Practitioner

Peter Ewert
Architect

Peter Hurst
Retired

Rebecca Trupp
Research Nurse

Rickey Kim
Physician

Robert Bailey
Social Worker

Robert Crawford
Retired

Dr. Sacoby Wilson, PhD, MS
Associate Professor

Sally Sincic
Retired

Dr. Sara Perl Egendorf
Postdoctoral Researcher

Scott Wilson Badenoch Jr.
Attorney

Shane Williams
Parent

Shannon Coffin
Designer

Dr. Sheila Liewald
DAOM

Sophia Christel
Climate Analyst

Stacey Vargas
Educator

Sue Blitz

Susan Chiang, MPH, MPP
Pollution Prevention Director

Sylvia Arenas
Councilmember

Tanja Freeman

Teresa Tse

Timothy J. Hooks
IT
Trisha Lamb  
Retired

Trujillo Miguel Angel Vazquez  
Poet, Song Writer, Music Creator, Activist, Community Leader

Tseming Yang  
Professor of Law, Santa Clara University School of Law

Vanessa Kranz  
Research Associate

Veronique Mead  
MD, MA

Victoria Miller

Virginia Nuta  
Retired Attorney

Zachary Hollopeter  
Residential Case Worker

cc: Steve Dickson, Administrator, Federal Aviation Administration

Joseph Goffman, Acting Assistant Administrator, Office of Air and Radiation, Environmental Protection Agency

Alejandra Nunez, Deputy Assistant Administrator for Mobile Sources, Office of Air and Radiation, Environmental Protection Agency

Marion Hoyer, Office of Transportation and Air Quality, Environmental Protection Agency