



September 8, 2025

To: Shorelands and Environmental Assistance Program
Department of Ecology
P.O. Box 47709
Olympia, WA 98504-7709

Submitted via online form:<https://sea.ecology.commentinput.com/?id=8pM3Hf7QK>

Subject: Scoping Document SAF Program PEIS

To Whom It May Concern:

Thank you for you for this opportunity to comment on the above reference subject

We incorporate by reference those comments made by Dianne L. Dick, Peter Riggs, CCAW (Cascadians for Clean Air and Water), Teri Wright, Gary Graham Hughes, BioFuelWatch, and those individuals and organizations who are concerned about the true sustainability of the process and use of SAFs.

Scoping questions on Sustainable Aviation Fuel (SAF) are important for assessing its environmental impact, as they help evaluate the lifecycle emissions and sustainability of different feedstocks used in SAF production. This ensures that SAF contributes to reducing greenhouse gas emissions and does not negatively affect food security or land use. If not carefully managed, SAF production can lead to negative consequences such as increased land use for crops, which may contribute to deforestation and higher food prices, ultimately worsening environmental issues.

Scoping questions must help clarify the environmental benefits and drawbacks of SAF. They should focus on lifecycle emissions, food security, land use changes, cumulative effects of feedstock use and feedstock sustainability. It is important to consider all aspects to avoid unintended consequences.

Thank you for in advance for this careful consideration.

Sincerely,

Arthur (RD) Grunbaum, President