

November 4, 2019

The President  
The White House  
1600 Pennsylvania Avenue, N.W.  
Washington, DC 20500

Dear Mr. President,

Thank you for your ongoing support for homegrown biofuels and America's Renewable Fuel Standard (RFS). As you know, the RFS is critical to revitalizing struggling farm economies and further reducing our dependence on foreign oil.

With farmers facing a multi-year decline in income, we enthusiastically supported the administration's commitment in September to restore the integrity of the RFS by accurately accounting for volumes lost to RFS Small Refinery Exemptions (SREs) starting in 2020. Unfortunately, the proposal released by the Environmental Protection Agency (EPA) on October 15 would not accurately account for SREs and fails in its mission to reinvigorate farm economies and reopen biofuel plants across America's heartland.

The flawed proposal swaps out a critical component of the SRE remedy sought by farmers and the biofuels industry. Instead of recovering the gallons exempted by EPA, it proposes to recover only those gallons previously recommended for exemption by the U.S. Department of Energy (DOE). This one EPA modification converts a commitment to fully account for SREs into a bureaucratically uncertain path that recovers only one fraction of those gallons lost to SREs and could result in RFS backsliding in 2020. This lack of certainty sabotages efforts toward market recovery and will stop biorefineries from reopening.

We are also concerned about the increasingly narrow remedy offered by EPA to farmers and biofuel producers. The supplemental proposal contains none of the market access remedies sought and makes no commitment to recover gallons lost to SREs after 2020. From an investment perspective, the proposed rule offers little more than the promise of a partial one-year fix that may never materialize.

Mr. President, we share a common vision regarding the RFS. We want to reopen biofuel plants and restore demand for America's farm products. We are asking for SRE accountability based on a rolling average of the actual volumes exempted by the EPA during the three most recently completed compliance years. This simple fix will provide the market and regulatory certainty necessary to bring back rural jobs and restore demand. The proposal – as written – will not provide the relief we believe you are seeking.

While current markets are challenging for farmers and biofuel producers alike, we remain confident that we can forge a final rule that will produce real results. We look forward to the opportunity to ensure that the supplemental rule produces the results we are all seeking for rural America.

Sincerely,





