



March 21, 2023

RE: Emerald Ash Borer/St. Paul Cogeneration/SF2973

Dear Chair Frentz,

I am writing in support of SF2973 that would allow for the continued economic viability of renewable biomass power generation and therefore support the management of tree waste by the state's largest biomass-fired combined heating and power plant, Saint Paul Cogeneration (SPC).

The City of Saint Paul is dependent on Saint Paul Cogeneration, LLC (SPC) as a disposal outlet, in its management of increasing volumes of urban tree waste which continues to mount in the face of the spread of Emerald Ash Borer. Saint Paul's tree waste is utilized by SPC to produce renewable electricity and hot water for district heating. District Energy's Saint Paul Cogeneration (SPC) facility is the only practical outlet at this time to manage the quantity of tree waste generated each year in the city.

Emerald Ash Borer in the City of Saint Paul has reached a critical stage and has created a local environmental crisis. By the end of 2022, over 22,000 ash trees have been removed from city-owned boulevards alone, with additional ash trees scheduled for removal from public land in 2023 and 2024. It is estimated that tens of thousands of additional ash trees remain on private property in the city. Emerald Ash Borer infested trees pose a significant public safety hazard as they rapidly become dry and brittle and prone to failure. SPC is essential to the management of this tree waste, which will unquestionably rise as residents remove privately-owned trees and The City continues its structured removal process.

Local governments are not prepared for, nor able to bear, a dramatically higher cost of tree waste management on top of other costs to respond to EAB including removal and replacement of infested trees. Straining local resources for EAB management risks spreading EAB and encouraging poor management choices, such as stockpiling and open burning, both of which pose significant public health, safety, and environmental threats to our community.

The continued operation of SPC is also pivotal to the City of Saint Paul in reaching our climate and environmental goals. District Energy heats 32 million square feet of buildings in downtown Saint Paul. Approximately 50 percent of the thermal energy used to supply this heat is generated by SPC from renewable biomass fuel primarily derived from urban tree waste. If SPC ceases operation, this biomass load will be replaced with natural gas, significantly exacerbating the city's carbon footprint.

Accordingly, it is critical to the City of Saint Paul and the region that SF2973 is passed so that SPC can continue operating and maintain its vital role as critical infrastructure for the disposal of tree waste.

Sincerely,

Russ Stark
Chief Resilience Officer