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November 15, 2021

Mr. Michael S. Regan, Administrator
U.S. Environmental Protection Agency
Office of Administrator 1101A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Dear Administrator Regan:

On behalf of our members and their employees, the Pocono Chamber of Commerce strongly supports critical reforms to the federal Renewable Fuel Standard (RFS). Our members, and countless other businesses in Pennsylvania and beyond, count on the critical fuel supply our region's refineries produce to help their companies and employees succeed.

Unfortunately, the RFS isn't working as Congress intended, and it's putting the future of our last few remaining East Coast refineries in jeopardy due to skyrocketing costs to meet the RFS mandate. The RFS has made it impossible for independent refineries to meet the mandate for one simple reason: They do not have the capability of blending renewable fuels, making them powerless but still responsible for compliance. This mistaken approach makes it imperative for the Biden administration to implement common-sense RFS reforms before it is too late.

Independent refineries are spending hundreds of millions of dollars every year in purchasing compliance credits known as Renewable Identification Numbers (RINs). The cost of these credits has increased by staggering amounts, going from an average of \$0.10 in January of 2020 to a record high of almost \$2.00 this past summer. At these prices, our region's refineries are in jeopardy of closing which we can ill afford because they are vital to our energy and national security.

Closures of these important facilities could be devastating to our local communities at such a delicate time when we're beginning to emerge from the pandemic recession. As we saw with the Colonial Pipeline cyber-attack earlier this year, our country's economic activity could quickly come to a standstill in the face of a widespread fuel shortage. This incident did not have significant impacts north of Washington, D.C., in large part due to the fact that our region was well-supplied, thanks to our local refineries.



The RFS must be reformed now, or we risk making our nation even more dependent on foreign energy sources which is exactly what the RFS was trying to prevent in the first place. While the RFS was well-intentioned, it has since gotten badly off-track. Without change, the livelihoods of countless Americans in our region are in jeopardy. However, if you take action now, a reasonable solution can be achieved that promotes the continued use of biofuels domestically, while also protecting America's independent refineries and our economy.

Sincerely,

Michael Moreno

Michael Moreno,

Vice President, Greater Lehigh Valley Chamber of Commerce

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Cedric Richmond, Senior Advisor and Director of Public
Engagement
Governor Tom Wolf, Pennsylvania
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