



Testimony in FAVOR WITH AMENDMENTS for Senate Bill 434

2/18/2025

Dear Chair Feldman and esteemed members of the Education, Energy, and Environment Committee,

On behalf of ShoreRivers, I am writing to express our position of **FAVORABLE WITH AMENDMENTS** for **SB434 – Empowering New Energy Resources and Green Initiatives Toward a Zero-Emission (ENERGIZE) Maryland Act**. 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 SB434 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 SB434 and agree that **moving towards clean, abundant energy is critical if we want to limit or mitigate the worse outcomes associated with Climate Change**. Of concern, however, is calling particular energy generation “Clean” when they are anything but.

All of the energy sources currently listed as “Tier 1” energy sources within the States Renewable Energy Portfolio (RPS) are genuinely renewable, but renaming them “Clean” risks greenwashing the very valuable goals of the ENERGIZE Act. Listed within the Tier 1 energy sources are trash-to-energy, refuse-derived fuels, anaerobic digestion, and poultry litter-to-energy. Under the ENERGIZE Act, as written, these would now be known as “clean” sources of energy in Maryland, which common sense illustrates they are not. **All of these renewable energy sources generate significant carbon emissions and are thus not “clean” by any definition**. 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.**

We urge the Committee to amend SB434 to **either remove poultry litter-to-energy, waste-to-energy, refuse-derived fuels, and anaerobic digestion as “Tier 1” renewable or clean energy sources or amend SB434 to read “Renewable” rather than “Clean” in every instance.**

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

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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, trash-to-energy, and refuse-derived fuels 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 nutrient pollution. Poorly managed digesters or methane-burning facilities can also generate **strong odors**, negatively impacting surrounding communities.

Using public funds to incentivize dirty energy would allow the producers of these “waste” products to increase the production of these problematic sources rather than move towards sustainable, viable, and responsible practices.

For these reasons, we urge the Committee to amend SB434 to **remove anaerobic digestion from the Tier 1 list within the RPS** or **amend SB434 to read “Renewable” rather than “Clean”**, and then issue a **favorable report** for SB434.

Thank you for your leadership in addressing this urgent issue.

Sincerely,



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