

May 11, 2020

The Honorable Andrew Wheeler
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 204600

Dear Administrator Wheeler:

As mayors of towns and cities across America, we urge the U.S. Environmental Protection Agency (EPA) to uphold the Renewable Fuel Standard (RFS) and reject any proposed waiver under Section 211(o)(7) of the Clean Air Act. Some of us have already seen our local ethanol plant shutter its doors while others have witnessed their local ethanol plant reduce operations. This is having devastating ripple effects throughout our economy. Such waivers would further damage our communities and the farmers, workers, and families who depend on a vibrant biofuels industry.

The unprecedented, nationwide COVID-19 pandemic is keeping drivers off the road and crashing demand for gasoline and ethanol alike. Conditions for motor fuel are hurting us all as virtually every gallon of gasoline contains at least 10-percent ethanol. More than 70 plants have completely shuttered their doors, another 70 have significantly cut production, and we expect this to worsen. Two of the nation's largest plants in Nebraska and Iowa have also closed. In just two months, more than half of U.S. ethanol production is offline, putting more than 350,000 jobs throughout rural America at risk. The biofuels industry is reeling.

The request for these waivers is unjustified under the law. Such waivers from RFS requirements may only be granted if there is a demonstration that the RFS causes severe economic harm to the economy as a whole. In reality, refiner market conditions are a result of plummeting demand for gasoline across the country, not compliance with the RFS. Further, the RFS already considers demand reduction by adjusting annual blending volumes to reflect actual motor fuel demand.

Lastly, the claim that higher Renewable Identification Numbers (RIN) prices hurt refiners is wrong. According to EPA's own RIN market analysis study¹ released in 2015, the agency found that merchant refiners are not disadvantaged by higher RIN prices as costs are recovered in the sale of their product.

Our communities depend on the RFS to support commodity prices for our farmers, high-skilled job opportunities for our workers, and reduce harmful air pollutants in our air. We ask that EPA reject unjustifiable RFS waiver requests and protect rural communities.

Sincerely,

¹ U.S. Environmental Protection Agency. (June 10, 2015). *A Preliminary Assessment of RIN Market Dynamics, RIN Prices, and Their Effects*. Author: Dallas Burkholder. Docket Number: EPA-HQ-OAR-2015-0111.

Brad Ahrenstorff
Mayor
Lake Crystal, MN

Jayne Akin
Mayor
Redfield, SD

Anson Albarado
Village President
Cadott, WI

Mayor Jeff Antofer
Mayor
Coon Rapids, IA

Mayor Jim Ardis
Mayor
Peoria, IL

Louis Armstrong
Mayor
Monroe, WI

Paul Aylward
Mayor
Huron, SD

Brett Barker
Mayor
Nevada, IA

Dennis Bergman
Mayor
Lena, IL

Jon Billups
Mayor
Burlington, IA

John W. Boggs
Mayor
Portland, IN

Lois Bragg
Mayor
La Plata, MO

Jim Bulkley
Mayor
Columbus, NE

Sarah Caron
Mayor
Watertown, SD

Scott Carter
Village President
Necedah, WI

Kevin Coleman
Mayor
Hennepin, IL

Paul Corkle
Mayor
Atkinson, NE

Chris Cox
Mayor
Centralia, MO

Tom DeBaun
Mayor
Shelbyville, IN

Patrick Degen
Mayor
Emmetsburg, IA

Josh Deimeke
Mayor
Ladonia, MO

Clayton Erickson
Mayor
Central City, NE

Bob Everson
Mayor
Mitchell, SD

Gabe Fiscus
Mayor
Goldfield, IA

Sheldon Geise
Mayor
Morris, MN

Les Glinsman
Mayor
Ord, NE

Joel Greer
Mayor
Marshalltown, IA

Alan Haas
Mayor
Stanley, WI

Brad Hart
Mayor
Cedar Rapids, IA

Justin Haught
Mayor
Waucoma, IA

Gene Hausauer
Mayor
Ortonville, MN

Lee Herek
Town Chairman
Plymouth, WI

James "Talt" Holman
Mayor
Macon, MO

Keith Horgen
Mayor
St. Ansgar, IA

Harold Hove
Mayor
Stanhope, IA

Richard Hunt
Mayor
Shenandoah, IA

David Jones
Mayor
Atlantic, IA

Bruce W. Keenan
Mayor
Spirit Lake, IA

Doug Kirchoff
Mayor
Le Mars, IA

Dave Kraehling
Mayor
Sioux Center, IA

Gib Kreuger
Village President
Boyceville, WI

Janice M. Leonard
Mayor
Corning, IA

John Long
Mayor
Monroe City, MO

Scott A. Long
Mayor
Wabash, IN

Scott Maddasion
Mayor
Clinton, IA

Joseph May
Mayor
Estherville, IA

Julie Moore-Wolf
Mayor
Decatur, IL

Lance Munyon
Mayor
Philipsburg, KS

Todd Naselroad
Mayor
Alexandria, IN

Wayne Olson
Town Chairman
Fountain, WI

Kevin Van Otterloo
Mayor
Rock Valley, IA

Pat Raffety
Mayor
Milbank, SD

Vern Rasmussen Jr.
Mayor
Albert Lea, MN

Barry Redfern
Mayor
York, NE

Kurt Reicks
Mayor
Preston, MN

Leo Reiter
Mayor
Jewell, IA

Paul Rennemeyer
Mayor
Windsor, CO

Travis Schaunaman
Mayor
Aberdeen, SD

Bill Schickel
Mayor
Mason City, IA

Rick Scholbrock
Mayor
Hanlontown, IA

Chad Spence
Mayor
Union City, IN

Mike Spirz
Mayor
Montgomery, MO

Terry Taft
Town Chairman
Necedah, WI

James Tendol Sr.
Mayor
Superior, IA

Hans Trousil
Mayor
West Burlington, IA

Von Tuttle
Mayor
Gove, KS

Timothy Whyte
Mayor
Oakley, KS

Steve Wickre
Mayor
Hudson, SD

Deb Wilk
Mayor
Big Stone City, SD

Gregg Wright
Mayor
Randall, IA