

James T. Lubischer, M.D.

9-29-24

(emailed to JCT.exhibits@oregonlegislature.gov at about 12:45 PM)

To: The Oregon Joint Committee on Transportation,

*“Transportation safety remains a top concern...Transportation safety is most critically needed on our high-traffic roads and **near our schools.**”*¹

My Concern: Children that live near the *Hillsboro Airport* (HIO), or go to school around the airport, are not safe from lead poisoning. The *Hillsboro Airport* is one of the nation’s highest emitters of lead air pollution.² Lead poisoning causes brain damage.³ This can lead to: lower IQ - speech difficulties – ADHD - risk of failure to complete high school - behavioral problems - pregnancy and aggression as a teen - criminal behavior as a young adult - reduced grey matter in regions of the brain known to govern executive judgment, impulsivity, and mood regulation. Children’s blood lead levels are higher within 1500 meters of an airport’s boundaries. The closer children live to an airport that uses leaded fuel the higher their blood lead levels are. “...no level of lead in a child’s blood can be specified as safe...” (*Centers for Disease Control and Prevention*)⁴

Effective 11-20-23, the EPA Administrator found that “*engine emissions of lead from certain aircraft cause or contribute to the lead air pollution that may reasonably be anticipated to endanger public health and welfare under the Clean Air Act*”.

On 5-16-24 President Biden signed the *FAA Reauthorization Act* into law. Section 47107(a) of title 49, United States Code was amended and now states:

*“(24) the airport owner or operator will continue to make available to general aviation aircraft all types of fuel, which were available to such aircraft at that airport at any time during calendar year 2022, **until the earlier of** “(A) December 31, 2030; **or** “(B) **the date on which a replacement for 100 octane Low Lead aviation gas for use by piston-driven aircraft is widely available for use, as determined by the Secretary**”.*

G100UL was developed by *General Aviation Modifications, Inc.* and is the only *FAA* approved unleaded aviation fuel which can be used by all piston engine fixed-wing aircraft. *G100UL* is produced by *Vitol Aviation* (based in Houston, Texas). *G100UL* may be ordered by contacting *Vitol Aviation* at <https://www.vitol.com/avgas/> .

I ask the *Oregon Joint Committee on Transportation* to stop the lead poisoning of the children around the Hillsboro Airport by requiring that the *Port of Portland* purchase G100UL and store it in their fuel tank at Hillsboro Airport that they have publicly stated is ready for the storage of unleaded fuel. At that time the Port may legally prohibit the use of leaded fuel at Hillsboro Airport. At that point the FBO’s at HIO and the Hillsboro Aero Academy flight school must transition to G100UL for use in all fixed-wing piston engine aircraft.

No financial incentives need be provided as the cost of required *STC* purchases should be offset by savings from the expected lengthening of the *Time Between Overhauls* (This is expected as G100UL will not have the fouling of spark plugs as there is less “detonation” occurring, if any).

In addition, the State must prohibit all sales of any lead containing aviation fuel to fixed-wing piston engine aircrafts in Oregon and work with the State of Washington to do likewise, especially at airports in southern Washington.

Thank you, Jim Lubischer

¹ Go to: <https://www.orcities.org/resources/communications/bulletin/joint-transportation-committee-announces-roadshow> > Then under “Joint Transportation Committee Announces Roadshow go down to “The LOC has prepared core messages to include in your comments. Those message can be found **here.**” Click on the “**here**” link > open the download and see: **Why is it Essential for the 2025 Legislature to Increase Transportation Funding?** > Then see “*Transportation safety remains a top concern*” paragraph.

² 2017 NEI (National Emissions Inventory)

https://earthjustice.org/sites/default/files/files/top100leadpollutingairports_2021-08-23.pdf

³ ***“Lead is the most extensively studied environmental neurotoxicant...Along with clinical and epidemiological data, this evidence has clearly established that lead is toxic to the developing and mature nervous system.”*** -- *“Preventing Lead Poisoning in Young Children”*, A Statement by the Centers for Disease Control and Prevention, August 2005, U.S. Department of Health and Human Services, Public Health Service, Appendix p14.

<https://www.cdc.gov/nceh/lead/publications/prevleadpoisoning.pdf>

“Exposure to even low levels of lead can cause damage over time, especially in children. The greatest risk is to brain development, where irreversible damage can occur. Higher levels can damage the kidneys and nervous system in both children and adults.” (Mayo Clinic) *Patient Care & Health Information > Diseases & Conditions > Lead Poisoning > Complications*

<https://www.mayoclinic.org/diseases-conditions/lead-poisoning/symptoms-causes/syc-20354717>

“Deficits in cognitive and academic skills associated with lead exposure occur at blood lead concentrations lower than 5 µg/dL” Dr. Lanphear, et al. *Public Health Reports 2000* (115); 521-529,

<https://pubmed.ncbi.nlm.nih.gov/11354334/>

“In short, this study [Nigg’s] confirms that ADHD, both as a diagnosis and as symptom dimension, is associated with blood lead level at low exposure levels, even below 2.5 ug/dL.” (Joel T. Nigg, Ph.D. et. al., Oregon Health & Sciences University) *“Confirmation and Extension of Association of Blood Lead with Attention-Deficit/Hyperactivity Disorder (ADHD) and ADHD Symptom Domains at Population-Typical Exposure Levels”*, 2010, *J Child Psychol Psychiatry*, Joel T. Nigg, Ph.D. et al, Oregon Health & Sciences University <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2810427/>

“IQ decreases with increasing levels of blood lead.” (Centers for Disease Control and Prevention) *“Preventing Lead Poisoning in Young Children”*, A Statement by the Centers for Disease Control and Prevention, August 2005, U.S. Department of Health and Human Services, Public Health Service, Appendix p9.

<https://www.cdc.gov/nceh/lead/publications/prevleadpoisoning.pdf>

“Lead associated cognitive and behavioral effects have, not surprisingly, been associated with an increased risk of failure to complete high school.” (Centers for Disease Control and Prevention) *“Preventing Lead Poisoning in Young Children”*, A Statement by the Centers for Disease Control and Prevention, August 2005, U.S. Department of Health and Human Services, Public Health Service, Appendix B-4.

<https://www.cdc.gov/nceh/lead/publications/prevleadpoisoning.pdf>

“Recent national policies have greatly reduced lead exposure among U.S. children, but even very low exposure levels compromise children’s later intellectual development and lifetime achievement. No threshold for these effects has been demonstrated.” *“Lead Exposures in U.S. Children, 2008: Implications for Prevention”*, Levin et. al., *Environmental Health Perspectives*, Volume 116, Number10, October 2008. <https://doi.org/10.1289/ehp.11241>

“...no level of lead in a child’s blood can be specified as safe...” *“Preventing Lead Poisoning in Young Children”*, A Statement by the Centers for Disease Control and Prevention, August 2005, U.S. Department of Health and Human Services, Public Health Service, p1. <https://www.cdc.gov/nceh/lead/publications/prevleadpoisoning.pdf>

⁴ *“Preventing Lead Poisoning in Young Children”*, A Statement by the Centers for Disease Control and Prevention, August 2005, U.S. Department of Health and Human Services, Public Health Service, p1.

<https://www.cdc.gov/nceh/lead/publications/prevleadpoisoning.pdf>