



The Hon. Michael S. Regan, Administrator
Environmental Protection Agency
Office of the Administrator, 1101A
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

May 11, 2023

Dear Administrator Regan,

We write today to highlight the need for strong, sustainable growth in U.S. production and commercial availability of low-carbon distillate replacements such as biomass-based diesel, Bioheat® fuel, and sustainable aviation fuels. We believe the Environmental Protection Agency's recent Proposed Renewable Fuel Standards for 2023, 2024 and 2025 misses a crucial opportunity to support that growth.

In January 2023, EPA joined three other federal agencies to launch the U.S. National Blueprint for Transportation Decarbonization. Transportation is currently responsible for one-third of all U.S. greenhouse gas emissions. The blueprint accurately notes that clean, sustainable fuels are needed right now to drive emissions reductions and set us on a road to a clean transportation future. In fact, the blueprint rightly notes that sustainable biofuels are drop-in replacements that offer the most substantial immediate carbon reductions.

The blueprint is consistent with the historic investments in clean energy and infrastructure the Biden administration spurred over the past two years. The administration's policies and programs are designed to leverage private sector investments to increase use of clean fuels and decarbonize the nation's supply chain. Our industries continue to make significant investments in producing, distributing, and using low-carbon fuels, but much more can be done.

The United States cannot achieve its midcentury decarbonization goals without immediate steps to meaningfully reduce transportation and home heating emissions. Sustainable, low-carbon, domestically produced liquid fuels like biodiesel, renewable diesel and Bioheat® fuel are commercially viable today and have sufficient resources to scale up rapidly. Our industries need these fuels to decarbonize air transport, long-haul shipping and trucking, and home heating and meet the needs of our customers and supply chain partners.

The Renewable Fuel Standard is fully aligned with the Biden administration's priorities to improve energy security, strengthen domestic manufacturing, and position the United

States as a leader in developing sustainable, clean transportation technologies. The rule that EPA proposed for the RFS program this past December undercounts current production of biodiesel, renewable diesel, sustainable aviation and other advanced biofuels. And the proposed volumes are simply inconsistent with the investments our industries have made and plan to make to expand production and commercial availability of these fuels by 2025.

We encourage you to ensure adequate supply and availability of these low-carbon fuels by substantially raising the biomass-based diesel and associated overall advanced biofuel volumes as you finalize the RFS standards for 2023-2025 this year.

Sincerely

American Short Line and Regional Railroad Association (ASLRRA)
American Trucking Associations
Association of American Railroads
Clean Fuels Alliance America
National Energy & Fuels Institute (NEFI)