

EAGLE VALLEY CLEAN ENERGY, LLC

October 11, 2018

The Honorable Andrew Wheeler
Acting Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Acting Administrator Wheeler:

Eagle Valley Clean Energy, LLC owns and operates a 13-MW biomass cogeneration power plant located in Eagle County, Colorado in the heart of the White River National Forest. It operates 24/7 throughout the year and sells all of its power to Holy Cross Energy, an electrical cooperative that services the Vail and Aspen areas of western Colorado. Located in a rural community, Eagle Valley Clean Energy employs, directly or indirectly, some 50 highly skilled workers to operate the plant and log, process and transport biomass fuel to the plant.

Eagle Valley's fuel consists of wood chips, shavings and sawdust, which is primarily sourced from waste material at regional saw mills and a 10-year stewardship contract issued by the Department of Agriculture, US Forest Service. The White River Long Term Stewardship Contract is a long-term contract that extends until 2022, with work orders under the contract continuing until 2025. The Forest Service relies on this contract and our power plant as an essential tool to safely and efficiently dispose of hazardous fuel, including beetle-kill forest material. Our facility is the only one in Colorado that can consistently accept substantial amounts of hazardous fuel, and the arrangement among Eagle Valley Clean Energy, our logger, and the U.S. Forest Service is a model example of public-private cooperation to mitigate wildfire risk in our national forests.

Eleven years ago, Congress agreed that electricity generated from renewable sources should be eligible for incentives under the Renewable Fuel Standard ("RFS") program. Four years ago, EPA approved application of this program to renewable energy sources, such as bioenergy plants. The Agency has since determined that certain solid forms of biomass fuel qualify under the RFS program. However, to date EPA has failed to act on this approval by processing formal applications from a number of renewable electricity producers seeking certification and identification numbers (Renewable Identification Number, or "RIN") under the RFS program. We understand that EPA now faces a four-year backlog of applications from power producers seeking registration, with many more requests expected to follow.

Eagle Valley Clean Energy intends to seek certification under the RFS program. It is essential to our financial well being that this program be extended to our plant, and it is only fair that biomass power plants be entitled to benefit from the RFS program on an equal footing with other generators of renewable energy, such as wind and solar.

We respectfully urge you to act on all outstanding registration requests as expeditiously as possible, and to issue a final conclusion on the regulatory structure for the electric RIN pathway.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Dean L. Rostrom", is positioned above the printed name.

Dean L. Rostrom