



The Honorable Michael Regan  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

RE: “Renewable Fuel Standard (“RFS”) Program: RFS Annual Rules,”  
Docket ID No. EPA-HQ-OAR-2021-0324

Dear Administrator Regan:

My name is Les Neri, I am the President of the Pennsylvania State Lodge Fraternal Order of Police (PA FOP). I am writing this comment to express our concerns regarding the Environmental Protection Agency’s (EPA) recent proposal to set biofuel volumes for the Renewable Fuel Standard (RFS) program for 2020, 2021, and 2022, as well as implement additional regulatory changes.

The PA FOP is the Commonwealth’s largest organization of sworn law enforcement officers. The State lodge was formed on July 24, 1934, and currently has a membership of approximately 40,000 men and women in 106 individual lodges. We are the voice of those who dedicate their lives to protecting and serving our communities.

We urge the EPA to reduce its proposed biofuel volumes for 2022, and further reduce its proposed volumes for 2021 and 2020 to reflect the economic realities which resulted from the Covid-19 pandemic and the subsequent decrease in national transportation fuel demand. Otherwise, the unsustainable costs of credits that independent refiners are obligated to purchase to demonstrate compliance with the RFS – called Renewable Identification Numbers (RINs) – will cause independent refineries in the Northeast region to close, resulting in great economic hardship to communities amid an already challenging economic recovery and will increase the cost of fuel for many of the police departments we represent.

The RFS established in 2005 as part of the Energy Policy Act, was well intentioned – to reduce the country’s dependence on foreign oil by increasing our usage of a domestically-produced resource. However, the RFS has become tainted by parties that are not involved in fuel production or farming, and they have found ways to exploit the program to their benefit.

To keep our communities healthy and safe, we depend on an affordable supply of fuel to power our vehicles so that we can respond to emergency situations as quickly as possible. That is why we strongly support our region's independent refiners. Without them, the entire Northeast region including hundreds of police departments would lose access to a reliable source of local fuel and become more dependent upon fuel from other countries overseas. At the same time, we would see even higher gas prices than we are already experiencing today. The PA FOP represents state, county, and local members who work side by side to serve the public and improve the law enforcement profession.

At a time when our nation is facing rising inflation, we cannot promote policies that will raise costs for the fuel that supports our essential services. We are already combatting the rising cost of our other life-saving equipment, making it more difficult to serve our communities. With the rising crime rates across the country's urban centers, our work is now more important than ever. We need help keeping our communities safe, not another hurdle to overcome in the line of duty.

This is a critical issue, and we are dangerously close to a tipping point. Without a change to the program's current structure, the goals of the program will not be met and our national and energy security will be at risk. We respectfully urge the EPA to take swift action beginning with modifications to the proposed RFS volumes before it is too late.

Sincerely,

A handwritten signature in black ink, appearing to read "Les Neri". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Les Neri  
President  
Pennsylvania State Lodge Fraternal Order of Police