



Testimony in FAVOR WITH AMENDMENTS for Senate Bill 10

2/11/2025

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 **SB10 – 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 SB10 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)**. **Energy sources that emit 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 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

ShoreRivers

Isabel Hardesty, Executive Director

Annie Richards, Chester Riverkeeper | Matt Pluta, Choptank Riverkeeper
Ben Ford, Miles Wye Riverkeeper | Zack Kelleher, Sassafras Riverkeeper

methane-burning facilities can also generate **strong odors**, negatively impacting surrounding communities.

For these reasons, we urge the Committee to amend SB10 to **remove anaerobic digestion from the Tier 1 list within the RPS** and then issue a **favorable report** for SB10.

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