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July 30, 2025

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

Dear Administrator Zeldin:

I have the pleasure of serving as the executive director of the Riverfront Alliance of Delaware County. I write today to voice our organization's support for meaningful RFS reform and to provide comment on EPA docket ID No. EPA-HQ-OAR-2024-0505. Our organization requests that the EPA set reasonable and realistic volumes in the final RVO for the next two years. This is a critical move that will help save refinery jobs, keep runaway fuel prices in check, and ensure that our ability to produce sufficient refined products here in the United States can continue.

The Riverfront Alliance is a consortium of private sector corporations and nonprofit institutions, united for the purpose of promoting our regional waterfront communities as an internationally recognized destination. We are a diverse group with members whose businesses touch many different sectors, such as higher education, healthcare, banking, manufacturing, commercial and residential development, and more. Our mission is to use our collective voices and business strength to encourage the physical, economic, and social development of our waterfront. One of our main priorities involves increasing the rate of homeownership in waterfront communities, but we cannot succeed in promoting this particular goal without simultaneously having great places to work.

Monroe Energy is a critical community partner and a major employer along the Delaware River waterfront. In addition to the 500+ high-paying, direct jobs that their facility supports, Monroe also provides opportunities for thousands of indirect employees that simply would not exist if they weren't in business. Monroe is exactly the type of company that makes our organization, and ultimately our mission successful. They have invested over \$2 billion dollars into their facility since purchasing and restarting the refinery in 2012, and their economic impact is felt locally, regionally, and even nationally. The team at Monroe is also passionate about investing in our local community, supporting and engaging in numerous charitable and philanthropic endeavors throughout the year. Beyond these tangible benefits, Monroe's most critical role is that they produce the essential transportation and heating fuels that move our people and goods, keep our homes warm, and power our local economy. And there are only a handful of facilities like them left on the entire East Coast.

In recent years, pipeline disruptions, temporary refinery shutdowns, and international conflicts have routinely demonstrated the fragility of our fuel production and distribution infrastructure. Furthermore, permanent domestic refinery closures have only worsened supply challenges. The last remaining refineries on the East Coast couldn't build our fuel reserves fast enough even when they were running at maximum capacity during periods of high demand in recent years. While we can't prevent conflicts abroad or control the decisions of international oil associations like OPEC+, we can set forth pragmatic and reasonable domestic policies that don't hinder American energy independence. Unfortunately, the RFS program has gone far astray, adding an estimated 20-30 cents per gallon for fuel consumed by everyday consumers. We all end up absorbing the added costs associated with fuel price increases. These increased costs have a ripple effect across every other facet of our economy since virtually every product reaches its end destination by truck.

The remaining refineries on the East Coast are an economic boon to our region, helping to dull the impact of fuel price spikes and unexpected supply chain constraints while providing critical refinery jobs. For these reasons, our organization is respectfully requesting the EPA to set reasonable and realistic volumes in the final RVO for the next two years. Thank you for your consideration of this request.

Sincerely,

A handwritten signature in blue ink that reads "Lisa R. Gaffney". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Lisa R. Gaffney  
Executive Director

cc: Adam Kaliner