Robert Briggs

1. The legislative mandate for Ecology to develop this Programmatic Environmental Impact Statement (PEIS) consistently uses the term "alternative jet fuel." I recommend that Ecology also use that term rather than the marketing term "sustainable aviation fuel," which many regard as inaccurate. The term "sustainable aviation fuel" or "SAF" is inconsistent with any sober scientific assessment of the potential these fuels have to reduce climate forcing from aviation to a level consistent with a stable climate.

2. It is inappropriate for this Scoping Document for the PEIS to read like promotional material from the airline industry. Instead of gushing boosterism, strive for objectivity and a balanced presentation of facts. For example on page 14 you state, "SAF has already been used in hundreds of thousands of commercial flights (IATA 2025). Currently, 174 airports distribute SAF, including 58 in the U.S. (ICAO 2025)." This statement alone is highly misleading and needs to be balanced by information on the percentage of alternative jet fuel (AJF) actually in use at U.S. airports, which I understand to remain quite small.

Similarly, this statement on the same page, "Compared with conventional jet fuel, 100% SAF has the potential to reduce GHG emissions by up to 94% on a lifecycle basis, depending on feedstock and technology pathway (DOE 2025)." is highly misleading. This very high claim for GHG emissions reduction is no doubt based on a HEFA process from a waste-oil feedstock. But that feedstock cannot scale and is already over-committed to aviation and other industries wishing to make claims of emissions reductions. No climate benefit will result from diverting this limited feedstock from one industry to another. AJFs from purpose-grown oil feedstocks offer far lower emissions reductions. The feedstocks and production processes that can reasonably be expected to grow to meet aviation's AJF demand provide far lower GHG reduction potential. In fact, some highly-credible studies of alcohol to jet using corn ethanol feedstock show GHG emissions increases compared with fossil-based jet fuel when land-use impacts are considered. Referring only to an extreme outlier among AJF feedstocks and production processes seems unbalanced and likely to undermine credibility with the public of future review processes that Ecology conducts based on this PEIS.

3. The current scoping document fails to make clear that reducing greenhouse gas (GHG) emissions is a key criterion for project approval. Any alternative jet fuel production project that cannot be credibly shown to reduce life-cycle GHG emissions by at least 50% relative to conventional fossil jet fuel should not be approved for construction in Washington. Industrial plants capable of producing AJFs are highly capital intensive, and given our climate crisis, scarce investment capital should go to implementing effective climate measures that are compatible with state climate goals, not to ineffective measures that further entrench legacy propulsion technology. Over the roughly 15 years that AJFs have been available, it has become clear that they can only be produced with massive regressive public subsidies. It is not in the public interest to have ineffective and uneconomic facilities locate in our state.

4. Any project using a biomass feedstock from a purpose-grown agricultural feedstock should be evaluated using best-available science related to indirect land use changes (ILUC). Failure to correctly account for the broader land use impacts of diverting 40% of the US corn harvest from the food sector to ethanol production has led to the mistaken view that blending corn ethanol with

gasoline can significantly benefit the climate. The Washington Department of Ecology should ensure that the same mistake is not made in Washington, particularly because corn ethanol will be a candidate feedstock for use in any alcohol-to-jet production facilities proposed here in Washington. The GREET model developed at Argonne National Laboratory, which has been widely used for greenhouse gas accounting, understates the importance of ILUC, and is not a credible source for analyses of climate benefits for alternative jet fuels that use purpose-grown feedstocks, as opposed to those from agricultural wastes. AJF calculations should use a correction factor or a modified version of WA-GREET to fully account for ILUCs for evaluating AJF proposals based on best available science.

5. The PEIS should clarify that AJF production projects must specify the details of planned feedstocks, including both what feedstocks will be used and where they will be sourced. The climate impact of using waste feedstocks for AJF production vs. diverting land to produce biomass for AJF production are very different. Accountability and transparency are needed regarding actual feedstocks used. Similarly, AJF produced from locally-sourced feedstocks may create a different climate burden from that produced from feedstocks imported from a different part of the world. The PEIS should spell out the process that applicants will be required to follow should the feedstock change over the operating life of the plant from what was submitted for Environmental Impact Statement approval to a different feedstock.

6. Although the legislation directing the Department of Ecology to develop this PEIS is clear in its definition of alternative jet fuel, Ecology should request that the PEIS be expanded to include infrastructure projects supporting battery electric and fuel cell electric propulsion. These aviation propulsion alternatives are far more effective as strategies for reducing the negative impacts of aviation on the environment and human health than AJF, as defined under Washington statute. They are also more likely to further Washington's leadership role in the aviation industry into the future. These are the aviation propulsion systems of the future, and they have critical infrastructure needs that are apparent now. Ecology should seek to have the scope of this PEIS broadened, so that the public support it affords to project developers is more broadly available to these promising new aviation propulsion technologies. It is not the role of the legislature to pick winners and losers, and I do not believe it was their intent to do so with respect sustainable aviation propulsion technologies—a role for which they are understandably ill-equipped.

Thank you for providing this opportunity to provide public input and for considering my concerns.