Public Hearing on the Maryland Climate Plan
Thursday, August 6, 2015
Largo, MD

My name is Lore Rosenthal and I represent the Greenbelt Climate Action Network, going strong with a mailing list of 700 Greenbelt Residents.

My comments will focus on maintaining Maryland's position as a <u>national</u> leader on addressing climate change. I feel we citizens need to start from the "bottom <u>up</u>". For example, in Greenbelt, the municipal government has developed a *Sustainability Framework Document* which includes goals of 20% emissions reductions by 2020 and 80% reductions by 2050.

Prince George's County has a draft *Climate Plan* of 15% reduction by 2020 and 80% reduction by 2050.

The Council of Governments (covering MD, DC, and VA) has set similar goals of 20% by 2020 and 80% by 2050.

<u>Unfortunately</u>, the US Government has yet to pass legislation, specifying interim reduction goals for 2020 nor long term goals by 2050.

This December, there will be an international conference, COP-21, in Paris, where all of the countries will attempt to agree on emission reduction goals, both short and long term.

As you may know, MD is one of only 8 states in the country with statutory Greenhouse Gas Reduction Goals. MD needs to renew the GGRA, to maintain our commitment to 25% by 2020. This will signal to the county and municipal governments in MD to raise their goals from 20% - 25% and will signal the United States to come forward at the Paris Talks and make a Federal commitment as well, to <u>at least</u> 25% by 2020.

I would like to note that the draft of the new 2016 GGRA includes <u>long term state goals</u> of emissions reductions **of 90%** by 2050 (which is higher than most county and municipal goals of only 80%). Scientists agree that climate change is progressing more rapidly than initial predictions, so we must move quickly and set aggressive goals. *(shorten the time frame)*

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need to keep

On a more <u>practical</u> note, we ~~actually are not even~~ <u>on track</u> to meet our current state goals. ~~The~~ best ways of achieving these numerical goals include: *I believe the*

#1: RPS – Passing a Renewable Portfolio Standard for increased use of renewable energy for our electricity needs.

#2: Solar – Incentivizing the Solar industry to create more jobs in MD (by a larger "solar carve out" in the RPS).

#3: Fracking – Eliminating dependence on fossil fuels, such as natural gas and Fracking, which will worsen the percentages towards our goals. As you know, natural gas is mostly methane and is now calculated to be 86 times more potent than carbon dioxide emissions.

Thank you for your consideration of these points.

#4 Citizen Education - eg Discussion Circle Curriculums
    — Northwest Earth Institute
    — Transition Streets

#5 more money for short handouts (PDFs)
Citizens will not read more than 4 pages. more focus
on <u>short</u> documents, with <u>graphics</u>, explaining climate change
and MD Climate Plan.

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Maryland Commission on Climate Change Meeting
August 6, 2015
Public Comments from Food & Water Watch

About Food & Water Watch (FWW): FWW champions healthy food and clean water for all. We stand up to corporations that put profits before people and advocate for a democracy that improves peoples' lives and protects the environment.

On behalf of Food & Water Watch's 23,000 members and supporters in Maryland, we recommend that the Maryland Commission on Climate Change make the following recommendations in their report due to the state legislature in November 2015:

1. Maryland should eliminate dirty sources of energy from Tier I in the Renewable Energy Portfolio Standard (RPS), including manure to energy sources, to meet its greenhouse gas (GHG) reduction goals.
2. Maryland should eliminate pollution trading as a strategy to reduce greenhouse gas emissions.
3. Maryland should ban hydraulic fracturing and not rely on natural gas to meet its GHG reduction goals.

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1. **Maryland should eliminate dirty energy sources from Tier I in the RPS, including manure to energy sources, to meet its GHG reduction goals.**

- One of the recommendations in the GGRA Plan is to increase the amount of clean, renewable electricity—like solar and wind power—that we use to power our homes and communities. The Maryland Renewable Energy Portfolio Standard (RPS) is a law that requires Maryland to obtain 20 percent of its electricity from renewable sources, as defined by statute, by 2022, with a solar carve-out which requires that two percent be obtained from solar energy generation by 2020.

- The RPS is underperforming. The GGRA Plan predicted that the RPS is capable of reducing 10.96 million metric tons of CO_2 in 2020—nearly 20% of the state's total reduction goal. However, the program is only on track to reduce 4.1 million metric tons of CO_2, which is less than half of the original target.

- In addition to investing in new renewable energy in Maryland, the GGRA acknowledges that Maryland need to needs to narrow the qualifying

sources to favor low- or no-carbon fuel sources to drive additional GHG emissions reductions.

- Currently, Maryland's RPS allows a number of different dirty fuel sources to qualify as renewable sources of energy, which are eligible to generate Tier 1 RECs. These dirty fuel sources include poultry litter-to-energy and energy from thermal biomass systems that use primarily animal manure, including poultry litter and associated bedding.

- These dirty energy sources have the potential to increase CO_2 emissions as well as other pollutants. For example, Fibrominn, the only operational poultry litter-fueled power plant in the United States, emits higher levels of CO_2, carbon monoxide, NOx, VOCs, and PM10 than Maryland's coal-fired power plants.

- In 2013, the State of Maryland signed a contract with Green Planet Power to build a similar "biomass" plant of up to 20 megawatts in size. The company has proposed combusting 56 percent litter and 44 percent wood waste. At best, the facility is a hybrid plant with barely half the consumed fuel able to address the targeted waste problem from chickens. In addition, the GPPS proposal actually states that the plant will consume 150,000 bone dry tons of wood fuel per year, enough to actually power all 20 megawatts of proposed generation. Either this is an error or the plant developers anticipate the possibility that the plant will at times run entirely on wood fuel, if built.

- The proposed power plant raises major carbon pollution concerns. Any facility that combusts bio- fuels like chicken litter or wood waste runs the risk of emitting even more carbon dioxide per unit of energy produced than coal combustion. Unfortunately, GPPS, in its proposal, erroneously declares wood waste and chicken litter to be "carbon neutral" with no details and no scientific grounding.

- To ensure that the RPS meets its emission reduction goals, Maryland's Commission on Climate Change should recommend to the State Legislature that they amend the RPS to eliminate dirty sources of energy from Tier 1, including all manure to energy sources, in their report due November, 2015.

- Furthermore, the Commission should recommend that the legislature continue to reject attempts by companies like Perdue to create a new thermal tier in the RPS to increase financing for anaerobic digesters.

- While anaerobic digesters have been promoted as a solution for capturing methane emissions, research has demonstrated that anaerobic digesters are not the 'silver bullet' for manure management. The nutrient loads

(nitrogen and phosphorus) loads are not reduced during the digestion process. The resulting effluent must still be managed appropriately and thus, digesters do not effectively alleviate the environmental challenges associated with storing large quantities of manure-based nitrogen or phosphorous, or applying it to crop fields in a manner that will not exacerbate surface or groundwater contamination. Utilization of biogas in digesters also carries air quality implications due to emissions from the combustion process.

2. **Maryland should eliminate pollution trading as a strategy to reduce greenhouse gas emissions.**

- The GGRA plan includes a number of conclusory statements that nutrient trading will help decrease greenhouse gas emissions by stacking carbon credits onto existing nutrient credits.

- In theory, pollution trading programs generally exist for two reasons. First, to allow purchasers of credits who are subject to technological mandates on emission controls, in this case industrial GHG emitters, to evade the cost of those controls; and second, to create financial incentives for other industrial polluters, in this case Maryland Ag operations, to do what they should be doing anyways to reduce their own contribution to the problem. This is a misguided plan for many reasons, but one of the biggest issues is that it destroys one of the most important aspects of our modern environmental and public protection framework - one that has mostly kept our waterways from being open sewers and our airways mostly breathable - and that is a technology-driving approach that challenges industries to invent and implement better systems to reduce or eliminate pollution discharges.

- Another major shortcoming of trading, on the credit generating side, is that it is an avoidance scheme used to avoid doing what needs to be done, and that is to place mandatory controls on all sources of pollution. If Maryland farmers can implement practices to reduce green house gas emissions, than why should they be able to profit from doing what, under any responsible regulatory regime, should be mandated by the state? If the state were really serious about reducing GHG emissions, then voluntary compliance would not be an option. Voluntary compliance has proven, time and again, to be a failed approach that only ensures ongoing problems and net increases of pollution.

- Finally, the Climate Commission should not pursue a trading strategy, because it will likely result in immoral outcomes. Historically, communities living near facilities that have taken advantage of cap and trade programs are overwhelmingly poor or communities of color. Use of allowances generated by ag operations at industrial facilities would deny on-site

pollution reductions for communities of color living near industrial facilities like refineries and power plants. In fact, the first potential pollution trade between an industrial facility and ag operations in Maryland is one proposed by power plant company NRG Energy who wants to buy credits to allow it to continue, and even increase, its pollution to a waterway in a community that is 70-80% Black and Latin.

3. Maryland should ban hydraulic fracturing and not rely on natural gas to meet its reduction goals.

- Hydraulic fracturing, or fracking, is the primary method of extracting natural gas in the United States today. Fracking, and the infrastructure necessary to support it, is a leading source of lifecycle methane leakage and therefore has major climate impacts. While fracking is not currently taking place in Maryland, at least 5 gas basins lie under the state and could one day be fracked. The state should ban fracking to keep this gas in the ground and protect communities from the local health and environmental and health impacts of drilling.

- The state should not rely on natural gas to meet its emissions reduction targets. That is because natural gas is 80 to 98 percent methane, which is approximately 86 times as potent a greenhouse gas (GHG) as carbon dioxide over a 20 year timeframe. Current estimates vary about the quantities of methane leaked into the atmosphere during the natural gas lifecycle, but some estimates range from 1.3 percent to over 15 percent of the total produced gas. All lifecycle methane leakages increase the climate change impacts of natural gas, and in fact, lifecycle leakage rates that exceed 2.7 percent result in climate change impacts that are even greater than coal.

- Lifecycle methane leaks are unavoidable and often occur outside of Maryland. The climate commission should account for those emissions when estimating the climate change impacts of fuel switching from coal to natural gas.

- Even without accounting for lifecycle methane leakage, natural gas is still a fossil fuel that emits carbon dioxide when burned. In order to achieve continued emissions reductions beyond 2020 and move towards the state's longer term goal of reducing emissions 90% by 2050, the state must end its reliance on all fossil fuels, including natural gas, and embrace energy efficiency and zero-carbon fuels like solar energy.