



Feb. 4, 2022

The Honorable Joseph R. Biden, Jr.
President of the United States of America
The White House
1600 Pennsylvania Ave, NW
Washington, DC 20500

Re: Docket ID No. EPA-HQ-OAR-2021-0324

Dear President Biden,

On behalf of the 95,000 Ohio Tradespeople and 132 local construction union affiliates represented by Affiliated Construction Trades Ohio Foundation (ACT Ohio), I submit this official comment to the Environmental Protection Agency's proposed rule: *Renewable Fuel Standard Program: RFS Annual Rules*, Docket ID No. EPA-HQ-OAR-2021-0324.

ACT Ohio is a 501(c)(5) organization created to facilitate economic and industrial development opportunities and to promote industry best-practices for Ohio's public and private construction sector. Our members build and maintain oil, gas, and petrochemical facilities in Ohio and contiguous states in the Great Lakes and Appalachian regions.

ACT Ohio respectfully encourages your administration to instruct the EPA to lower the proposed Renewable Volume Obligations (RVO) for 2022 by more than 1.5 billion gallons in the final rule, and to eliminate the proposed supplemental RVO. As currently written, we believe the proposed EPA rule threatens Ohio Building Tradespeople's jobs in Ohio's refining sector at a time when these jobs are already in jeopardy. The uncertainty of RFS compliance at this time will add undue strain to Ohio's refineries and the tradespeople who build and maintain them.

We appreciate your commitment to union construction workers in Ohio and nationwide. Furthermore, we support the aims of your administration in creating a stronger renewable energy infrastructure, including renewable fuel standards. However, more realistic 2022 RVO levels will help protect union construction jobs in Ohio and avoid undue increases in consumer fuel prices at a time of continued uncertainty in our state's vital oil, gas, and petrochemical industries.

Sincerely,

Matthew Szollosi
Executive Director
Affiliated Construction Trades Ohio Foundation
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