



## 19 organizations' comments to Reclaim Renewable Energy in MD's Climate Pathway

October 16, 2023

Dear Susan E Casey and the Maryland Department of the Environment,

The undersigned 19 organizations urge you to make critically important changes to the Maryland Climate Pathway report to support clean air and water, healthy communities, and environmental justice. The Climate Pathway report is a pivotal opportunity for Maryland to act on climate justice in the face of health-harming pollution and climate disasters that are already impacting communities in Maryland. We must commit to pursuing true climate solutions, not polluting industries that will harm our communities and hold the entire state back from its goals. Trash incineration, biogas, and biomass must have no place in Maryland's Climate Pathway.

**Trash incineration** emits significant greenhouse gasses and pollutes the air that communities in Maryland breathe. [A recent peer-reviewed study in PLOS Climate](#) found that "incinerators emit more greenhouse gas emissions per unit of electricity produced than any other power source." Each ton of plastic burned in an incinerator [results in the release of 1.43 tons of CO<sub>2</sub>](#), driving climate change by essentially burning fossil fuels in the form of plastics. The same study in PLOS Climate found that incinerators "emit more criteria air pollutants" - those that harm our health - "than replacement sources of energy." Maryland's local governments impacted by trash incineration ([Baltimore City](#), [Montgomery County](#), [Frederick County](#)) support eliminating incentives for trash incineration and have avoided or committed to transitioning away from trash incinerators.

Discussion of inviting **natural gas with CSS** into Maryland in this proposal has troubling connections with proposals to produce so-called **biogas** at large scale from anaerobic digestion of agricultural wastes. Much like trash incineration, such anaerobic digestion facilities are sometimes touted as a solution to problems posed by waste; but they [do not solve nutrient runoff problems](#) from agricultural wastes, and the methane produced by them is just as potent a greenhouse gas as methane fracked from the ground. Such facilities have been [staunchly](#)

[opposed by community and environmental justice organizations](#), and a similar facility in Delaware is [currently the subject of a Civil Rights Act Title VI complaint](#). Maryland must avoid developing large-scale anaerobic digestion of agricultural wastes, an industry which does not currently exist in our state.

**Biomass**, the burning of materials such as wood for energy and heat, is responsible for the fastest-growing share of early deaths caused by major energy sectors, according to a recent [Harvard School of Public Health study](#). When burned, [wood emits 206.74 pounds of CO2 per one million BTU](#); studies have shown that [using woody biomass pollutes more than using coal](#). In other states that have developed biomass industries, it required [sacrificing mature forest ecosystems](#). Maryland cannot afford to allow this destructive and enormously polluting industry to cement itself here, siphoning funds away from truly clean energy : we must preserve our forests instead, because [mature forest ecosystems are among our most effective tools for carbon sequestration and storage](#).

Both climate action and environmental justice demand that these polluting industries play no part in Maryland's future. We urge you to amend the Climate Pathway report to:

- 1. Incorporate a recommendation that Maryland eliminate polluting industries (incineration, biogas, and biomass) from the Renewable Portfolio Standard and commit to barring them from the future 100% Clean Energy Standard in the "Electricity Sector: Additional Policies" section.** The draft Pathway report states on page 33:

*Additional policies in this sector include ... a clean electricity standard (CES) requiring 100% of in-state electricity to be produced from clean sources by 2035.*

*In-state generation meets the RPS target of 50% by 2030 and complies with the current RGGI target, with federal tax incentives lowering the costs of renewables.*

The final Pathway report must address the environmental injustices of including incineration, biogas, and biomass in the Renewable Portfolio Standard through a clear recommendation that these polluting industries be eliminated from the Renewable Portfolio Standard. It must also specify that the Clean Energy Standard will not include these polluting industries.

- 2. Eliminate the recommendations that biomass and gas industries be newly created in Maryland in the "Electricity Sector: Modeling Results" section.** The draft Pathway report states on page 36:

*"Natural gas with CCS is introduced in the 2030s and contributes to 2% of in-state generation by 2045. Residual emissions from natural gas after the implementation of CCS are due to imperfect capture rates, which are generally expected to be, at most, 95%. Biomass with CCS is also introduced in the 2030s, though it plays a minor role, making up less than 1% of the generation mix in 2045."*

It would be a tremendous mistake to introduce these industries, which do not currently exist in Maryland, to our state. Doing so is incompatible with environmental justice - such facilities would be staunchly opposed by the local communities surrounding them - and would move Maryland backwards on climate action. The final Pathway report must eliminate this recommendation.

- 3. Add a recommendation that Maryland phase out trash incineration in the Waste Management Additional Policies section.** The draft Pathway report makes no specific policy recommendations in its “Waste Management: Additional Policies” section on page 73. This final Pathway report must include a clear, specific recommendation in its Additional Policies that Maryland phase out trash incineration in the near future, which would both reduce greenhouse gas emission from the sector (as demonstrated by the disproportionately high emissions from Maryland’s two incinerators compared to all of Maryland’s landfills modeled on page 73) and improve public health in the communities surrounding incinerators.

Implementing these recommendations in the final Climate Pathway report will make the report a more effective tool for Maryland to meet its ambitious climate goals, while also fulfilling the demands of frontline communities and fulfilling Maryland’s promises of action on environmental justice. We encourage you to ensure that these recommendations are incorporated into the final Climate Pathway report.

Sincerely,

Clean Water Action  
Progressive Maryland  
Maryland Latinos Unidos  
Mountain Maryland Movement  
Climate Communications Coalition  
Maryland Legislative Coalition  
Waterkeepers Chesapeake  
Concerned Citizens Against Industrial CAFOS  
Envision Frederick County  
Food & Water Watch  
Public Employees for Environmental Responsibility  
Sentinels of Eastern Shore Health  
MLC Climate Justice Wing  
Locust Point Community Garden  
Clean Air Baltimore Coalition  
Cedar Lane Environmental Justice Ministry  
South Baltimore Community Land Trust  
Echotopia LLC  
HoCo Climate Action