American Soybean Association®

November 5, 2025

Casey Sixkiller, Director
Washington Department of Ecology
Clean Energy Coordination
P.O. Box 47709
Olympia, WA 98504-7709

Via Electronic Submission

Subject: American Soybean Association (ASA) Scoping Comments on the Washington SAF PEIS

Dear Director Sixkiller and the Washington Department of Ecology:

The American Soybean Association (ASA) appreciates the opportunity to provide input during the scoping phase for the Washington State Department of Ecology's Programmatic Environmental Impact Statement (PEIS) on Sustainable Aviation Fuel (SAF).

ASA represents approximately 500,000 U.S. soybean farmers on domestic and international policy issues important to the soybean industry and has 26 affiliated state associations representing 30 soybean-producing states. U.S. soybean growers have long been committed to producing the world's food, feed, fuel, and thousands of bioproducts in a sustainable and climate-smart way.

As the Washington State Department of Ecology (Ecology) determines what topics and alternatives related to SAF to study, ASA encourages inclusion of domestically produced soybean oil feedstock pathways in the PEIS. Soybean oil is the largest and most scalable renewable oil feedstock available in the United States and plays a critical role in decarbonizing aviation fuel while strengthening national energy and food security.

Alternatives and Pathways to Be Studied

ASA recommends that the PEIS include, as a distinct alternative, a dedicated U.S. agricultural vegetable oil feedstock pathway based on soybean oil used in hydroprocessed esters and fatty acids (HEFA) processes for SAF production.

This alternative should:

- Represent the full "farm-to-crush-to-fuel" supply chain, from U.S. soybean cultivation through oil extraction, refining, and fuel conversion.

- Allow comparison between domestic agricultural vegetable oils (soy, canola) and imported or waste oils (used cooking oil, animal fats).
- Evaluate the potential for U.S. feedstocks to enhance energy security, supply stability, traceability, and rural economic growth within Washington's SAF market.

Key Study Topics: Feedstock Supply, Economics, and Resilience

ASA requests that the PEIS study includes:

- Regional supply-chain modeling showing how soybean oil from major U.S. growing regions could reach Washington refineries via existing rail and port networks.
- Feedstock availability and price stability analyses comparing domestic soybean oil to alternative sources.
- Risk and resilience assessments on how domestic agricultural feedstocks support stable, verifiable, low-carbon SAF production over time.

Studying these areas will help Ecology evaluate the long-term reliability and emissions advantages of U.S. agricultural feedstocks versus imported or limited-volume waste oils.

Geographic and Lifecycle Scope

The PEIS should adopt a national feedstock boundary for modeling purposes. Although SAF facilities may operate in Washington, the majority of soybean oil feedstock originates from other U.S. regions.

ASA recommends:

- Including interstate transportation routes (rail, barge, and port systems) to accurately model feedstock logistics and associated emissions.
- Using updated Argonne GREET, USDA data, and other studies to assess the lifecycle carbon intensity (CI) of soybean oil-based SAF.
- Incorporating co-product allocation for soybean meal and other outputs to reflect the full environmental efficiency of soybean production.

Studying soybean oil within a national lifecycle and logistics framework will ensure the PEIS captures realistic outcomes for emissions, cost, and supply.

Environmental and Socioeconomic Considerations

Ecology should study how SAF demand for soybean oil may:

• Influence agricultural markets and rural economies, including job creation and renewable energy investment in producing regions.

• Promote climate smart agriculture, considering modern conservation practices (e.g., cover crops, reduced tillage, precision nutrient management) that lower greenhouse-gas emissions.

• Provide opportunities for sustainability, minimizing and/or eliminating indirect land-use change (ILUC) in modeling to most accurately represent soy's CI score while supporting soil health and biodiversity.

Including these topics will help Ecology assess the broader sustainability of SAF derived from agricultural feedstocks and ensure a balanced understanding of tradeoffs.

Data Transparency and Collaboration

ASA urges the Department of Ecology to:

• Disclose all lifecycle carbon intensity assumptions and data sources used in modeling soybean oil pathways.

• Conduct sensitivity analyses to test the influence of policy variables (e.g., credit prices, feedstock availability, transportation disruptions).

• Collaborate with industry and agricultural stakeholders, including ASA, to access the most current data on soybean yields, regional flows, and sustainability metrics.

As needed, ASA and its partners stand ready to provide verified data to strengthen Ecology's SAF analysis.

Conclusion/Next Steps

During this scoping process, ASA respectfully requests that Ecology include U.S. soybean oil feedstock pathways as a central study area in the SAF PEIS. Analyzing these pathways will help the Department accurately assess the environmental performance, scalability, and reliability of domestic soybean oil and other agricultural vegetable oil feedstocks to ensure policy outcomes reflect comprehensive, data-driven science.

ASA looks forward to continued collaboration and offers to provide additional data and expertise throughout PEIS development as needed.

Sincerely,

Caleb Ragland

Caleb Ragland, President
American Soybean Association