



SIERRA CLUB

MAINE CHAPTER

PO Box 88
Belfast, ME 04915
Phone: (207) 761-5616
www.sierraclub.org/maine

To: Energy, Utilities, and Technology Committee
From: Marina Melo de Miranda, Sierra Club Maine
Date: 04/18/2023
Re: **Testimony Neither for Nor Against LD 1489: Capitalize on Opportunities from Newly Revised Federal Renewable Fuels Standards by Studying the Environmental and Economic Benefits of Electric and Steam Generation Facilities Powered by Biomass**

Senator Lawrence, Representative Zeigler, and members of the Energy, Utilities, and Technology Committee,

I am testifying on behalf of Sierra Club Maine, representing over 22,000 supporters and members statewide. Founded in 1892, Sierra Club is one of our nation's oldest and largest environmental organizations. We work diligently to amplify the power of our 3.8 million members nation-wide as we work towards combating climate change and promoting a just and sustainable economy. To that end, we are testifying neither for nor against LD 1489: *Capitalize on Opportunities from Newly Revised Federal Renewable Fuels Standards by Studying the Environmental and Economic Benefits of Electric and Steam Generation Facilities Powered by Biomass*.

As currently written, L.D. 1489 directs the study of environmental and economic benefits of electric steam generation facilities, also known as biomass powered combined heat and power (CHP) facilities. Though Sierra Club supports studying Biomass CHP facilities and sees it as a viable energy resource when coupled with conservation and efficiency measures, we must ensure that any study on CHP includes both benefits and costs or potential costs. In general, co-generation, which is another way of referring to Combined Heat and Power, is a very efficient process, and can be made to be a relatively clean process for facilities that need both process heat or building heat, such as district heating or heat for a large building, but using biomass for it requires very carefully set limits on sourcing and pollution controls, among other factors.

To elaborate, we are increasingly concerned that biomass projects may rely on or create incentives for fuel derived from unsustainable forestry and agricultural practices. Promoting CHP without taking into account potential costs of growing the industry could lead to the destruction of existing forests, clear cutting, or unsustainable logging activities that comprise the functioning of forest ecosystems. Keeping our forests intact is vital for biodiversity and for maintaining strong carbon sequestration potential. We oppose using wood as fuel if it contributes to the destruction or degradation of existing forests including national or native forest as well remaining old growths and roadless areas¹. Biomass CHP facilities may be acceptable on small scales, but promoting them at a large scale poses many risks. For example, the Drax Power Station located in the United Kingdom

¹<https://www.sierraclub.org/policy/energy/biomass-guidance#:~:text=We%20oppose%20biomass%20energy%20production,jeopardize%20fully%20functioning%20forest%20ecosystems.>

led to the destruction of large swaths of forests in British Columbia. When the power plant owner was confronted about the issue, the owner explained that cutting down lower quality wood from the rest of the logs would be too expensive². There is also the aspect of burning wood on a massive scale that can produce more GHG than coal.

Even though we voice opposition to using biomass on a large scale and share our concerns about the environmental implications of promoting the industry, there could be opportunity for CHP using waste woods on a small scale to both economically and environmentally benefit Maine.

In order to ensure a clear and balanced study, we urge the committee to amend L.D. 1489 to include both economic and environmental benefits and costs of biomass based steam generation facilities at different scales and from different sources so as to distinguish between small scale efficient use on site by a mill or its own waste, versus large scale clearcutting and plantation monoculture tree cropping to compete with wind and solar generation.

Thank you for your time and consideration.

Sincerely,
Marina Melo de Miranda
Sierra Club Maine
Volunteer Legislative Team

² <https://www.bbc.com/news/science-environment-63089348>