

San Francisco International Airport

October 22, 2021

Richard Corey
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95812

TRANSMITTED VIA EMAIL
Richard.Corey@arb.ca.gov

SUBJECT: 2022 Scoping Plan Update: Scenario 1 Concerns

Dear Mr. Corey:

San Francisco International Airport (SFO) would like to take this opportunity to comment on the California Air Resources Board's (CARB) Scoping Plan Scenario Modeling Assumptions, which, as proposed, have the potential to severely impact the aviation industry. These scenarios should focus on expanding our use of viable and market-ready solutions that can help enable the state's attainment of its climate goals, like drop-in sustainable aviation fuel (SAF), versus unrealistic options that devalue aviation's significant contribution to our state's economic prosperity.

I understand that there is an aggressive modeling scenario being considered to phase out aviation in the State of California. This scenario is not practical or necessary. As you are aware, the state already leads the world in the uplift of SAF. SAF is being commercialized and is scalable, but volumes are currently small, with roughly 5 million gallons used exclusively in California last year, compared to 2.5 billion gallons of biodiesel and renewable diesel consumption. A pathway already exists to 100% SAF, as demonstrated by United Airlines' first commercial flight last week using 100% SAF. Airlines for America has committed to 3 billion gallons of SAF annually by 2030, and we expect much of this volume to come to our state due to the nation-leading Low Carbon Fuel Standard. SFO set a goal of expanding SAF use by our airline partners to 5% by 2025, or 60 million gallons, which we expect to meet.

Rather than a scenario to phase out aviation, why not evaluate and model more aggressive scenarios focused on increasing SAF used by aircraft in the state, which could be enabled by growing the incentives and creating new economic development and environmental review pathways, as has been long recommended by SFO's SAF Coalition in previous comment letters and discussions? Without addressing the continued shortfalls in incentives for greenhouse gas emissions reductions for the aviation sector, when compared to other sectors, the proposed Scoping Plan model may, in fact, predict our state's future. Instead, we propose that CARB model the industry-aligned growth curve for SAF that could be enabled by the state taking an active role in addressing this shortfall through new incentives that recognize the co-benefits of SAF production and use for our residents and job-creating industries. CARB is well-equipped to quantify and model scenarios that fully recognize SAF's local air quality benefits and the feedstock carbon intensity reductions achieved by using woody biomass in SAF, including the mitigation of wildfire risks and avoided emissions from burn piles.

The Airport respectfully requests that CARB focus on developing scenarios that can rally available technologies – like SAF – to meet CARB's air quality and greenhouse gas goals.

Very truly yours,


Ivar C. Satero
Airport Director

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