WASHINGTON CONSERVATION ACTION
Protecting People & Nature as One

November 5, 2025

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

Re: Scoping Document for Programmatic Environmental Impact Statement on Sustainable Aviation Fuel Production Pathways, Including Blending and Distribution Infrastructure, in Washington State

Dear Mark Daniel and Clean Energy Coordination Section:

Thank you for the opportunity to provide comments on the Department of Ecology's Programmatic Environmental Impact Statement (PEIS) Scoping Document for Sustainable Aviation Fuel. Washington Conservation Action, formerly known as Washington Environmental Council, has been a leading policy voice for the environment in our state for nearly 60 years. We develop, advocate, and defend policies that advance environmental progress and justice.

We submit these comments for your consideration.

Maintain Consistent Terminology with Legislation

We recommend that Ecology use the term *alternative jet fuel* throughout the PEIS, rather than *sustainable aviation fuel*. The legislature directed Ecology to undergo a nonproject environmental impact statement for alternative jet fuel production pathways, including blending and distribution infrastructure. Consistency with this directive and with other statues, such as the Clean Fuels Program, is important for clarity and reducing confusion.

Consider Production Methods Separately

It is important that the PEIS consider the potential impacts of new facilities *and* the modification of existing refineries. We support Ecology limiting the number of production methods that will be included in the PEIS in order to have more in-depth study on the most likely methods to be employed in Washington: hydroprocessed esters and fatty acids (HEFA), alcohol to jet (AtJ), Fischer-Tropsh (FT), and power to liquid

(PTL). Because each production method is accompanied by its own unique set of impacts, we suggest separating out each type throughout the PEIS in a similar manner as the recent Green Hydrogen PEIS separated green hydrogen production facilities, green hydrogen production facilities with battery energy storage systems, and green hydrogen storage facilities.

Transportation

Ecology should evaluate the impacts of transporting fuel and feedstocks, including by rail, vessel, truck, and pipeline. Because of the extreme volatility of jet fuel, Ecology should consider the potential risks and mitigations to prevent accidental leaks, fires, and explosions. Ecology should also study the importance of geography and proximity to terminals to minimize fuel and feedstock transportation risks.

Each type of production facility uses different feedstocks, which will have different means of transportation, impacts, and mitigations. For example, the considerations for transporting carbon dioxide and hydrogen to AtJ facilities may differ greatly from considerations for transporting waste oils to HEFA facilities. Again, we recommend separating out each type of facility because of these differences.

Blending

Ecology should evaluate the potential risks and hazards involved in the blending process, including greenhouse gas emissions, air, water, and soil pollution, the likelihood of leaks, and the need for new infrastructure.

Water

Alternative jet fuel (AJF) production can be extremely water-intensive. Ecology should consider the impacts to water quality and availability throughout the entirety of the AJF lifecycle, from feedstock production to end uses. Especially as Washington has experienced droughts for the past several years and many areas in the state are already over-appropriating water, the impacts to water are of significant concern. Water usage should be evaluated for each production method, and optimal geographic locations should be identified.

Wastewater management and risks should be considered, as well as mitigation measures to ensure overall water quality. Ecology should include mitigations such as reusing water on a closed cycle, capturing steam, and treatment measures for water

that will be discharged. Mitigations for handling toxic waste derived from water treatment should be included as well to minimize impacts on aquatic life and human health.

The effects of water temperature should also be considered. Water discharges that change the overall water temperature could have negative consequences, such as disrupting salmon spawning. Indirectly, some effects of water temperature changes, such as algae bloom, can affect human health and the quality of recreational water and drinking water. Ecology should suggest mitigation measures that will maintain healthy water temperatures near proposed facilities.

Earthquakes, Floods, Wildfires, and Other Disasters

Ecology should evaluate the risks that earthquakes, floods, wildfires, or other disasters pose to production facilities. Ecology should also identify areas that are less at risk of tectonic movements or wildfires. Mitigations such as reinforced infrastructure, fireproofing, and waterproofing should be included in the PEIS.

Geographic locations that are more vulnerable to undue strain on local utility resources or public services, such as emergency response services, should be identified. These locations should either be avoided or mitigation measures should be suggested to prevent a strain on local services. These might include having on-site emergency response teams or community benefit agreements to aid local services.

Tribal Sovereignty

Sustainable aviation fuel facility projects cannot be permitted to compromise Tribal sovereignty, interests, resources, or treaty rights. We appreciate the scoping document's acknowledgement of the necessity of seeking consultation on potential impacts to Tribal interests, rights, and resources, as well as possible mitigation measures. This information, and additional information as identified by individual Tribes, will be critical for evaluation in the PEIS.

Environmental Justice

Sustainable aviation fuel projects have the potential to exacerbate injustices already experienced by overburdened communities. The PEIS should identify environmental justice effects, suggest mitigation measures to support frontline communities, and offer

recommendations for meaningful engagement with communities. Environmental justice should be heavily weighted in AJF project evaluations.

Cumulative Impacts

It is likely that AJF facilities could make other products, such as renewable diesel or other fuels, and existing refineries may be modified to produce AJF. AJF projects might also be co-located with other types of facilities, such as a hydrogen production facility. As it might be mutually beneficial to site a hydrogen facility and an AJF facility together, the PEIS should consider likely co-located facility combinations and identify overlap with other clean energy PEIS's when appropriate.

It is also important for Ecology to note locations that are already overburdened by pollution and where adding an AJF facility would amplify environmental injustices. The PEIS should identify specific measures to avoid, reduce, and mitigate impacts for communities that experience environmental health disparities as a result of pollution exposure and socioeconomic vulnerabilities.

Environmental Health and Safety

Health and safety should be of the utmost priority throughout the AJF siting process and weighted heavily in the PEIS. Likely direct, indirect, and cumulative impacts of air pollution, water pollution, and land contamination should be identified across the production and distribution pathways analyzed in the PEIS. Effective measures to avoid and reduce these impacts should then be recommended. Measures to avoid, reduce, and mitigate risk of fires, leaks, and explosions should also be included in the PEIS.

Thank you for considering these comments. We look forward to further engagement throughout this process.

Sincerely,

Keith Curl-Dove
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