Port of Seattle (Sandra Kilroy)

Dear Ms. Butorac,

The Port of Seattle is thankful for the opportunity to provide comments on the department's scope of work for the Programmatic Environmental Impact Statement (PEIS) for Sustainable Aviation Fuels (SAF). We believe that this process will help grow the industry and provide invaluable expertise and guidance to prospective developers and SAF producers. We appreciate Ecology's ongoing commitment to decarbonization of the aviation sector and for the diligent work by agency staff.

The Port strongly recommends that the department prioritize studying SAF blending, storage, and distribution infrastructure, as this has been the most significant "bottleneck" to the use of SAF by end-users at all airports throughout Washington state regardless of the airport's size or familiarity with SAF. This is an area where little progress has been achieved, and where the department's expertise and engagement would be most impactful.

Two different SAF production facilities have already cleared the permitting process here in Washington (SkyNRG and Twelve). Those facilities utilize distinct production pathways and different feedstocks. The Port recommends that an aspect of the department's study focuses on those successful permitting exercises, lessons learned, and applicable takeaways.

As production facilities come online in the next 5 to 10 years, SAF blending and delivery systems will continue to serve a critical role for the use of SAF in-state, and any tool that supports thorough and efficient permitting of blending facilities is and will remain crucial.

Detailed Scope Recommendations

Based on the 2016 SAF Infrastructure feasibility study that the Port of Seattle conducted with partners Alaska Airlines and Boeing (https://www.portseattle.org/sites/default/files/2018-03/Aviation_Biofuel_Infrastructure_Report_Conc we suggest including those features which are common to all SAF blending, storage, and distribution infrastructure in the proposed PEIS.

Washington state has significant challenges compared to other states and regions for integrating SAF into existing jet fuel delivery mechanisms due to constrained fuel storage tanks at marine terminals, constrained pipeline capacities, and limited fuel storage tanks at rail-connected terminals. Without these, any SAF produced in Washington will be more cost-competitive for end users in markets with lower-cost supply chains for delivery. Oregon, British Columbia, California, and even sections of Europe are already cheaper for producers when it comes to delivering their fuel.

The geographic scope of the PEIS should be statewide, with an emphasis on combined marine, rail and truck access locations.

While some existing brown-field sites could be expanded and modified as described in the 2016 infrastructure study, below is a list of the most common and most likely components required for such a facility:

• Truck offloading rack with one to two positions and associated pumps and filter separators for "neat" SAF (unblended)
• Truck loading rack to deliver blended SAF (ASTM D7566) to nearby non-pipeline connected smaller airports (for example, Renton Muni Airport, Boeing Field and Paine Field receive fuel by truck-only and could receive SAF via offloading from a common blending facility)
• Filter separator vessels
• New rail spur to terminal facility
• Rail offload rack with one or more positions and associated pumps and filter separators for "neat" SAF (unblended)
• Receipt piping from offloading rack(s) to receipt tank(s)
• Issue piping from blending tanks to truck loading rack
• Receipt tank(s) for "neat" SAF
• Blending tank(s)
• Petroleum Jet-A tank(s)
• Custody transfer meters
• Tank gauging and flow controls system for piping between receipt, blending, storage, and issue tanks

If a facility has maritime access, also include:
• Barge offloading facilities for neat SAF
• Marine receipt piping to receipt tank(s)

If a facility is connected to pipeline (e.g. Olympic pipeline), also include:
• Custody transfer meters
• Pipeline transfer pumps
• Pipeline issue piping
• Pipeline receipt piping
• Additional jet fuel storage

Thank you for the opportunity to provide feedback.

Sincerely,

Sandra Kilroy
Senior Director, Environment and Sustainability
Port of Seattle

P.O. Box 1209
Seattle, WA 98111-1209
Tel: 787-3000

www.portseattle.org

November 5, 2025

Subject: Port of Seattle Comment to PEIS Scoping Inquiry for Sustainable Aviation Fuels

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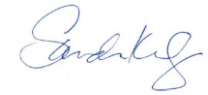

Sandra Kilroy
Senior Director, Environment and Sustainability
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