

I represent the 1000+ members of the Malibu Mirage Owners & Pilots Association (MMOPA). We all fly variants of the Piper PA-46 Malibu aircraft. The Malibu, Matrix, and Mirage models all feature high performance, turbocharged piston engines that operate at altitudes up to 25,000 ft. These aircraft are owned primarily by owner-pilots who fly for business. They represent a large investment (\$300K to \$1.2M) and are an essential tool for travel. Our association's position is three-fold: 1) We are concerned about atmospheric lead emissions from general aviation piston aircraft that burn 100LL avgas, and we support the research efforts to bring a suitable unleaded replacement fuel to the market as quickly as possible. 2) In context, the lead emissions from 100LL is minuscule, so while important, this is not urgent. The general aviation industry needs adequate time to develop an unleaded replacement avgas that will function properly in our aircraft, without loss of performance or expensive modifications. 3) The wrong solution, or a premature action by the EPA, would devastate the general aviation economy, from private and corporate aircraft owners, to those who fuel and service these aircraft. In an already difficult economy and market, the wrong action here would put thousands of people out of work and close the doors and hundreds of small businesses. Our members opposed any rulemaking on lead emissions for piston engine aircraft until: 1) the approval process for any new fuel is clearly defined by the FAA, and the authority of the EPA and FAA in this matter is clarified. 2) a viable, minimum 100-octane alternative avgas is developed and fully tested. 3) a realistic timeline supported by industry that provides for necessary infrastructure changes is developed, including a workable transition period. I must respectfully request that the EPA delay any rulemaking on lead emissions from piston engine aircraft until the above concerns are adequately addressed.