



Sustainable Aviation Technologies and Energies (SATE) Cluster

August 31, 2022

Rachel Assink
Rulemaking Lead
WA Department of Ecology
Air Quality Program
P.O. Box 47600
Olympia, WA 98504

Re: Proposed Clean Fuels Program Rule – SATE Cluster Comments

Dear Ms. Assink:

Thank you for the opportunity to comment on the proposed Clean Fuels Program Rule. The Sustainable Aviation Technologies and Energies (SATE) Cluster is a coalition of industry, entrepreneurs, government, academia, and venture capital partners leading the research, development, and deployment of sustainable aviation fuels, electrified- and hydrogen-powered aviation.

Aerospace is one of the most challenging sectors to decarbonize. With a goal of net-zero emissions by 2050, the aerospace industry is aggressively developing new technologies to attain that goal. Simultaneously, we can reduce aviation emissions today through the utilization of sustainable aviation fuels (SAF). With up to 80% lower lifecycle carbon emissions than conventional jet fuel, SAF is the only viable solution for reducing aviation emissions produced by medium- and long-distance flying in the immediate term. Yet, SAF will not become commercially viable without critical policy incentives.

The SATE Cluster appreciates Ecology including SAF as an opt-in fuel in the Clean Fuels Program. Still, the SATE Cluster is concerned the draft Clean Fuels Program Rule delays implementation of Tier 2 pathway applications until July 1, 2025—Tier 2 fuels include SAF. Given the bold, swift action needed to decarbonize this hard-to-abate sector, Ecology should allow for immediate credit generation and certification of SAF pathways at the program's onset on January 1, 2023.

Under the current proposal, many SAF producers will be able to leverage the California LCFS and Oregon CFP certification pathways. However, any SAF pathway not already approved by California or Oregon will not be considered until 2025. Delaying certification could delay the sale of SAF in Washington or prevent a potentially transformative, low carbon intensity SAF from entering the market.

With a broad array of sustainable feedstocks, clean electricity, and robust aerospace industry, Washington is uniquely positioned to be a national leader in SAF production. As the last state on the west coast to implement a program of this kind, Washington must aggressively incentivize SAF production to remain competitive with California and Oregon markets.

Thank you again for the opportunity to comment on the proposed Clean Fuels Program Rule. To follow up, please contact Misha Lujan, Director of Cluster Initiatives, via e-mail at MishaL@afa-wa.com.

Sincerely,

Misha Lujan
Director of Cluster Initiatives
Sustainable Aviation Technologies and Energies (SATE) Cluster