Sally Keely

Thank you for providing an opportunity to comment. My main concern is regarding feedstocks (sections 2.2.1-2.2.2). Based on current science, most feedstocks proposed for SAF production—such as forestry residues, agricultural waste, and vegetable oils—raise significant sustainability concerns and often fail to meet established lifecycle standards for reducing greenhouse gas emissions.

- Forestry "slash": Collecting slash from clearcut sites removes critical nutrients, disrupts habitat, and diminishes soil health. On-site decomposition provides vital ecosystem services, and increased logging traffic further degrades roads and landscapes.
- Agricultural waste: Industrial crop production relies heavily on fossil-based fertilizers, herbicides, and significant freshwater use, undermining genuine emissions savings.
- Vegetable oil: Regional oilseed crops are not available at scale and production depends on industrial farming, often causing land use change.
- Carbon capture: Direct air capture is currently energy and cost-intensive, typically powered by non-renewable electricity, and not viable at scale.
- Green hydrogen: Electrolysis is extremely energy and water-intensive, with significant infrastructure demands, and is rarely powered by 100% renewables.

The PEIS must require detailed, third-party-reviewed lifecycle assessments of every feedstock, accounting for full upstream and downstream impacts, and ensure alignment with Washington's Climate Commitment Act milestones. Only SAF projects that verifiably reduce full life-cycle GHG emissions by >50% compared to fossil jet fuel and avoid ecological and social harms should proceed; otherwise, approval must be denied.

Please assure the PEIS includes transparent, thorough, credible science as part of a rigorous PEIS review.