Rosemary J Moore

Any increase in aviation significantly increases its harmful impacts on our environment, health and climate. The use of Alternative Jet Fuel (AJF) unfortunately will do little to reduce this harm overall

There are several pathways for producing AJFs. However, there are a number of major environmental, climate, and justice problems associated with most of these pathways. In general:
• AJFs are ineffective at reducing the climate and environmental problems associated with aviation.
• Most pathways have limited potential to be used at scale to levels that could make a significant climate difference.
• Many of the production processes are unproven, having never been deployed at commercial scale.
• Some production pathways pose threats to forests or the food supply.
• AJFs are not economic to produce. In the absence of sound climate policy, AJF production can only happen with large public subsidies. These subsidies constitute highly regressive policy, which impose financial burdens on ordinary citizens to enable the wealthy and business travelers to travel for far less than its true cost – while continuing to cause environmental harm.
AJFs are a false solution to addressing aviation's climate problem. Yet they are a critical element in the travel and aviation industries' efforts to promote inessential air travel and to preserve the public perception that flying is environmentally and socially acceptable.
Below are some additional specific issues in the Department of Ecology's Scoping Document that we feel warrant comment from 350 members.
1. The current scoping document fails to make clear that reducing greenhouse gas (GHG) emissions is a key criteria for project approval. 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.
2. 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, also known as ILUCs. 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 from alternative jet fuels that use purpose-grown biomass, 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 when evaluating AAF proposals based on best-available science.
3. 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 impacts 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 feedstock 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.

4. The legislative mandate for Ecology to develop this PEIS consistently uses the term "alternative jet fuel." We recommend that Ecology also use that term rather than the marketing term "sustainable aviation fuel," which we 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.