



Testimony in FAVOR WITH AMENDMENTS for House Bill 220

2/18/2025

Dear Chair Wilson, Vice-Chair Crosby, and esteemed members of the Economic Matters Committee,

On behalf of ShoreRivers, I am writing to express our position of **FAVORABLE WITH AMENDMENTS for HB220 – Renewable Energy Portfolio Standard – Eligible Sources – Alterations (Reclaim Renewable Energy Act of 2025)**. As a science-based advocacy and restoration organization dedicated to protecting and restoring the waterways of Maryland’s Eastern Shore, we urge the Committee to **amend SB10 and issue a favorable report** on this critical legislation.

As an organization committed to clean water, environmental justice, and community resilience, ShoreRivers recognizes that climate change directly impacts our ability to fulfill our mission. We have seen firsthand the devastating effects of rising waters, increased nutrient pollution from extreme rainfall, and damage to critical oyster and wetland restoration projects—challenges that will only worsen without immediate action. We applaud the intent of SB10 and agree that **waste-to-energy and refuse-derived fuel should not be included** in the Renewable Energy Portfolio Standard (RPS) or any future “Clean” Energy Portfolio Standard.

However, we also urge the Committee to amend HB220 to **remove poultry litter-to-energy and anaerobic digestion** as “Tier 1” renewable or clean energy sources. The combustion of methane, regardless of its source, produces two major byproducts: water (H₂O) **and carbon dioxide (CO₂)**. Additionally, methane leaks from production and transportation are a potent greenhouse gas concern. **Energy sources that emit CO₂ and other greenhouse gases should not, and cannot reasonably, be considered “clean” energy. Therefore, these sources should be excluded from the RPS and any future Clean Energy Portfolio.**

Currently, the RPS states that:

"It is the intent of the General Assembly to: (1) recognize the economic, environmental, fuel diversity, and security benefits of renewable energy resources; [and] (2) reduce greenhouse gas emissions and eliminate carbon-fueled generation from the State’s electric grid by using these resources."

Because anaerobic digestion produces methane—a greenhouse gas **28 times more potent than carbon dioxide at trapping heat—and its combustion results in CO₂ emissions, its inclusion in a renewable or clean energy portfolio is inappropriate.**

Furthermore, the inclusion of carbon-emitting energy sources such as poultry litter-to-energy and anaerobic digestion, and their associated Renewable Energy Credits (RECs) within the state RPS, discourages the transition to **truly clean, renewable energy**. Additionally, anaerobic digestion produces **digestate**, which requires proper management to prevent environmental harm, including

ShoreRivers

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nutrient pollution. Poorly managed digesters or methane-burning facilities can also generate **strong odors**, negatively impacting surrounding communities.

For these reasons, we urge the Committee to amend HB220 to **remove anaerobic digestion from the Tier 1 list within the RPS** and then issue a **favorable report** for HB220.

Thank you for your leadership in addressing this urgent issue.

Sincerely,

A handwritten signature in black ink, appearing to be 'BF', with a horizontal line extending to the right.

Benjamin Ford, Miles-Wye Riverkeeper, on behalf of ShoreRivers