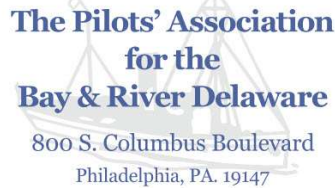


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May 21, 2021

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

Dear Administrator Regan:

On behalf of the Pilots' Association for the Bay & River Delaware and the Delaware River port business community, this letter is to express our desire to see the Biden Administration take swift and meaningful action to reform the Federal Renewable Fuel Standard (RFS). The RFS is not currently operating as Congress intended; without reform, the livelihoods of thousands of people are at risk, and the economic vitality of the tristate region will suffer significant negative consequences.

The Pilots' Association for the Bay and River Delaware is one of the oldest state pilot organizations in the nation, founded in 1896. Pilots are required by State law to go aboard all foreign trade vessels to safely navigate these vessels when they are entering or departing a port in this State or when otherwise moving in State pilotage waters.

The role and official responsibility of these pilots is to keep maritime commerce flowing smoothly and efficiently while protecting the safety of navigation and the marine environment on the waters for which they are licensed.

Refineries in our region have been crucial industry partners for generations. These facilities provide family-sustaining livelihoods not only for those who work on ships and at the refineries, but also for maritime workers throughout the region, including vessel agents, pilots, tug companies, barge operators, and a host of others. They also support downstream economic activity, generating indirect jobs at companies dependent on port activity, such as equipment and parts suppliers, maintenance and repair services, office supply firms, and restaurants, just to name a few. In total, the regional port industry supports 135,000 jobs, and each refinery job supports a further 18.3 jobs in our greater community.

For some time, refiners in our region have been under tremendous financial pressure from the RFS. The current structure of the RFS places the obligation to blend renewable fuels like ethanol on merchant refiners who have little or no control over the amount of renewable fuel that gets blended into the transportation fuels that they produce. These refiners are therefore left with only one option to comply with the RFS: purchase expensive compliance credits known as Renewable Identification Numbers (RINs) regardless of the price.

RINs prices have fluctuated dramatically over the years and unfortunately, due to a number of complex structural problems with the RFS, the price of these credits has soared to untenable levels. To put this into perspective, the largest refiners in our region — Monroe Energy and

PBF have spent billions on RFS compliance costs in the past decade alone. This is an unsustainable cost that represents an existential threat to the continued existence of these facilities. If the recent cyber-attack on the Colonial Pipeline showed us anything, it was that having refining capacity in regions beyond the gulf coast is critical to our nation's national and energy security. With only a handful of refineries left in the Northeast, a resolution to this issue is more important now than ever.

For these reasons and many more, we hope that the Administration will work to achieve meaningful resolution to this issue before it is too late.

Thank you for your prompt attention to this matter and for any relief you can provide.

A handwritten signature in black ink, appearing to read "David K. Cuff". The signature is fluid and cursive, with a large initial "D" and "K".

David K. Cuff, President  
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