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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.

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 has significantly benefited the climate; it has not. 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 built 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, as opposed to feedstocks from agricultural wastes. AJF calculations should use a correction factor or a modified version of WA-GREET to fully account for ILUCs for evaluating AAF proposals based on best-available science.

The PEIS should clarify that alternative jet fuel (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 a 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 from what was submitted for Environmental Impact Statement approval to a different feedstock over the operating life of the plant.

The PEIS should include an assessment of other methods of reducing jet fuel emissions besides increasing alternative jet fuel production, e.g., enhancing regional passenger rail service, providing incentives to businesses to reduce non-essential travel, and discouraging frequent short haul flights through a per-passenger emissions surcharge.

The legislative mandate for Ecology to develop this 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 I regard as inaccurate and inconsistent with any sober scientific assessments of the potential of these fuels to reduce climate forcing from aviation to a level consistent with a stable climate.