WSDOT Aviation Division (David Ison)

We have reviewed the document and suggest these comments:

1. Integration with State Aviation System Planning
WSDOT Aviation requests that the SAF PEIS explicitly integrate with the Washington Aviation System Plan (WASP) and the Airport-Centric Energy and Sustainability (ACES) initiative to ensure alignment between statewide SAF infrastructure planning and airport system development.
2. Inclusion of Airport and On-Site Fuel Infrastructure
The scoping should include evaluation of on-airport fuel storage, blending, and distribution logistics, recognizing airports as critical endpoints within the SAF supply chain. This should encompass consideration of existing airport fuel farms, tank farms, and potential expansion requirements.
3. Compatibility and Safety Review
The PEIS should assess land-use compatibility under FAA Order 5190.6B and Part 77 surfaces, as well as safety standards under NFPA 407 and FAA Advisory Circular 150/5230-4C. Mitigation measures should address fire protection, secondary containment, and separation distances from aircraft operations.
4. Interagency Coordination and Tiering
Ecology should develop a clear methodology for how future airport-specific SAF projects will tier to the PEIS, ensuring consistent SEPA/NEPA coordination and avoiding redundant reviews for airport sponsors seeking FAA funding.
5. Distribution Network Assessment
The PEIS should map potential multimodal SAF distribution routes serving public-use airports, including pipelines, rail lines, and trucking corridors, and evaluate associated impacts (traffic, safety, emissions).
6. Equity and Tribal Engagement
Include targeted consultation with Tribal aviation operators and rural airport sponsors to ensure equitable access to SAF and protection of Tribal airspace, land, and cultural resources.
7. Quantitative Emissions Accounting
The analysis should use FAA AEE or EPA MOVES3 models to quantify lifecycle GHG benefits and potential secondary emissions from transport and blending activities.
8. Cumulative Impacts
Ensure that cumulative impacts analyses incorporate concurrent energy-infrastructure projects (e.g., hydrogen hubs, renewable diesel facilities) that may compete for feedstocks or transportation capacity affecting airports.