Kristin Edmark

Scoping comment regarding
Environmental Impact Statement for Sustainable Aviation Fuel

My 2 main concerns are total impact on greenhouse gas production when all upstream and downstream impacts are considered and impact of substrate used (loss of forest or use of crops) to produce the fuel.

Please require a full analysis of all upstream greenhouse gas production including transportation and CO2 produced in all aspects of crop production. According to https://mulling.substack.com/p/sustainable-aviation-fuel-goals, it would take 237 million acres of soybeans to produce enough SAF for 2019 commercial US aviation consumption and additional production for military aviation fuel. However, the 2025 projected soybean crop is 4.3 billion bushels on 80.3 million harvested acres. Therefore, other feedstock would be necessary even with massive increase in soybean production at a time when climate uncertainty is making agriculture more difficult. There is nowhere near enough waste from crops, logging and used cooking oil. The removal of forests is associated with huge impacts on recreation, air quality, water quality, habitat loss, etc. In addition, removing adult trees causes less CO2 to be taken up by forests.

Downstream, biofuel is mixed with fossil fuel and burns to produce CO2. Use of biofuel encourages continued use of fossil fuel and takes funds from true clean energy projects. When all greenhouse gas is accounted for, it is likely that the result will produce more greenhouse gas, at a cost which is likely not economically competitive, which takes a very long time to come online and takes resources from real solutions.