

October 31, 2025

Attn: Mark Daniel
Clean Energy PEIS Senior Planner
Washington Department of Ecology
300 Desmond Drive SE
Lacey, WA 98503

Submitted electronically

RE: RHA Public Comments on SAF PEIS

Dear Mr. Daniel:

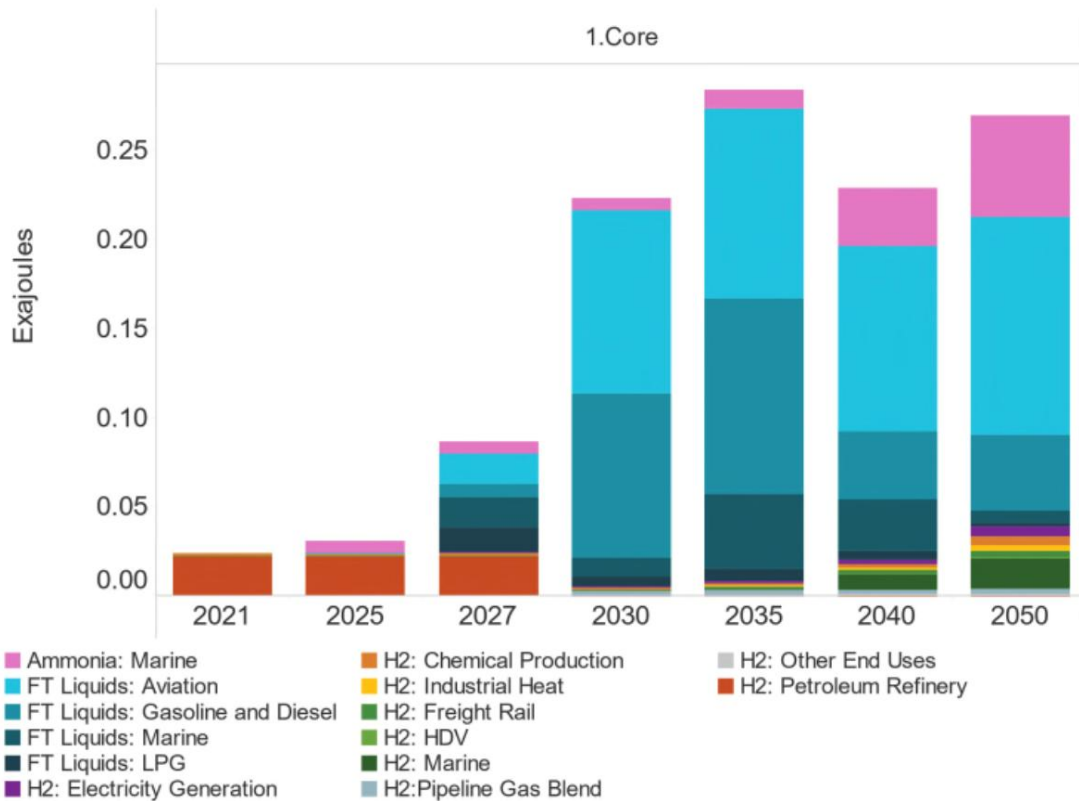
The Renewable Hydrogen Alliance (RHA) appreciates the opportunity to comment on the Washington Department of Ecology's (the Department) Scoping Document for Programmatic Environmental Impact Statement on Sustainable Aviation Fuel. RHA is a regional non-profit trade association enabling access to safe, affordable, and renewable hydrogen for communities across the Pacific Northwest. Our 80+ members represent the full value chain of the hydrogen ecosystem – hydrogen technology and service providers, equipment manufacturers, project developers, public transit agencies, labor unions, utilities, and many others with an interest in the clean and renewable hydrogen sector.

Sustainable aviation fuel (SAF) will be central to decarbonizing the aviation industry, and the Pacific Northwest has an opportunity to serve as an early incubator for further development and deployment of SAF production technologies. A recent report by the Washington Department of Commerce estimates that achieving the state's energy and climate goals will require a significant increase in the production and use of SAF, and that production of SAF will be one of the largest end-use applications for renewable hydrogen.¹

¹ Washington State Department of Commerce. (January 2024). "Green Electrolytic Hydrogen and Renewable Fuels: Recommendations for Deployment in Washington."

<https://deptofcommerce.app.box.com/s/widfnmxbo8ijt3uozpog91jzapu4dhae>

Hydrogen and Hydrogen-Derived Fuels in WA by End Use



For this initial scoping exercise, RHA recommends that the Department be as expansive as possible in the feedstocks and production pathways for SAF it considers for the PEIS. The first three SAF production facilities planned for the PNW each use a different feedstock and production process. International SAF producer SkyRNG has chosen to site its first US SAF facility in Eastern Washington, where it will produce SAF through reformation of renewable natural gas. Twelve eFuels will site its power-to-liquid SAF production facility in Moses Lake, WA. And NXT Clean Fuels is building a facility near Clatskanie, Oregon, to produce SAF using hydroprocessed esters and fatty acids (HEFA).

All of these SAF production pathways require low-carbon-intensity hydrogen as an input, and the PEIS should include hydrogen access as a consideration in facility location and design. Some facilities produce hydrogen onsite; others may receive delivery by truck, train, or pipeline, with pipeline and train delivery able to achieve significantly lower cost per kilogram. Access to hydrogen production and/or transportation infrastructure should be a consideration in identifying potential locations for SAF facilities. The Department should also consider opportunities in this PEIS process to support the colocation of SAF and hydrogen production facilities, given the potential infrastructure efficiencies.

As the market for SAF grows and matures, producers will choose between available and emerging technologies based on current policies, availability of different feedstocks, and the yield and carbon intensity reduction that they can achieve per unit of feedstock. By including as many of these pathways and feedstocks in the PEIS as practicable, the Department will help project applicants, permitting agencies, Tribes, and the public better understand the potential impacts and mitigations of proposed projects.

RHA also supports the Department's efforts to include SAF transportation and fuel blending facilities in the PEIS. The ability to deliver fuel to airports will be an important consideration for the successful use of SAF in WA airports.

RHA appreciates the efforts of the Department's team to streamline the permitting process for alternative jet fuel infrastructure and looks forward to collaborating with the Department through this PEIS process.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Smith', with a stylized flourish at the end.

Rebecca Smith
Senior Director, Policy and Education