TO: State of Washington Department of Ecology
FROM: Elly Pepper, Director of Forest Policy, Natural Resources Defense Council
DATE: November 5, 2025
SUBJECT: Comments on Scoping for Sustainable Aviation Fuel Programmatic Environmental Impact Statement

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We thank the Department of Ecology for the opportunity to comment on its scoping project evaluating the environmental impacts of Sustainable Aviation Fuels (SAF), with the intention of creating a programmatic environmental impact statement (PEIS) that would generally cover future projects associated with SAF development.

NRDC would like to use this opportunity to discourage Washington State from further exploring and/or considering using slash and/or forest residues for SAF development. Indeed, doing so would have significant negative impacts on many of the key areas the scoping document seeks to examine, including environmental justice, air quality and greenhouse gases, water resources, noise and vibration, land use, and biological resources (species and habitat).

1. **Forest biomass sourcing is harmful to the climate and biodiversity** – Biomass sourcing leads to forest degradation, loss of carbon sequestration capacity, habitat loss, and wildlife declines, exacerbating our planet's biodiversity and climate crises. To embrace woody biomass as a SAF would only make it harder for Washington to meaningfully fight climate change, maintain and restore its forests, and conserve its wildlife. It has become increasingly clear that assumptions about the carbon neutrality of biomass are completely misplaced. Instead, biomass is a highly emissive energy source – from the logging of trees to the conversion to wood pellets to the transportation of the pellets to the burning of the pellets (or byproduct thereof) for energy. For source areas like the Pacific Northwest, using woody biomass for SAF will create a carbon debt that takes decades to repay because trees take a long time to grow back—much longer than the timelines relevant for climate change. In short, using SAF from woody biomass would not reduce aviation emissions at all.

   While the biomass industry and other proponents of using woody biomass for SAF claim they do and will use only wastes and residues of logging, this is not true. Indeed, the biomass industry is focused on logging – and, often clearcutting – whole trees, as evidenced by various investigations in the United States, Canada, Romania, and other areas. The biomass industry's failure to comply with sustainability standards in various countries has led to multiple investigations. For example, Drax – the UK's biggest bioenergy producer, which sources most of its biomass from the United States – is currently under investigation by the country's Financial Conduct Authority for false and misleading statements related to its sourcing. And in 2024, Ofgem – the UK's energy regulator – investigated Drax, concluding that the company misreported annual profiling data for 2021-2022 and lacked adequate data governance and controls.

Finally, the scale of wood that would be needed for SAF is alarming and further rules out the use of solely wastes and residues. A pilot project by Drax and Pathway Energy will require one million tons of wood per year to produce just 30 million gallons of fuel , whereas annual global jet fuel consumption totals 100 billion gallons. To produce any meaningful proportion of global jet fuel would require hundreds of millions – if not billions – of tons of wood.

2. **Biomass Sourcing Harms Environmental Justice Communities** – Biofuel sourcing also has significant environmental justice impacts, harming vulnerable communities of color with air pollution and other ills. Pellet mills – which would likely be necessary to develop woody biomass for SAF – are 50% more likely to be sited in economically depressed areas of color.

   Pellet mills emit hazardous or toxic air pollutants that are known to cause cancer and other serious health impacts even at relatively small amounts. A 2018 report by the Environmental Integrity Project found that 21 wood pellet mills exporting to the European Union emit thousands of tons of fine particulate matter or PM2.5 (fine dust), carbon monoxide, nitrogen oxides (smog), and volatile organic compounds (VOCs) every year, which the U.S. Environmental Protection Agency associates with illnesses ranging from respiratory and heart disease to cancer to slowed lung function in children.

   The National Association for the Advancement of Colored People (NAACP) found that African Americans who live near biomass power plants are more likely to suffer from increased exposure to many dangerous emissions (e.g., smog, sulfur dioxide) such than any other racial group in America. Further, the noise created by these plants affects residents' lives—between the dust, smog, and constant noise, many people cannot leave their homes.

   Despite all this, one-third of pellet mills in the U.S. South were in violation of emissions limitations set in their permits in 2017. In fact, violations of air quality laws have resulted in numerous enforcement actions, fines, and community-led lawsuits against pellet mills in the U.S. Southeast.

   The logging of forests around the pellet mills is also concerning because of the critical ecosystem services the trees provide to surrounding communities. Trees remove nutrients and other pollutants from water, meaning logging reduces water quality in marginalized communities. Intensive logging in these areas also leaves nearby communities more vulnerable to increasingly frequent extreme weather events caused by climate change.

3. **Embracing woody biomass for SAF would encourage bioenergy expansion in the Pacific Northwest** – The bioenergy industry is currently trying to expand out of the U.S. Southeast – where it has historically confined its U.S. operations – to the West Coast to take advantage of the proximity to Asian bioenergy markets. Embracing forest residues as part of SAF development would encourage this endeavor. NRDC and our partners –

which include frontline communities – recently stopped California's largest ever pellet mill proposal, which included two pellets mills in Tuolumne and Lassen counties, along with an export facility in Stockton. In Washington State, NRDC and our partners, represented by Earthjustice, are awaiting a decision on a legal challenge to Pacific Northwest Renewable Energy's (PNWRE) proposed pellet mill in Hoquiam—a wildlife-rich area that includes Grays Harbor National Wildlife Refuge. Finally, we are opposing Drax's efforts to build another pellet mill in Longview, Washington, where Drax was recently fined for beginning construction *without* a permit, adding to the company's long list of legal violations across the globe.

In conclusion, we encourage Washington State to learn from the bioenergy industry's history and reject woody biomass to develop SAF. To do otherwise, will harm Washington's forests, air, and communities.