



April 26, 2018

Dr. Philip Fine
Deputy Executive Officer
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Dear Dr. Fine,

I am writing in opposition to the South Coast Air Quality Management District's (SCAQMD) Proposed Rule 1410, a ban on refinery use of modified hydrofluoric acid (MHF).

MHF is used during the alkylation process, which is required to create the clean burning fuel that meets California's strict emissions standards. This technology is not interchangeable, so a ban could force Southern California refineries to demolish their current alkylation systems, build a new system, and modify upstream units, a process that could take years to complete.

The California Energy Commission found this ban could raise gas prices by 26 cents or more per gallon, making daily life even more expensive for Southern California's families, commuters and businesses. It could also create price spikes and fuel shortages because the two Southern California refineries that use MHF are responsible for 25% of the region's fuel supply.

Proposed Rule 1410 could eliminate thousands of high-paying jobs at Southern California's refineries, which operate under the strictest refinery safety regulations in the nation. California's refineries provide high-paying, family supporting jobs to those across the educational attainment spectrum. It could also jeopardize millions of dollars in vital tax revenues that fund public safety and local schools as well as funding for vital community programs and partnerships.

It is vital that the Air Quality Management District Board understand the devastating consequences of Proposed Rule 1410 to our communities.

Sincerely,

A handwritten signature in black ink that reads 'Colleen Mooney'.

Colleen Mooney
Executive Director
SBCC, Thrive LA